**Maryland Balance of State Continuum of Care MD-514**

**FY2023 CoC Funding Competition**

**Request for Proposals (RFP)**

**RFP ISSUE DATE: August 3, 2023**

**PROPOSAL DEADLINE: 8:00 pm, August 28, 2023**

**FUNDING OPPORTUNITY:** FR-6700-N-25

[Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2023 Continuum of Care Competition](https://www.mdboscoc.org/_files/ugd/880085_df96a21833d949eb8aa4f52e04858e81.pdf)

**ESTIMATED FUNDS AVAILABLE:** CoC Annual Renewal Demand: $6,074,987

CoC Bonus Funds: $425,249

DV Bonus: $299,422

*CoC Tier 1: $5,649,738*

*CoC Tier 2: $1,149,920*

Contents

[Introduction 2](#_Toc141896420)

[How to Apply 5](#_Toc141896421)

[Proposal Checklist 6](#_Toc141896422)

[Project Application Scoring Matrix 7](#_Toc141896423)

[Application Cover Sheet 10](#_Toc141896424)

[Applicant Attestation 11](#_Toc141896425)

[Housing First Assessment 13](#_Toc141896426)

[Proposal General Questions 15](#_Toc141896427)

[Proposal Narrative Questions 19](#_Toc141896429)

[DV bonus Proposal Narrative questions 24](#_Toc141896431)

[Appendix A: VAWA Policy on Housing Protection 26](#_Toc141896433)

[Appendix B: Anti-Discrimination Policy 27](#_Toc141896434)

[Appendix C: New Project Eligible Costs 30](#_Toc141896435)

[Appendix D: Match Requirements 32](#_Toc141896436)

Introduction

The purpose of this Request for Proposal (RFP) is to solicit project applications from across the MD Balance of State CoC for new and renewing projects in the FY2023 CoC Funding Competition. The Continuum of Care Program Competition (24 CFR part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, states, Indian Tribes or tribally designated housing entities and local governments to quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals and families, and to optimize self-sufficiency among those experiencing homelessness.

##### Policy Priorities

HUD has established policy priorities for this funding opportunity which are intended to help applicants better understand how the selection criteria supports the goal of ending homelessness.

|  |
| --- |
| 2023 CoC NOFO Priorities |
| Ending Homelessness for All Persons |
| Use a Housing First Approach |
| Reducing Unsheltered Homelessness |
| Improving System Performance |
| Partnering with Housing, Health, and Service Agencies |
| Racial Equity |
| Improving Assistance to LGBTQ+ Individuals |
| Persons with Lived Experience |
| Increasing Affordable Housing Supply |

##### Balance of State Local Competition Process

CoCs are required by HUD to review, rate and rank all project applications. The BoS uses the Performance Review Committee to facilitate the scoring and ranking process. Projects that are selected and ranked in priority order by the committee are provided to the CoC Board of Directors for final review and approval.

The committee scores new project applications solely based on the responses to this RFP. Renewing project scores are primarily derived from the Renewal Project Scorecard, based on actual project performance, but renewing projects are required to respond to this RFP as part of the application process. Please review the [FY2023 BoS CoC Competition Overview](https://www.mdboscoc.org/_files/ugd/880085_1671d7094c404f46a01e21c612019501.pdf) for more information. The Competition Overview also includes the CoC Rating and Ranking and the CoC Reallocation Policies.

All project submissions will undergo a threshold review for completion and accuracy prior to being scored by the Project Review Committee.

**Projects that submit incomplete applications or do not submit their application by the stated deadline may not be considered for funding.**

The MD-514 Maryland Balance of State CoC has chosen the Maryland Department of Housing and Community Development (DHCD) to serve as its Collaborative Applicant for FY2023.

The contents of this RFP are subject to change pending updates from HUD.

##### Eligible New Project **APplications**

For the FY2023 CoC Competition, **the Maryland Balance of State is prioritizing Permanent Supportive Housing projects and Joint Transitional Housing - Rapid Rehousing projects.** All new project applications will be accepted for review, however, PSH and Joint TH-RRH submission will receive bonus points.

**New Project Component Types**

*Permanent Supportive Housing (PSH)*

Permanent Supportive Housing in which housing assistance (e.g., long-term leasing or rental assistance) and [supportive services are provided](https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/supportive-services/) to assist households with at least one member with a disabling condition in achieving housing stability.

PSH combines non-time-limited, decent, safe and affordable housing assistance with wrap-around supportive services designed to help the individual or family stay housed and live a more productive life in the community.

