Community Action Pioneer Valley (CAPV)
Three County Continuum of Care MA 507 (CoC)

Fiscal Year (FY) 2022 Continuum of Care Competition

And Noncompetitive Award of
Youth Homelessness Demonstration Program (YHDP) Grants

REQUEST FOR PROPOSALS (RFP), Released –August 12, 2022

For CoC Renewal & Expansion Projects (and YHDP Renewal and Replacement Projects) in Berkshire, Hampshire, and Franklin Counties Providing:

- **Permanent Housing (PSH & RRH)** for individuals and families and individuals and families experiencing chronic homelessness (PSH only)
- **Transitional Housing (TH)** serving homeless individuals and families
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH)** serving homeless individuals and families

And NEW Bonus Projects Providing:

- **Current Project Expansion Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)
- **Permanent Housing (RHH only)**, **Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH), Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)
- **Permanent Housing (PSH only) Projects** Serving chronically homeless individuals and families
- **Permanent Housing (RRH) Projects** serving Individuals and families experiencing homelessness in categories 1 or 2.
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH)**, serving individuals and families experiencing homelessness in categories 1, 2, or 4.

Total Available Renewal Project Funding: $3,057,836
(Including CoC planning dollars of $89,063)

Available NEW funding includes new DV (RRH/TH-RHH) Bonus - Approximately
$169,245 & CoC Bonus funding – Approx. $148,439 (PSH, RHH, TH-RRH)

Additional information can be found at https://www.threecountycoc.communityaction.us/news-events

Bidder's Conference: Wednesday, August 17th at 1pm and Friday August 19th at 10am, 2022
Zoom Link: https://us02web.zoom.us/j/84395202643?pwd=MUZZZXhEUzFwNVJnK2NZMlczS0NOdz09

New Project Applications Due: Wednesday, August 31st, 2022 by 8pm.
Application submitted to Keleigh Pereira, CoC Program Director. CoC staff will contact applicants if they met threshold requirements to begin esnaps applications by 9/5 and to provide access.

Renewal Project applications responded to, in esnaps by August 31st, 2022 by 8pm.

> **Questions? Contact:** Keleigh Pereira, CoC Program Director, kpereira@communityaction.us

Timeline Description	Date
Released/posted https://www.threecountycoc.communityaction.us/news-events	**8/12/2022**
Three County CoC Bidders Conference (optional) – zoom link: https://us02web.zoom.us/j/84395202643?pwd=MUZZZXhEUzFwNVJnK2NZMlczS0NOdz09	**8/17 - 1pm** **8/19 - 10am**
Renewal Project Responses/Applications due in esnaps *(applicants will be notified when HUD opens esnaps apps.)* **https://esnaps.hud.gov/grantium/frontOffice.jsf**	**8/31/22 at 8pm**
New Applicant Applications to Kpereira@communityaction.us *Incompleteness:* **(***Due to the reduced time available this year for this process, mostly complete submissions* **may** *still be reviewed for threshold requirements and could be given additional time for completion as long as project ranking can be completed.)*	**8/31/22 at 8pm**
New and Renewal Project review and ranking completed by	**9/14/22**
CoC written notification to Project Applicants regarding whether projects will be accepted as part of the project listing and submission to HUD for approval; reduced or rejected, with explanation. Project selections, scoring and ranking and tier allocations will be provided in writing and published at www.threecountycoc.communityaction.us Applicants not selected may appeal to the board and/or apply directly to HUD.	**9/15/22**

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Full Three County CoC Consolidated Application & Project listing will be posted on the CoC website.	**By 9/28/2022 5pm**
Expected Project Start Date	**2023**
CoC Application submitted to HUD *(rejected applications can be submitted directly to HUD in esnaps)*	**By 9/30/22 8pm**

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Purpose:

The U.S. Department of Housing and Urban Development (HUD) Community Planning and Development Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants was released on August 1, 2022. View the NOFO and all supporting documents in detail on the FY22 Competition page, **here**.

HUD's annual NOFO determines the process by which each CoC, through its designated Collaborative Applicant, submits a consolidated application to fund all CoC activities and eligible housing projects to advance the Federal and local goals of Ending Homelessness in our region. The Designee for the Three County CoC (MA-507) is Community Action Pioneer Valley (CAPV), the sole recipient of the CoC funding in the region.

This document provides information to the Three County CoC stakeholders, sub-recipients and other interested parties about the local Process leading up to submission of an application to HUD, including the steps required regarding all Renewal and Replacement applications for Current Continuum of Care and Youth Homelessness Demonstration Programs (YHDP), applying for new funding, the project selection process, and the timeline for project approval and esnaps submission.

The consolidated application will be submitted by CAPV and will include a CoC application, renewal, expansion and new CoC projects, as well as renewal and replacement YHDP projects. CAPV's Three County CoC is seeking proposals from Berkshire, Hampshire, and Franklin County housing and service providers for the following **renewal project** types:

- **Permanent Housing (PSH & RRH)** for individuals and families and individuals and families experiencing chronic homelessness (PSH only)
- **Transitional Housing (TH)** serving homeless individuals and families
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH)** serving homeless individuals and families

In addition, the CoC is seeking proposals for bonus funds to **fund new projects** (new or expansion of current projects) targeted to servicing victims of domestic violence, dating violence, sexual assault, and stalking. DV Bonus funds will target the following project types:

NEW- DV Bonus Projects Providing:

- **Current Project Expansion Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)

- **Permanent Housing (RHH only)**, **Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH), Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)

NEW - CoC Bonus Projects Providing:
- **Permanent Housing (PSH only) Projects** Serving chronically homeless individuals and families
- **Permanent Housing (RRH) Projects** serving Individuals and families experiencing homelessness in categories 1 or 2.
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH)**, serving individuals and families experiencing homelessness in categories 1, 2, or 4.

