Balance of State Continuum of Care 2021 CoC Competition Debriefing

Webinar, June 30, 2022

Presented by DCA as Collaborative Applicant

WebEx Introduction

- Notice the menu options at the bottom of your screen.

- Please remember to mute yourself unless you are talking.

- You are muted if the microphone is red.

- You can toggle the mute button off and on by clicking the microphone.

- Participants can UNMUTE in order to ask questions during question breaks
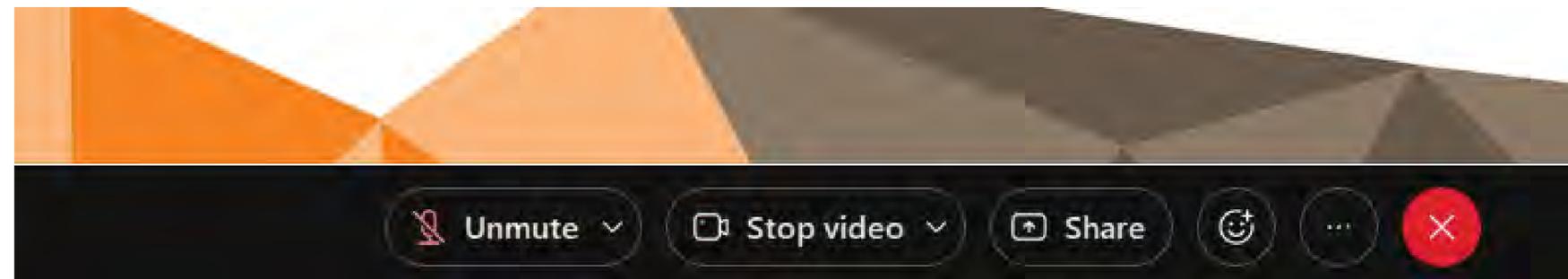
WebEx Introduction

- To view the participants, click on the Participant button

- To view the chat, click on the button with the chat bubble

- Please make sure chat is set to "Everyone" for discussion

Agenda

- Welcome and Introductions
- What is a Continuum of Care
- 2021 Balance of State CoC Application Score
- 2021 Continuum of Care Funding
    - Project Awards
    - Project Scoring
- New Applicant Interest
- HUD Special NOFO

Purpose of Debriefing

To walk through the CoC Awards and highlight specific parts of the application process

- We will focus on what we are generally looking for in your application submissions

- We will also discuss some common errors mistakes when applying

It is NOT our purpose to:

- Read the NOFO to you

- To go over every question or requirement
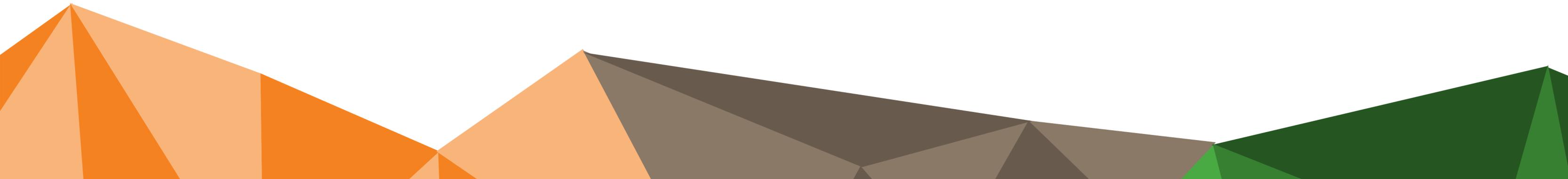
- Tell you **exactly** how you should answer questions

Balance of State Continuum of Care

HUD Continuum of Care

A Continuum of Care (CoC) is established by representatives of relevant organizations within a geographic area to carry out the responsibilities set forth in the CoC Program interim rule.

Georgia Balance of State CoC has 152 counties.

GEORGIA
CoCs

|	
Atlanta	
Balance of State	
Fulton	
Athens	
Augusta	
Columbus	
Marietta/Cobb	
Savannah	
DeKalb	
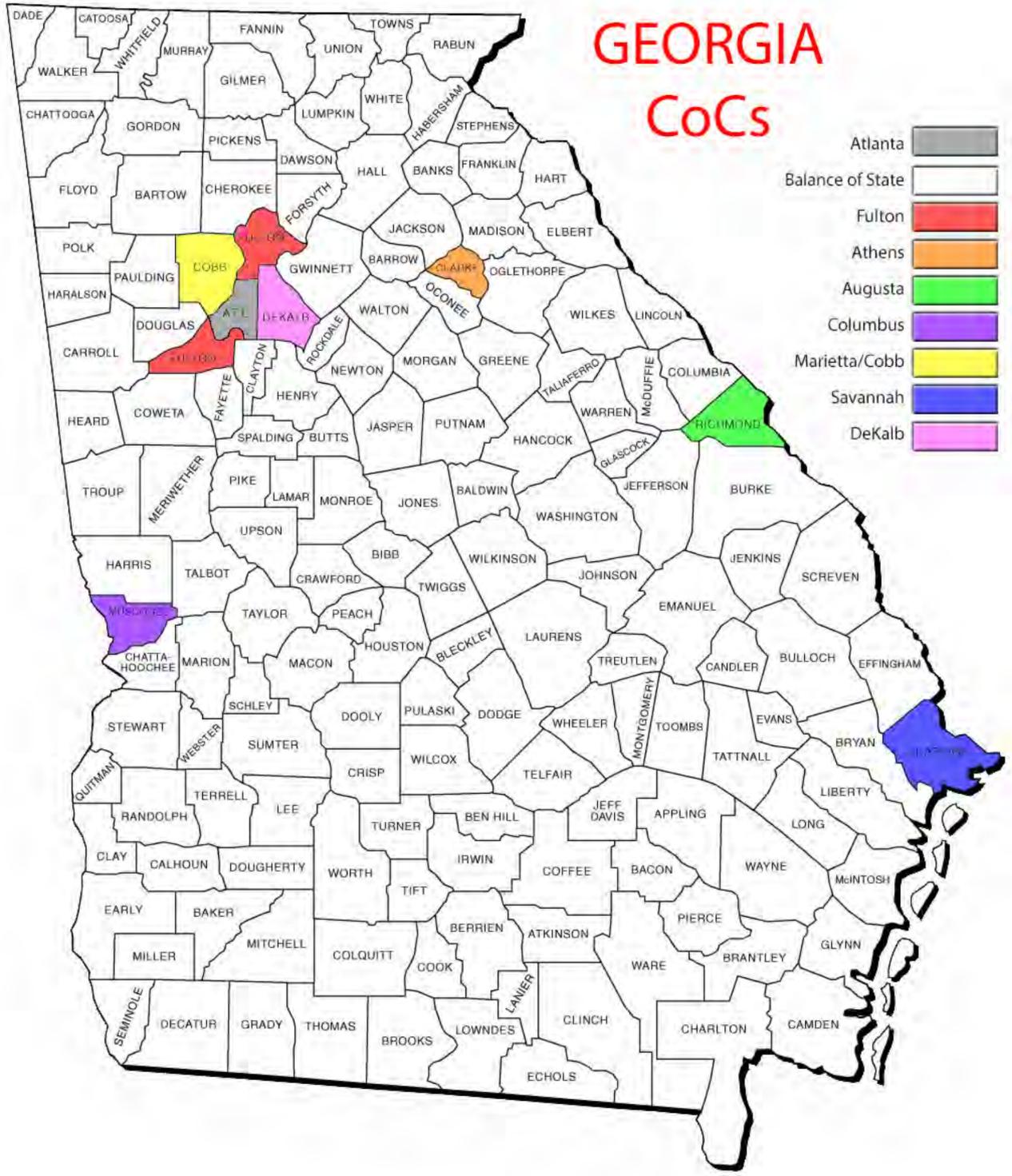
HUD Continuum of Care Program

The CoC Program is designed to assist individuals and families experiencing homelessness and to provide the services needed to help them move into permanent housing, with the goal of long-term stability.

❑ To develop a **long-term strategic plan and manage a year-round planning effort** that addresses
- the needs of homeless individuals and households;
- the availability and accessibility of existing housing and services; and
- the opportunities for linkages with mainstream housing and services resources.

❑ To prepare an **application** for McKinney-Vento Homeless Assistance Act (McKinney-Vento) competitive grants.

❑ To have an **independent Board of Directors,** maintain a **written Governance Charter,** set and meet **goals to prevent and end homelessness,** and implement all other requirements of the **HEARTH Act**
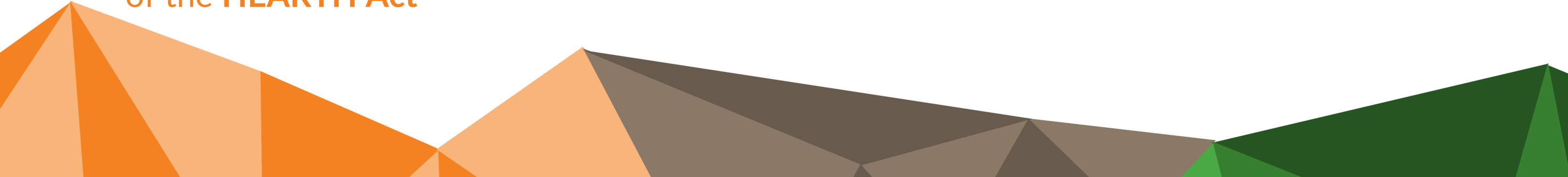
Collaborative Applicant (DCA) Responsibilities

- To provide oversight for the Continuum in order to meet HUD's rule for Continua of Care and to assure that requirements are met for the annual HUD Continuum of Care funding competition.

- Maintain Continuum membership lists, conduct membership recruitment campaigns targeted to stakeholders, publish agendas for membership meetings, and assist the Board in conducting meetings of full membership not less than twice annually.

- Consult with both ESG Entitlements and HUD Consolidated Planning jurisdictions.