There is no time limitation, and tenants may live in their homes as long as they meet the basic obligations of tenancy. While participation in services is encouraged, it is not a condition of living in the housing. These optional services are designed to build independent living and tenancy skills, assistance with integrating into the community, and connections to community-based health care, treatment and employment services.

*Rapid Rehousing (RRH)*

Rapid Rehousing is permanent housing that provides short-term (up to three months) and/or medium-term (4-24 months) tenant-based rental assistance and supportive services to households experiencing homelessness.

RRH is designed to help individuals and families quickly exit homelessness and return to permanent housing. Assistance is offered without preconditions — like employment, income, absence of criminal record, or sobriety — and the resources and services provided are tailored to the unique needs of the household.

New Rapid Rehousing project must serve [persons who qualify as homeless](https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/) under paragraphs (1), (2), or (4) of 24 CFR 578.3, Section 103(b) of the McKinney-Vento Homeless Assistance Act.

*Joint Transitional Housing - Rapid Rehousing (Joint TH-RRH)*

The Joint TH-RRH component project combines two existing program components – transitional housing and rapid rehousing – in a single project to serve individuals and families experiencing homelessness. Program participants may only receive up to 24-months of total assistance.

When a program participant is enrolled in a Joint TH-RRH component project, the recipient or subrecipient must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the RRH component, to all participants.

A program participant may choose to receive only the TH unit, or the assistance provided through the RRH component, but the recipient or subrecipient must make both types of assistance available.

New Joint TH-RRH projects must serve [persons who qualify as homeless](https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/) under paragraphs (1), (2), or 4) of 24 CFR 578.3, Section 103(b) of the McKinney-Vento Homeless Assistance Act.

*Supportive Services Only - Coordinated Entry*

SSO – Coordinated Entry grant applications must demonstrate a gap in the CE system and identify how the proposed project will fill the need. SSO-CE projects must ensure that the coordinated entry system is easily available/reachable for all persons within the CoC’s geographic area who are seeking homeless assistance; and must ensure that the system is accessible for persons with disabilities within the CoC’s geographic area. The SSO-CE project must develop a strategy for advertising that is designed specifically to reach homeless persons with the highest barriers within the CoC’s geographic area. Finally, the SSO-CE project must adhere to a standardized assessment process and ensure that program participants are directed to appropriate housing and services that fit their needs.

New SSO-CE projects must serve [persons who qualify as homeless](https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/) under paragraphs (1), (2), or (4) of 24 CFR 578.3, Section 103(b) of the McKinney-Vento Homeless Assistance Act.

##### Eligible Renewal Projects

Projects eligible for renewal in the FFY2023 CoC Funding Competition include projects that are set to expire in calendar year 2024 and must be listed on the [2023 Grant Inventory Worksheet (GIW).](https://www.hudexchange.info/programs/coc/coc-giw-reports/?filter_Year=2023&filter_State=MD&filter_CoC=MD-514&program=CoC&group=GIW) Renewal projects cannot request a total dollar amount higher than the total listed in the GIW. Renewal project applications may include requests to add eligible activities to the project, shift up to 10% of funds from one approved eligible activity to another and a change in the subpopulation served.

How to Apply

1. Before continuing with this RFP, applicants may wish to review the [MD-514 Balance of State CoC Funding Opportunities webpage](https://www.mdboscoc.org/2023-coc-competition) for more information.
2. Complete all required components as listed on the proposal checklist on page 6.
   1. **RENEWAL PROJECTS** are ONLY required to respond to pages 10-18 of this RFP, [click here to review the list of renewing projects](../Renewal%20Project%20Score%20Cards/MD-514%20ELIGIBLE%20RENEWAL%20PROJECTS.pdf).
   2. **NEW PROJECT** applications must respond to this RFP in its entirety.
   3. Please insert narrative responses under each individual question where applicable.
3. Email all narrative responses and any required attachments to [boscoc.dhcd@maryland.gov](mailto:Boscoc.dhcd@maryland.gov) no later than **8:00 p.m., Monday, August 28, 2023.**
4. Questions about the RFP should be submitted by email to [boscoc.dhcd@maryland.gov](mailto:Boscoc.dhcd@maryland.gov). Please include “NOFO-23” in the subject line. Questions may be submitted until August 25, 2023, at 5:00 PM.
5. DHCD will post clarifications, corrections and announcements at <https://www.mdboscoc.org/2023-coc-competition> through August 25, 2023, at 5:00 PM.
6. The Performance Review Committee will review and rank all project applications in early September and provide recommendations to the CoC Board for final approval.
7. All project applicants will be notified of their status no later than September 13, 2023.

