Sonoma County Continuum of Care

c/o Sonoma County Department of Health Services, 1450 Neotomas Ave, Santa Rosa, CA 95405
Continuum of Care Coordinator (707) 565-4080 • Karissa.White@sonoma-county.org
Homeless Projects Specialist (707) 565-4088 • Araceli.Rivera@sonoma-county.org

August 02, 2023

HUD Notice of Funding Opportunity (NOFO)
For FY 2023 Continuum of Care Funds Sonoma County Request for Proposals (RFP)

On July 5, 2023, the U.S. Department of Housing and Urban Development (HUD) issued the Continuum of Care (CoC) Notice of Funding Opportunity (NOFO) for 2023 Continuum of Care Funds. Based on recent communications with HUD, Sonoma County applicants are eligible for a combined total of approximately **$4.8** million for new and renewal FY 2023 Continuum of Care projects. A total of up to **$4,154,689.00** is approved for renewal projects (7% of the total being at-risk). The following funds are available for NEW projects:

- A total of $**290,828** in bonus funding is competitively available for one or more permanent supportive housing projects (PSH), rapid rehousing projects (RRH), joint transitional housing-rapid rehousing projects (TH-RRH), HMIS projects, or Coordinated Entry projects.
- A total of **$234,975** in Domestic Violence (DV) bonus funding is competitively available for one more projects serving victims of domestic violence.
- A total of **$0** is currently available in reallocated funding, this may change upon providers response to the reallocation questionnaire or the committee's decision to reallocate underperforming projects.

Local application guidance for both new and renewal projects is attached to this Request for Proposals (RFP). Prospective applicants should review the Continuum of Care NOFO in full at:

https://www.hudexchange.info/programs/e-snaps/fy-2023-coc-program-nofa-coc-program-competition/

Please also review the provisions of this local RFP in full, and note the local and final deadlines as follows:

Bidders conference for NEW Projects (virtual meeting)	August 9, 2023
Technical Assistance Session: e-snaps and applications (In person meeting)	August 16, 2023
Open Office Hours – (Drop in Assistance, virtual meeting)	August 21, 2023
Local Submission in e-snaps (5:00 PM PST)	August 23, 2023
Finals Submission by CoC (8:00 PM PST)	September 25, 2023

For further information contact:
Karissa White, Continuum of Care Coordinator: 707-565-4080 or Karissa.White@sonoma-county.org
and Araceli Rivera, Homeless Projects Specialist: 707-565-4088 or Araceli.Rivera@sonoma-county.org

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Submission Timeline and Local Deadlines

In the annual Continuum of Care competition, all applications are submitted as a single, consolidated application. Thus, both local and final submission deadlines are needed. The final local CoC Collaborative Application submission deadline is **September 25, 2023**. The 2023 Continuum of Care Application

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Detailed Timeline (Attachment 1) ensures the collaborative application is complete and ready for submission by the final submission deadline of **September 28, 2023 (8:00 PM EST).**

A competition for new project funding will be conducted using HUD's electronic application system, e-Snaps. **All new applications must submit the Supplemental Questionnaire (Attachment 4) outside of e-Snaps** to the CoC Coordinator **by 5:00 PM** on **August 23, 2023**. The Sonoma County 2023 CoC Competition Evaluation Workgroup will review submissions for new projects on **August 29, 2023,** and will bring funding recommendations to the Sonoma County CoC Board special meeting held on **September 06, 2023.** The Continuum of Care Board will make the final decision on new bonus project(s), and additional project(s) to be created with reallocated funds (if applicable). Final scores and selections will be posted on the Sonoma County Continuum of Care's website by **September 11, 2023**: https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition

All full project applications (both new and renewal) must be submitted in e-Snaps, by **5:00 pm** Pacific Time on Wednesday, **August 23, 2023**.

Between **August 24th and September 6th**, the CoC Coordinator will review all approved project applications, and applicants will have the opportunity to make technical corrections to project applications prior to final submission.

Tiered Submission

The Sonoma County Continuum of Care is responsible for prioritizing projects and placing all submitted projects into one of two tiers. Projects placed in Tier 1 will be funded first, from HUD's FY2023 allocation of $3.1 billion. Projects placed in Tier 1 are virtually guaranteed funding, assuming they pass threshold review by HUD. This year, HUD has determined that Tier 1 funding will be equal to 93% of the total Annual Renewal Demand (ARD). In previous years, HUD would put between 5%-15% of the ARD at risk in Tier 2. 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. Underperforming projects may be at risk of being placed into Tier 2, and ultimately could have their projects eliminated or reduced if a new project application is ranked above it as projects are funded on a nationally competitive basis.

New CoC Bonus Project Funding	**$290,828**
New Domestic Violence Bonus Funding	**$234,975**
Reallocated funds currently available for new project(s) – this amount may increase	$0
Annual Renewal Demand (ARD)	$4,154,689
Anticipated Tier 1 funding (ARD 93%)	$3,863,861

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*Anticipated Tier 2 funding (ARD Minus 7%)	$290,828
Continuum of Care Planning Grant	$207,734
Total Possible CoC Award	$4,888,226

* Tier 2 Funding does not include potential funding from the CoC Bonus Project. The DV Bonus is separate and given a unique rank only if accepted as a new DV Bonus project.

Tier 2 Funding

Tier 1 is equal to 93 percent of the CoC's Annual Renewal Demand (ARD). Tier 2 projects will be funded on a nationally competitive basis and Sonoma County CoC may place one or more projects either fully or partially into Tier 2. The local policy for making such decisions is located within this RFP, attachment 6- Sonoma County Continuum of Care – Process for Making Cuts: FY 2023.

At this point, there are currently three CoC-funded projects that have been identified of being at-risk for eliminated or reduced funding.

Applicants for renewal projects have already submitted the **mandatory Renewal/ Reallocation Questionnaire**, to confirm their intent to apply for all contracted and approved funds, and/or to offer funds for reallocation. The Renewal/Reallocation Questionnaire confirmed that no projects expected to receive funds in 2024-2025 intend on voluntarily reallocating any of their funds. Therefore, there are currently no funds available for reallocated funds unless the CoC determines that an underperforming project should be reallocated. HUD rewards communities that reallocate funding, which means reallocating funds will increase the chance of receiving funding for renewal projects, new bonus projects, and new projects created through reallocation. However, the Sonoma County CoC has already met the requirement to score full points in this section of the Consolidated Application because we have reallocated at least 20% of our current ARD in funding competitions from 2018-2023. However, underperforming projects placed in tier two are still considered at risk of losing their funds as this is a nationally competitive process. The CoC Board will approve placements in tier 1 and tier 2 during a special CoC Board meeting when the Final Priority Listing is set for approval on September 6th.