- Implement and coordinate the biennial unsheltered point in time count and the annual shelter survey.

- Provide staff for planning and implementation of HEARTH Act requirements and overall CoC strategies
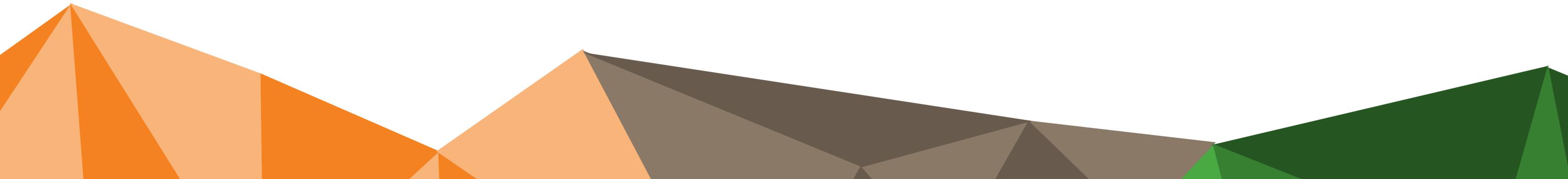
Membership

- Formalized process

- Agency representation and individuals

- Voting – Designated voting member (agencies only)

- Participation – Code of Conduct Policy approved May 19, 2021
  - Attend not less than one meeting (membership, Board, Committee, or Subcommittee) per year
  - Agencies can substitute staff for meeting participation
  - Inactive or non-voting members to be reviewed

- CoC-funded providers are expected to participate (membership & attendance)
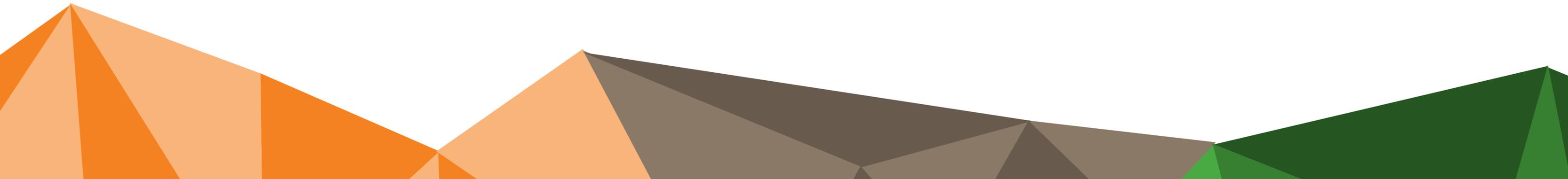
CoC Award and Implementation
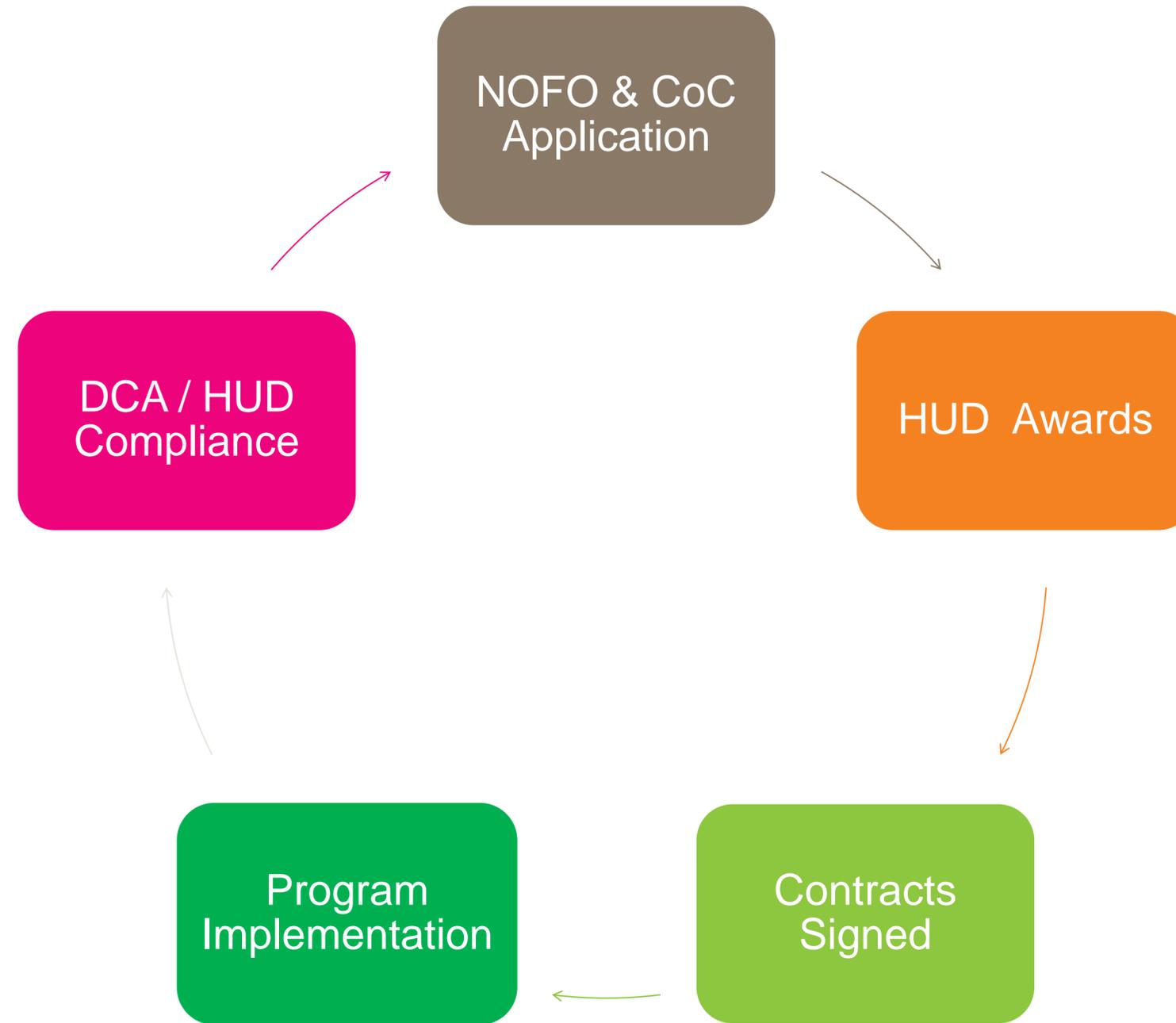
2021 HUD & CoC Policy Priorities

1. Ending Homelessness for All Persons (taking into account challenges faced by Veterans, Youth, Families, and Chronically Homeless)
2. Using a Housing First Approach
3. Reducing Unsheltered Homelessness
4. Improving System Performance
5. Partnering with Housing, Health, and Service Agencies
6. Racial Equity
7. Persons with Lived Experience

2021 GA Balance of State CoC Scoring

❑CoC Coordination and Engagement 68.5 (of 96)

❑Project Capacity, Review, and Ranking 28 (of 30)

❑HMIS 10.5 (of 11)

❑Point-in-Time Count 2 (of 3)

❑System Performance 19.75 (of 23)

❑Coordination w/Housing & Healthcare 0 (of 10 bonus points)

Total CoC Application Score: 128.5 (of 163)

(Highest 168.25 /Lowest 60.25 /Median 143 /Weighted Mean 155.5)

High Priority CoC Application Questions

❑ Coordination and Engagement – Coordination with Federal, State, Local, Private, and Other Organizations

- Housing First-Lowering Barriers to Entry & Housing First-Project Evaluation– 10 of 10
- Street Outreach-Scope – 1.5 of 3
- RRH available (2021 vs 2020) – 0 of 10
- Promoting Racial Equity in Homelessness-Assessing Racial Disparities – 5.5 of 7

❑ Addressing COVID-19 in the CoC's Geographic Area

- How CoC addressed challenges resulting from COVID-19 outbreak – 21 of 21.5

❑ Project Review and Ranking Process Your CoC Used in Local Competition

- CoC used objective criteria & past performance to review and rank projects – 20.5 of 22

High Priority CoC Application Questions

❏ Homeless Management Information Systems (HMIS) Bed Coverage
- HMIS Bed Coverage Rate – 5.5 of 6
- Longitudinal System Analysis Submission – 2 of 2

❏ System Performance
- Reduction in the Number of First Time Homeless - 3 of 3
- Length of Time Homeless – 5 of 6
- Exits to Permanent Housing Destinations/Retention of Permanent Housing 5 of 5
- Returns to Homelessness – 3 of 4
- Increasing Employment and Case Income – 3.25 of 4

Other Highlights of HUD CoC Scoring

- Housing First & Low Barrier Projects
- Prioritization of Chronically Homeless for PSH
- Dedicated PSH beds for Chronically Homeless
- Prioritization of Families and Unaccompanied Youth
- Ending Veteran & Chronic Homelessness
- Severity of Needs in project review, ranking and selection
- Performance Monitoring
  - Utilization
  - Housing Stability
  - Participant Eligibility
  - Length of time homeless
  - Timely draw downs
  - Mainstream benefits

2021 Balance of State CoC Competition Priority Ranking Submitted to HUD

- 70 project applications received
- Applications divided into 4 groups for review
- Application reviews conducted by third parties
- Staff conducted performance reviews for renewal projects (based on data)
- New project reviews based on organization capacity, project design, and eligibility
- Board approved results of the competition, final ranking and determinations, and recommended reallocations of the 2021 Balance of State CoC Competition (as recommended by the Standards, Rating & Project Selection Committee)

2021 Balance of State CoC Project Funding Requested

- 70 Applications
  - 2 projects did not meet threshold (3 projects in e-snaps)
  - 3 projects approved conditionally pending clarification
- 68 Projects in the final ranking
  - Group 1: 58 renewal PSH & RRH that were operational, 2 HMIS, & 2 Coordinated Assessment (62 total)
  - Group 2: 1 RRH Renewal from 2019
  - Group 3: 2 New RRH under Reallocated Funds
  - Group 4: 1 RRH Renewal
  - Group 6: 2 New RRH under DV Bonus
- 1 Project opted not to request funding for renewal of their project ($707,086)