Total Estimated Annual Renewal Demand (for both Tier 1 CoC Projects and YHDP Projects)	**$2,968,773**
CoC Planning (Collaborative Applicant only)	**$89,063**
DV Bonus Funds	**Up to $169,245**
CoC Bonus Funds	**Up to $148,439**
Total Possible Available Funding	**$3,375,520**

Eligible applicants include non-profits, local and state government entities, Indian Tribes or Tribally Designated Housing Entities (TDHE), and housing authorities. For more information about eligible applicants, please see section V.A & B. of the NOFO. *For-profit entities are ineligible, and applications submitted from these entities will not be reviewed.*

Applications will be submitted in HUD's electronic grant application system (*esnaps*) in collaboration with CAPV's CoC staff. **Due to the limits in timing availability for this year's competition, and to encourage applicants who have not applied for CoC funds in the past, new projects applications will first be submitted through an application outside of the esnaps system** (Appendix F.) The Three County CoC program staff will provide technical assistance regarding the use of the esnaps system for all applicants. Scoring criteria for new, renewal and expansion CoC projects are attached as **Appendix A. & Appendix B.**

More information is available through the NOFO and at the HUD exchange. HUD guidance is prioritized before this Request for Proposals. If there is conflicting information, HUD guidance will take precedence.

Applicants are strongly encouraged to read the FY2022 CoC NOF0 on the HUD Exchange at:
https://www.hudexchange.info/programs/e-snaps/fy-2022-coc-program-nofa-coc-program-competition/

And the funding criteria for projects available in the interim rule, which governs the CoC:
www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf.

The Three County CoC's website will provide additional information regarding the annual funding process: https://www.threecountycoc.communityaction.us/coc-funding-process

Background on the Continuum of Care (CoC):

The Continuum of Care (CoC) Program was established by the McKinney-Vento Homeless Assistance Act as amended by S.896 Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. The program consists of the former McKinney/Vento Shelter Plus Care (S+C) Program, the former McKinney/Vento Supportive Housing Program, and the former Single-Room-Occupancy program.

The CoC Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

The goal of the Youth Homelessness Demonstration Program (YHDP) is to support the development and implementation of a coordinated community approach to preventing and ending youth homelessness and sharing that experience with and mobilizing communities towards that same end. The population to be served by the demonstration program is youth experiencing homelessness, including unaccompanied and pregnant or parent youth.

In Massachusetts, there are 12 Continuum of Care based on geographic service areas and they collaborate through a state-wide CoC network. HUD competitively funds the CoCs and membership is open to anyone interested in ending homelessness in the CoC geographic area. Examples of members are: state agencies, private non-profit homeless service providers, private non-profit organizations, participants from our funded programs, and individual community members. Our CoC prioritizes the involvement of persons with lived experience of homelessness in decision-making.

Acting as the **Collaborative Applicant** for **the Three County CoC**, Community Action Pioneer Valley (CAPV) coordinates the submission of the Three County CoC Consolidated Application to HUD. The Three County CoC will act as the recipient for all funding, including the YHDP funding, and applicants approved for

funding will be sub-recipients to the CoC grant process. As the Collaborative Applicant, CAPV is responsible for submitting the consolidated application for funding on behalf of the Continuum, and for fiscal and programmatic monitoring of sub-recipient projects and funding.

Available Funding:

According to HUD, the CoC should expect to be awarded a minimum of $2,958,295 in this funding round (*including Tier 1, YHDP projects, & planning dollars*), and may apply for up to $3,375,520. The renewal projects listed in **Attachment C.** are eligible to apply for renewal at the amount listed. *(See further down in this section regarding YHDP projects.)*

In addition, the CoC is eligible to apply for Bonus Project funds in the approx. amount of **$148,439** and DV Bonus Project funds in the approx. amount of **$169,245**. **Renewal Projects may apply for expansion through the new project application process, specifically to serve survivors of domestic violence and would need to notify Keleigh Pereira, and submit the new project application.**

Renewal projects may have budgets reduced or may be replaced by new projects. The CoC Competition is highly competitive, with HUD placing increasing emphasis on reallocating resources based on project performance and area gaps in resources. The FY 2022 NOFO explains that the available amount of funding may not be sufficient to fund renewal projects, and HUD requires CoCs to competitively rank all projects (*except planning projects & YHDP*) in two tiers.

Project applications submitted to the CoC for inclusion on the FY22 CoC Priority Listing (as part of the Consolidated Application) will be reviewed and either approved accepted and ranked, approved without ranking (i.e. YHDP renewal or replacement projects and CoC planning project), or rejected by the CoC. All project applications approved by the CoC must be listed on the FY22 CoC Priority Listing in rank order, except project applications for YHDP renewal or replacement, and CoC planning. Higher ranked projects will be assigned to Tier 1 (*95% of the Annual Renewal Demand, minus YHDP Projects*) and lower ranked projects may fall into Tier 2 (*Total Project budget – including renewal and new, minus YHDP – beyond 95% of ARD)* as described in Sections II.B.11.a and b of the NOFO. The purpose of this two-tiered approach is for CoCs to notify HUD which projects are prioritized for funding based on performance, local needs, and gaps.

