

Three County Continuum of Care Partner Procurement Announcement

Background of the Continuum of Care:

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.

In Massachusetts, there are 12 Continuum of Care based on geographic service areas and they collaborate through a state-wide CoC network. 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 acts as the recipient for all funding, and applicants approved for funding are 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.

New Partner Opportunity:

Beginning July 1, 2023, **48 beds of Permanent Supportive Housing** (PSH - housing and supportive services to assist homeless persons with a disability to live independently; see Appendix 1 for Definitions & Key Terms) across Franklin, Hampshire and Berkshire counties, previously managed by the Center for Human Development (CHD), will be available. Due to the timing of the FY2022 CoC Notice of Funding Opportunity (NOFO) by the U.S. Department of Housing & Urban Development (HUD), the CoC submitted an application that included this project, in order to retain the resource for the community and to search for a new partner agency or agencies. This renewal project has been funded for many years and is a valuable resource in our CoC region.

Interested providers are encouraged to review the FY2022 CoC NOFO which can be found on the HUD Exchange at: <https://www.hudexchange.info/programs/e-snaps/fy-2022-coc-program-nofa-coc-program-competition/>

Timeline:

- Applications available: February 28, 2023.
- An Information Session will be held on March 10, 2023 12:30-2:00pm. Applicants are strongly encouraged to attend. Please email Emma Coles at ecoles@communityaction.us to register.
- **Application Deadline: March 31, 2023. Online Application [link](#).** See Appendix 4 for the application questions. *Note the online application does not have the ability to save in progress.*
- Project Interviews with Review Committee: April 10 and April 11, 2023.
- Awards will be made on or near April 14, 2023.
- Contract negotiations and transitions with CHD: April 21, 2023 – June 30, 2023.

About the Project:

CHD's Permanent Supportive Housing Program is contracted for 48 beds of PSH to serve Hampshire, Berkshire, and Franklin County. Services have included: Housing support, connection to entitlements, connection to mental health and substance abuse support as needs, as well as support for increasing income through employment and other entitlements. CHD served individuals directly referred from the CoC's Coordinated Entry program.

The Three County CoC is looking for a new provider, or providers, to continue this project. There are currently 44 beds occupied and the CoC is looking for new partners to take over existing, occupied units *with as little disruption to tenants as possible.*

Interested providers may apply for the entire project across all three counties, or apply for one or more counties, depending upon geographic presence/ability to provide services. Funding availability by county, and in total, is delineated below.

The project must provide housing (see Leasing under Eligible Costs below) and supportive services (see Supportive Services under Eligible Costs below) to assist homeless persons with a disability to live independently. Priority will be given to partners who can demonstrate experience in these areas and who can demonstrate a geographic presence in the counties for which they are proposing.

The total contract is \$741,202 for a one-year period (July 1, 2023-June 30, 2024) and can be broken down by county as follows:

| | | | | | |
|------------------------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| Contracted Beds: | 48 | | | | |
| Current Beds: | 44 | 27 | 7 | 10 | TOTAL |
| County: | 3 Counties | Franklin | Hampshire | Berkshire | |
| Pro-rated by # Beds: | 100% | 61.36% | 15.91% | 22.73% | |
| Leasing | \$381,368.00 | \$234,021.27 | \$60,672.18 | \$86,674.55 | \$381,368.00 |
| Supportive Services | \$232,388.00 | \$142,601.73 | \$36,970.82 | \$52,815.45 | \$232,388.00 |
| Operating | \$77,575.00 | \$47,602.84 | \$12,341.48 | \$17,630.68 | \$77,575.00 |
| HMIS | \$7,558.00 | \$4,637.86 | \$1,202.41 | \$1,717.73 | \$7,558.00 |
| Admin (50%) | \$21,156.50 | \$12,982.40 | \$3,365.81 | \$4,808.30 | \$21,156.50 |
| TOTAL SUBRECIPIENT CONTRACT | \$720,045.50 | \$441,846.10 | \$114,552.69 | \$163,646.70 | \$720,045.50 |
| CAPV Admin (50%) | \$21,156.50 | \$12,982.40 | \$3,365.81 | \$4,808.30 | \$21,156.50 |
| TOTAL CONTRACT | \$741,202.00 | \$454,828.50 | \$117,918.50 | \$168,455.00 | \$741,202.00 |
| Match Requirement | \$89,958.50 | \$55,201.81 | \$14,311.58 | \$20,445.11 | \$89,958.50 |

(Match =25% OF total contract less leasing)

While the above represents what is currently in the FY22 CHD PSH Project budget, Applicants should be aware that there may be an opportunity to move funds between line items. Significant changes (e.g. moving 10% of a major line item) would require HUD’s approval and therefore cannot be guaranteed, but there is a budget amendment process and procedures in place for making such requests.