2021 Balance of State CoC Project Funding Requested (cont'd.)

- ❑ Adjustments: 2 new highest scoring projects adjusted to align with Reallocated funding available ($707,086)

- ❑ Adjustments: 2 new DV Bonus projects need adjustments to correct budget errors and narratives, **proposing to increase amount requested**

- ❑ No additional projects proposed for reduction or reallocation

- ❑ Of 6 new projects submitted (7 in e-snaps), 2 (3 in e-snaps) did NOT meet threshold

2021 Balance of State Continuum of Care Competition **AWARDS**

- Tier 1 & Tier 2 funding award of $19.8 million awarded to 64 Renewal projects AND $737,662 awarded to 2.5 New projects

- Funded Renewal projects
  - 45 Permanent Supportive Housing (PSH)
  - 18 Rapid Re-Housing (RRH)
  - 2 Homeless Management Information Systems (HMIS)
  - 2 Coordinated Entry

- Funded NEW Projects
  - 2 RRH - Victims of Domestic Violence (one is only partially funded)
  - 1 RRH – Homeless Youth

2021 Balance of State Continuum of Care Competition **AWARDS** (cont'd.)

- ❑ Other NEW projects
  - ❑ CoC Planning (funded outside of ARD allowed)
- ❑ Funding points:
  - ❑ FMR/Other adjustments were $1,102,163 over request
  - ❑ $1,158,094 more than previous year
- ❑ Total awards (Tier 1 and Tier 2)
  - ❑ $21.3 million Balance of State CoC
  - ❑ $49.8 million all Georgia CoCs

2021 Balance of State CoC Project Funding Available Versus Amount Requested

Funding Available to Balance of State CoC

- CoC Bonus – (5% of PPRN) - $1,192,227
- DV Bonus (15% of PPRN) - $3,576,680
- Estimated Total = $24,274,045

Project Funding Requested:

- Tier 1 & Tier 2: $19,505,138
- DV Bonus: $249,010 (current without adjustments)
- Project Total: $19,754,148

- CoC Planning (non-competitive): $715,336
- Total: $20,469,484
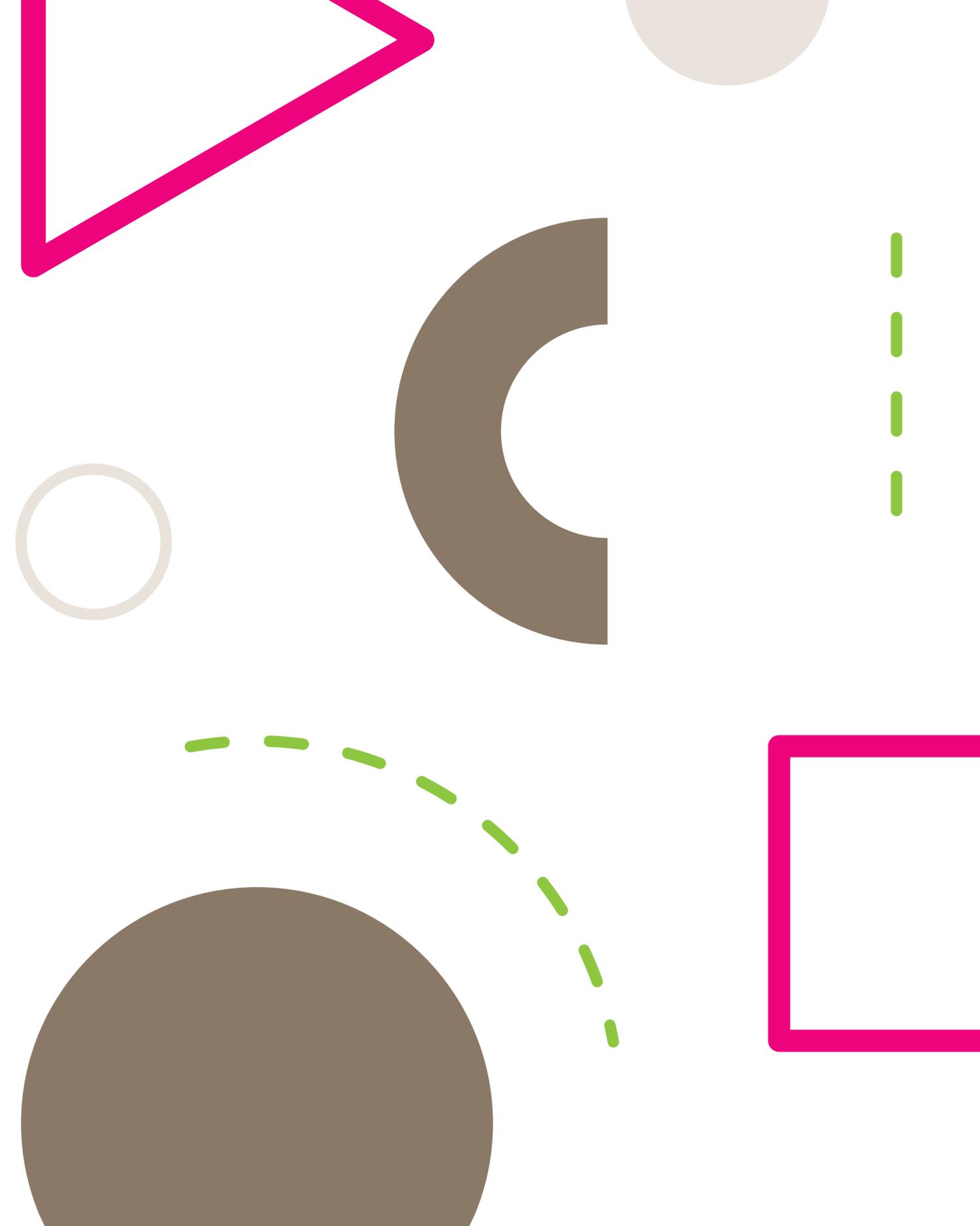
2021 Balance of State CoC Competition (cont'd.)

- CoCs cannot receive bonus funds unless they demonstrate that projects are evaluated and ranked based on the degree to which they improve system performance.

- HUD prioritizes funding for CoCs that demonstrate ability to reallocate lower performing projects to higher performing projects.

- Alignment with CoC and HUD priorities
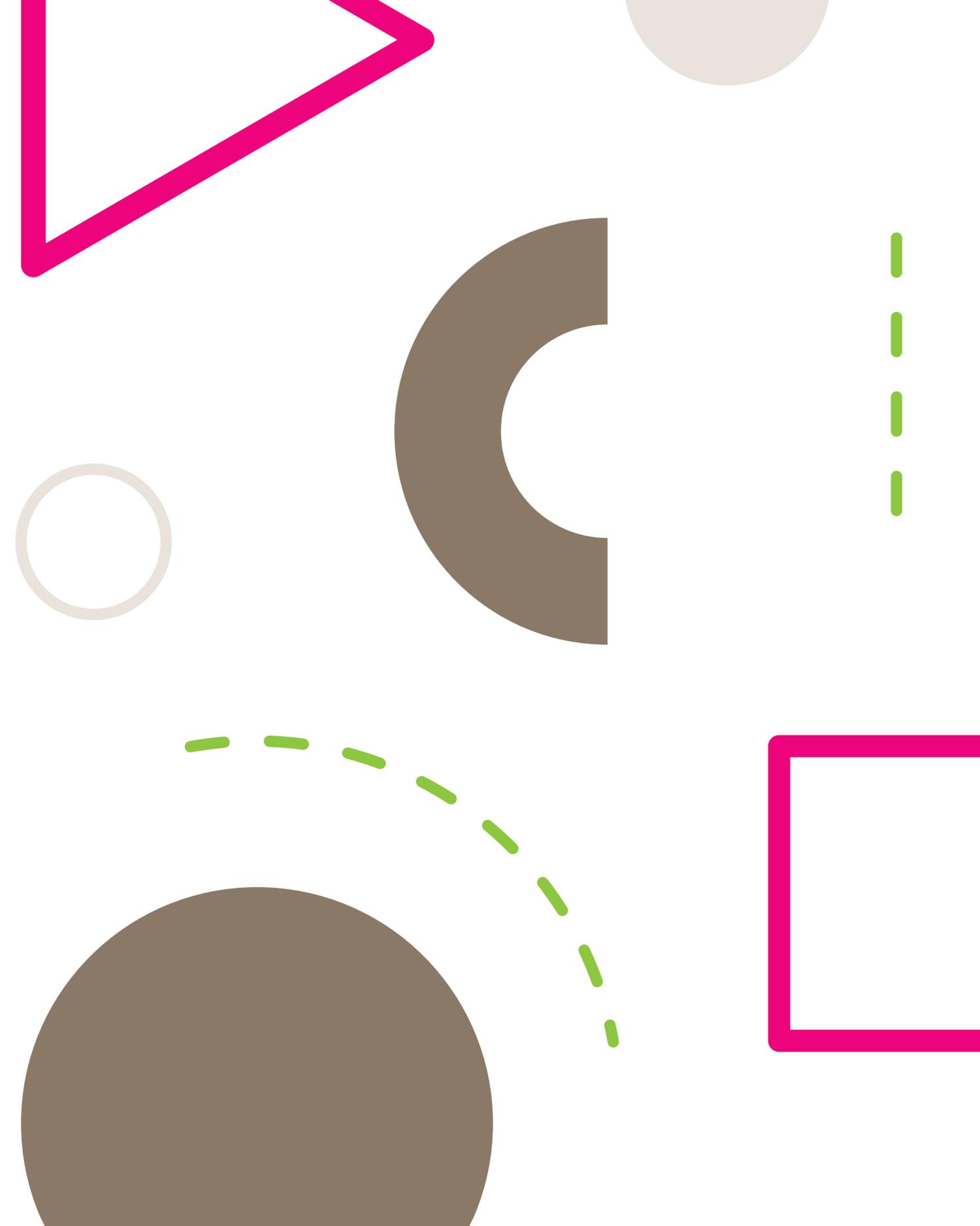
Important Points for the HUD NOFO