Projects submitted to HUD in Tier 1 are expected to be funded if the project meets HUD eligibility and threshold requirements. Tier 2 projects will be awarded funds by HUD based on a comparative score computation which utilizes the CoC's FY2022 application's competitive score and project ranking.

Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for (but does not include YHDP renewal or YHDP replacement projects, CoC planning projects, and if applicable, UFA Costs projects, or projects selected with DV Bonus funds). If a CoC's DV Bonus project(s) are selected under the DV Bonus selection process – by HUD, they will not be included in the calculation of Tier 1 or Tier 2. If, however, a CoC's DV Bonus project(s) is/are not selected under the DV Bonus selection process, these projects will be included in the calculation of Tier 1 and Tier

2. In this scenario, if a project is ranked lower than a DV Bonus project it may fall outside of the Tier 2 limit and not be eligible for selection. Since we will not know in advance whether a DV Bonus project submitted will be conditionally selected (under the DV Bonus selection process), the CoC will rank all projects in Tier 1 and Tier 2 based on performance and need for the project under the local ranking process.

Youth Homelessness Demonstration Projects (YHDP), listed in **Appendix D**., may apply for renewal or replacement, based on the Consolidated Appropriations Act of 2022, permitting expiring YHDP projects to renew or replace non-competitively in this competition. YHDP projects will be held harmless, will not be ranked, and will be conditionally approved by HUD. Agencies funded by the Three County CoC should work with CoC staff to determine application type.

Project Types:

All renewal project applications must be completed in *esnaps* (including CoC renewal, expansion or YHDP renewal and replacement projects). New Project applicants will complete the application included in this RFP and include the population(s) they will serve, the type of housing and services that will be provided, and the budget activities that are being requested **(Appendix F.)**.

A CoC can apply for new projects, as described in the NOFO, by using amounts available through the bonus process; by making funds available through reallocation; or a combination. Reallocation is the process of shifting funds in whole or in part from renewal projects to create one or more new projects without decreasing the CoC's Annual Renewal Demand (ARD). CoCs may also apply to expand renewal projects if they fall within the eligible new bonus projects types. The Reallocation Plan is found in **Appendix G.**

The Three County CoC is seeking applicants from eligible organizations to submit to HUD, for approval and implementation, **Project types** approved by the Three County CoC Board that will address critical resource needs for persons experiencing homelessness in the region. **HUD is incentivizing new projects utilizing housing subsidies (7 pts) and healthcare (7 pts), therefore the CoC will prioritize projects that can demonstrate either or both of these** (*See VII.B.6.a. for leveraging housing resources and VII.B.6.b leveraging healthcare resources.*)

In Addition, the CoC Board has set priority for new project applications *(reflected in the scoring tool)* which*:*

- Demonstrate a plan to move participants into housing within 30 days from entering the project. (*Examples: projects that have housing units included, programs that use a current inventory for housing, demonstrated agreement with area landlord(s).)*
- Fill a gap for a local housing project *(to provide the services on a project being developed/add units wherever we can.)*
- Utilize Rapid Rehousing
- Meet the needs of survivors of DV
- Demonstrate through policies that they have developed anti-discrimination practices that demonstrate racial equity measures in service delivery; and that support equal access and measures that address LGBTQ protections.

The CoC Board has set priorities for renewal projects which:

- Demonstrate robust Supportive Services and agree to follow the CoC-Wide Move-on policy
- Are meeting their target for utilization (bed and funding)
- Demonstrate through policies that they have developed anti-discrimination practices that demonstrate racial equity measures in service delivery; and support equal access and measures that address LGBTQ protections.
- Agree to follow the CoC-wide anti-discrimination and equal access policy.
- Small programs that fill pockets and are critical – high impact – protecting.

Applicants may apply for one or more than one of the projects, and in their application, could choose to subcontract a portion of the project, as part of the description. *(For example: The supportive services aspect of a project could be subcontracted to another organization in your plan and/or be used as match if paid for through other funding resources.)*

See the following sections of the FY 2022 CoC Program NOFO for information regarding New Projects: Section V.B.3.e(1) for project types; Section V.B.3.f - New Project Grant Terms; Section V.B.4.a(3) - New Projects Created Through Reallocation or CoC Bonus processes – this includes the eligible component types available (e.g., PH-PSH, PH-RRH, Joint TH-RRH); Section V.B.4.a(4) - New Projects for DV Bonus – limited to PH-RRH OR Joint TH and PH-RRH (CoC was awarded DV bonus funds for CE-SSO in FY21, so will not apply this year.); See VII.B.6.a. for leveraging housing resources, and VII.B.6.b leveraging healthcare resources.

1. Renewal Projects

Projects currently funded under this CoC Program are eligible to apply for renewal in this competition. Renewal projects apply seeking the same funded items that are in the FY21 grant. These project sub-recipients may request a reduction in rental assistance funds (if the project does not spend all funds) but may not request increases in any line item, and may not move funds between line items. Renewal Project applicants may apply for expansion of renewal projects in which a renewal project submits a new application to expand its current operations specifically to utilize DV Bonus Funds, see section V.B.4.a.(6) – Expansion Project. Renewal Project sub-recipients may also apply for consolidation to combine grants in the same component – See section V.B.4.a.(7) of the NOFO for additional information.