Bonus Projects and New Projects Created through Reallocation

In 2023, bonus funding is available in the amount of $290,838 for the CoC Bonus, $234,975 for the DV Bonus, and $0 is currently available through reallocation. Bonus Projects and new projects created through reallocation will be scored separately from renewal projects in the national competition and can include one or more new bonus projects listed below.

Eligible Bonus projects include:

- Permanent Supportive Housing (PSH) projects that serve 100% chronically homeless individuals and families or meet the requirements of DedicatedPlus as defined in of the federal NOFO.

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- Permanent housing-Rapid Re-Housing Projects (PH-RRH) must serve homeless individuals, transition age youth, or families.
- Joint Transitional Housing-Rapid Re-Housing projects (Joint TH-RRH) which include transitional housing and permanent housing-rapid rehousing in a single project to serve individuals and families experiencing homelessness, including victims of domestic violence.
- Domestic Violence (DV) Bonus projects providing housing and services to survivors of domestic violence, dating violence, sexual assault, and stalking. Per the federal NOFO, Sonoma County CoC may submit applications for one of each of the following projects: 1) Rapid Re-housing project, 2) Joint TH and PH-RRH project, 3) SSO projects for Coordinated Entry to implement policies, procedures, and practices that equip the CoC's Coordinated Entry to better meet the needs of survivors of domestic violence, and 4) Expand an existing renewal project, not dedicated to this population, so long as the DV Bonus funds for expansion are solely for additional units, beds, or services dedicated to persons eligible to be served with DV Bonus funding.

Additional requirements of Bonus Projects (please refer to federal NOFO for all details):

- Bonus projects may include expansion of existing CoC-funded PSH Projects.
- Project applicant does not have any certain open monitoring Findings or a history of slow expenditure of grant funds (e.g., funds left unspent at contract year-end). Please see NOFO for more details.
- The type, scale, and location of the housing fit the needs of program participants; type and scale of services fits the needs of participants.
- A specific plan is in place to ensure program participants will be individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible to apply.
- Program participants must be assisted to obtain and remain in permanent housing in a manner that fits their needs.
- Applicant must agree to accept referrals solely from the CoC's Coordinated Entry System and follow a Housing First approach.

Bonus projects will also be scored nationally on criteria below, therefore these criteria are incorporated into the local scoring (see Attachment 2).

- Prioritizing the Highest Need per Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing, issued July 25, 2016.
- A Housing First model must be adequately described in the project narrative as well as collaboration with Coordinated Entry. Local applicants are required to complete Attachment 4 – Supplemental Questionnaire.

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- Using an Evidence Based Approach and cost effectiveness
- Maximizing use of mainstream resources for supportive services, especially Medicaid-financed services and/or formal partnerships with Medicaid-billable providers (such as Federally Qualified Health Centers).
- Prioritizing new projects with partnerships with substance use providers, health care organizations, and Public Housing Authorities. Points are available in the overall CoC Application in the amount of 14 points for new projects that show a committed partnership with a 25% match of subsidized housing, substance use services, and/or healthcare services provided that are outside of the CoC and ESG Program.

Applicants for Bonus funds are strongly advised to review and understand the grant terms, especially those described in the NOFO. Additional eligible projects (such as expansion projects and consolidated projects) are described in Attachment 5 – "What's New in FY 2023").

All new projects must submit the Supplemental Questionnaire, Attachment 4, by August 23, 2023, outside of e-snaps. The Continuum of Care Board will approve final project rankings at the meeting scheduled on September 6th.

Renewal Projects

Per HUD guidance, **renewal projects will be assigned a priority number** based on the results of project evaluations conducted by the 2023 CoC Competition Evaluation Workgroup earlier in 2023. The highest performing/highest need projects will be placed at the top of the project listing, and the lowest performing/ lowest need projects will be placed at the bottom of the listing.

Renewal projects supporting required system infrastructure, such as HMIS and Coordinated Entry renewals, will be prioritized into Tier 1 following all Tier 1 housing projects. **Renewal projects have already completed an in-depth review of their project and scored by the CoC and will only be required to submit their application in e-snaps by August 23, 2023.**

Administrative Expenses

In this funding cycle, both new and renewal project applicants may claim up to 10% of the CoC project budget, for administrative expense. **A chart showing approved summary budgets for all Sonoma County CoC renewal projects is included as Attachment 3**.

Mandatory Bidder's Conference

A **Mandatory Bidder's Conference for New Projects** will be held virtually on **Wednesday, August 09, 2023, from 10:30 – 12:00 pm**. The Bidder's Conference will address Continuum of Care funding regulations and options for using available funds. Virtual meeting login information is located on **Attachment 1 – 2023 Continuum of Care Application Detailed Timeline**, and will be posted on our

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website using the following link: https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition

Local Submission Deadline

All projects approved for submission—new bonus and reallocation (if applicable) projects, and all renewal projects—must be **submitted in e-Snaps** by 5:00 p.m., **Wednesday, August 23, 2023**.

Materials to Be Submitted to the Sonoma County Continuum of Care

In addition to the e-Snaps submission, agencies that are <u>new</u> to the CoC funding process must submit the following documents:

- Applicant's most recent fiscal audit, with accompanying management letter.
- Materials from the most recent Board of Directors meeting (agenda, approved minutes, committee reports, and any other materials presented at the most recent meeting).
- Organizational Chart
- List of 3 funder references
- Supplemental Questionnaire
- HUD's Housing First Assessment Tool, located for download here: https://www.hudexchange.info/resource/5294/housing-first-assessment-tool/
- Agency Non-discrimination Policy

Please submit the above materials to the CoC Coordinator by 5:00pm August 23, 2023 by email to Karissa.White@sonoma-county.org and the Homeless Project Specialist Araceli.Rivera@sonoma-county.org . Applicants may deliver required electronic documents on a flash drive, by the same deadline to Sonoma County Continuum of Care, c/o Sonoma County Department of Health Services, 1450 Neotomas Ave, Santa Rosa CA 95405, Attention: Karissa White.

Note, electronic submission is highly preferred.

E-Snaps Submission: All full applications—both new and renewal—must be submitted within **e-Snaps by 5:00 pm, Wednesday, August 23, 2023**.

