

## Attachment D

### CFCH Continuum of Care (CoC FL-507)

#### Selected Policies and Priorities Re: the 2025 Application for HUD CoC Program Funding

In developing its overall strategy to address and end homelessness, and in particular with respect to ranking of renewal projects and solicitation of new project applications, the CoC is committed to upholding and applying the following values:

1. Obtain and maintain HUD Continuum of Care Program funding sufficient to meet the needs of the FL 507 geographic area.
2. Promote our goal to make homelessness rare, brief, and one time in FL-507.
3. Prioritize projects that:
  - a. Comply with HUD's stated priorities in the 2025 HUD NOFO
  - b. Actively participate in the Continuum of Care and help advance collective goals
  - c. Have movement to permanent housing and subsequent stability as the primary focus
  - d. Focus on those who are literally homeless (streets, shelter, transitional housing for homeless)
  - e. Participate in the HMIS with complete, high quality data
  - f. Demonstrate positive outcomes including self-sufficiency
  - g. Are cost effective including leverage capacity
  - h. Perform well against HUD McKinney Continuum of Care goals and positively impact system performance
  - i. Consistently meet and exceed operational standards for spending, match, occupancy and reporting.

#### A. Projects and Applications

##### 1. Types of Projects Eligible for Consideration through the Community Process

The HUD regional application review and selection process should score and rank submitted applications for funding to form projects within the following six (6) categories:

- a. Permanent Supportive Housing (PSH)
- b. Transitional Housing (TH)
- c. Supportive Services Only (SSO) including Street Outreach (SSO – Outreach)
- d. Essential System Supports Coordinated Entry System (CES)
- e. Essential System Supports Homeless Management Information System (HMIS)

CoC FL-507 should include at least one CES and one HMIS project and at least one PSH project on its list of highest-priority (Tier 1) projects in the Submission to HUD.

##### 2. Types of Projects Ineligible for Consideration through the Regional Application Process

The following types of projects should be ineligible for consideration through the CoC FL-507 regional application process:

- a. Rapid ReHousing Projects
- b. Safe Haven projects

##### 3. Types of Projects Eligible for Consideration through the Regional Application Process, but Unlikely to be Included in the Submission to HUD

The following types of projects should be eligible for review through the regional application process, but ineligible for inclusion in the Application to HUD without the express approval of the CoC FL-507 Board:

- a. Projects that propose to use HUD funding for acquisition, new construction or rehabilitation activity.

- b. Projects that propose to use HUD funding to provide project- or sponsor-based rental assistance, but are unable to document that the units will be online by October 2025.
- c. New Permanent Supportive Housing projects unless they are reallocation within the 30% ARD eligible for PSH funding.
- d. Projects proposed in applications that do not meet threshold criteria (i.e., do not meet the basic criteria to be eligible for consideration by HUD, such as Projects that do not accept Program Participants through the Coordinated Entry process, do not participate in HMIS or comparable data system (DV providers), or other eligibility criteria as defined in the Scoring Matrix for each type of project).

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## \* B. Specific Project Factors Relevant to the Application Process 1.

### 1. Project Bundling

- a. Given the flexibility afforded by an approach that "bundles" housing with supportive services - both with regard to budgeting and programming - application bundling should continue to be the preferred approach to building housing-services linkages within PSH and TH projects.
- b. If existing bundled Projects are selected for renewal, the baseline assumption should be that the distribution of awards to sub-recipient agencies to provide components of the renewal project will be proportionate to the allocation of funding to sub-recipients for FY 2024. However, HSN conducts a separate competitive process by which sub-recipient funding will be formally awarded for renewal projects at least once every three years. During this process, based on performance or sub-recipient preferences, funds may be reallocated between sub-recipients. The process should be completed more than 60 days prior to the start of the HUD grant term for the project. This competitive process will include scoring based on key project performance measures that support overall system performance measures. Examples of these objective criteria include length of time homeless, returns to homelessness, HMIS data quality, adherence to CoC written standards, participation in Coordinated Entry System, involvement of persons with lived experience in policy and program design, and provision of services to hardest to serve populations. Should the sub-recipient portfolio and/or funding allocations associated with any Project change based on the results of that competition, HUD will be notified of the changes.