2. YHDP Renewal & Replacement Projects

These projects are not ranked, and will be selected for funding provided they pass project eligibility and quality threshold reviews, or renewal threshold review; as explained in section V.C.4. of the NOFO. YHDP project representatives should work with the CoC to determine if a renewal or replacement application will be submitted. YHDP Renewal projects apply seeking the same funded items that are in the FY21 grant. Replacement applications will be submitted if there are significant changes needed. See sections II.B.11.d, II.B.11.f, and V.B.4.a.(5) of the NOFO for more information.

3. NEW CoC Bonus- Permanent Supportive Housing (PSH)

These projects serve either 100% Chronically Homeless Individuals and/or Families, or designated as DedicatedPLUS project, with a demonstrated plan for healthcare access and integration into the project model. *(see section VII.B.6.b. of the NOFO, for additional details re: healthcare access and integration and here for more information on PSH https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/permanent-housing/permanent-supportive-housing/*

New permanent supportive housing projects that will serve 100% chronically homeless individuals/families or will be designated as DedicatedPLUS are eligible to apply in this competition. Permanent housing is community-based housing, the purpose of which is to provide supportive housing without a designated length of stay.

*Chronically Homeless refers to (1) An individual who: (i) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in in emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years, adding up to a total of 12 months; and (iii) Can be diagnosed with one or more of the following conditions: substance abuse disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; <u>or</u> (2) an individual who has been residing in an institutional care facility, including a jail, mental health or substance abuse facility, hospital or other similar facility for fewer than 90 days and has met all the criteria in paragraph (1) of this definition before entering that facility; <u>or</u> (2) 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 of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

* Permanent Supportive Housing (PSH) permanent (not time limited) housing in which supportive services are provided to assist homeless persons with a disability to live independently. Permanent housing is community-based housing without a designated length of stay. To be permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.

*A DedicatedPLUS project is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless youth, who at intake are:

- experiencing chronic homelessness as defined in 24 CFR 578.3;
- 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;

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- residing in transitional housing funded by a Joint TH-RRH project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
- residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
- receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

For PSH and DedicatedPLUS PSH, CoC funds may be used for: Acq, Rehab, New Construction; leasing; rental assistance; operating costs; supportive services; HMIS; and administrative costs. Definitions and guidance for these items are at 24 CFR 578.43-578.63.

These *projects should demonstrate the opportunity to utilize housing vouchers and healthcare provided through healthcare service providers.*

4. NEW CoC Bonus or DV Bonus - Rapid Rehousing (RRH)

These projects serve Homeless Individuals or Families with a demonstrated plan for healthcare access and integration into the project model. *(see section VII.B.6 of the NOFO, for additional details) and here for more information on RRH* https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/permanent-housing/rapid-re-housing/

RRH is permanent housing that provides short-term (up to three months) and medium-term (4-24 months) tenant-based [rental assistance](#) and supportive services to households experiencing homelessness. New rapid rehousing projects that will serve homeless individuals, homeless households with children are eligible to apply in this competition.

For RRH, CoC funds may be used for: supportive services; short-term (up to 3 months) and/or medium-term (3 to 24 months) tenant-based rental assistance (as necessary to help participants move as quickly as possible into permanent housing and achieve stability in that housing); and administrative costs. Definitions and guidance for these items are at 24 CFR 578.43-578.63. ***These projects should demonstrate the opportunity to utilize housing vouchers and healthcare provided through healthcare service providers.***

5. NEW CoC Bonus or DV Bonus – Joint Transitional Housing (TH) and Rapid Rehousing (RRH-PH)

For Homeless Individuals or Families with a demonstrated plan for healthcare access and integration into the project model. *(see section VII.B.6 of the NOFO, for additional details and here for more information on the Joint Component* https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/joint-th-ph-rrh/

This project type provides a new way to meet some of the pressing challenges that communities are facing. These projects provide a safe place for people to stay – transitional housing – with financial assistance and wrap around supportive services determined by program participants to help them move to permanent housing as quickly as possible.

Transitional Housing (TH) provides temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing. TH projects can cover housing costs and accompanying supportive services for program participants for up to 24 months.

RRH is permanent housing that provides short-term (up to three months) and medium-term (4-24 months) tenant-based rental assistance (As necessary to help participants move as quickly as possible into permanent housing and achieve stability in that housing); and supportive services to households experiencing homelessness; and administrative costs. Definitions and guidance for these items are at 24 CFR 578.43-578.63.

> ****It is anticipated that only one total project out of Project Types #3, #4 & #5. will be included in the CoC application to HUD in each bonus area because of the maximum funding available, unless additional funds become available through reallocation.**

In the circumstances of a **DV Bonus Project** – These funds are to support projects designed to serve survivors of domestic violence, dating violence, sexual assault, or stalking. These funds may be applied for or used to support providers with new programs dedicated to this population, or may be used to enable an existing program to expand its program by dedicating additional units, beds, persons served, or services provided to this population.

DV Bonus projects that are funded will be eligible for ongoing annual renewals through the regular CoC competition.

The CoC competition and operations are modified for projects designed to serve victims of domestic violence, in order to accommodate the particular need for privacy and safety required by these programs.

The following modifications apply:

- CoC will consider policies and procedures specific to the coordinated entry process to address privacy, confidentiality and safety for victims of domestic violence.
- The performance of CoC programs are evaluated annually and part of the performance evaluation includes review of measures in reports pulled directly by the CoC from the Homeless Management Information System (HMIS). However, domestic violence entities are prohibited from using the CoC's HMIS, but must use a comparable data system. To accommodate the different data-keeping requirements, the CoC will request that DV programs submit their own aggregated data reports for the performance evaluation.