New Project Scoring

The scoring schema is organized into the following areas (total points: 100):

- HUD's System Performance Measures and Use of Objective Scoring Criteria
- Housing First Practices and Use of the Coordinated Entry System

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- Improving Assistance for LGBTQ+ Individuals, practices/current efforts to address Racial Equity, incorporation of individuals with lived experience in programming, and other Local and HUD Priorities
- Project Narrative/Design
- Coordination with Housing and Healthcare Providers
- Project Readiness, Budget, Cost Effectiveness, and Financial Health
- Organizational Capacity & Experience
- HMIS Data Quality and Timeliness

This schema is designed to maximize the chances of both Bonus and Tier 2 New and Renewal projects being awarded. It incorporates HUD's key policy priorities for the 2023 CoC Competition. **All new projects must complete and submit the Supplemental Questionnaire, Attachment 4, which addresses key scoring criteria. Please note, this is a supplemental document and New projects must still complete the project application in the E-snaps system.**

Scoring for DV Bonus Projects will follow the same scoring schema as new projects created through reallocation or Bonus Project funding. If a DV Bonus project ranked in Tier 1 is selected with DV Bonus funds, the project will be removed from this tier and the projects below it will move up one rank position. However, if a new DV Bonus project is not selected with DV Bonus funds, the project will retain its ranked position (see NOFO, page 21). Agencies serving victims of domestic violence projects will be scored on non- identified data submitted through a comparable database.

As noted previously, the Continuum of Care Board may elect to place a Bonus Project into Tier 1. The experience of the previous competitions indicates a Bonus project is less likely to be awarded if placed into Tier 2. DV Bonus Projects will be ranked with a unique identifier per the federal NOFO, only if they are accepted as a DV Bonus.

Only applicants new to the CoC funding process need to submit financial and organizational materials.

New Project Rating and Ranking

New projects will be scored by the 2023 CoC Competition Evaluation Workgroup at its **August 29, 2023,** meeting. The CoC Competition Evaluation Workgroup's recommendations will be brought to the Sonoma County Continuum of Care Board for final approval during the special meeting to be scheduled September 6th.

Final project priorities will be announced through the Sonoma County Continuum of Care website at the following URL: https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition

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Letters will be sent to all new project applicants by **September 11, 2023**, to communicate whether projects are accepted, reduced, or rejected and their priority placement. Please note, if the new project is accepted by the CoC this does not mean that it is approved for funding. HUD will announce the confirmed awards for the competition in early 2024 (typically around March).

Appeals

Due to necessary technical review, rating and ranking, and the extremely short timeline before final submission, the CoC Board's selection of projects to be included in the Sonoma County Consolidated CoC Application will be final.

Consistent with HUD rules, an organization may appeal the CoC Board's decision not to include it in the Sonoma County Consolidated CoC Application and submit a solo application to HUD, if that application is submitted by the competition deadline of September 28, 2023. Applicants appealing this decision should reference the CoC NOFO for details on types of appeals and the process to submit a solo application (NOFO Section VII).

If HUD finds that the solo applicant was not permitted to participate in the Continuum of Care funding process in a reasonable manner, then HUD may award the grant to that solo applicant and may direct the Sonoma County Continuum of Care to take remedial steps to ensure reasonable participation in the future. HUD may also reduce the consolidated award to the Sonoma County Continuum of Care.

Technical Assistance Session and Office Hours- New and Renewal Project Applicants

A **Technical Assistance Session on the e-Snaps electronic submission system and application review** will be held in person, at the Sonoma County Department of Health Services on **Wednesday, August 16th from 10:00 am- 12:00 pm**.

It is <u>highly recommended that you bring your laptop</u> with you so staff can walk through opening up your application in the system. Meeting address, date and time are listed on Attachment 1-2023 Continuum of Care Application Detailed Timeline. Technical assistance sessions are open to all applicants (new or renewal). New applicants should obtain a Unique Entity Identifier (EUI) number and begin SAM registration prior to this session. See Recommended Steps, next page, for UEI and SAM guidance. If the registration is still pending during this process, please consult with the CoC Coordinator as you will be required to have this information upon receiving the award (in 2024).

This training will focus on basic e-snaps navigation, Project Applications, and attachments; applicants should have access to the e-snaps system while participating in the meeting. E-snaps information: https://www.hudexchange.info/programs/e-snaps/

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The Technical Assistance session is designed to improve the quality of the Sonoma County Consolidated CoC Application as a whole. Those with e-Snaps experience are expected to assist newer applicants in this collaborative application.

CoC staff will also be holding optional Office Hours to assist with any questions or issues with the e-snaps system. **Office hours will be held virtually on August 21st from 10:00 -11:30am.** Link to the virtual meeting login information is located in Attachment 1. However, if there are any technical issues at any point between the Technical Assistance session and open office hours, please contact staff as soon as possible to help resolve any issues.

The published meetings may be the only times Sonoma County Continuum of Care staff can provide assistance prior to technical corrections, and it is strongly recommended that those preparing applications attend.

If applicants attend the TA sessions and are still experiencing difficulties, they should contact the Continuum of Care Coordinator, Karissa White, for additional assistance at Karissa.white@sonoma-county.org or by phone at 707-565-4080. Please ensure that the Homeless Project Specialist, Araceli Rivera, is also copied in communications to ensure your questions are answered as soon as possible at Araceli.Rivera@sonoma-county.org.

Questions

Questions may be directed to the Continuum of Care Coordinator, Karissa White, at Karissa.white@sonoma-county.org or by phone at 707-565-4080 and the Homeless Project Specialist, Araceli Rivera, at Araceli.Rivera@sonoma-county.org.

Note, including both emails will expedite a response from staff.

Recommended Steps

Potential applicants are urged to take the following steps as soon as possible:

1. To receive up to date information about the 2023 Continuum of Care NOFO, join a listserv at https:// www.hudexchange.info/mailinglist/ .
2. All local communications about the competition will be posted on the Lead Agency's website at: https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition
3. Obtain a UEI number: Applicants must provide a valid UEI number, or be in the process of registration at https://sam.gov/content/duns-uei . If you are unable to obtain an activated UEI number prior to submitting the application, please consult with the CoC Coordinator.
4. Register with the federal government's System for Award Management (SAM) at https://sam.gov/SAM/pages/public/loginFAQ.jsf . This process takes the place of the old Central

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Contractor Registry and can take several weeks if there are problems. If you were registered in CCR, these files were migrated into SAM but you must set up a new account in SAM to access or update them. If your CCR or SAM registration has expired, you need to set up an account and update the file. Once complete, it can still take several days for it to update everywhere in the SAM system. Note: A UEI Number and SAM assistance document is located at https://www.hudexchange.info/resource/1245/dun-and-bradstreet-duns-number-guide/ (See General Resources tab.)

5. Set up an individual user profile on the e-Snaps electronic application site: https://esnaps.hud.gov/grantium/frontOffice.jsf

6. If there have been changes to the Authorized Representative since your last application, please see the Authorized Representative Resource at https://www.hudexchange.info/resource/2906/instructions-for-updating-coc-project-applicant-authorized-representative/ . It can take several weeks to complete this change, so do not delay.