### 2. Administration of Scattered-Site Rental Assistance

In light of the fact that the administration of scattered-site rental assistance/leasing funds across the CoC is such a specialized and complex function, HSN should continue to administer these resources CoC-wide. Because of the increased efficiency and reduced regional confusion associated with having a single point of contact, these funds should continue to be administered on a consolidated basis across the region. This recommendation was also based on the recognition that rental assistance funds are pass-through dollars to landlords, stretch an agency's cash flow capacity, and do not tend to build organizational capacity. This policy increases the ability of service providers with limited administrative capacity to apply for CoC funding.

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## C. Application Ranking and Project Selection Process

### 1. Reallocation Policy

Any funds reallocated as part of recapturing unspent funds, voluntary or involuntary reallocation will be made available for reallocation to create new projects during the local solicitation process. As part of the FL-507 solicitation for projects included in the HUD CoC collaborative application, providers are encouraged to reallocate projects that are underspending

their full award, underutilizing beds, are not cost effective, and/or underperform in other areas critical to meeting the goal of ending homelessness in the FL-507 geographic region. Projects with poor performance, do not spend their full award, underutilize beds, are not in alignment with Housing First principles and practices (including evictions and non-renewals for site based projects), do not serve the intended population or with significant, unresolved findings are subject to involuntary reallocation. Projects who score below a threshold as established by the local COC during each application period will be subject to either voluntarily or involuntarily giving up award money to be reallocated to a New Project. Applicants may appeal the decision and the appeal must be considered by the COC's Management Board or its Executive Committee.

CoC FL-507 will also allow voluntary reallocate from renewal projects to new projects that will further the overall system performance goals of HUD and the CoC FL-507 region.

## 2. Grouping of Applications for Initial Scoring

Each Application should be scored so that it competes only with other projects within the same component and activity type, at least for purposes of generating the initial ranked project list. For example, all Applicants proposing to provide supportive services to TH Projects should be scored and ranked as a separate and distinct group, and none would be evaluated in comparison with Applicants proposing to provide services to PSH projects.

## 3. Baseline Tier 1 and Tier 2 Assumptions

Since participation in HMIS and Coordinated Entry is a requirement for any project awarded funding through the 2025 CoC competition, HMIS and Coordinated Entry projects will be funded in Tier 1. Other Tier 1 funds will be include PSH projects intended to serve current PSH participants who are over the age of 62 and/or have a physical disability and/or have a developmental disability. Tier 2 will include any remaining eligible PSH projects, TH projects and SSO projects, including Bonus Projects, DV Bonus Projects, projects previously funded by DV Bonus funds, and projects funded with YHDP funds.

## 5. Baseline Bonus Project(s) Assumptions.

Given the manner in which HUD has structured the CoC Bonus Project(s) opportunity, funding requests by all Applicants associated with a particular proposed CoC Bonus Project(s) are encouraged to not exceed a total of \$400,000 (housing and services included). Similarly, a DV Bonus Project is encouraged to not exceed a total of \$800,000. These figures may be adjusted upon additional guidance from HUD.

## 6. Scoring Tool Description.

The Scoring Tool evaluates projects along multiple performance dimensions including project financials; cost effectiveness; project performance that contributes to improved overall system performance; priority populations services; HMIS data quality (comparable data systems for Domestic Violence/Human Trafficking providers); commitment to CoC priorities; inclusion of persons with lived experience in policy and program design, and project design. Each of these dimensions has multiple component measures. Each performance measure is in turn based on one or more defined data elements drawn from a specific data source, including individual project applications, annual progress reports (APR), HMIS and HUD reports. For each individual measure, the Scoring Tool also identifies a range of points awarded for specific component measures.

The intent is for each individual measure within the tool to be an objective metric with a defined method of calculation and correspond to one or more data elements from specific reports. This approach reduces variability in assessment between reviewers, as independent reviewers (including the self-assessment completed by the renewal project applicant or sub-

recipient) using the same, defined data sources should thus be able to reliably arrive at the same value, and the same point score, for a project on any given measure.