Participant eligibility: The CoC Projects must serve people experiencing homelessness that meet HUD's definition of Homelessness. PSH projects must support those experiencing Chronic Homelessness. Other project types serve categories 1 (literally homeless), 2 (at imminent risk of homelessness), or 4 (fleeing – DV). DV Bonus projects must serve category 4. Please see HUD categories of homelessness for more information in **Appendix E**, or at https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/

Eligible Costs and Fiscal Management:

The CoC Program interim rule sets forth the costs eligible for each program component in § 578.37(a). Not all costs are eligible in each program component, and in some cases, certain costs cannot be combined in a single unit or structure. The eligible costs for contributing data to the HMIS designated by the Continuum of Care are also eligible under all components.
https://www.hudexchange.info/programs/coc/coc-program-eligibility-requirements/

The eligible costs are summarized below.

Acquisition, Rehabilitation, New Construction (PSH only)

Acquisition funds may be used to pay up to 100 percent of the acquisition cost of real property for the purpose of providing housing (PSH or TH) or supportive services to homeless persons. **Rehabilitation** funds may be used to pay up to 100 percent of the cost to rehabilitate an existing structure that is owned (not leased) by the recipient or subrecipient, and that is used to provide housing (PSH or TH) or supportive services to homeless persons. These costs may include installing cost-effective energy measures or bringing an existing structure to State and local government health and safety standards. **New Construction** funds may be used to pay up to 100 percent of the cost of new construction (§ 578.43).

Rental Assistance

Rental assistance for homeless individuals and families, including tenant-based rental assistance. Grant funds may be used for security deposits in an amount not to exceed one month's rent, as well as first and last month's rent. When rental assistance funds are used to pay rent on units, the lease must be between the program participant and the landowner. Each program participant, on whose behalf rental assistance payments are made, must pay a contribution toward rent consistent with the requirements of the interim rule.

Leasing

Funds may be used to lease individual units or all or part of structures. Rents must be reasonable and, in the case of individual units, the rent paid may not exceed HUD-determined Fair Market Rents. Leasing funds may not be used for units or structures owned by the recipient, sub-recipient, their parent

organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure without a HUD-authorized exception. When leasing funds are used to pay rent on units, the lease must be between the recipient or the sub-recipient and the landowner, with a sublease or occupancy agreement with the program participant. The recipient may, but is not required to, charge the program participant an occupancy charge, consistent with the parameters specified in the interim rule. Grant funds may be used to pay security deposits, in an amount not to exceed one month's rent, as well as last month's rent.

> **Utilities are not a leasing line item. If utilities are not provided by the landlord, utility costs are an operating cost.*

Operating Costs

Operating costs are eligible under the PH, TH, and HMIS program components. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units, including maintenance (such as scheduled replacement of major systems), repair, building security (when CoC Program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes.

> **These costs may not be combined with rental assistance costs within the same unit or structure, and operating costs are not eligible under the SSO program component.*

HMIS Costs

Costs related to contributing client data to or maintaining data in the CoC's HMIS or a comparable database for victim services providers or legal services providers are eligible costs under the PH (PSH & RRH), TH, & SSO program components. Eligible HMIS costs include hardware, equipment and software costs; training and overhead; and staffing costs associated with contributing data to the HMIS designated by the CoC for its geographic area.

Supportive Services

Supportive services are eligible costs under the PH, TH, and SSO program components. The CoC Program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. As in the past, services must be offered to residents of PSH and TH for the full period of their residence. RRH programs must require program participants to meet with a case manager at least monthly.

Services may be provided to formerly homeless individuals for up to six months after their exit from homelessness, including the six months following exit from a transitional housing project. Recipients and sub-recipients are required to perform an annual assessment of the service needs of their program participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services.

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Client Specific Supportive Services Costs:

- Reasonable one-time moving costs
- Case management
- Food—meals or groceries for program participants
- Housing search and counseling services
- Life skills training
- Outreach services
- Transportation
- Utility deposits
- Direct provision of services: 1) costs of labor, supplies, and materials; and 2) salary and benefit packages of service delivery staff

> **** CoC supportive services provided must help program participants to obtain and maintain housing.***

Project Administration

These costs include expenses related to the overall administration of the grant (24 CFR part 578.59), such as management, coordination, monitoring, and evaluation activities and environmental review. **Sub-recipient projects awarded funds may use up to 50% of the HUD-allowed administrative funds associated with the project – CAPV will retain the other half in order to administer the grant funds & the CoC Program.**

The HUD-allowed administrative costs for new grants are 10% and for renewal grants is the amount previously set by HUD in the grant inventory worksheet and shown in the attached renewal project listing. New projects are encouraged to use the full 10% administrative costs.

Grant Terms/Contracts

All successful applicants in the Three County CoC annual competition will become sub-recipients of CAPV and the agency will enter into a reimbursement contract with the CoC, once the CoC has executed a grant agreement with HUD. Community Action Pioneer Valley is the sole recipient of the grant funds. The sub-recipient policy can be found here.

Renewal projects may only apply for one-year grant terms.

HUD will allow new projects to request a longer initial grant term not to exceed 18 months (See page 35 of the NOFO for more detail).