7. Once you have obtained a number and registered with SAM, set your organization up on the e-Snaps site on the Applicants tab. This is comparable to the SF-424 cover sheet submitted with every other federal grant. This process will also be covered at the August 16th Technical Assistance Session; tutorials are also available at: https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources/

Resources

HUD guides for applications: https://www.hud.gov/program_offices/comm_planning/coc/competition

Note- there is a guide for renewal project applications and new project applications. The detailed instructions tell you how to answer the questions and what they mean, whereas the navigational guides give you step by step instructions on how to complete your application in e-snaps.

The federal FY2023 Continuum of Care NOFO is available at: https://www.grants.gov/web/grants/view-opportunity.html?oppId=349091

FY 2023 CoC Program NOFO Policy Requirements and General Section: https://www.hudexchange.info/programs/e-snaps/fy-2023-coc-program-nofa-coc-program-competition/

Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status, at : https://www.hudexchange.info/resource/5108/notice-cpd-16-11- prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in- psh/

Notice on Affirmatively Furthering Fair Housing: https://www.huduser.gov/portal/affht_pt.html

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The Continuum of Care Program Interim Rule can be found at:
https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule /

E-Snaps, the online submission system, can be accessed at:
https://esnaps.hud.gov/grantium/frontOffice.jsf

A series of useful tutorials on the E-Snaps electronic submission system are at:
https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources

HUD regularly updates its Frequently Asked Questions (FAQs) at: https://www.hudexchange.info/e-snaps/faqs/

CoC Program Toolkit - Introduction to the CoC Program:
https://www.hudexchange.info/programs/coc/toolkit/

Sonoma County Continuum of Care Local Competition Page:

https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition

HUD's CoC Virtual Binders: https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/?utm_source=HUD+Exchange+Mailing+List&utm_campaign=aa5cc12e9b-New_CoC_ESG_Binders_HUDX_6_16_21&utm_medium=email&utm_term=0_f32b935a5f-aa5cc12e9b-19343217

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Attachment 1- 2023 Continuum of Care Application Detailed Timeline

Date	Action
July 05	NOFO for FY 2023 Funds Released
August 02	Local Request for Proposals issued, including new funding availability and Renewal/Reallocation forms.
August 09	**MANDATORY Bidder's Conference for NEW Projects- virtual** 10:30am -12:00pm, Virtual Zoom meeting, login information listed below Zoom Meeting Link: https://sonomacounty.zoom.us/j/98914021672?pwd=ODQ0dUorazE0dTJ3VVZTOGZGVDhWUT09 Meeting ID: 989 1402 1672 Passcode: 820251
August 16	**Technical Assistance Session for Applicants: Introduction to *e-Snaps and Applications in e-Snaps review (in person, please bring your laptops if you would like assistance walking through opening your application)*** 10:00am – 12:00pm Location: Sonoma County Department of Health Services – Santa Rosa Room 1450 Neotomas Ave., Santa Rosa, CA 95405 *This is a collaborative application. Those with e-snaps experience are expected to assist newer applicants. New applicants should obtain a UEI number and SAM registration prior to the session if possible.*
August 21	***FY 2023 CoC Competition Open Office Hours (optional- drop-in session)*** 10:00pm-11:30am, Virtual Zoom meeting, login information listed below https://sonomacounty.zoom.us/j/93701682556?pwd=NHE1Qis3QmJFbWtYTzZpV0ZsVDltUT09 Meeting ID: 937 0168 2556 Passcode: 121421
August 23	**New and Renewal Project Application(s) and Supplemental Questionnaire due in e-Snaps, 5 pm**
Aug 29	Sonoma County 2023 CoC Competition Evaluation Workgroup Review of New Project Applications
September 6	CoC Board Approval of New Projects and Ranking and Ratings
September 11	Publication of new project selections and Priority Listings *(earlier if possible)* on the Sonoma County Continuum of Care Competition website at: https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition
September 11	Notice of new and renewal project acceptance, reduction, or rejection to applicants.

c/o Sonoma County Department of Health Services, 1450 Neotomas Ave, Santa Rosa, CA 95405

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Aug 24-Sept 6	Technical review/corrections, e-snaps priority ranking & Consolidated Plan certifications
September 22-25	Public Posting of full Consolidated Application https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/continuum-of-care/continuum-of-care-competition
September 25	Final Submission of CoC Application Due in e-snaps (8:00 PM)

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Attachment 2- New Project Scoring Criteria

Sonoma County Continuum of Care New Project Scoring Tool
2023 CoC Program Competition

Section	Measure	Scoring Methodology	Points Possible
1.	Housing Stability (System Performance Measure)	Proposed percentage of clients served in project to meet this outcome. Highest percentage of project participants remaining permanently housed at year-end earns full points. 6 points are prorated from highest to lowest percentage of project participants permanently housed at year end, to lowest.	7– staff will calculate
2.	Exits to Permanent Housing (System Performance Measure)	Proposed percentage of clients served in project to meet this outcome. Highest rate of proposed exits to permanent housing destinations earns full points. 6 points prorated for the highest percentage of project participants that exit to permanent destinations.	7 – staff will calculate
3.	Increase in Earned Income (System Performance Measure)	Proposed percentage of clients served in the project to meet this outcome. Highest rate of income growth for participants at annual assessment and exit earns full points. 5 points prorated for the highest percentage of project participants increasing employment income at annual assessment and exit.	5 – staff will calculate
4.	Increase in Non-Employment Income (System Performance Measure)	Proposed percentage of clients served in project to meet this outcome Highest rate of other income growth for participants at annual assessment and exit earns full points. Points prorated for the highest percentage of project participants increasing other income at annual assessment and exit.	5 – staff will calculate
5.	Maximizing the use of mainstream resources (System Performance Measure)	Proposed percentage of clients served in the project receiving outcome mainstream health, social, and employment programs. Points prorated for the highest percentage of project participants increasing other income at annual assessment and exit.	4 – Staff will calculate
6.	Housing First Approach and Coordinated Entry	A Housing First approach identifies, engages, and connects homeless persons with the highest level of need; and works to eliminate any barriers to housing in front of the people that need our help the most, utilizing the Coordinated Entry System as the sole source for referrals. The extent to which the narrative reflects how the agency is working to	7