Balance of State CoC Role

❑ Facilitation of the scoring and ranking of project applications

❑ Grants are administered directly by HUD

Federal Funding Availability

❑ Based on the Annual Renewal Amount

❑ Tiered Approach for Project Ranking*

- Tier 1 = typically 94% or more of funding available to the CoC

- Tier 2 = difference between Tier 1 and max amount of renewal, reallocation & CoC bonus

Bonus funding typically available, provided appropriate high-scoring new project applications are submitted
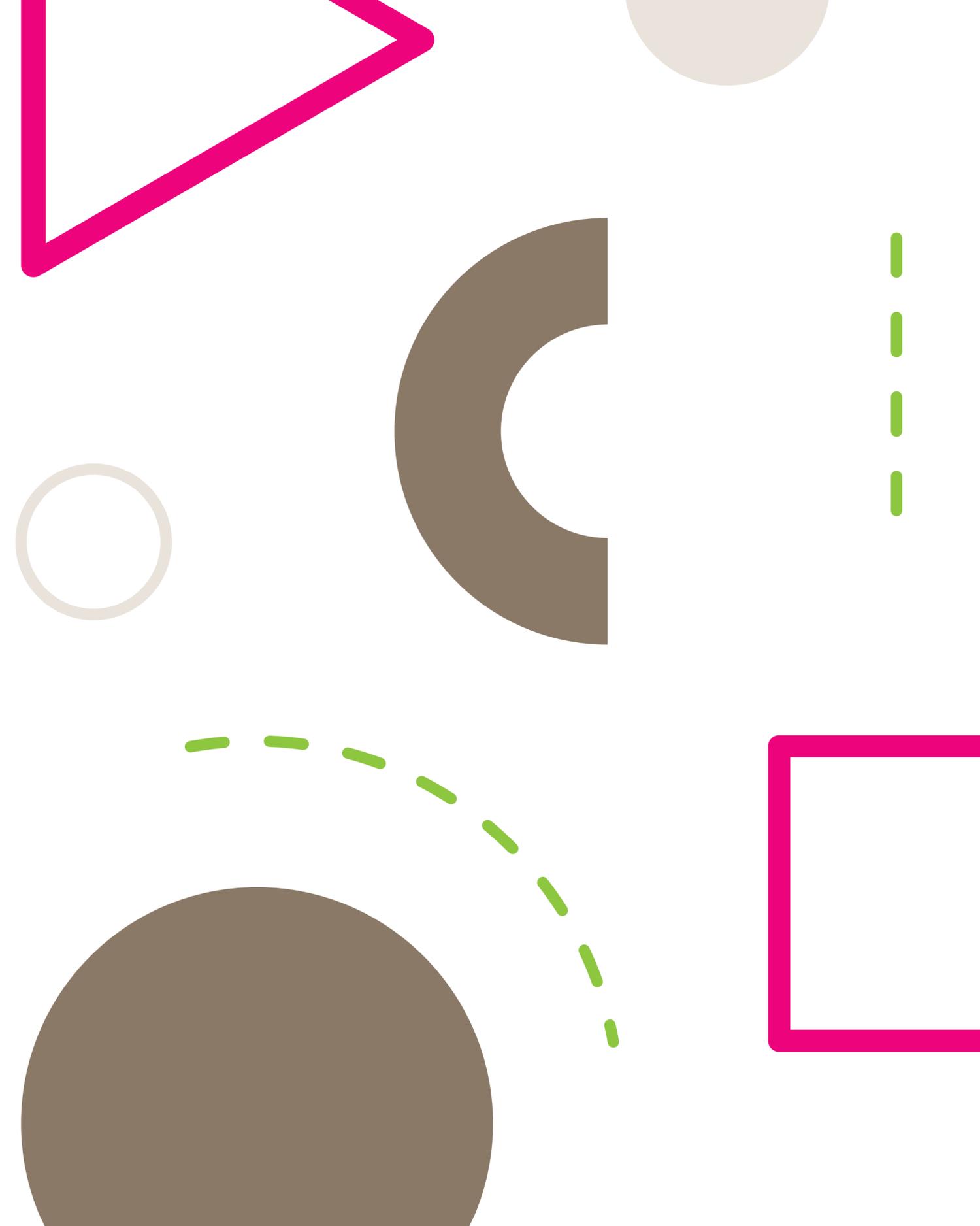
2021 Project Scoring

Organization Review - Agency Capacity

❑ **Renewal** projects - Project Threshold Criteria

  ❑ Agency demonstrates they have capacity to carry out and implement the project proposed. Eligible renewing projects are considered to have met threshold unless other information is available to the contrary.

❑ **New** projects

  ❑ Agency demonstrates they have the capacity to carry out and implement the project proposed. (BoS - 20 possible points in 2021)

  ❑ New applicants must sufficiently describe experience administering federally funded grants, and submit the most recent financial audit, IRS Form 990, and list of current board members.

  ❑ Should describe how project will reach full operational capacity. New applications that do not demonstrate capacity to carry out project may be rejected by the review team.

2021 Renewal Performance & CoC Priority Scoring (245 Possible Points)

- Demonstration of capacity to carry out and implement project - Threshold
- Utilization of grant funds & Project Utilization
- Quarterly Draw Downs from LOCCS
- Housing Stability (Retention/Exits to PH)
- Returns to Homelessness
- Dedicated beds for chronically homeless & Serving chronically homeless
- Project targets/serves Veterans
- Project targets/serves Youth-headed Households
- Project serves persons w/special needs or high barriers to housing
- Project Eligibility (street or shelter previous residence)
- Increase Earned Income & Increased Income (all sources)

- Participants with Non-Cash Mainstream Benefits
- Exits to streets, shelter, or unknown
- Coordinated Entry Participation
- Acceptance of Participants without Income
- Variance in Length of Stay
- Housing First
- Low Barrier
- Policies & Procedures reflect Rapid Housing Placement Without Barriers
- Monitoring
- CoC participation
- HMIS data quality & Timeliness of Data Entry
- Match & Leveraging

2021 Renewal Project Bonus Scoring (65 Possible Points)

- CoC Priority
  - PSH – 30 points
- Coordinated Entry Implementation – 20 points (CES Actively Serving as Lead Agency ONLY)
- 2021 Homeless Count Coordinator (preparation & planning) – 10 points
- Increase Number Dedicated Chronic Beds (2021 PIT/HIC) – 5 points

**Timeliness of meeting deadline – -5% total points for each working day application OR Supplemental Documents are late AND if 3 days late, application may not be sent to review team for ranking (required for funding)

2021 BoS CoC Renewal Review Team Scoring (60 Possible Points)

BoS CoC Priority Points

- PSH– 10 points
- RRH – 5 points

Project Overview and Priority Alignment

- Project Summary
- Objective 1: Increase Progress Ending Chronic Homelessness
  - 1-A Assessment, Prioritization, Acceptance Highest Needs
  - 1-B Housing First and Low Barrier
- Objective 2: Increase Housing Stability
- Objective 3: Increase Participant Income
- Objective 4: Increase # Participants Obtaining Mainstream Benefits
- Racial & Ethnic Equity (NEW): identification of barriers and steps taken/will be taken to eliminate identified barriers

2021 Renewal Project Performance (project scores)

❑ **Project Scoring Issues & Concerns**

❑ Previous residence indicating literal homelessness

- PSH – 41 100%, 2 less than 100% (of 43)
- RRH – 5 100%, 9 less than 100% (of 14)

❑ Spending all grant funds – 15 <95% (5 subject to poss. reduction)

❑ Unit utilization – 17 <95% (3 subject to/reviewed for reallocation)

❑ Housing Stability/Exits to PH

- PSH - 40 > 85%, 1 80%-84%, 2 <75% (of 43)
- RRH - 8 > 85%, 3 75%-79%, 3 <75% (of 14)

❑ Returns to homelessness (goal 15% or less)

- PSH – 7 16% or more (4 over 21%)
- RRH – 2 16% or more

❑ Leavers with Mainstream Benefits (improved)

2021 Renewal Project Performance (project scores cont'd.)

- **Project Scoring Issues or Concerns (cont'd.)**
  - Exits to homelessness (goal 10% or less)
    - PSH – 37 <10%, 3 11%-20%, 3 over 20%
    - RRH – 10 <10%, 4 11%-20%
  - Increased Earned Income
  - Increased Income
  - Acceptance of People without Income (70% or less have income at entry)
    - PSH – 4 received zero points (7%)
    - RRH – 12 received zero points (85%)
  - Policies & Procedures (barriers)
    - PSH – 21 received zero or only half points (49%)
    - RRH – 3 received zero or only half points (21%)
  - Data Quality – 16 projects lost points
  - Data Timeliness – all projects lost points
  - Leveraging – 22 projects <75% (16 <40%)

2021 Renewal Performance (project scores cont'd.)

- **Project Scoring Good Areas**
  - ❑ Quarterly drawdowns from LOCCS
  - ❑ Spending Grant Funds (74% met goal)
  - ❑ Project/Unit Utilization (70% met goal)
  - ❑ Housing Stability / Exits to PH (82% met goal)
  - ❑ Returns to homelessness (84% met goal)
  - ❑ Variance in Length of Stay (100% goal)
  - ❑ Acceptance of People without Income – (93% PSH met goal)

2021 Reviewer Comments – Renewal Projects

General comments from the reviewers were:

- Applicants lost points where narratives didn't specifically address questions or provide enough detail within a question.

- Some Project Summaries did not comprehensively describe program, populations being served, &/or services.