Eligible Costs:

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 by major line item for this project are summarized below. **Note that staff and overhead costs related to carrying out each eligible activity are eligible as part of that activity and should be charged to that activity’s respective line item-not charged to Project Administration.** See the “Project Administration” and “Indirect Costs” sections on pages 6 -7 of this announcement for further information.

Supportive Services

CoC-funded projects (including PSH) must include the provision of Supportive Services, either by the subrecipient or a third-party service. Supportive Services are necessary to assist program participants in obtaining and maintaining housing. Projects must: conduct an ongoing assessment of the supportive

services needed by the residents of the project; the availability of such services; the coordination of services needed to ensure long-term housing stability; and must make adjustments as appropriate.

Services must be offered to residents for the entire duration of enrollment in the project (while still experiencing homelessness and searching for a unit as well as after exiting homelessness and entering housing). Supportive Services may be required for up to 6 months after the participant exits the project to assist the participant in maintaining long-term housing stability.

The CoC Program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services. Direct staff costs for managing supportive service activities (such as case management), may also be incorporated in the supportive services budget.

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

For more information on Supportive Services Eligible Costs, see [Supportive Services – CoC At A Glance – Virtual Binders \(hudexchange.info\)](https://www.hudexchange.info/public/coa/Supportive-Services-CoC-At-A-Glance-Virtual-Binders).

Client Specific Supportive Services Eligible Cost Categories:

- Annual Assessment of Service needs
- Assistance with Moving Costs
- Case Management
- Child Care
- Education Services
- Employment Assistance and Job Training
- Food—Meals or Groceries for Program Participants
- Housing Search /Counseling Services
- Legal Services
- Life Skills Training
- Mental Health Services
- Outpatient Health Services
- Outreach Services
- Substance Abuse Treatment Services
- Transportation
- Utility Deposits
- Direct Provision of Services — Staff, Space and Overhead

Operating Costs

Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units including maintenance 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. Staff costs for time and expenses for carrying out eligible operating activities can be included.

Note that utilities for most units in Franklin and Berkshire County are not included in the rent, and must be paid for by the subrecipient and billed to the Operating line item. It is suggested that Applicants budget a minimum of:

- **\$46,000 for Franklin County units**
- **\$16,000 for Berkshire County units.**

****Operating costs may not be combined with rental assistance costs within the same unit or structure.***

For more information on Operating Eligible Costs, see [Operating Costs – CoC At A Glance – Virtual Binders \(hudexchange.info\)](https://hudexchange.info).

Operating Eligible Cost Categories:

- Maintenance/Repair (not included in the lease)
- Insurance
- Building Security
- Utilities (Electricity, Water, and Gas)
- Furniture (that remains with the project)
- Equipment (leasing and buying-must remain with project)
- Staff time carrying out activities

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. 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. For more information on HMIS Eligible Costs, see [Homeless Management Information Systems \(HMIS\) – CoC At A Glance – Virtual Binders \(hudexchange.info\)](https://hudexchange.info).

HMIS Eligible Cost Categories:

- Hardware
- Software
- Equipment
- Personnel

- Attending Trainings
- Space, Utilities and Overhead

Leasing

Funds may be used to lease individual units, or all or part of structures. Rents must be reasonable and may not exceed either HUD-determined Fair Market Rents (issued yearly) or the rent reasonableness standard (if calculated per unit). 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. 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. Staff costs for carrying out eligible activities such as processing rental payments, examining participant income and family composition, and inspecting units for compliance with housing quality standards (HQS) may be included.

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

For more information on Leasing Eligible Costs, see [Leasing – CoC At A Glance – Virtual Binders \(hudexchange.info\)](http://hudexchange.info)

Project Administration

These costs include **direct** expenses related to the **overall administration of the grant** (24 CFR part 578.59), such as staff salary and fringe for **general** management, oversight, and coordination (§ 578.59(a)(1)); Training on CoC requirements and attending HUD-sponsored CoC trainings (§ 578.59(a)(2)).

Note that **staff and overhead related to carrying out each activity, are eligible as part of that activity and should be billed under that activity's respective line item - not billed to Project Administration** (see "Indirect Costs" below). For example, **direct** management of an activity under Supportive Services, such as case management, would be eligible to be billed under Supportive Service and should be included in the Supportive Services budget.

Projects 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.

Indirect Costs

Subrecipients are allowed to capture indirect (10% or their federally approved indirect cost rate) on certain line items through the use of **Modified Total Direct Costs (MTDC)**. Those indirect charges must be

made to the direct costs line item. For example, in order to charge an indirect rate to direct case management staff charges, the indirect rate must be charged under the Supportive Services line item. **There is no separate indirect cost line item in a HUD/CoC budget.**

See **Summary of Allowable MTDC** on page 15 of the following: [Indirect Cost Toolkit for Continuum of Care and Emergency Solutions Grants Programs \(hudexchange.info\)](http://hudexchange.info)

Eligible Applicants:

In order to apply for funding, an applicant must be considered “eligible”. Nonprofit organizations, States, local governments, and instrumentalities of State or local governments are eligible to apply for grants. For-profit entities are not eligible to apply to be a recipient or sub-recipient of CoC grant funds. In addition, HUD has established further eligibility requirements for applicants of all HUD grant programs, including the CoC. **Those eligibility requirements include, but are not limited to:** no outstanding delinquent federal debts, no debarred or suspended applicants, pre-selection Review of Performance, sufficient financial management system, no false statements in an application, mandatory disclosure requirement, and prohibition against lobbying.