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		implement a Housing First approach. (Add CES Language) • Supplemental Scoring questionnaire 4 points • HUD Housing First Assessment Tool 3 points	
7.	Improving Assistance for LGBTQ+ Individuals	Addressing the service needs of LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in agency planning process, employment, and agency anti-discrimination policies. • Full points for addressing service needs, employment opportunities at the organization, training for current staff, hiring practices, and having an agency anti-discrimination policy; • Half points for addressing the needs, but do not have an anti-discrimination policy; and • zero points for no action/work pertaining to meeting the needs of this population.	4
8.	Racial Equity	Emphasizing system and program changes to address racial equity using proven approaches and partnerships with racially diverse stakeholders who have experience serving underserved populations. The extent to which the narrative reflects how agency is working to eliminate barriers to improve racial equity and to address disparities. Such as review procedures, and processes with attention to identifying barriers that result in racial disparities and taking steps to eliminate barriers to improve racial equity and to address disparities. • Full points for reviewing data and implementing a plan to address these needs as an agency; • half points for reviewing the data without implementing a plan; and • zero points for no action/work completed to address racial inequities in the agency's programming.	5
9.	Persons with lived Experience	Incorporating Persons with lived experience or those who have formerly experienced homelessness in program planning, policy development, employment, decision-making bodies, etc. • Full points for the inclusion of those with lived experience on decision-making bodies and with employment opportunities at the organization, training for current staff; • half points for only meeting one of the two options for full points;	4

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		• and zero points for no participation from those with lived experience.	
10.	Project Narrative/Design	Narrative is understandable; project design reflects the experience of applicant in working with proposed population; applicant understands client needs, type and scale, and location of the housing fit population being served, how clients are assisted in receiving mainstream benefits, performance measurement indicators for housing and income meet HEARTH benchmarks, plan to assist clients with rapidly obtaining permanent housing is clear and accessible. • *Domestic violence projects will be evaluated based on the degree they improve safety for the population they serve and employ trauma-informed victim-centered approaches to service delivery.*	8
11.	Coordination with Housing Partners	Housing Partners (create new permanent supportive housing and rapid rehousing projects that coordinate with housing providers not funded through ESG/CoC Program) • 0 Points if the project/agency has no planned/committed partnerships with housing providers directly related to the proposed project • 2 Points if the agency has a written commitment from a housing provider to provide subsidies (other than ESG/CoC) to the proposed units for PSH/participants served for RRH, but it is less than 25% of units/participants served proposed • 4 Points if the agency has a written commitment from a housing provider to provide subsidies other than ESG/CoC to the proposed units for PSH/participants served for RRH that will cover at least 25% of the units/participants served being proposed.	4
12.	Coordination with Healthcare Partners	Healthcare Partners (create new permanent supportive housing and rapid rehousing services projects that coordinate with healthcare providers to provide services to participants not funded through CoC or ESG Program): Scoring methodology (Healthcare): • 0 Points If the project/agency has no planned/committed partnerships with healthcare providers directly related to the proposed project • 2 Points if the agency has a written commitment from a healthcare provider to provide in-kind services to the proposed project, but it is less than	4

		25% of the total amount of application • 4- Points if the agency has a written commitment from a healthcare provider to provide in-kind services match with services totaling 25% of the total amount of the application	
13.	Project Readiness	Plan for opening services and housing is understandable, realistic, and timely (e.g., open within 90 days of contract execution- 2024/2025 term). The extent to which the narrative addresses expedited plan for housing placement after technical submission of contract (within 60 days, 120 days, and 180 days)	5
14.	Budget	Up to 5 points for a budget that is reasonable and meets threshold requirements for eligible expenses. Line item narratives document how CoC funds requested are essential to helping people become permanently housed. Required match (cash or in-kind) is adequate, from appropriate sources, and accurately calculated.	4
15.	Cost Effectiveness	Total Project Budget (including estimated match) ÷ number projected to achieve housing performance measures defined in the project application. 5 prorated points; lowest cost per successful projected housing outcome earns full points. The difference between the highest and lowest cost per successful outcome is spread over the 5 points to create a deduction factor per added dollar cost.	5
16.	Financial Audit and Health	Scoring based on most recent audit including identification of agency as "low risk", number (if any) of findings, documented match, etc. • 4 points = no findings, timely audit, and documented match • 2-3 points = 1 finding in the past 3 years, inaccurate/inconsistent match; 0-1 points = multiple findings, late audit, etc.	4- staff will calculate
17.	Organizational capacity and experience/ Demonstrated Capacity to Manage CoC Awards	New Projects : If you are new to the CoC Program HUD notes that demonstrating capacity may include a description of other funds the project receives, which are either federal or state funding. Scores will be drawn from the 20223 CoC Project Evaluations • Renewal Providers: cumulative rankings from past 3 CoC Competitions. Full points awarded to	5

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		agencies scoring in the Top 5 of the previous 3 CoC Competitions with no projects falling into At-Risk Tier in past 3 competitions.	
18.	Local & Other HUD Priorities	Alignment with 10-year plan goals and HUD priorities. 1 point for each goal this is in the project: • Evidence of Project's collaborations with **corrections/Justice partners** • Evidence of **SSI/SSDI Outreach Access & Recovery (SOAR)** benefits advocacy. • Alignment with Upstream Investments as evidenced by agency practices on the Upstream portfolio, or other evidence-based practice databases. Alignment with Upstream Investments as evidenced by agency practices on the Upstream portfolio, or other **evidence-based practice** databases • Staff training/screening for **mainstream resources** (e.g., Medi-cal, Calfresh, TANF, substance abuse programs, employment assistance) • Promotion of/supporting volunteering, community engagement, and **employment services**	5
19.	HMIS data quality, timeliness and coverage of all programs serving homeless	There are 3 criteria: • Universal Data Elements (Name, SSN, DOB, gender, race & ethnicity) are at least 95% complete; • Assessment data is entered in HMIS 5 days or less after assessments are administered; • Data Validation Reports from HMIS are clean and data is 95% complete. Full points for meeting all 3 criteria; pro-rated points for missing one or more criteria • **For Victim Services providers, this will be measured by analysis of data quality submitted by victim services providers that does not contain identifying information.	8- staff will calculate
	Total Points Possible		
			100

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Attachment 3- Approved Renewal Projects with Final Budgets

Priority Ranking	Applicant	Project Name	Leasing	Rental Assistance	Supportive Services	Operating costs	HMIS	Admin Costs	Total ARA
1	Sonoma County Community Development Commission	Renewal Rental Assistance – Persons with HIV/AIDS	$0	$605,544	$0	$0	$0	$49,870	**$655,414**
2	West County Community Services	Mill Street Supportive Services	$0	$0	$12,579	$80,924	$0	$4,339	**$97,842**
3	Committee on the Shelterless	Community Based Permanent Supportive Housing	$239,283	$0	$28,968	$12,828	$0	$11,764	**$292,843**
4	Catholic Charities of the Diocese of Santa Rosa	Catholic Charities Permanent Supportive Housing Santa Rosa 2	$135,500	$0	$549,078	$57,280	$0	$43,103	**$784,961**
5	Individuals Now dba Social Advocates for Youth	SAY-Sponsor-Based Rental Assistance Renewal	$0	$197,760	$95,231	$0	$0	$12,338	**$305,329**
6	Young Women's Christian Association of Sonoma County	RRH for Vulnerable Survivors of DV	$0	$104,676	$148,707	$0	$0	$6,657	**$260,040**
7	Sonoma County Community Development Commission	Renewal Rental Assistance-Youth with Disabilities	$0	$76,608	$0	$0	$0	$4,058	**$80,666**