- Some Explanations for Objectives 1-A and 1-B lacked detail or explanation missing. Many applicants did not adequately describe:
  - Process of assessing clients using the VI-SPDAT or participation in a local CE implementation
  - Prioritization of clients as outlined in written standards, or participation in a local CE implementation

2021 Reviewer Comments – Renewal Projects (cont'd.)

- Many narratives did not describe how the program helps participants increase employment income and all income
- Many narratives did not describe how the program will increase the number of participants obtaining mainstream benefits
- Applicants with no leavers should have addressed questions and provide information on client progress in meeting objectives 3 and 4
- Some Housing First & Low Barrier charts were competed incorrectly
- Submission of the wrong application
- Racial & Ethnicity question not addressed, or no clear plan provided to address barriers

2021 Competition - Additional Takeaways

- ❏ Data Quality & Timeliness
  - ❏ Ensuring data clean before competition
  - ❏ Data review before submission of APR to HUD
- ❏ Increased emphasis on data driven and performance scoring
- ❏ Housing first
- ❏ Low barriers to entry

2021 New Project Scoring (171 Possible Points)

- Agency Capacity
- Homeless and PSH/RRH/Joint TH-RRH Experience
- Leasing, Rental Assistance, Services & HMIS Experience
- Monitoring Findings or Concerns Program Description (& Project Expansion if applicable)
- Estimated Schedule (project implementation timeliness)
- Housing First Model
- Housing First - Entry Requirements Housing First - Reasons for Termination
- Determinations by Project Type
- Coordinated Entry Participation

- Educational Liaison
- Permanent Housing Stability (services)
- Increase in Employment and/or Income (services)
- Supportive Services
- Prioritization
- Racial & Ethnic Equity (NEW)
- Housing Stability
- Income Performance
- Project Evaluation
- Budget
- Project Match
- Project Leveraging

2021 New Project Bonus Scoring (50 Possible Points)

- ❑ Veteran Prioritization* (*100% dedicated beds) – 5 points

- ❑ Youth Prioritization* (*100% dedicated beds to youth-headed households aged 18-24 yrs old) – 5 points

- ❑ Leveraging Housing Resources – 5 points

- ❑ Leveraging Healthcare Resources – 5 points

- ❑ 2021 Homeless Count Coordinator - 10 points

- ❑ Coordinated Entry Implementation (only agencies that are currently managing the assessment, prioritization, & referral process) – 20 points

Reviewer Comments – 2021 NEW Projects

General comments from reviewers:

- ❑ Applicants lose points where narratives didn't specifically address questions or provide enough detail within a question (scope of project, target population, services, etc.)

- ❑ Narratives must demonstrate fair housing and equal access for the proposed project)

- ❑ Narratives must demonstrate understanding of housing first and that project will be low barrier

- ❑ Narratives must demonstrate understanding of coordinated entry and fully describe how project will assess and prioritize participants, or participate in a local CE implementation

- ❑ Narratives must adequately describe supportive services that will be provided, and services should make sense for target population

Reviewer Comments – 2021 NEW Projects (cont'd.)

General comments (cont'd.):

- ❑ Project model should demonstrate being housing first and proposed assistance to be provided should be based on needs of each household

- ❑ Applicants should demonstrate how participants are connected to ALL mainstream resources (and provide proposed outcomes)

- ❑ Documentation for match and leveraging should match amounts throughout the application

- ❑ Match and leveraging should be the amounts that will be specifically committed to proposed project

- ❑ Line items in the supportive service budget should be fully quantified with detail (real cost for activity X number of households)

- ❑ Applicants should discuss how participants will be assisted to obtain/increase income and mainstream benefits (and project outcomes)

Reviewer Comments – 2021 New Project Threshold Issues

Issues/Concerns resulting in a project not being included in the final ranking:

- Joint Component TH-RRH Project design must meet the parameters of project requirements:
  - Housing first model
  - Requirement to combine Transitional Housing (TH) as crisis housing and Rapid Re-Housing (RRH)
  - Application should demonstrate project would be limited to serving households meeting homeless eligibility requirements.

Reviewer Comments – 2021 New Projects (cont'd.)

Other issues resulting in project Denial for Not Meeting Threshold (Not Scored or Ranked):

- Not demonstrating the capacity to administer grant:
  - Financial information not submitted
  - Proposed match and leveraging as 100% volunteer staff
- Incomplete application
- Application submitted for review combined two type of housing into one project
- Application only being submitted in e-snaps
- Target population not demonstrated to HUD Homeless Definition
- Not demonstrating project eligibility (example: narratives describe homelessness prevention)

Reviewer Comments – 2021 New Projects (cont'd.)

Other issues that can result in project Denial for Not Meeting Threshold (cont'd.)

- ❑ Insufficient match and leveraging
- ❑ Audit findings without the response
- ❑ Significant budget errors
- ❑ Pre-determined/time-limited assistance per household
- ❑ Income requirement for participants
- ❑ Proposed projects not demonstrating equal access and fair housing compliance

CoC Program Requirements:

Coordinated Entry Participation
Environmental Reviews

Reminder: BoS CoC Coordinated Entry Participation

- All projects must participate in coordinated entry, and selection of program participants must be consistent with the CoC's Coordinated Entry process

- BoS CoC-funded projects required to coordinate locally to serve people experiencing homelessness **IN** the Balance of State CoC

- 2021 BoS CoC Coordinated Entry Policy Addendum (Certification)

- Critical for applicants with projects funded to address homelessness in the Balance of State CoC to target, providing outreach, and participate in local coordinated entry implementation areas (as applicable) in order to reduce homelessness in the Balance of State CoC

Reminder: BoS CoC Coordinated Entry Participation (cont'd.)

- Critical for applicants in non-implementation areas to target, provide outreach, and participate in CES planning to reduce homelessness in the Balance of State CoC

- If being assessed by a DV specific agency, participant information will not be entered into HMIS. De-identified information (DV comparable database client key, VI-SPDAT score, family size, veteran status, and chronicity) will be added to the supplemental prioritization list. Lead agency will follow the standard assessment, prioritization and referral process.

- Information and training: https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/georgia-balance-state-continuum-care/balance

Reminder: Environmental Reviews – BoS CoC-funded Projects (direct grantees)

- All CoC Program projects **required** to have an Environmental Review (ER). Direct grant recipients (f/k/a SHP) should submit completed ER form to DCA for the following BoS CoC-funded projects:
  - Rapid Re-Housing (RRH Form)
  - Permanent Supportive Housing (PSH Form)
- Environmental Review forms for PSH and RRH projects funded under the Balance of State CoC can be found on the following web page: https://www.dca.ga.gov/node/4042.
- Email completed forms to: Rick.Heermans@dca.ga.gov (please cc tina.moore@dca.ga.gov

Availability of Expedited Waivers for HUD CPD Programs – COVID-19
(Current Grant Recipients)

Availability of Expedited Waivers for CoC Grant Recipients (6/15/22)

- June 15, 2022, Memo outlining availability of expedited waivers (CoC, YHDP, ESG, & HOPWA): https://www.hud.gov/sites/dfiles/OCHCO/documents/2022-09cpdn.pdf (set to expire 3/31/23)

- Intended to prevent spread of COVID-19 and facilitate assistance to eligible communities and households economically impacted by COVID-19

- **No waiver(s) requested may be implemented unless written approval from HUD has been received.** Email waiver requests to SNAPSinfo@hud.gov with a copy to the Local HUD Field Office CPD Director. Waiver requests must be received by HUD **on or before July 21, 2022, to be designated for expedited processing as provided by the notice.**

- HUD CPD COVID-19 Grantee Guidance at: https://www.hud.gov/program_offices/comm_planning/covid-19 **AND** https://www.hudexchange.info/homelessness-assistance/diseases/#covid-19-webinars-and-office-hours

Expedited Waivers: Continuum of Care Program (CoC/YHDP)

D.1-a: Suitable Dwelling Size and Housing Quality Standards

D.1-b: Fair Market Rent for Individual Units and Leasing Costs (unit must meet rent reasonableness)

D.1-c: Remove One-Year Lease Requirement

D.1-d: Permanent Housing Rapid Re-Housing Limit to 24 Months of Rental Assistance

D.1-e: Disability Documentation for Permanent Supportive Housing (PSH)

Please see guidance for Housing Quality Standards (HQS) inspections within notice (pages 2-3)

System for Award Management (SAM) Registration

- **System for Award Management (SAM):**
  - Federal Repository into which an entity must provide information required for the conduct of business as a recipient.
  - Registration with SAM is required for submission of applications via e-snaps. You can access the website at https://www.sam.gov/SAM/. There is no cost to use SAM.
  - Applicants must maintain an active SAM registration with current information while they have an active Federal award or an application or plan under consideration by HUD.