Eligible applicants can be organizations that are currently funded through the CoC and want to expand the programming, or new applicants. All applicants must fill out the Application.

Minimum Threshold Requirements:

To be considered for HUD/CoC funding through this Project Announcement, applicants must meet or be prepared to meet the following requirements:

1. Submit a fully completed application with consistent data, on time;
2. Be an eligible applicant with experience serving an eligible population as described in the Act;
3. Be located and/or provide services in The Three County CoC’s geographic area and serve people who are experiencing homelessness;
4. Demonstrate commitment to Housing First/No Barrier access to housing (i.e. that housing & services are offered without pre-conditions or background checks and that programs work to screen-in rather than screen out);
5. Not debarred from receiving federal funds and in good standing with all government and funding contracts;
6. Demonstrate that operating the project and meeting the match requirement is financially feasible;
7. Provide documentation of organizational financial stability (This is a review of audits or financial statements if applicant is not a current CoC subrecipient);
8. Document secured minimum match; Provide match letter specifying amount, type of match (cash and/or in-kind), source (e.g. cash donations, program income, grant), and if in-kind the value of the contribution with a third-party MOU); See Match Requirements below;
9. SAM Registration & valid DUNs Number;

10. Demonstrate due process to participants, comply with Fair Housing, Civil Rights, VAWA, and equal access Laws;
11. Have an updated Code of Conduct compliant with 2 CFR Part 200;
12. Compliant with any lobbying – Section 1352, Title 31, US Code.

Three County CoC Additional Requirements:

1. Agree to work with The CoC Board & Staff on project design, implementation and budget including any required submissions to eSNAPS office and HUD Field Office;
2. Be prepared to begin project implementation at the time of funding availability;
3. Review and sign Three County CoC Subrecipient Manual;
4. Agree to adhere to Community Action Pioneer Valley's fiscal expectations;
5. Participate in evaluation by the CoC and the Project Ranking and Evaluation committee and demonstrate a commitment to Continuous Quality Improvement;
6. 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;
7. Comply with program requirements as per the Three County Continuum of Care 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;
10. Adhere to Housing First practices while serving households experiencing homelessness.

HUD's Project Requirements:

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>. Also, see [Match – CoC At A Glance – Virtual Binders \(hudexchange.info\)](https://www.hudexchange.info).

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 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 (i.e., Program Income) may be used as match and must be spent on eligible activities.

This project will generate **Program Income** by the collection of tenant rents (e.g., 30% of adjusted household income). Program Income received by subrecipient may be used for eligible activities **and can be considered a match source**. Program Income varies, but for match budgeting purposes the following is an annual estimate of tenant rent collections by county:

- **Franklin: \$43,000**
- **Berkshire: \$16,000**
- **Hampshire: \$11,000**

All project applicants 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 Janna Tetreault, Acting Director of Community Services, Community Action Pioneer Valley, 393 Main St., Greenfield MA 01301, and 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 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 (less leasing).

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 contract period, CAPV will provide written notice to subrecipients during the NOFO application process.

Reporting and Evaluation Requirements

Applicants are responsible for complying with all HUD Continuum of Care 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](#)). And the Three County CoC Subrecipient APR Guide on our website ([84ef6c_24b0fc063b494ddc83d3e10e9842f7cb.pdf \(communityaction.us\)](#)). Ongoing technical assistance will be available for all funded projects throughout project implementation within the CoC structure, by program staff.

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). Visit the CoC website for further information regarding the Three County CoC HMIS and related Data Agreement & Provider Release, Data Collection Notice, Privacy Notice Template, and the Three County CoC Privacy & Security Plan ([Data Collection, Reporting, & HMIS | 3 County CoC \(communityaction.us\)](#)). 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.*

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 By Names List (BNL) which prioritizes eligible applicants by vulnerability. All CoC subrecipients 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. Visit the CoC's website for further information including a three County CoC Coordinated Entry Video ([Coordinated Entry | 3 County CoC \(communityaction.us\)](#)).

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 confidentiality can participate in the Coordinated Entry process by coding names & personally identifying information. We are also actively working with Victim Service Providers and consultants to create a robust and equitable system of access specifically for this population.

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.

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.

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 application 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.

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.

Project Application Scoring & Ranking, Selection, and Appeal

All applications that meet the threshold requirements will be reviewed by a subcommittee of the CHD Transition Work Group (an ad hoc Committee of CoC Members) for evaluation, selection and ranking. **Appendix 3** provides the scoring tool for Partner Procurement Applications.