The total possible points vary for renewal, new/bonus and domestic violence bonus project applications. Final project scores will be normalized to a standard range before being presented for ranking consideration.

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## D. CoC FL-507 Project Participant Prioritization

### 1. Homeless Definition Prioritization

In accordance with the CoC's written standards for assistance, in order to be eligible to receive housing assistance and/or supportive services through a HUD CoC Program, a Program Participant must meet the definition of homelessness found in either Category 1 (i.e., is literally homeless) or Category 4 (i.e., fleeing or attempting to flee domestic violence) of the HUD definition of homelessness (24 CFR §578.3). Transitional Housing projects may be able to serve Category 2 (i.e. at imminent risk of homelessness).

Category 1: Any individual or family who lacks, regular and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- Is living in a public or privately operated shelter (congregate shelters, transitional housing and hotels and motels are paid for by charitable organizations or federal, state and local government); or
- Is exiting an institution where (s) he 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: Any individual or family who:

If fleeing, or is attempting to flee domestic violence, human trafficking, dating violence, stalking, or sexual assault, has no other residence and lack resources of support networks to obtain other permanent housing. For more information about Category 4 eligibility, see [https://nnedv.org/wp-content/uploads/2020/08/Library\\_Policy\\_HEARTH\\_Creating\\_Access\\_for\\_Survivors.pdf](https://nnedv.org/wp-content/uploads/2020/08/Library_Policy_HEARTH_Creating_Access_for_Survivors.pdf)

### 2. Income

Any individual or family with household income exceeding 50 percent of the Area Median Income (AMI) most recently published by HUD for the Orlando-Kissimmee-Sanford MSA is assumed to have sufficient resources to obtain other permanent housing and is not eligible for enrollment into HUD CoC Program funded PSH, RRH or TH assistance.

### 3. Chronicity

PSH housing assistance and supportive services are prioritized for individuals and families experiencing the longest histories of homelessness histories and most severe needs. In particular, the CoC has adopted and expanded upon the orders of priority as set forth in HUD Notice CPD-16-11. The CoC does allow for PSH projects that accept participants as identified in HUD's definition of a DedicatedPLUS project. Specifically, DedicatedPLUS projects may serve persons who meet one of the following criteria at project entry:

1. Experiencing chronic homelessness as defined in 24 CFR 578.3;
2. Residing in transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;

3. Residing in a place not meant for human habitation, emergency shelter or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
4. Residing in transitional housing funded by a Joint transitional housing (TH and rapid rehousing (PH-RRH) component project and who were experiencing chronic homeless as defined at 24 CFH 578.3 prior to entering the project;
5. Residing and has resided in a place not meant for human habitation, a safe having, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
6. Receiving assistance through a Department of Veteran Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

## F. CoC FL-507 Project Prioritization

All other things being equal, FL CoC-507 prioritizes project applications in the following order:

Priority 1: Renewal Coordinated Entry System (CES) and Homeless Management Information (HMIS) System Projects

Priority 2: Renewal Permanent Housing (PH) Projects and Youth Projects (includes PSH and TH)

Priority 3: Reallocation Permanent Housing Projects

Priority 4: New Transitional Housing Projects

Priority 5: New Supportive Services only Projects

## G. Applicants Not Selected for Inclusion in the Submission to HUD

### 1. Other Funding Opportunities

Applicants not selected for inclusion in the Submission to HUD may, through the ranking and review process, be identified as qualified for future funding including incorporation in an existing HUD funded project as a competitive sub-recipient or inclusion in a non-HUD funded project whose funding is administered by HSN.

### 2. Appeals

Applicants notified that they have not been selected for inclusion in the Submission to HUD and that perceive that their non-selection is the result of reversible error may submit an appeal to be considered by the Ranking Committee, CoC Board or CoC Executive Committee. Appeals must be submitted in the same manner as the application and be received by the deadline noted in the Request for Applications. In order to be eligible for consideration, an appeal should include a detailed explanation of the perceived error and any other information the applicant considers relevant. HUD has emphasized that appeals should focus on how the applicant was denied the opportunity to participate in the planning process. Each Applicant submitting an appeal will be notified of its final status upon disposition by the CoC Management Board, its Executive Committee or other appointed Committee.