New projects may request funds for an initial grant term of 1 year, 2 years, 3 years, 4 years, or 5 years, depending on project type and line items. The grant term may be extended consistent with 2 CFR200.308 and 2 CFR 200.309 (See page 34 of the NOFO for exceptions.). Most projects are for 1 year grant terms, which will begin in 2023.

For information regarding fiscal responsibilities, please see the sub-recipient policy and the following:

https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-financial-management/overview/?utm_source=HUD+Exchange+Mailing+List&utm_campaign=28471fc51e-CoC_ESG_VB_Financial_Management_9_8_21&utm_medium=email&utm_term=0_f32b935a5f-28471fc51e-19524653

Application Process

The FY22 CoC competition is open to renewal and eligible new projects, which will be scored competitively. The highest scoring projects will be included in the CoC application submitted to HUD. *(see sections on Funding Available (pg.7) and Application Scoring and Ranking details (pg. 18) for more information)*. Applicants will need to log in to *esnaps* to complete a renewal or new application, however due to the limited time allowed for response to the RFP, we are allowing new project applicants to complete the application outside of esnaps, as step 1 for threshold requirements and to begin scoring, and then will expect a very quick turnaround time for the esnaps application, when it is available. CoC staff will prioritize support for new project applicants in esnaps.

6. **Renewal**

The CoC will create renewal application files in *esnaps* for each existing project as soon as they have been made available by HUD, and will contact project representatives once it is created. We are awaiting HUD release of these applications. Renewal applicants must open the renewal application, fill in missing information, update existing information, and upload any required supporting documents. **Once complete, applicants must notify Keleigh Pereira** at kpereira@communityaction.us that they have completed their renewal application in *esnaps and provided all attachments needed* – prior to including match documentation, these must be sent to the CoC for approval. **DO NOT HIT SUBMIT. This must be completed by August 31, 2022, 8pm.**

7. **Expansion and New Projects**

New project applicants must submit a new application and complete the application **(Appendix F) by August 31, 2022, 8pm. (***Due to the reduced time available this year for this process, mostly complete submissions **may** still be reviewed for threshold requirements and could be given additional time for completion as long as project ranking can be completed.)*

The new project application will be set up in *esnaps* and ready for entry of application information, after first submission. CoC staff will complete parts of the esnaps application for applicant ease and then

support additional needs. Expansion and new project sponsors must open the new project application in esnaps, fill in application information, and upload required supporting documents. **Once complete, applicants must notify Keleigh Pereira** at kpereira@communityaction.us that they have completed their renewal application in *esnaps and provided all attachments needed* – prior to including match documentation, these must be sent to the CoC for approval. **DO NOT HIT SUBMIT.** The timeframe for completion of these projects will be within 1 week of the initial application due date.

Esnaps is available at www.esnaps.hud.gov. Any applicant that does not already have the ability to log in to the CoCs esnaps account must request access from Michele LaFleur at
mlafleur@communityaction.us

CoC staff can also provide technical assistance regarding esnaps use throughout the application process.

See Appendix H. Esnaps & Document Submissions for instructions for submission/use of esnaps.

Application Review

8. **Minimum Threshold Requirements:**

To be considered for funding through this RFP, projects must meet or be prepared to meet the following requirements *(Applications that do not meet this expectation will not move forward to the ranking and evaluation committee.)*

1. Submit a fully completed application with consistent data, on time;
2. Be an eligible applicant serving/planning to serve an eligible population as described in the Act, including any additional eligibility criteria for certain types of projects contained in the NOFO;
3. Be located and/or provide services in The Three County CoC's geographic area and serve people who are experiencing homelessness, demonstrate that the project is consistent with Jurisdictional Consolidated Plans;
4. Meet the threshold requirements of the FY22 CoC NOFO for new or renewal projects (see sections V.A.& V.B.3 for threshold requirements), including any required certifications & the following:

    A. Applicant & Project eligibility
    B. Project eligibility
    C. Project quality
5. Demonstrate Commitment to Housing First/Low Barrier access to housing;
6. Not debarred from receiving federal funds and in good standing with all government and funding contracts;
7. Demonstrate that the project is financially feasible;

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8. Provide documentation of organizational financial stability. (This is a review of audits or financial statements. For renewal projects, this review has been completed as part of program monitoring.);
9. Document secured minimum match;
10. Some applicants may be required to have an active SAM Registration & valid DUNs Number;
11. Demonstrate due process to participants, comply with Fair Housing, Civil Rights, VAWA, and equal access Laws;
12. Has an updated Code of Conduct compliant with 2 CFR Part 200.
13. Compliant with any lobbying – Section 1352, Title 31, US Code.

9. Local CoC Requirements:

1. Agree to work with The CoC Board & Staff on project design and implementation once selected, within 30 days of selection, including the application submission to eSNAPS office, as approved by the Ranking and Evaluation Committee and Selection team. This will include finalizing project scope and proposed budget;
2. Be prepared to begin project implementation at time of funding availability;
3. Agree to adhere to Community Action Pioneer Valley's fiscal expectations;
4. Participate in evaluation by the CoC and the Project Ranking and Evaluation committee and demonstrate a commitment to Continuous Quality Improvement;
5. Participate in and coordinate all program referrals through the Three County CoC Coordinated Entry Process as defined by the CoC Written Standards and policy manuals.
6. Comply with program requirements as per the Three County Continuum of Care & YHDP Policies and Procedures & HUD Continuum of Care Interim Rule;
8. Participate in the Homeless Management Information System (HMIS): The HMIS is an online database that enables organizations to collect data on the services they provide to people experiencing homelessness and follow any CoC training and reporting expectations. Agencies are required to participate in HMIS and enter participant data per the HMIS data standards, elements, and procedures (VSP use a comparable database).
9. Align with screening standards for program eligibility and CoC documentation requirements
11. Adhere to Housing First practices while serving households experiencing homelessness

Project Application Scoring & Ranking, Selection, and Appeal

All applications that meet the threshold requirements will be forwarded to the CoC Ranking and Evaluation Committee for evaluation, selection and ranking. See **Appendix I** for the roles and responsibilities of this committee. **Appendix A** provides the scoring rubric that will be used for Renewal Project applications and **Appendix B** provides the scoring tool for New Projects.