Scoring & Selection

The CHD Transition Work Group Subcommittee will review the applications in accordance with the scoring rubric in **Appendix 3**. These criteria should be addressed in your application. The CoC's Board of Directors will determine final approval for the new partner selected for this PSH Project.

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 the CoC Board Chair.

Grant Terms/Contracts

The successful applicant(s) will become sub-recipients of CAPV and 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](#).

Information regarding subrecipient policies, expectations, and billing requirements can be found in the [Three County CoC Subrecipient Manual](#) and additional Fiscal Management information can be found on the [HUD Exchange website](#).

APPENDIX 1

Definitions & Key Terms:

- **Chronically Homeless** –See Appendix 2 –Categories of Homelessness
- **Collaborative Applicant**-The eligible applicant that has been designated by the CoC to collect and submit the CoC Registration, CoC Consolidated Application, and apply for CoC planning funds on behalf of the CoC during the CoC Program Competition. For the Three County CoC, this is Community Action Pioneer Valley.
- **Continuum of Care (CoC)**-The group organized to carry out the responsibilities required of the CoC and that is composed of representatives of organizations, including nonprofit homeless providers, victim services providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.
- **Coordinated Entry (CE)**-A process developed to ensure that all people experiencing a housing crisis have fair and equal access to housing services and assistance. Through Coordinated Entry, households in need of assistance are quickly identified, assessed for, referred and connected to housing and assistance based on their strengths and needs
- **Eligible Applicant**-A private nonprofit organization, State, local government, or instrumentality of the State and local government.
- **Homeless Management Information System (HMIS)**-A computerized data collection application designed to capture client-level information over time on the characteristics of service needs of men, women, and children experiencing homelessness, while also protecting client confidentiality. It is designed to aggregate client-level data to generate an unduplicated count of clients served within a community's system of homeless services. An HMIS may also cover a statewide or regional area, and include several CoCs. The HMIS can provide data on client characteristics and service utilization.
- **Housing First**-A model of assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold).
- **Housing Quality Standards (HQS)**-The HUD minimum quality standards for housing for tenant-based programs such as the Section 8 program. HQS standards are required both at initial occupancy and during the term of the lease and to ensure that the housing unit is decent, safe and sanitary.

- **Notice of Funding Opportunity (NOFO)**-is a notice published each year in grants.gov for HUD's Discretionary Funding Programs. This notice describes the type of funding available on a competitive basis. The deadline for submission is typically 60 to 90 days from the date of NOFA publication
- **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 2, or at <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/>
- **Permanent Supportive Housing (PSH)**- is 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.
- **Recipient** - The agency or organization awarded the CoC HUD funds. In this Continuum, the Collaborative Applicant is the recipient.
- **Renewal Programs** - Previously funded projects and activities that a community is proposing for continuation of funding.
- **Subrecipient** - A private nonprofit organization, State, local government, or instrumentality of State or local government that receives a sub grant from the recipient to carry out a project
- **Trauma-Informed Care (TIC)** - An approach that recognizes the widespread impact of trauma and understands potential paths for recovery, recognizes the signs and symptoms of trauma in clients, families, staff and others involved with the system, responds by fully integrating knowledge about trauma into policies, procedures and practices and seeks to actively resist re-traumatization

APPENDIX 2

Definitions of Homelessness (Per HUD)

Homeless Person:

As defined by McKinney Act (42 U.S.C 11302), a homeless person is:

- A person sleeping in a place not meant for human habitation or in an emergency shelter; and
- A person in transitional housing for homeless persons who originally came from the street or an emergency shelter.

Chronically Homeless Individual:

- A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:
 - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and
 - Has been homeless and living as described for at least 12 months* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described.
- An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility**; or
- 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 of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

CATEGORIES OF HOMELESSNESS PER HUD

The following describes the categories of homelessness as defined by HUD. For information about how to document homelessness per category type, please refer to [this form](#).

Category 1: Literally Homeless

1. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - a. Has a primary nighttime residence that is a public or private place not meant for human habitation;
 - b. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or
 - c. Is exiting an institution where they have 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 2: Imminent Risk of Homelessness

1. An individual or family who will imminently lose their primary nighttime residence, provided that:
 - a. Residence will be lost within 14 days of the date of application for homeless assistance;
 - b. No subsequent residence has been identified; and
 - c. The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Category 3: Homeless Under Other Federal Definitions

1. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - a. Are defined as homeless under the other listed federal statuses;
 - b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to homeless assistance application;
 - c. Have experience persistent instability as measured by two moves or more during the preceding 60 days; and
 - d. Can be expected to continue in such a status for an extended period of time due to special needs or barriers.

Category 4: Fleeing/ Attempting to Flee Domestic Violence

1. Any individual or family who:
 - a. Is fleeing, or is attempting to flee, domestic violence;
 - b. Has no other residence; and
 - c. Lacks the resources or support networks to obtain other permanent housing.