- **Unique Entity Identifier (UEI):**
  - The identifier assigned by SAM to uniquely identify business entities
  - Applicants must provide a valid UEI number, registered and active at /www.sam.gov/ in the application

- **Start early to ensure annual registration or new requests are not delayed in processing

Questions?
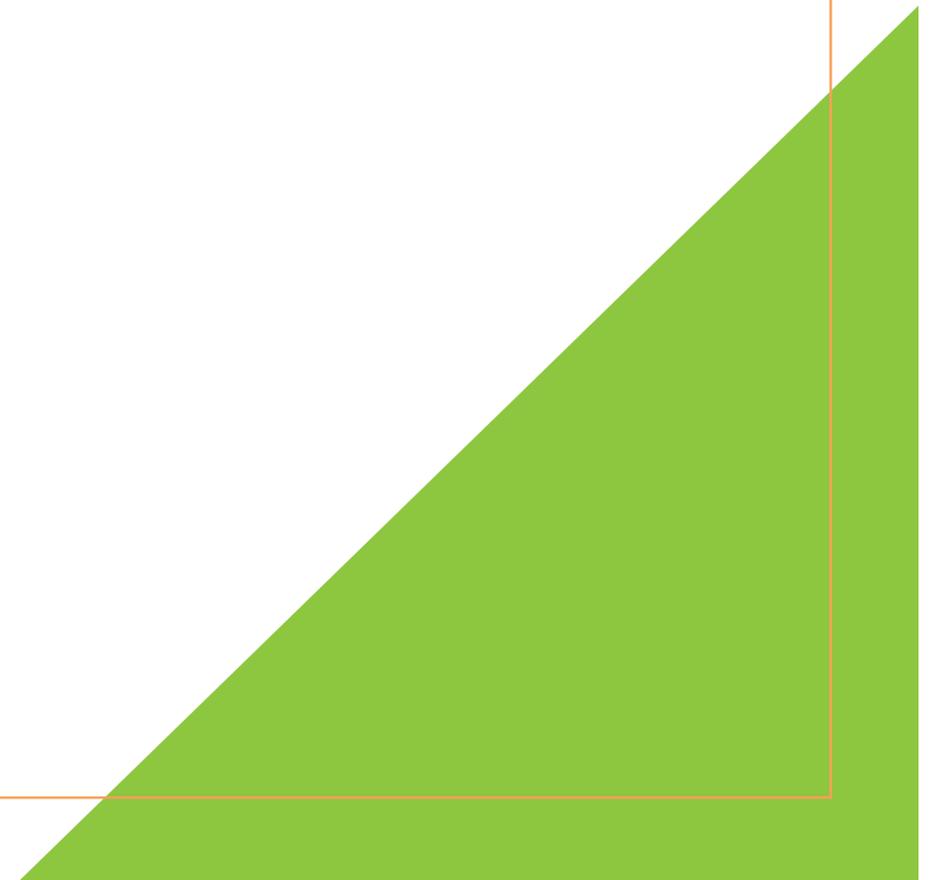
2022 Competition Status Update

2022 BoS CoC Competition Status Update

- HUD is currently working to open competition
  - Date and Timeline Unknown
  - Once HUD opens competition (NOFO/Notice of Funding Availability)/releases more details, we may need to call a special meeting of the CoC Board before information available
- Grant Inventory Worksheet (GIW)
  - Released & under review
  - DCA will need to submit proposed changes to HUD for review
  - Determines eligible projects, project renewal amounts, and total BoS CoC Annual Renewal Amount (ARA)
  - ARA estimated amount to be determined
  - Renewal applicant **responses due by 3:00 pm on Friday, July 1st**

2022 BoS CoC Competition Status Update

- Applicant webinars will be available (dates TBD)
- 2021 Competition documents and policy can be found on DCA's website:

    https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/georgia-balance-state-continuum-care/2021

    OR

    https://www.dca.ga.gov/node/2174/documents/2091

    OR

    https://www.dca.ga.gov/node/3181/documents/11

New Applicants Interested in Submitting an Application in the 2022 Competition

Continuum of Care Program

Critical to KNOW the Regs!

Applicants are responsible for reading the Notice of Funding Opportunity (NOFO), regulations, and other related information as it is released on HUD's web site, HUD Exchange to see program and eligibility requirements.

https://www.hudexchange.info/programs/coc/toolkit/introduction-to-the-coc-program/#coc-program-laws-regulations-and-notices

https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/

https://www.hud.gov/program_offices/comm_planning/coc

https://www.hud.gov/program_offices/comm_planning/coc/competition

https://www.hudexchange.info/programs/coc/

DISCLAIMER

- This is a GENERAL overview of some CoC Program and Application requirements based on the 2021 competition. Information on 2022 requirements for eligible new projects to be scored and ranked under Georgia's BoS CoC competition is NOT available yet.

- This section is meant to provide information on general requirements of the CoC Program, and to provide potential applicants the opportunity to ask questions before the competition opens.

- Applicants will be responsible for reading the 2022 NOFO, regulations, and other related information as it is released on HUD's web site, HUD Exchange to see program and eligibility requirements.

  - HUD CoC Competition page on HUD.gov: https://www.hud.gov/program_offices/comm_planning/coc/competition

  - HUD Exchange CoC Program page: https://www.hudexchange.info/programs/coc/

  - HUD Exchange e-snaps resources: https://www.hudexchange.info/programs/e-snaps/

CoC Award and Implementation
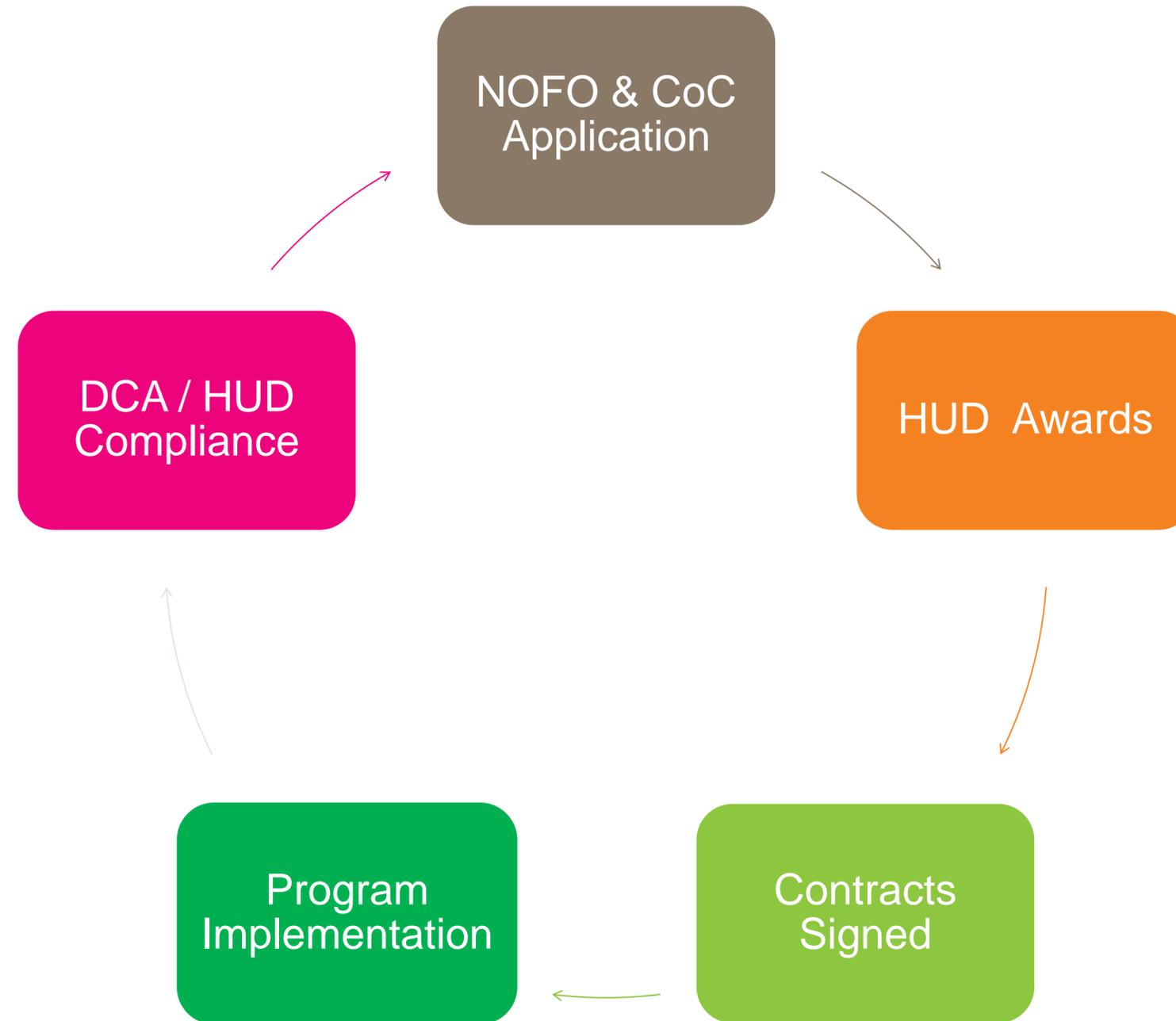
General Balance of State CoC Process

- ❑ HUD release of Notice of Funding Opportunity (NOFO)

- ❑ Policy and material update and review with Standards, Rating & Project Review Committee and Balance of State CoC Board (Approval required to open BoS competition)

  - ❑ BoS 2021 Documents: 2021 Georgia BoS CoC NOFO Competition Policy, Process, Application Documents, Certification Policy Addendum, Coordinated Entry Policy Addendum, and Other Materials for the NOFO including:

    - Program priorities according to type (Permanent Supportive Housing) and according to population served

    - Reallocation process

  - ❑ Scoring Criteria for the project application reviews

2021 HUD NOFO Competition

- As in past years, the application process was a two-step process
- ❑ Review Application and all required documents for New project ranking
  - Emailed to DCA (with all required attachments)
  - Applications will be scored and ranked by an application review subcommittee
- ❑ HUD Application in *E-SNAPS*
  - This is required for ALL project applications
  - Must be complete, with all required attachments, by the BoS CoC deadline (TBD)

New Projects

- ❑ New Project Criteria (2021):
  - ❑ Project Applicant in good standing with HUD, DCA, or other
  - ❑ Applicant, subrecipient, project, and participant eligibility
  - ❑ Demonstrate connection to mainstream service systems
  - ❑ Participate/agree to participate in CoC's Coordinated Assessment System AND HMIS (or comparable database)
  - ❑ Must administer programs or activities in the most integrated setting appropriate to the needs of qualified homeless with disabilities
  - ❑ Applicants must commit to following Written Standards and VAWA Policy

Additional BoS CoC NOFO Priorities and Policies

- ❑ Proposal Outline for new projects to indicate intention to apply (doesn't commit to applying)

- ❑ No late new applications accepted

- ❑ New project applications must pass a threshold review to move forward to the scoring portion. Threshold factors include, but are not limited to:

  - ❑ Financial Management Capacity and Experience

  - ❑ Past performance or Open Monitoring Findings, if applicable

  - ❑ Match and Leveraging dollars

  - ❑ Use of HMIS (or HMIS comparable system, if a DV provider)

  - ❑ Application is complete or & on time (for new projects)

  - ❑ Eligible populations, activities, location, etc.