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10. Scoring & Ranking

Renewal Projects

Renewal Projects will be ranked according to the 2022 Three County CoC Renewal Project Outcomes, Measures, & Scoring Tool (**Appendix A**). This plan reviews past performance and is based on this year's site monitoring, equity efforts, and other evaluations. It is customized to the specific needs of a Rural Community and the unique nature of the Three County Area (MA507 Berkshire, Franklin, and Hampshire Counties). It incorporates both strategies identified in the FY22 NOFO and Technical Assistance suggestions. In addition, the CoC's ranking and evaluation committee, the CoC board, and regional network committees were involved in shaping the tool as approved by the Board.

This scoring methodology is intended to improve our local response to homelessness, align our response with regional needs, national policies and best practices, and enhance the competitiveness of our CoC application to HUD. Final scores will reflect the completeness of project applications, adherence to the FY22 Local Competition guidelines, and incorporate additional questions/responses as set forth in the NOFO. The Ranking and Evaluation Committee will score applications and submit their rankings to the CoC Board for final approval.

HMIS and Coordinated Entry Projects are administrative requirements for the CoC and must be funded. the **HMIS and Coordinated Entry grants** will receive the maximum score. In addition, **some projects which are eligible for renewal** and which have not completed an initial year of operation may be placed at the top of Tier 1, below the administrative grants because they reflect HUD priorities and have not yet been able to demonstrate performance.

A total of 225 points are available for PSH, 215 for RRH, Joint Component programs – 230 points, and TH-220. All projects are then provided with a weighted score. Between 23-29% of the points will be for contributing to systems measures outcomes; between 38-42%, depending on project type, will be for Objective Criteria.

Scores may be used to reject applications or to reduce budgets for low-scoring projects or over-funded projects. The CoC may also choose to reallocate all or part of a renewal project in order to fund a new project. See the Reallocation Plan in **Appendix G.**

New project applications

New project applications including reallocation, transition, expansion, and bonus projects will be ranked by the CoC's Ranking and Evaluation committee according to the criteria set forth in in the scoring rubric in **Appendix B.** These criteria should be addressed in your application. The scoring rubric for new projects identifies where in the application reviewers might look to find the information to score each section. *(See also Section II.A. in the NOFO to review HUD's Policy Priorities and Program Highlights to consider what might demonstrate how this project, if funded, might effectively support the overall goal of ending*

homelessness.) The CoC's Board of Directors will determine final approval for the Project Listing submission to HUD.

A total of 185 points is available for New Project Applications. Additional priority bonus points may be awarded as described in section h of Appendix B.

NOTE: The Three County CoC full consolidated application scoring will partially determine HUD approval for bonus funds. The CoC is not guaranteed the availability of these funds.

11. Selection

Once the committee completes the scoring and ranking, the committee may consider the CoC's overall funding priorities, whether the initial scoring is likely to result in any critical service gaps, and strategy related to Tier cut offs and HUD's selection process, and may make adjustments to budgets and produce the final ranking of projects to be included in the CoC application. The Committee's rationale for any adjustments will be recorded and made public with the published rankings.

Scores will determine each project's rank in the CoC's application to HUD, and rank will be the primary determinant of placement into Tier 1 and Tier 2 – see section on Funding Available for further information on the Tier Structure.

Project selections, rankings and tier allocations will be provided to applicants by written notice and published on the following website no later than **September 15, 2022**:

Three County Continuum of Care https://www.threecountycoc.communityaction.us/

12. Appeal

Applicants who believe they were denied the opportunity to participate in the local CoC process or who were rejected or reallocated may appeal directly to HUD by submitting a Solo Application.

HUD's Project Requirements:

13. Match Requirements

HUD requires all project applicants to contribute a 25% match on all budget items, except leasing dollars. Match is actual cash or in-kind resources (or a combination of the two) contributed to the grant. Guidance regarding cash and in-kind match is at 24 CFR 578.73 and can be found in the Three County CoC's sub-recipient policy at https://www.threecountycoc.communityaction.us/three-county-coc-documents.

All costs paid for with matching funds must be for activities that are eligible under the CoC interim rule or the NOFO, even if the recipient is not receiving CoC grant funds for that activity. In-kind match is the value of any real property, equipment, goods, or services contributed to the project that would have been eligible costs if the recipient/sub-recipient was required to pay for such costs with these Federal grant

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funds. Match may be from public or private resources, as long as they are not statutorily prohibited from being used as match and not otherwise leveraged. Cash match with state funding may require pre-approval from the state agency administering the respective funds. Rental income received from program participants may be used as match and must be spent on eligible activities.