APPENDIX 3

Project Application Evaluation Criteria and Scoring

| | |
|---|--|
| Applicant Agency | |
| New Applicant or Current/Former CoC Subrecipient? | |
| If new, did they meet HUD Threshold? (Questions 10-36) | |
| <i>Note: If Applicant does not meet HUD threshold requirements, they are not eligible to become a CoC Subrecipient.</i> | |

| <u>Section</u> | <u>Total Points</u> | <u>Score</u> |
|---|---------------------|----------------|
| A. Fiscal (Questions 37-51) | 40 Points | ___/40 |
| B. Experience (Questions 52-57) | 50 Points | ___/50 |
| C. Project Description (Questions 58-66) | 45 Points | ___/45 |
| D. Equity Factors (Questions 67-73) | 30 Points | ___/30 |
| Total | Points | ___/165 |

Fiscal – 40 Points

| <u>Criteria</u> | <u>Response Found</u> | <u>Points Spread</u> | <u>Points</u> |
|--|--|--|---------------|
| Agency does not have a history of returning funds, has no outstanding financial obligations to fed or state agencies, and (if a current subrecipient) has consistently drawdown funds at least quarterly | Questions 37-42 | Meets criteria = 10 points Addressing via Actions = 5 points Does not meet criteria= 0 points | |
| Project is cost-effective, budgeted costs are reasonable, allocable, and allowable. | Questions 43-49, 51 | Meets all criteria = 10 points Budget requires changes = 5 points Does not meet criteria = 0 points | |
| Documented match amount meets HUD requirements | Question 50 | Meets all criteria = 10 points Requires some changes = 5 points Does not meet criteria = 0 points | |
| Agency’s most recent audit: 1) found no exceptions to standard practices; 2) identified agency as ‘low-risk’, and 3) indicates no findings. | Review of Audit findings/management letter | Meets 3 criteria = 10 points Findings but addressed = 5 points Findings not addressed = 0 points | |
| PROJECT SCORE: | | | |

Experience – 50 Points

| <u>Criteria</u> | <u>Response Found</u> | <u>Points Spread</u> | <u>Points</u> |
|--|-----------------------|---|---------------|
| Experience of the agency in working with and leveraging Federal and state funds. | Question 52 | Has significant experience = 10 points Has some experience = 5 points Has no experience = 0 points | |
| Experience of the agency in working with the proposed population and in providing housing similar to that proposed in the application. | Question 53 | 5 yrs experience with population AND 5 yrs experience in providing housing = 15 Points 5 yrs experience with population OR 5 yrs experience providing housing = 10 points Experience but under 5 yrs = 5 points No experience = 0 points | |
| Experience and/or presence of the agency in the county/counties they are applying for. | Question 54 | +5 yrs experience and/or presence in the county = 15 points 3-5 yrs experience/presence = 10 points <3 yrs experience/presence = 5 points No Experience/ presence = 0 points | |
| Experience with using a Housing First approach. Include 1) eligibility criteria; 2) | Questions 55, 56, 57 | Experience using Housing First approach = 10 points | |

| | | | |
|--|--|--|--|
| <p>process for accepting new program participants' 3) process and criteria for exiting participants. Must demonstrate there are no preconditions to entry, allowing entry regardless of past substance abuse, income, criminal records (with exceptions of restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, self-disclosed or perceived sexual orientation, gender identity or gender expression. Must demonstrate the project has a process to address situations that may jeopardize housing or project assistance to ensure that project participation is terminated in only the most severe cases.</p> | | <p>Experience using Low Threshold approach = 5 points</p> <p>No experience using Housing First or Low Threshold = 0 points</p> | |
| PROJECT SCORE: | | | |

Project Description – 45 Points

| <u>Criteria</u> | <u>Response Found</u> | <u>Point Spread</u> | <u>Points</u> |
|--|-----------------------|---|---------------|
| Project narrative and operational design | Question 58 | <p>Project design addresses all components=15 points</p> <p>Project design needs work=10 points</p> <p>Project design needs substantial work=5 points</p> <p>Does not understand project components=0 pts</p> <ul style="list-style-type: none"> • | |
| Demonstrates that the type and scale of all the supportive services, regardless of funding source, meets the needs of program participants to be served and operates from a trauma informed care perspective | Question 59 | <p>Meets criteria = 5 points</p> <p>Needs some work= 2.5 points</p> <p>Does not meet criteria = 0 points</p> | |
| Describes how program participants will be assisted to increase employment and/or income and to maximize their ability to live independently | Question 60 | <p>Meets criteria = 5 points</p> <p>Needs some work= 2.5 points</p> <p>Does not meet criteria = 0 points</p> | |
| Has plan to coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible | Question 61 | <p>Meets criteria = 5 points</p> <p>Needs some work= 2.5 points</p> <p>Does not meet criteria = 0 points</p> | |

| | | | |
|---|---------------------|--|--|
| Demonstrates that program participants will be assisted in accessing SSI/SSDI | Questions 62 and 63 | Meets criteria = 5 points Needs some work= 2.5 points Does not meet criteria = 0 points | |
| Describes viable plan for building relationships with landlords | Question 64 | Meets criteria = 5 points Needs some work= 2.5 points Does not meet criteria = 0 points | |
| Leverages housing resources with housing subsidies or units not funded through the CoC or ESG program | Questions 65 and 66 | No points spread (5 points) | |
| PROJECT SCORE: | | | |