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8	Community Support Network	Stony Point Commons	$0	$0	$17,228	$39,384	$0	$2,722	**$59,334**
9	*Society of St. Vincent de Paul Sonoma County	St. Vincent de Paul Commons PSH	$0	$0	$239,100	$64,260	$0	$0	**$303,360**
10	**County of Sonoma	Coordinated Intake Expansion Project	$0	$0	$508,916	$0	$0	$41,077	**$549,993**
11	**County of Sonoma	Homeless Management Information System (HMIS) Expansion	$0	$0	$0	$0	$305,767	$21,390	**$327,157**
12	Buckelew Programs	Sonoma SCIL 02.02.23-01.31.24	$174,645	$0	$48,360	$32,103	$0	$11,162	**$266,270**
13	Buckelew Programs	Samaritan FACT 02.01.23-01.31.24	$71,227	$0	$13,331	$19,924	$0	$4,444	**$108,926**
14	Community Support Network	Sanctuary Villas	$0	$0	$46,644	$11,710	$0	$4,200	**$62,544**

*Denotes project is newly funded without an APR to score and has not yet began serving individuals.

**Denotes project was a mandated system component.

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Attachment 4- 2023 Supplemental New Project Evaluation Application Questionnaire, Due on August 23, 2023

A completed, signed questionnaire must be received at the Sonoma County Department of Health Services, 1450 Neotomas Ave, Santa Rosa, CA 95405, or email electronic submissions questionnaires to (Strongly preferred): Karissa.White@sonoma-county.org and Araceli.Rivera@sonoma-county.org no later than 5:00pm on August 23, 2023.

Agency Name:

Project Name(s):

Project Type:

Please answer the following questions related to your CoC New Project Proposal. Please note, some of the questions are specific to the proposed <u>project</u>, and others ask questions related to your <u>agency/organization</u>.

1. **Housing Stability (System Performance Measure).** Please provide the proposed outcome percentage of participants that will maintain their housing placement. _____

2. **Exits to Permanent Housing (System Performance Measure).** Please provide the proposed outcome percentage of participants that will exit to permanent housing destinations. _____

3. **Increase in Earned Income (System Performance Measure).** Please provide the proposed percentage of participants that will increase their earned income. _____

4. **Increase in non-employment Income (System Performance Measure).** Please provide the proposed percentage of individuals served in the project that will increase their non-employment income (e.g., SSI/SSDI, General Assistance, retirement benefits, etc.) _____

5. **Maximizing the use of mainstream resources (System Performance Measure).** Please provide the proposed outcome percentage of participants who will be accessing at least one or more mainstream health, social, and employment programs (e.g., non-cash benefits could include housing subsidies not provided by the project, monthly food box distributions, government-paid cell phone, TANF Childcare services, WIC, Calfresh, etc.) _____

The following narrative questions will be used to evaluate your proposed project's adherence to HUD guidelines and priorities, please ensure you answer the question entirely for scoring purposes.

6. **Housing First Approach and Coordinated Entry.** Please provide a narrative response on how your project's design will adhere to the Housing First Model, utilizing Coordinated Entry as the sole referral source (e.g., not requiring criminal background screenings/mental health evaluations prior to entry, no sobriety requirements, no income requirements, does not mandate participation in services, leases do

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not have provisions not found in a standard lease, separation of case management and property management services, participant-driven services, etc.).

7. **Improving Assistance for LGBTQ+ Individuals**. As outlined within the CoC NOFO, CoCs should ensure privacy, respect, safety, and access regardless of gender identity or sexual orientation in projects. Please describe how your project plan will meet the needs of this population and how your agency's anti-discrimination policy ensures equal access to this population (e.g., have your staff been trained on HUD's Equal Access Rule, related training/policies in place or in development, employment opportunities, hiring practices, etc.). If your agency does not have an anti-discrimination policy in place, please provide a response on how your agency will develop one prior to the potential project award.

8. **Racial Equity.**

    a. Has your organization reviewed data for racial and ethnic disparities in the provision of or the outcome of homeless assistance? If racial or ethnic disparities are present, has your organization worked to identify barriers faced by these populations that resulted in being less likely to receive assistance or receive a positive outcome (e.g., lack of outreach) and steps taken or will take steps to eliminate the identified barriers faced by these populations?

    b. Please describe efforts made to address racial equity within your programs (including staffing and individuals served).

9. **Persons with lived Experience.**

    a. Does your agency have a client advisory board, or do you have lived experience members on your advisory board? If you have a client advisory board, how often do they meet? What are their responsibilities? If you are in the process of developing one or plan on developing one for this project, please provide details.

    b. How do you plan on obtaining and evaluating client feedback for the proposed project (will there be a form, monthly meetings, etc.)? How will that feedback be used to receive and improve service delivery?

    c. How does the perspective of individuals with Lived Experience guide policymaking, process, and program development in your agency currently?

    d. Does your agency provide employment opportunities for those with lived experience of homelessness and/or provide any type of training for staff without lived experience? Please provide a response.

10. **Project Narrative/Design.** This will be evaluated in the project application in e-snaps system. Please ensure the narrative is understandable; project design reflects the experience of applicant in working with proposed population; applicant understands client needs, type and scale, population being served,

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how clients are assisted in receiving mainstream benefits, performance measurement indicators for housing and income meet HEARTH benchmarks, plan to assist clients with rapidly obtaining permanent housing is clear and accessible. (No response is required in this form, e-snaps application will be reviewed for scoring this measure- section 3B. Project Description).

11. **Coordination with Housing Partners.** Does your project proposal include partnerships with housing providers that will provide subsidies from sources other than ESG or CoC Program funding? If yes, please provide details (e.g., rental assistance and housing vouchers).

12. **Coordination with Healthcare Partners.** Does your project proposal include partnerships with Healthcare providers that will provide services to participants through sources of funds other than ESG/CoC? If yes, please provide details on what services will be provided and how often (e.g., in-kind service partnerships for physical, behavioral, and substance abuse services).

13. **Project Readiness**.

    a. Timeline for project start-up. (No response is required in this form, e-snaps application will be reviewed for scoring this measure- Section 3B. Project Description # 2).

    b. Please describe your plan to ensure your project proposal meets the timeline in your application to start serving participants. (Note, you are applying for funds for contract term 2024-2025, the timeline relates to start-up after the contract has been executed with HUD, if awarded).