Proposal Checklist

|  |  |  |  |
| --- | --- | --- | --- |
| Application Contents | | New  Project Requirement | Renewal Project Requirement |
|  | Application Cover Sheet (RFP Page 10) | ✔ | ✔ |
|  | Complete Applicant Attestation, Housing First Assessment and CoC Proposal Questions: ALL PROJECTS (RFP Pages 11-18) | ✔ | ✔ |
|  | Complete CoC Proposal Narratives: NEW PROJECTS ONLY (RFP Pages 19-23, complete as appropriate for project type) | ✔ | **No** |
|  | Complete CoC Proposal Narratives: NEW DV BONUS PROJECTS ONLY (RFP Pages 24-25) | ✔ | **No** |
|  | **Attachment:** Violence Against Women Act (VAWA) – Emergency Transfer Plan if applicable (RFP Page 18; Appendix A) | ✔ | ✔ |
|  | **Attachment:** Anti-Discrimination Policy if applicable (RFP Page 18; Appendix B) | ✔ | ✔ |
|  | **Attachment:** Agency policies and procedures, termination policy, and other relevant documents demonstrating compliance with Housing First or low barrier to entry if applicable (RFP Page 18) | ✔ | ✔ |
|  | **Attachment:** Articles of Incorporation and Bylaws | ✔ | **No** |
|  | **Attachment:** Federal Tax Exemption Determination Letters | ✔ | **No** |
|  | **Attachment:** Certificate of Good Standing from State of Maryland dated within 30 days of application deadline | ✔ | ✔ |
|  | **Attachment:** List of Board of Directors | ✔ | ✔ |
|  | **Attachment:** Most recent A-133 Single Audit or Independent Financial Audit if organization received less than $750,000 in federal funds | ✔ | ✔ |
|  | **Attachment:** Screenshot of organizational registration status with the Secretary of State (non-profit organizations only)  <https://sos.maryland.gov/Charity/Pages/default.aspx> | ✔ | ✔ |
|  | Submit new or renewal project application in the e-SNAPS system | ✔ | ✔ |