Equity Factors – 30 Points

| <u>Criteria</u> | <u>Response Found</u> | <u>Points Spread</u> | <u>Points</u> |
|--|-----------------------|---|---------------|
| Has plan to include PLE as collaborative partners through membership on the Board of Directors and providing input for project design, rules, service practices and grievance policies. | Question 67 | <p>Already in place, satisfactory plan = 5 points</p> <p>Plan to implement/plan needs work = 2.5 points</p> <p>No Plan/unsatisfactory answer= 0 points</p> | |
| Inclusion of under-represented individuals in managerial and leadership positions. | Question 68 | <p>Already in place, satisfactory plan = 5 points</p> <p>Plan to implement/plan needs work = 2.5 points</p> <p>No Plan/unsatisfactory answer= 0 points</p> | |
| Agency has reviewed internal policies and procedures with an equity lens demonstrates demonstrate racial equity measures in service delivery; and policies have been introduced in order to ensure safety, privacy, respect, and access regardless of gender identity or sexual orientation for LGBTQ+ persons | Question 69 | <p>Already in place, satisfactory plan = 5 points</p> <p>Plan to implement/plan needs work = 2.5 points</p> <p>No Plan/unsatisfactory answer= 0 points</p> | |

| | | | |
|--|---------------------|---|--|
| Plan for reviewing program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/or age. | Questions 70 and 71 | <p>Already in place, satisfactory plan = 5 points</p> <p>Plan to implement/plan needs work = 2.5 points</p> <p>No Plan/unsatisfactory answer= 0 points</p> | |
| Plan to review whether programmatic changes are needed to make program participant outcomes more equitable and developed a plan to make those changes. | Question 72 | <p>Already in place, satisfactory plan = 5 points</p> <p>Plan to implement/plan needs work = 2.5 points</p> <p>No Plan/unsatisfactory answer= 0 points</p> | |
| Project utilization of Coordinated Entry System while maintaining equity in housing placement and participants served. | Question 73 | <p>Already in place, satisfactory plan = 5 points</p> <p>Plan to implement/plan needs work = 2.5 points</p> <p>No Plan/unsatisfactory answer= 0 points</p> | |
| PROJECT SCORE: | | | |

Total Points: _____ / 165

Signature of Reviewer Date

Print Name of Reviewer

APPENDIX 4

Three County CoC Partner Procurement Application

Below are the questions that make up the Three County Continuum of Care Partner Procurement Application. This PDF contains links for specific laws and regulations that CoC subrecipients must follow. There is also additional detail about eligible costs. ****If you are a current subrecipient, you do not have to fill out Part II.**

Please remember to email the following required documentation to jtetreault@communityaction.us:

- A copy of your agency's two most recent annual audited financial statements;
- A Match letter on agency letterhead and signed by an authorized signer; and
- Proof of your federally approved indirect cost rate (if applicable).

Applications and documentation are due by March 31, 2023.

Part I: Applicant Information

- 1. Agency Name:**
- 2. Primary Agency Contact Name:**
- 3. Title:**
- 4. Email address:**
- 5. Phone number:**
- 6. Which county/counties of this project are you interested in applying for? You may select more than one.**
 - a. Berkshire
 - b. Franklin
 - c. Hampshire
- 7. What is your total agency budget for current fiscal year?**
- 8. What percentage of your overall budget is Federal Funding?**
- 9. Are you a current or former Three County CoC subrecipient?**
 - a. Yes

- b. No

Part II: HUD Threshold (New Applicants)

- 10. Does your agency provide for the participation of MORE than one homeless or formerly homeless individual on the Board of Directors or other equivalent policymaking entity?**
 - a. Yes-Board
 - b. Yes-Other
 - c. No
- 11. If "Yes - Other", please describe the entity, its nature, and how they participate:**
- 12. If "No", please explain how you plan to engage in this expectation:**
- 13. Does your agency or program have a relational process for receiving and incorporating feedback from persons with lived experience?**
 - a. Yes
 - b. No
- 14. If "Yes", please explain this process:**
- 15. Does your agency have an independent financial audit completed within 6 months of the end of the fiscal year? [Please note that a copy of your agency's two most recent annual audited financial statements must be sent to jtetreault@communityaction.us]**
 - a. Yes
 - b. No
- 16. Does your agency have an active registration in SAM.gov?**
 - a. Yes
 - b. No
- 17. Please list the SAM.gov Unique Entity Identifier (UEI):**
- 18. Does your agency have an active DUNS number?**
 - a. Yes
 - b. No
- 19. Please list the DUNS number:**
- 20. Does your agency have experience with receiving federal funding to operate similar programming?**
 - a. Yes
 - b. No

21. Please describe this experience:

22. Does your agency have any delinquent federal debt?

- a. Yes
- b. No

23. Please explain:

24. Does your agency provide reasonable accommodations to meet the unique needs of program participants with physical, cognitive, or behavioral disabilities and provide specialized resources for participants with Limited English Proficiency and/or cultural challenges (i.e. ramps, Spanish language forms, etc.)?

