

Attachment D

CFCH Continuum of Care (CoC FL-507)

Selected Policies and Priorities Re: the 2024-2025 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. Actively participate in the Continuum of Care and help advance collective goals
 - b. Have movement to permanent housing and subsequent stability as the primary focus
 - c. Focus on those who are literally homeless (streets, shelter, transitional housing for homeless)
 - d. Participate in the HMIS with complete, high quality data
 - e. Demonstrate low barriers to program entry
 - f. Are actively engaged in addressing race equity and LGBTQ inclusion
 - 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. Rapid Rehousing (RRH)
- c. Youth-Specific Transitional Housing (TH) or Supportive Services Only (SSO) Renewals
- d. Transitional Housing- Rapid Rehousing (TH-RRH)
- e. Essential System Supports Coordinated Entry System (CES)
- f. Essential System Supports Homeless Management Information System (HMIS)

CoC FL-507 should include at least one project in each of the above categories on its list of highest-priority (Tier 1) projects in the Submission to HUD (assuming at least one eligible project is submitted in each category), with the exception of TH-RRH.

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. All other TH projects
- b. All other SSO projects, unless they are or can be directly bundled with a PSH, RRH or are linked to a youth TH project
- c. Safe Haven projects
- d. New or Expansion CES or HMIS 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 July 2025.
- c. New projects that, excluding admin, propose greater than 30% of funding allocated to services, and no less than 70% to housing. Projects that include housing funded from non-CoC sources are allowed to have greater than 30% of their HUD request for services. Regional preference is for projects to include no more than 30% of HUD budget allocated to services unless non-CoC funded housing is included in the project.
- 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), do not adhere to Housing First principals, or other eligibility criteria as defined in the Scoring Matrix for each type of project).

B. Jurisdictional Issues

1. Option for Jurisdictions to Express Preference for Jurisdiction-Specific Projects

- a. The regional application process should include a mechanism whereby each participating jurisdiction has the option to indicate a preference among all Applicants dedicated to serving a particular county, in the event that the CoC receives an application for a single-jurisdiction application.
- b. As a secondary option, a jurisdiction should have the opportunity to verify and quantify its history of investing or leveraging funds for Projects administered by the Applicant in the past. This information may be helpful in determining if a jurisdiction is choosing to develop capacity for a specific agency and/or if the HUD funds will be leveraged in a way that reduces the service per HUD dollar ratio.

2. Option to Corroborate Applicant Claims that a Project Will Serve the Jurisdiction

- a. Each jurisdiction should be afforded the opportunity to confirm (or deny) jurisdiction-specific activities that an Applicant claims in its proposal. Specifically, if in its application, the Applicant asserts that it has “served” households in/from a particular jurisdiction, that jurisdiction should have the opportunity to confirm the assertion. If the jurisdiction is not aware of any activity, the Applicant would have to provide verification to the jurisdiction.
- b. The definition of “served” will vary based on the nature of the Project. In many cases, however, the determination of whether the jurisdiction will be served will be immediate.
- c. An Applicant that expresses the intent to serve a jurisdiction without a documented history of doing so would not receive points that another applicant with an established history would receive.

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* C. 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 RRH 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 2023 (implementation 2024- 2025). 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, provision of services to hardest to serve populations, and promotion of race equity. 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.

3. Domestic Violence (DV) Bonus Project

The CoC should include at least one and conceivably all of the following types of project types, where the project is exclusively dedicated to serving survivors of domestic violence (including sexual assault, dating violence and stalking) and/or human trafficking under the DV Bonus in the Submission to HUD: 1) a RRH project, or 2) a Joint Transitional Housing/Rapid ReHousing (TH-RRH) project.

4. CoC Bonus Project

CoC FL-507 should include at least one of the following as a CoC Bonus Project in the Submission to HUD, all other things being equal: 1) a TH-RRH Project serving youth, 2) a RRH project serving families with children and/or youth, or 3) a project-based or sponsor-based, site-specific Permanent Supportive Housing (PSH) project that demonstrates written commitment from a health care organization to provide services or a project that includes a commitment of non-CoC or ESG housing vouchers or 4) a tenant-based, scattered-site or sponsor-based PSH project. All other things being equal the CoC will prioritize projects that leverage health care and housing resources.

D. 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, are not in alignment with Housing First principles 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.

- a. The CoC has determined that its current portfolio of HUD-funded projects provides the region with the configuration and distribution of housing and services capacity to best address the current regional need, and retention of that capacity is of paramount importance.
 1. Consequently, Applicants requesting funding through reallocation should not be considered for reallocation unless they maintain existing capacity (by project type, geography and modality) without increasing costs and assure the sustained tenancy of persons served by the Project from which funding is re-allocated. Such Applicants could, however, be considered for funding as part of a Bonus Project.
 2. When comparing project type, geography and modality reallocation, the CoC will give highest consideration to project scores related specifically to project performance measures that impact overall system performance including, but not limited to, alignment with housing first principles, housing stability, exits to homelessness, length of time to housing, spending rates, inclusion of persons with lived experience in program development; race equity, and barriers/acuity level of project participants.
- b. 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 RRH 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 Assumptions for Use in the Community Ranking and Project Selection Process

Therefore, the baseline assumption for the FY 2024 scoring and selection process should be that:

- a. The distribution of FY 2024 awards should favor the current mix, location (county) and distribution of current funds of PSH and RRH projects funding (approximately 65%-35% excluding system support projects). This distribution will be reflected in the publication of baseline renewal amounts by Project and activity type.

- b. Notwithstanding D.3.a., the need for some adjustments could emerge through the Community Ranking and Project Selection process in the form of documented system and project performance concerns.

4. Baseline Tier 1 and Tier 2 Assumptions

Because of the expectation that a PSH unit be made available to a resident for as long as it may be needed, the cost to the region of losing a PSH unit is significantly greater than the cost of losing a RRH unit. Furthermore, CoC FL-507 has prioritized the use of PSH to serve individuals and families experiencing chronic homelessness due to the established need documented in HMIS and Point in Time Count. All other things being equal, PSH renewals or new projects funded through re-allocations, Youth Projects, CES and HMIS Projects should be funded in Tier 1 and in front of RRH projects in order to reduce the likelihood that these resources are imperiled. Tier 2 will include Rapid Rehousing projects and bonus projects, although some bonus projects may also be included in Tier 1.

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 \$250,000 (housing and services included). Similarly, a DV Bonus Project is encouraged to not exceed a total of \$800,000.

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 including race equity and housing first; 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.

E. 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).

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://nnev.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 RRH)

Priority 3: Reallocation Permanent Housing Projects

Priority 4: New Permanent Housing Projects

Priority 5: New Joint Youth or DV TH-PH Housing 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 or its Executive Committee.