All projects will be required to submit letters providing match detail and MOUs for in-kind services. Match letters should include the following information and should be addressed to Keleigh Pereira, Three County CoC Community Action Pioneer Valley, Greenfield MA 01301. (Letters should be emailed to kpereira@communityaction.us for approval prior to attaching to esnaps applications.)

- include the name of the organization providing the match contribution;
- the type of contribution (cash or in-kind match);
- the value of the contribution;
- specific services to be provided;
- the number of participants the contribution will support;
- the value of the contribution per participant;
- the name and the grant number of the project and the name of the organization and program to which the contribution will be given;
- the date the contribution will be available and the grant term;
- In total match documentation should demonstrate 25% of the full grant amount/amount applied for.

14. HMIS Cash Match

In addition to the required 25% match for an individual grant, all grant sub-recipients *may* be required to support match funding for the Region's HMIS grant which supports the CoC in meeting HUD's data collection and reporting requirements. If needed, each Project will contribute funding amounts based on the percentage of the overall award they receive. The total HMIS grant is $80,080.00 (25% of that is $20,020.00- which could be divided amongst the sub-recipients). IF this is expected for the FY22 grant terms, CAPV will provide written notice to subrecipients.

15. Reporting and Evaluation Requirements

Applicants are responsible for complying with all HUD Continuum of Care and YHDP reporting requirements. Projects may be required to track additional information inside and outside of our HMIS data tracking system. Recipients must collect and report data on their use of CoC Program funds in an Annual Performance Report (APR) and any additional reports required by HUD. For more information on the APR, see HUD's APR Training Materials (link). Ongoing technical assistance will be available for all funded projects throughout project implementation within the CoC structure, by program staff.

16. Homeless Management Information System (HMIS)

CoC sub-recipients, with the exception of entities that are victim service providers, must participate in the CoC's Homeless Management Information System (HMIS). Access to the HMIS is made available to CoC grantees and the CoC provides training in the use of the system. *Applicants should not include costs for use of HMIS in project budgets, costs included in project budgets for HMIS should be for data collection activities and other eligible costs under HMIS line item.*

Victim services providers are required to use a comparable data collection system for recording client-level data, and may include HMIS costs in program budgets. These service providers MUST provide the CoC with de-identified information & aggregated data to utilize to review performance and complete required reporting.

17. Coordinated Entry System

The CoC oversees a collaborative coordinated entry (CE) system for equitable access to housing for persons experiencing homelessness. Persons are assessed using a local assessment tool, and are placed on a waiting list which prioritizes eligible applicants by vulnerability. All CoC sub-grantees are required to participate in the CoC's coordinated entry system by attending case conferencing when needed; identifying to staff when vacancies occur; and filling vacancies through the CE system.

The coordinated entry system recognizes the unique challenges faced by survivors of domestic violence, and actively maintains safety and confidentiality with providers. Survivors and others concerned with their name being listed can participate in the coordinated entry process by coding names & personally identifying information. We are also actively working with VSPs and consultants to create a robust and equitable system of access specifically for this population.

18. Housing First

Housing First is a model of housing assistance that is offered without preconditions (such as sobriety or a minimum income threshold) or service participation requirements, and rapid placement and stabilization in permanent housing are primary goals. Project applications should demonstrate that housing & services are offered without pre-conditions or background checks; programs work to screen-in rather than screen out; eligibility documentation protocols are streamlined. In addition, CoC Program funded projects should help individuals and families move quickly into permanent housing.

19. Racial Equity

In nearly every community, Black, Indigenous and other people of color are substantially overrepresented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs. Policies, procedures and processes should incorporate how to address racial disparities affecting individuals and families experiencing homelessness. The Three County CoC has a specific racial

equity action plan and requires sub-recipient agencies to adhere to an anti-discrimination and equal access policy.

20. Persons with Lived Experience

Including persons with lived expertise in all levels of program development, monitoring and assessment is a foundational element of the CoC. The project narrative must include the ways in which the project will include the voices of people with lived experience as collaborative partners in meaningful and ongoing ways, including input for project design, rules, service practices and policies; as well as a formal grievance policy that all participants are informed of. All funding recipients will need to have more than one person with lived experience on their board or equivalent governing body, or have an avenue for homeless or formerly homeless neighbors to provide feedback. Applications will be reviewed for information regarding how agencies and programs do or plan to incorporate this in their program and system development.

21. Trauma Informed Care

Trauma Informed Care is a strengths-based framework that is grounded in an understanding of and responsiveness to the impact of trauma experienced by people experiencing homelessness. Project applications should demonstrate that supportive services will include this perspective.

For Applicant Questions and CoC Technical Support:

Keleigh Pereira, CoC Program Director/Representative for the Collaborative Applicant. kpereira@communityaction.us or

Michele LaFleur, CoC Data and Evaluation Manager/HMIS lead. mlafleur@communityaction.us

Individuals with Disabilities may contact the CoC if they are in need of alternative, accessible application formats.

Appendix:

A. *2022 Three County CoC Renewal Project Outcomes, Measures, & Scoring Tool*
B. *2022 Three County CoC New Project Scoring tool*
C. *2022 Three County CoC Renewal Project Listing*
D. *2022 Three County CoC YHDP Project Listing*
E. *HUD Categories of Homelessness – Definitions*
F. *2022 New Project Application –microsoft word version available at*
   https://www.threecountycoc.communityaction.us/news-events
G. *CoC Reallocation and Transition Plan*
H. *Esnaps & Document Submissions*
I. *Ranking and Evaluation Committee Roles and Responsibilities*