- a. Yes
- b. No

25. Please explain any specialized resources and reasonable accommodations available:

26. Does your agency provide due process to participants who are asked to leave any program?

- a. Yes
- b. No

27. Does your agency comply with [Public Law 90-284](#) referring to the Fair Housing Act (42 USC 3601-20), as amended?

- a. Yes
- b. No

28. Does your agency have any unresolved Fair Housing or Civil Rights matters?

- a. Yes
- b. No

29. If "Yes", please explain any unresolved Fair Housing or Civil Rights matters:

30. Is your agency willing to update its Code of Conduct so that it is compliant with [2 CFR Part 200](#) and submit it to HUD?

- a. Yes
- b. No

31. Is your agency under debarment or suspension from doing business with the Federal Government and/or on the Federal do not pay list?

- a. Yes
- b. No

32. Is your agency in compliance with the prohibition against lobbying [Section 1352, Title 31, U.S. Code](#)?

- a. Yes
- b. No

33. Does your agency comply with HUD directives regarding Equal Access to Housing [Docket Number: HUD-2015- 0104; Docket Name: FR-5863-P-01](#)?

- a. Yes
- b. No

34. Does your agency have any other non-HUD funded homeless projects?

- a. Yes
- b. No

35. Does your agency agree to collect/enter the data from funded homeless projects into the local HMIS and provide required information for reporting to HUD? (Or for VSPs, a comparable database)

- a. Yes
- b. No

36. Does your agency agree to prioritize participants for this project through the Coordinated Entry Process?

- a. Yes
- b. No

Part III: Funding Questions (New Applicants and Current/Former Subrecipients)

37. Have you returned any funds to HUD (or other federal government agency) or the state on any existing grants in the last two years?

- a. Yes
- b. No
- c. N/A

38. If "Yes", how much has been returned? What is the reason that the funds have been returned? What actions are you taking to ensure full spending?

39. Do you have any outstanding obligation to HUD, other federal or state agencies that is in arrears or for which a payment schedule has not been agreed upon?

- a. Yes

- b. No
- c. N/A

40. If "Yes", how much has been returned? What is the reason that the funds have been returned? What actions are you taking to ensure full spending?

41. Have you consistently drawn down funds at least quarterly on all HUD CoC grants in the last two years?

- a. Yes
- b. No
- c. N/A

42. If "No", what is the reason that the funds have not been drawn down? What actions are you taking to ensure timely draw down?

43. Does this project propose to allocate funds according to a federally approved indirect cost rate? [Please note that proof of your federally approved indirect cost rate (if applicable) must be sent to jtetreault@communityaction.us]

- a. Yes
- b. No

Part IV: Budget

This section is intended for the CoC to get a general idea of how applicants are thinking about the budget. Selected applicants will have the opportunity to work with the CoC staff to finalize the budget in greater detail, including the Leasing portion of the budget.

Supportive Services Budget Detail

Eligible Costs:

- Annual Assessment of Service needs
- Assistance with Moving Costs
- Case Management
- Child Care
- Education Services
- Employment Assistance and Job Training
- Food—Meals or Groceries for Program Participants

- Housing Search /Counseling Services
- Legal Services
- Life Skills Training
- Mental Health Services
- Outpatient Health Services
- Outreach Services
- Substance Abuse Treatment Services
- Transportation
- Utility Deposits
- Direct Provision of Services — Staff, Space and Overhead

For more details on these Eligible Costs, please review: [Supportive Services – CoC At A Glance – Virtual Binders \(hudexchange.info\)](https://www.hudexchange.info)

44. Supportive Services Breakdown by Eligible Cost Category [Please include quantity, description, and dollars]:

45. Total Supportive Service Dollars (\$) Requested:

Operating Budget Detail

Eligible Costs:

- Maintenance/Repair (not included in the lease)
- Insurance
- Building Security
- Utilities (Electricity, Water, and Gas)
- Furniture (that remains with the project)
- Equipment (leasing and buying—must remain with the project)
- Staff time carrying out activities

Please note that utilities for most units in Franklin and Berkshire County are not included in rent, and must be paid for by the subrecipient & billed to Operating line item. It is suggested that Applicants budget a minimum of \$46,000 for Franklin units and \$16,000 for Berkshire units.