  - ❑ Certificate of Consistency (Local Approval)

  - ❑ Submission of Required certifications as specified in NOFO

  - ❑ Application only within Balance of State's 152 counties

  - ❑ *Application includes a plan to coordinate mainstream resources

2021 Eligible Project Applicants

2021 Eligible Project Applicants

- Eligible Project Applicants include:
  - Nonprofit Organizations
  - States
  - Local Governments
  - Instrumentalities of State and Local Governments
  - Indian Tribes and Tribally Designated Housing Entities (TDHEs) as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103)
  - Public Housing Agencies (as defined in 24 CFR 5.100), are eligible without limitation or exclusion

2021 Eligible Project Types

2021 Eligible New Projects

- ❑ Funds for new projects typically available through bonus funds available to CoCs that receive a high enough score.
- ❑ Possible new projects available as a result of reallocated funding from existing projects (amount unknow)
- ❑ In 2021, there were four types of new project applications accepted:
  - ❑ Permanent Supportive Housing (PSH) project
  - ❑ Rapid Re-Housing (RRH) project
  - ❑ Joint TH and PH-RRH Component projects
  - ❑ Supportive Services Only Coordinated Entry (SSO-CE) under DV Bonus only
- ❑ Expansions Allowed

Housing First & Low Barrier Projects (Project & CoC Score)

- Low Barrier Entry
  - Participants are NOT screened out based on barriers for:
    - Having too little or no income
    - Active or history of substance abuse
    - Having a criminal record (w/exception of state-mandated restrictions)
    - Having a history of victimization
  - 100% BoS Applicants committed to being Low Barrier

- Service Participation Requirement
  - Participants are NOT terminated for:
    - Failure to participate in supportive services
    - Failure to make progress on a services plan
    - Loss of income or failure to improve income
    - Any other activity not covered in a lease agreement typically found for unassisted persons
  - 100% BoS Applicants Committed to being Housing First

Eligible Populations

Definition of Homelessness
(Categories 1 & 4)

The CoC program specifically targets/prioritizes homeless persons who:

❑ Category 1: Individuals and families who lack a fixed, regular, and adequate nighttime residence, meaning:

  ❑ Has a primary nighttime residence that is not meant for human habitation; **or**

  ❑ Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); **or**

  ❑ Is exiting an institution where she/he temporarily has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

❑ Category 4: individuals and families who:

  ❑ Are fleeing, or are attempting to flee, domestic violence ("Domestic Violence" includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking);

  ❑ Has no other residence; and

  ❑ Lacks the resources or support networks to obtain other permanent housing

Populations Served Through Continuum of Care

Homeless Individuals & Families

- ❑ Originally from the streets or emergency shelters (or as expanded by NOFO).

- ❑ Homeless Verification - A household is homeless if you can prove with adequate documentation.

- ❑ All families served by new PSH or RRH projects MUST meet HUD definition of homelessness (or as expanded by NOFO) and agencies MUST complete/provide homeless verification on ALL people served.

- ❑ Example of Documentation format on DCA ESG web page at: https://www.dca.ga.gov/node/1922/documents/10

- ❑ Families with children include ALL families with children.

- ❑ *Under the CoC Program, households with children may not be categorically excluded from any project based solely on the basis of their familial status.

- ❑ Equal access.

Examples of Persons NOT Eligible (PSH)

❑ Persons with resources for housing

❑ In housing paying excessive rent, in substandard or overcrowded housing

❑ Living long-term with immediate family, relatives or friends

❑ Living in a congregate living facility (other than a shelter)

❑ Living in a hospital or institution (for > 90 days) where the institution has a policy that requires housing placement at discharge

❑ Youth or adults in state custody

All projects must participate in coordinated entry, and selection of program participants must be consistent with the CoC's Coordinated Entry process.

Examples of Persons NOT Eligible (RRH and Joint TH/RRH)

❑ Persons housed or with resources for housing

❑ In housing paying excessive rent, in substandard or overcrowded housing

❑ Living long-term with immediate family, relatives or friends

❑ Living in a congregate living facility (other than temporary shelter or transitional housing for homeless)

❑ Living in a hotel/motel (unless paid for by charitable organization or government program)

❑ Living in a hospital or institution (for > 90 days) where the institution has a policy that requires housing placement at discharge

❑ Youth or adults in state custody

All projects must participate in coordinated entry, and selection of program participants must be consistent with the CoC's Coordinated Entry process

Chronic Homelessness & Dedicated Plus

Final Definition of Chronically Homeless (Amends 24 CFR 91.5 and 24 CFR 578.3)

Chronically Homeless means:

(1) A "homeless individual with a disability," who:

- ❑ Lives in a place not meant for human habitation, or emergency shelter; and
- ❑ Has been literally homeless continuously for at least 12 months or on at least 4 separate occasions in the last 3 years (combined occasions must total at least 12 months)
  - Occasions separated by a break of at least 7 nights
  - Stays in an institution of fewer than 90 days do not constitute a break

(2) An individual who has been residing in an institutional care facility for fewer than 90 days (meeting all criteria in paragraph (1), before entering the facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

*Definition of "chronically homeless" provides a way to prioritize people with longest histories of homelessness and most severe needs

*Seeks to ensure that persons with highest needs are prioritized for permanent supportive housing

DedicatedPLUS

- 100% of beds dedicated to serve:
  - Chronic Homeless
  - CoC TH to be eliminated (**N/A**)
  - Living on street or in shelter, but chronic & had been admitted & enrolled in PH in last year and unable to maintain placement
  - In Joint TH and PH-RRH component project & chronic prior to entry (**N/A**)
  - Living on street or in shelter for at least 12 months in last 3 years, but not on 4 separate occasions **OR**
  - Receiving assistance through a VA-funded homeless program and met one of the above criteria at initial intake to VA homeless program

Eligible Expenses

Eligible Expenses for New PSH Projects

- Rental Assistance (see § 578.51 for full guidance)
  - 25% Match Requirement
  - Fair Market Rent (FMR) to rent individual units to provide housing (based on FMR for location)
  - Utility allowance included in FMR
- Leasing (see § 578.49 for full guidance) – **Cannot be combined with Rental Assistance**
  - No Match Requirement
  - Can lease individual units to provide housing
  - Based on Fair Market Rent for location
  - No utilities unless they are included in the actual rent amount
- Operating Costs (see § 578.55 for full guidance) – **Cannot be combined with Rental Assistance**
  - 25% Match Requirement
  - Utilities to support Leasing (IF utilities not covered in rent)
  - Furniture
  - Equipment
- Supportive Services (see § 578.53 for full guidance)
  - Eligible Service Costs Limited (see NOFO)
  - 25% Match
- Administrative Costs (§ 578.59)
  - Up to **10%** of Grant Amount (10% of subtotal)
  - Costs associated with general management, oversight, and coordination; training on Continuum of Care requirements; and environmental review
  - Administrative costs <u>cannot</u> be used for staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57
- HMIS (see § 578.57 for full guidance)
  - Data entry staff
  - Other

Please see full CoC Interim Regulations at: https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

Eligible Expenses for New RRH Projects

- Rental Assistance (see § 578.51 for full guidance)
  - 25% Match Requirement
  - Fair Market Rent (FMR) to rent individual units to provide housing (based on FMR for location)
  - Utility allowance included in FMR
- Supportive Services (see § 578.53 for full guidance)
  - Eligible Service Costs Limited
  - 25% Match
- Administrative Costs (§ 578.59)
  - Up to 10% of Grant Amount (10% of subtotal)
  - Costs associated with general management, oversight, and coordination; training on Continuum of Care requirements; and environmental review
  - Administrative costs <u>cannot</u> be used for staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57
- HMIS (see § 578.57 for full guidance)
  - Data entry staff
  - Other

Please see full CoC Interim Regulations at:
https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/#regulations

Eligible Expenses for New Joint TH & PH-RRH Component Projects (2021 NOFO)

- TH Portion: Leasing (see § 578.49 for full guidance) – Cannot be combined with Rental Assistance
  - No Match Requirement
  - Can lease individual units to provide housing
  - Based on Fair Market Rent for location
  - No utilities unless they are included in the actual rent amount
- TH Portion: Operating Costs (see § 578.55 for full guidance) – Cannot be combined with Rental Assistance
  - 25% Match Requirement
  - Utilities to support Leasing (IF utilities not covered in rent)
  - Furniture
  - Equipment
- RRH Portion: Rental Assistance (see § 578.51 for full guidance)
  - 25% Match Requirement
  - Fair Market Rent (FMR) to rent individual units to provide housing (based on FMR for location)
  - Utility allowance included in FMR
- Both: Supportive Services (see § 578.53 for full guidance)
  - Eligible Service Costs Limited
  - 25% Match

Eligible Expenses for New Joint TH & PH-RRH Component Projects (cont'd)

- Administrative Costs (§ 578.59)
  - Up to 10% of Grant Amount (10% of subtotal)
  - Costs associated with general management, oversight, and coordination; training on Continuum of Care requirements; and environmental review
  - Administrative costs <u>cannot</u> be used for staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57
- HMIS (see § 578.57 for full guidance)
  - Data entry staff
  - Other

Please see full CoC Interim Regulations at:

https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/#regulations

New Project Threshold

- ❑ Agency meets HUD's eligibility criteria
- ❑ Agency demonstrates adequate capacity to carry out grant (with proper documentation).
- ❑ Project meets eligible costs or activities requirements.
- ❑ Project sufficiently demonstrates eligible populations will be served.
- ❑ Project shows required match & sufficient commitments for leveraging to implement project.
- ❑ Agency does not have serious compliance or performance issues on current projects.
- ❑ Project demonstrates adequate impact or cost effectiveness.
- ❑ Project meets HUD Joint TH & PH-RRH Component Minimum Standards or SSO-CE DV Bonus Minimum Standards
- ❑ Project for Balance of State CoC's 152 county jurisdiction

Additional BoS CoC NOFO Priorities and Policies (continued)

❑ Joint Component TH & PH-RRH additional threshold factors included, but not limited to:

  ❑ Not intended to replace transitional housing projects

  ❑ Provide crisis housing with financial assistance and supportive services based on client need

  ❑ Have both TH & RRH components, where RRH budget is two thirds of housing

  ❑ Target and prioritize people with higher needs and most vulnerable

  ❑ Target people in unsheltered locations or homeless youth

  ❑ Demonstrate proposed area in not covered by crisis housing and have a street outreach team, or be in an area where coordinated entry planning is occurring

Project Quality (HUD NOFO)

- ❑ Whether type and scale of housing proposed will fit the needs of program participants

- ❑ Whether type and scale of the supportive services offered to program participants will ensure housing stability

- ❑ *Whether proposed project has a specific plan to coordinate and integrate with other mainstream health, social services, and employment programs and ensure that program participants are assisted to obtain benefits from mainstream programs for which they may be eligible.