14. **Budget.**

    a. Budget is reasonable and meets threshold requirements for eligible expenses. Line item narratives document how CoC funds requested are essential to helping people become permanently housed. (No response is required in this form, e-snaps application will be reviewed for scoring this measure- Section- 6A-6J. Budget).

    b. Required match of 25% (cash or in-kind) is adequate, from appropriate sources, and accurately calculated. Please confirm what source of funds will be used for the required match commitment of this project proposal. (Note, you are required to identify a match commitment, leveraged funding, for the total amount of award in the amount of 25%, excluding leasing dollars)

15. **Cost Effectiveness.** Calculated through E-Snaps submission (No response is required in this form, e-snaps application will be reviewed for scoring this measure- Section- 6J. Budget).

16. **Financial Audit and Health**. Please provide your agency's most recent financial audit. If there are any particular items worth noting, please describe in this section (e.g., agency does not receive enough funding to be required to complete a full annual audit or any notes on particular findings in the submitted audit).

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17. **Organizational capacity and experience/ Demonstrated Capacity to Manage CoC Program Awards.**

   a. Please list any State, Federal or Local contracts your agency receives.

   b. Narrative of your agency's experience managing any State or Federal Awards. What policies and procedures are in place to ensure effective management of awards, spend down of funds, and maintaining agency institutional knowledge? (No response is required in this form, e-snaps application will be reviewed for scoring this measure- Section- 2B. Experience of Applicant, Subrecipient(s), and Other Partners).

18. **Local & Other HUD Priorities**

   a. Does your agency collaborate with Justice partners (e.g., corrections officers, law enforcement, etc.) If yes, please describe the partnership and how these efforts, if any, help to reduce the criminalization of homelessness.

   b. Does your agency currently have or plan to have an SSI/SSDI Outreach Access & Recovery (SOAR) benefits trained staff member? If you do not have or do not plan to train a staff to become SOAR certified, please provide a description on your plan to ensure program participants are connected to these benefits.

   c. Is your agency on the Upstream Investment Portfolio (yes or no)? Does your agency use evidence-practices in the provision of services in your project(s)? Please list which practices will be used in the proposed project and training plan for staff.

   d. Describe the plan for your project to ensure participants are screened for and will gain access to appropriate and relevant mainstream resources for which they may be eligible. Also, describe how your agency plans to provide access to training for staff related to accessing mainstream services (e.g., Medi-Cal, CalFresh, TANF, substance abuse programs, employment assistance, other non-cash benefit sources, etc.).

   e. Will the proposed project promote and support volunteering, community engagement, and employment services among individuals experiencing homelessness or recently housed in the project. If yes, please describe the plan.

19. **HMIS data quality, timeliness, and coverage.** Staff will calculate based on agency programs serving homeless in the HMIS. (No response required)

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Required Attachments for Submission

</div>

☐ HUD's New Project Application (submitted in the E-snaps system)

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☐ Applicant's most recent fiscal audit, with accompanying management letter.

☐ Materials from the most recent Board of Directors meeting (agenda, approved minutes, committee reports, and any other materials presented at the most recent meeting).

☐ Organizational Chart

☐ List of 3 funder references

☐ Supplemental Questionnaire

☐ HUD's Housing First Assessment Tool, located for download here: https://www.hudexchange.info/resource/5294/housing-first-assessment-tool/

☐ Agency Non-discrimination Policy

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Attachment 5- What's New in FY 2023 Competition

For full details on all changes in the FY 2023 CoC Competition, please review the full federal NOFO and the detailed instructional guides listed on the HUD website. These changes will be reviewed at the Technical Assistance sessions on August 9th and 16th. HUD has not yet released the New, Changes and Highlights for the Competition document. Additional information will be provided as an addendum to this RFP as more HUD guidance is released.

HUD FAQ's are currently available and can be located here:
https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY-2023-Project-Application-FAQs.pdf

Competition Guide Resource Page:
https://www.hud.gov/program_offices/comm_planning/coc/competition

HUD Strategic Goals and Homeless Priorities
The U.S. Department of Housing and Urban Development (HUD) Strategic Plan sets the direction and focus of our programs and staff to create strong, sustainable, inclusive communities and quality, affordable homes for all. The NOFO supports HUD's Strategic Plan for Fiscal Years (FY) 2022-2026 to accomplish HUD's mission and vision. Each of the five goals in the Strategic Plan include what HUD hopes to accomplish, the strategies to accomplish those objectives, and the indicators of success.

HUD will pursue two overarching priorities focused on increasing equity and improving customer experience across all HUD programs. Five strategic goals and several objectives undergird the Plan; however, the follow goals are applicable to the NOFO.

Applicable Goals and Objectives from HUD's Strategic Plan

1. Strategic Goal 1: Support Underserved Communities
2. Strategic Goal 2: Ensure Access to and Increase the Production of Affordable Housing
3. Strategic Goal 3: Promote Homeownership
4. Strategic Goal 4: Advance Sustainable Communities

HUD Homeless Policy Priorities (section V.B. of the NOFO)
The following list of priorities remains the same from last year. However, HUD has provided additional information that expands on these priorities in line with their Strategic Goals listed above, please see the NOFO for additional details.
1. Ending homelessness for all persons.
2. Use a Housing First approach.
3. Reducing Unsheltered Homelessness.
4. Improving System Performance. Partnering with Housing, Health, and Service Agencies.
5. Racial Equity

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6. Improving Assistance to LGBTQ+ Individuals. Persons with Lived Experience.
7. Increasing Affordable Housing Supply.

You are expected to align your application to the applicable strategic goals and priorities listed above. Review the NOFO and use the information in this section to describe in your application the specific goals, objectives, and measures that your project is expected to help accomplish. If your project is selected for funding, you are also expected to establish a plan to track progress related to those goals, objectives, and measures. HUD will monitor compliance with the goals, objectives, and measures in your project.

Tier 1 and Tier 2

During the FY 2023 Competition tier 1 is equal to 93% of the CoC's Annual Renewal Demand and Tier 2 is equal to the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for.

CoC Planning Grant Increase

HUD is establishing an alternative maximum amount for CoC Planning grant applications under the NOFO.

New Eligible CoC Activities

These following new budget line items (BLIs) will be built into the CoC Program Competition Application process. Applicants wishing to utilize these new BLIs can request a budget modification during the competition to add funds to these line items from an existing line item. Applicants may also request to expand existing renewal grants to add new funding to these BLIs.