For more details on these Eligible Costs, please review: [Operating Costs – CoC At A Glance – Virtual Binders \(hudexchange.info\)](#)

46. Operating Costs Breakdown by Eligible Cost Category [Please include quantity, description, and dollars]:

47. Total Operating Dollars (\$) Requested:

HMIS Budget Detail

Eligible Costs:

- Hardware
- Software
- Equipment
- Personnel
- Attending Trainings
- Space, Utilities, and Overhead

For more details on these Eligible Costs, please review: [Homeless Management Information Systems \(HMIS\) – CoC At A Glance – Virtual Binders \(hudexchange.info\)](#)

48. HMIS Breakdown by Eligible Cost Category [Please include quantity, description, and dollars.]:

49. Total HMIS Dollars (\$) Requested:

Match Sources & Amounts

Match obligation for this project is 25% of overall budget, less any leasing funds.

This project will generate Program Income by the collection of tenant rents (e.g. 30% of adjusted household income). Program Income received by subrecipient may be used for eligible activities and can be considered a match source. Program Income varies, but for match budgeting purposes the following is an annual estimate of tenant rent collections by county:

- Franklin: \$43,000
- Berkshire: \$16,000
- Hampshire: \$11,000

Please note that a match letter on agency letterhead must be signed by an authorized signer and sent to jtetreault@communityaction.us

50. Please list your match source(s), if it is cash or in-kind; if it is a private or government contribution; and the amount of commitment.

Summary Budget

51. Please provide the Total Assistance Requested for One-Year Grant Term in dollars (\$) for all of the following:

- Leasing (units and dollars listed in [Partner Procurement Announcement](#) by county)
- Supportive Services
- Operating
- HMIS
- Direct Admin
- Total Budget (not including Match)
- Total Match
- Total Budget (including Match)

Part V: Experience

52. Describe your agency's experience working with and leveraging Federal and State funds.

53. Describe your agency's experience in working with the proposed population and in providing housing and services.

54. Describe your agency's experience and/or presence working in the county/counties you are applying for.

55. Describe your agency's experience using a Housing First approach. Include:

- 1) Eligibility criteria;
- 2) Process for accepting new participants; and
- 3) Process and criteria for exiting participants.

Must demonstrate there are no preconditions to entry, allowing entry regardless of past substance abuse, income, criminal records (with exceptions of restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, self-disclosed or perceived sexual orientation, gender identity or gender expression. Must demonstrate the project has a process to address situations that may jeopardize housing or project assistance to ensure that project participation is terminated in only the most severe cases.

56. Will the project enroll program participants who have the following barriers? Select all that apply:

- a. Having too little income
- b. Having a criminal record with exceptions for state-mandated restrictions
- c. Active or history of substance use
- d. History of victimization (e.g. domestic violence, sexual assault, childhood abuse)
- e. None of the above

57. Will the project prevent program participant termination for the following reasons? Select all that apply:

- a. Failure to participate in supportive services
- b. Failure to make progress on a service plan
- c. Loss of income or failure to improve income
- d. Any other activity not covered in a lease agreement typically found for unassisted persons in the project's geographic area
- e. None of the above

Part VI: Project Description

58. Provide a narrative description of how your agency will operate the project.

59. Describe how supportive services (including case management) will meet the needs of the participants being served and operate from a trauma informed care perspective.

60. Describe how program participants will be assisted to increase employment and/or income and to maximize their ability to live independently.
61. Describe the specific plan to coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible.
62. Will program participants have access to SSI/SSDI technical assistance provided by this project the applicant, a subrecipient, or partner agency?
- a. Yes
 - b. No
63. Has the staff completed SOAR training in the past 24 months?
- a. Yes
 - b. No
64. Describe how your agency will build relationships with landlords to ensure minimal tenant disruption.
65. Will your agency incorporate additional housing subsidies or units not funded through the CoC or ESG program?
- a. Yes
 - b. No
66. If "Yes", please describe how:

Part VII: Equity Factors

67. Describe your agency's specific plan to include the voices of people with lived experience as collaborative partners in meaningful and ongoing ways. This includes membership on the Board of Directors, as well as providing input for project design, rules, service practices and policies, and a formal grievance policy that all participants are informed of.
68. Please describe how your agency will include under-represented individuals in managerial and leadership positions within this project.
69. Describe agency efforts that demonstrate agency policies and procedures have been evaluated with an equity lens/have developed anti-discrimination practices that demonstrate racial equity measures in service delivery; and which have been introduced in order to ensure safety, privacy, respect, and access regardless of gender identity or sexual orientation for LGBTQ+ persons:

70. Please describe the plan for reviewing program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/or age. If already implementing a plan, describe findings from outcomes review.

71. Does the agency agree to work with the HMIS Lead to review HMIS data with disaggregation by race, ethnicity, gender identity, and/or age?

a. Yes

b. No

72. Please describe a plan to review whether programmatic changes are needed to make program participant outcomes more equitable.

73. Please share how this project will utilize the Coordinated Entry system for all program participant referrals and maintain a commitment to equity in housing placement and participants served.