- ❑ Whether program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs

- ❑ Whether proposed Joint TH-RRH Component projects will provide enough rapid rehousing assistance that at any given time a participant may move from TH to permanent housing (2 times the resources for RRH versus TH).

- ❑ Joint TH-RRH Component projects are required to adhere to a housing first model as defined in the NOFO

System Performance

System Performance Measures

❑ Measurement of System Performance for Each Continuum

1. Length of Time People Remain Homeless
2. Extent People who Exit Homelessness Return to Homelessness
3. Number of Homeless People (Reduction)
4. Employment and Income Growth for Homeless People in CoC Program-funded Projects
5. Number of People who Become Homeless for the First Time
6. Successful Placement from Street Outreach and Successful Placement in Retention of Permanent Housing

System Performance Data

PERFORMANCE MEASURE	2019	2021	CHANGE
1-Length of Time Homeless (Ave. Bed Nights)			
Shelter	61	48	-13
Shelter & Transitional	91	55	-36
2-Returns to Homelessness (PH Exits)	288	601	+313
3-Number Homeless	4,183	4,158*	-25*
4-Employment & Income Growth			
Stayers	396	502	+106
Leavers	334	213	-121

System Performance Data

PERFORMANCE MEASURE	2019	2021	CHANGE
5-Number First-time Homeless	7,252	6,250	-1,002
7-Placement from Outreach and in PH			
7a-Outreach Exits to Temporary or PH	76%	62%	-14%
7b1-Program Exits to PH	59%	44%	-15%
7b2-PH Exit or Retention of PH	93%	96%	+3%

Best Practices

Best Practices for Completing the CoC Review Application & e-snaps Application

- Know the CoC Program Regulations
  - Projects should align with funding source
- Review the HUD NOFA
  - Critical program & competition requirements
- Review CoC Policy and Scoring Criteria
  - Critical competition & project threshold requirements
- Review narratives for completeness
- Have someone else read your application before submission
- Double check all attachments
- Don't wait to ensure access to *e-snaps*
- Don't wait until the last minute to complete *e-snaps* application
- Questions specific to *e-snaps'* functionality must be sent to HUD e-snaps@hud.gov

Policies & Procedures

Policies and Procedures (include)

- Balance of State CoC Written Standards

- Balance of State CoC Coordinated Entry Policies & Procedures

- Balance of State CoC VAWA Policies & Procedures

- Balance of State CoC-funded projects that have committed to be Low Barrier and/or Housing First:

  - Projects should have updated policies & procedures

- Continuum of Care Monitoring

  - Monitoring visits (update of CoC monitoring form)

  - Performance and Data Monitoring

  - Homeless documentation (random files vs APR/competition data)

  - Chronic homelessness documentation

- Grant Administration

  - Homelessness verification & documentation

  - Disability documentation (PSH only)

  - Annual Reporting to HUD

HUD Special CoC NOFO

HUD Special CoC Program Notice of Funding Opportunity (NOFO)

- Approximately $322 Million available through Special NOFO, divided as follows:
  - Rural Set Aside - $54.5 million
  - Unsheltered Homelessness Set Aside - $267.5 million
- Project applications must be submitted to CoC to be included on CoC Priority Listing.
- All projects must be rated and ranked
- Grant terms will be 3-years
- HUD deadline is October 20, 2022

HUD Special CoC Program Notice of Funding Opportunity (NOFO) (cont'd.)

- Eligible Project Types:
  - Permanent Housing
    - Permanent Supportive Housing
    - Rapid Re-housing
  - Joint TH and RRH
  - Supportive Service Only
    - Coordinated Entry
    - Street Outreach
    - Standalone SSO

HUD Special CoC Program Notice of Funding Opportunity (NOFO) (cont'd.)

- ❑ HUD Policy Priorities:
  - ❑ Reduce Unsheltered Homelessness for people experiencing unsheltered homelessness and those with severe service needs
  - ❑ Provide assistance on Tribal Lands
  - ❑ Involve broad array of stakeholders in the CoC's effort to reduce homelessness
  - ❑ Advance Equity
  - ❑ Use a Housing First Approach
- ❑ HUD Notice at: https://www.grants.gov/web/grants/view-opportunity.html?oppId=341301
- ❑ Please review this Special NOFO
- ❑ More information soon

Questions?
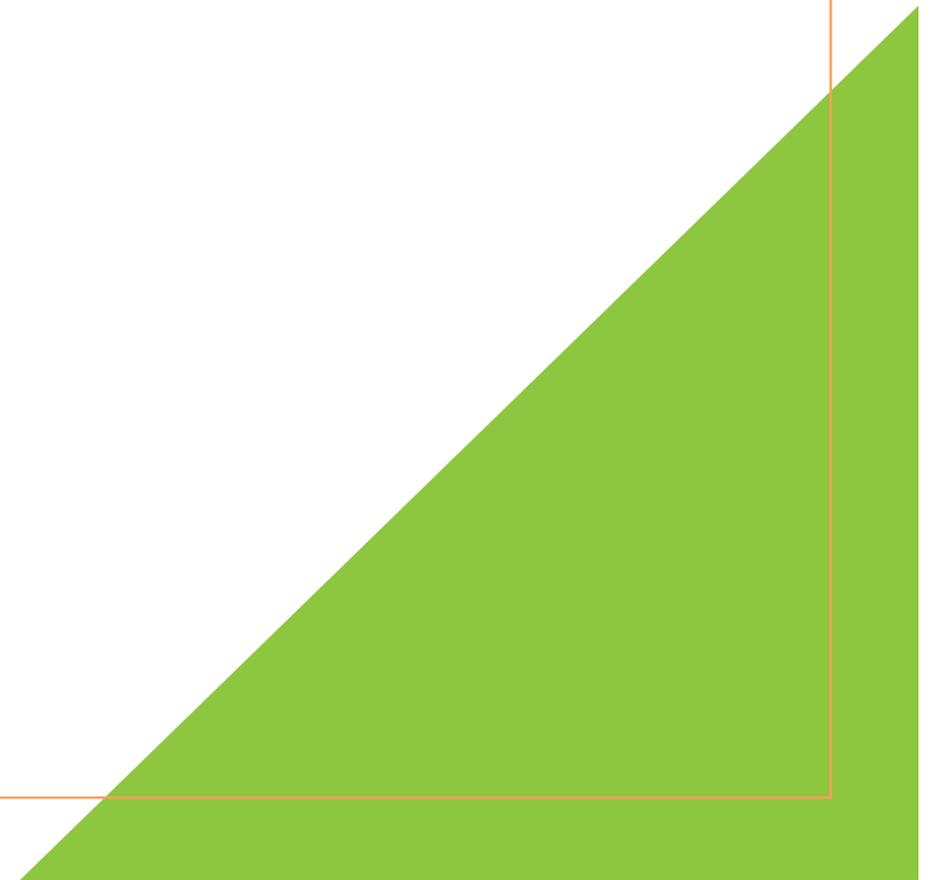
Balance of State Staff Contacts

Amanda Brand, Coordinated Entry System Coordinator
(470) 328-9686 / amanda.brand@dca.ga.gov

Aashish Gautam, HMIS Data Analyst
(404) 486-6360 / BosHMIS@dca.ga.gov

Chandra Woods McGhee, HMIS Data Analyst
(404) 679-0655 / BosHMIS@dca.ga.gov

Diana Pitcher, CoC Program Coordinator
(404) 679-0651 / diana.pitcher@dca.ga.gov

Isaac Davis, Coordinated Entry System Coordinator
(404) 370-2985 / isaac.davis@dca.ga.gov

John Shereikis, Interim Office Director
(470) 747-9331 / john.shereikis@dca.ga.gov

Josh Gray, CoC Program Manager
(404) 327-6811 / Josh.Gray@dca.ga.gov

Rick Heermans, Continuum of Care Assistant
rick.heermans@dca.ga.gov

Tina Moore, CoC Program Coordinator
(404) 327-6870 / tina.moore@dca.ga.gov

Resources

- Balance of State CoC
  https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/georgia-balance-state-continuum-care

- 2021 Balance of State CoC Competition documents and policy can be found on DCA's website (first page listed pending update):
  https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/georgia-balance-state-continuum-care/2021
  OR
  https://www.dca.ga.gov/node/2174/documents/2091
  OR
  https://www.dca.ga.gov/node/3181/documents/11

HUD Resources

HUD Continuum of Care Competition, Program, & Resource pages:

- Continuum of Care Competition at HUD.gov: https://www.hud.gov/program_offices/comm_planning/coc/competition

- NOFO at Grants.gov: https://www.grants.gov/web/grants/search-grants.html?keywords=continuum%20of%20care

- HUD Exchange e-snaps resources: https://www.hudexchange.info/programs/e-snaps/

- HUD Exchange CoC Program: https://www.hudexchange.info/programs/coc/

Thank You!

Any questions?

You can contact DCA at: Tina.Moore@dca.ga.gov or Josh.Gray@dca.ga.gov