VAWA Costs Budget Line Item.
Facilitating and coordinating activities to ensure compliance with [the emergency transfer plan requirement in 34 U.S.C. 12491(e)] and monitoring compliance with [the confidentiality protections of the confidentiality requirement in 34 U.S.C. 12491(c)(4)].
1. New projects- can include this budget line item in overall budget
2. Renewal projects- can either request this new activity through a grant expansion of their current project or shift up to 10 percent of funds from other eligible BLIs

Rural Costs Budget Line Item.
Activities that address barriers to transitioning families in rural areas to permanent housing and additional activities to increase capacity to address the unique challenges CoCs face when serving people experiencing homelessness in rural areas [as defined in section I.B.2.b.(26) of this NOFO] to use Continuum of Care Program funds to pay for the following eligible activities:
1. Payment of short-term emergency lodging, including in motels or shelters, directly or through vouchers.

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2. Repairs to units in which homeless individuals and families will be housed; or are currently not fit for human habitation.
3. Staff training, professional development, skill development, and staff retention activities.

HUD has not yet released a list of which CoC's are considered eligible for the BLI. However, the application will permit this activity if the project location is permitted within the e-snaps application.

Amendment to Criteria for qualifying as "homeless"

For purposes of the CoC Program and other HUD programs authorized by the McKinney-Vento H o meless Assistance Act, section 605 of VAWA 2022 amended section 103(b) of the McKinney-Vento Homeless Assistance Act to require HUD to consider as homeless:

any individual or family who—
1. is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
2. has no other safe residence; and
3. lacks the resources to obtain other safe permanent housing.

This statutory change took effect on October 1, 2022. Rulemaking will be needed to require Continuums of Care (CoCs) and CoC Program recipients and subrecipients to make corresponding changes to the applicable written standards, coordinated entry policies, and documentation policies used to qualify individual and families as homeless under the CoC Program. That said, because HUD must recognize as "homeless" families and individuals who meet the new statutory criteria in section 103(b) of the McKinney-Vento Homeless Assistance Act as of October 1, 2022, CoC recipients may implement the new definition prior to HUD rulemaking, provided that CoCs update the relevant written standards and policies as needed to reflect the new statutory criteria. For further information, please see "The Violence Against Women Act Reauthorization Act of 2022: Overview of Applicability to HUD Programs" which HUD published in the Federal Register on January 4, 2023. This qualification of HUD's understanding and use of the "homeless" definition applies for purposes of all references to the "homeless" definition in the NOFO, including all references to specific paragraphs of the "homeless" definition in 24 CFR 578.3.

Sonoma County Continuum of Care

c/o Sonoma County Department of Health Services, 1450 Neotomas Ave, Santa Rosa, CA 95405
Continuum of Care Coordinator (707) 565-4080 • Karissa.White@sonoma-county.org
Homeless Projects Specialist (707) 565-4088 • Araceli.Rivera@sonoma-county.org

Attachment 6- Sonoma County Continuum of Care- Process for Making Cuts FY 2023

To create a pool of reallocated funds from which to create new projects, the Sonoma County Continuum of Care works through its Renewal Project Evaluation Process to make voluntary and involuntary cuts; and makes additional voluntary cuts during the NOFO period if new opportunities emerge.

1. **Reallocation via Renewal Project Evaluations**

The Sonoma County CoC's 2023 CoC Competition Evaluation Workgroup both prioritizes renewal projects for the CoC application and identifies projects with capacity concerns for corrective action and technical assistance. Scoring is based on unmet housing need, alignment with 10-year plan goals, performance on HUD measurements, and grant management. Because of the scoring schema's weighting by unmet housing need (a need which is overwhelmingly for permanent supportive housing), SSO, RRH and TH projects must perform exceedingly well to be approved for renewal.

The 2023 CoC Competition Evaluation Workgroup meets to review preliminary scores and conduct a risk assessment to guide evaluation prior to the release of the NOFO each year. A threshold for unconditional renewal is set at 80% of top score; projects scoring above the line are scheduled for monitoring visits only. Projects scoring below that line are provided with a report prior to the annual monitoring site visit to prepare them to discuss the challenges faced by the project and design a Corrective Action Plan. Known problems are described in the invitation and applicants are asked to address them and bring any other concerns to the workgroup's attention; under-spent contracts and other issues are noted for discussion and possible follow-up.

At the meeting, applicants and the workgroup together identify areas of improvement and what resources are needed to help the project improve its performance. Grantees have the opportunity to provide new information that sometimes raises their score above the unconditional renewal threshold. Through a summary letter recording the conversation and follow-up communications, over the course of 6 weeks each applicant is guided through a process of determining whether to submit additional documentation to revise scoring, undertake Corrective Action or to voluntarily release the project funding for reallocation. If corrective action plans and technical assistance are unsuccessful in improving project performance to the expected level over several years, or in particularly egregious cases (for example, serious concerns about grant management), the workgroup can recommend reallocating funds without further corrective action to the Continuum of Care (CoC) Board.

The Workgroup's findings are followed by a full report to the CoC governing body, which reviews its work both in process and at the end of the designated period to develop Corrective Action Plans. The

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CoC governing body makes the final decision regarding renewal with or without conditions vs. reallocation.

Note: Since publication of the CoC Interim Rule in 2011, the 2023 CoC Competition Evaluation Workgroup has also reviewed each project's continued eligibility under the new CoC regulation. If eligibility concerns emerge, these are discussed with the grantee even if the project scores above the threshold for unconditional renewal.

Reallocations are made in the following situations:

- **Voluntary Cuts:** Following discussion of performance and/or continued project eligibility, and applicant consideration of corrective action needed, the applicant may voluntarily opt not to renew and/or to seek continued funding from non-CoC sources.
- **Involuntary Cuts:** In cases where the 2023 CoC Competition Evaluation Workgroup records major concerns over several years, the Committee may recommend cutting the project without further corrective action. This decision must be confirmed by the Continuum of Care Board. Applicants may appeal the decision, and the appeal must be considered by the Continuum of Care Board.

2. **Reallocation based on new opportunities identified during the NOFO Period:**

During the Renewal Project evaluations, grantees will submit a form in which they are required to confirm their intent to reapply for this funding prior to the release of the NOFO. Grantees can either confirm they do not wish to reallocate funding, they would like to give up part of their funding, or they would like to completely reallocate their projects funding.

Upon HUD's release of the annual NOFO, all provisions of the NOFO are reviewed. If the NOFO indicates further ways to maximize Annual Renewal Demand, renewal grantees may be asked again if they intend to apply; in addition to maximizing awards, the project may no longer be in line with HUD regulations and may wish to reallocate funding based on new requirements. Renewal grantees will be asked if they intend to apply for the full approved amount, or to indicate they are open to a reduction. Continuing discussion takes place with those agencies to ensure the reduction makes sense. **All cuts at this phase are voluntary.**

Determinations on final cuts and reallocations will be made at the Continuum of Care Board special meeting on September 6th.