Project Application Scoring Matrix

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Scoring Category / Question | | Measurement | Points Available NEW PROJECTS | Points Available RENEWAL PROJECTS |
| Project Application Completeness | | Maximum points will be awarded to applicants who submit all required components of this RFP by the 8/28/23 deadline | **5** | **5** |
| PROPOSAL GENERAL QUESTIONS: ALL PROJECT APPLICANTS | | | | |
| Applicant Attestation | | Maximum points will be awarded for completing the form  (RFP pg 11-12) | **1** | **1** |
| Housing First Assessment | | Maximum points will be awarded for completing the form  (RFP pg 13-14) | **1** | **1** |
| 1 | Healthcare | Maximum points will be awarded to applicants who identify how they assist clients obtain healthcare (RFP pg 15) | **1** | **1** |
| 2 | Educational Access/Services | Maximum points will be awarded to applicants who identify any formal agreements with early childhood services (RFP pg 15) | **1** | **1** |
| 3 | Geography | Maximum points will be given to applicants who specify geographic areas served by the project (RFP pg 16) | **1** | **1** |
| 4 | Subpopulation | Maximum points will be given to applicants who specific which subpopulation that will be served by the project (RFP pg 16) | **1** | **1** |
| 5 | Diversity, Equity & Inclusion | Maximum points will be awarded to applicants who demonstrate they have assessed their agency for DEI issues and disparities, developed an action plan to address issues, and implemented specific strategies (RFP pg 16) | **1** | **1** |
| 6 | Lived Experience Engagement | Maximum points will be awarded to applicants who demonstrate they actively engage people with lived experience in program design and decision-making processes (RFP pg 17) | **1** | **1** |
| 7 | Summary Budget | Maximum points will be awarded to projects that complete the budget chart (RFP pg 17) | **1** | **1** |
| 8 | Match Funds | Maximum points will be awarded to projects that complete the match chart (RFP pg 17-18) | **1** | **1** |
| 9 | Violence Against Women Act (VAWA) Policy | Maximum points will be awarded to applicants who have adopted or clearly articulate their plan to adopt an Emergency Transfer Plan by the project start date (RFP pg 18) **Attachment (if applicable): Emergency Transfer Plan** | **2** | **2** |
| 10 | Anti-Discrimination Policy | Maximum points will be awarded to applicants who have adopted or clearly articulate their plan to adopt an anti-discrimination plan by the project start date (RFP pg 18)  **Attachment (if applicable): Anti-Discrimination Policy** | **2** | **2** |
| 11 | Housing First | Maximum points will be awarded to applicants who have adopted or clearly articulate their plan to adopt and implement Housing First principals by the project start date (RFP pg 18)  **Attachment (if applicable): Housing First Policies and Procedures, Termination Policy, and Other Documents** | **2** | **2** |
| PROPOSAL NARRATIVE QUESTIONS: NEW PROJECT APPLICANTS ONLY | | | | |
| 12 | General Description | Maximum points will be awarded to applicants who clearly articulate how their project meets community needs, the target population(s) to be served, the project’s plan for addressing the identified housing and supportive service needs, projected project outcome(s), and coordination with other source(s)or partner(s) (RFP pg 19) | **10** | **N/A** |
| 13 | HMIS | Maximum points will be awarded to applicants who articulate how they will ensure staff will attend annual HMIS training, as well as ensure timely and accurate data entry (RFP pg 19) | **5** | **N/A** |
| 14 | Coordinated Entry Participation | Maximum points will be awarded to applicants who agree to adhere to CoC CES goals (RFP pg 19) | **5** | **N/A** |
| 15 | System Performance Measures | Maximum points will be awarded to applicants that demonstrate how the project will contribute to the CoC’s overall success for the stated system performance measures. Applicants should use quantifiable and measurable data to demonstrate contributions to the system, as well as how they will continue to improve their performance and strategies to improve the system (RFP pg 19) | **10** | **N/A** |
| 16 | Housing First | Maximum points will be awarded to applicants who clearly describe how their project will quickly and successfully connect those experiencing homelessness to permanent housing; has low barriers to entry; and does not contain any preconditions that might lead to termination from the project. Applicants should demonstrate agency experience in successfully operating Housing First programs (RFP pg 20) | **10** | **N/A** |
| 17 | Income & Mainstream Benefits | Maximum points will be awarded to applicants who clearly articulate how they work with mainstream employment organizations to increase income and how they systematically update program staff on mainstream resources and help clients access public benefits (RFP pg 20) | **10** | **N/A** |
| 18 | Educational Access/Services | Maximum points will be awarded to applicants who clearly describe policies and procedures for educational access services (RFP pg 20) | **10** | **N/A** |
| PROJECT COMPONENT QUESTIONS: NEW PROJECT APPLICANTS ONLY | | | | |
| 19 | New PSH Projects ONLY | Maximum points will be awarded to applicants who clearly describe how the proposed PSH intends to help clients succeed in the project, describe relationships with housing and healthcare providers and how they will assist those will complex service needs (RFP pg 21) | **25** | **N/A** |
| 20 | New RRH Projects ONLY | Maximum points will be awarded to applicants who clearly describe how they will determine the monthly rental subsidy policy and describe relationships with housing and healthcare providers (RFP pg 21-22) | **5** | **N/A** |
| 21 | New TH/PH-RRH Projects ONLY | Maximum points will be awarded to applicants who clearly articulate why the program is vital to the CoC, describe the monthly rental subsidy policy and describe relationships with housing and healthcare providers (RFP pg 22-23) | **25** | **N/A** |
| 22 | New Coordinated Entry Projects ONLY | Maximum points will be awarded to applicants who clearly demonstrate how the project will contribute to the overall CES and how it will target those with service barriers (RFP pg 23) | **5** | **N/A** |
| DV BONUS PROJECT QUESTIONS: NEW DV PROJECT APPLICANTS ONLY | | | | |
| DV1 | Project Need | Maximum points will be awarded to applicants who provide data and sources to demonstrate need for the project (RFP pg 24) | **5** | **N/A** |
| DV2 | Applicant Housing Experience | Maximum points will be awarded to applicants who clearly describe prior experience providing housing and services to survivors (RFP pg 24) | **5** | **N/A** |
| DV3 | Applicant Experience Ensuring Survivor Safety | Maximum points will be awarded to applicants who clearly describe prior experience ensuring the safety and confidentiality of survivors (RFP pg 24) | **5** | **N/A** |
| DV4 | Applicant Experience Evaluating Safety Protocol | Maximum points will be awarded to applicants who clearly describe how the agency has evaluated its ability to ensure the safety of survivors (RFP pg 25) | **5** | **N/A** |
| DV5 | Applicant Experience with Trauma-Informed, Victim Centered Approach | Maximum points will be awarded to applicants who clearly describe the agency experience using a Trauma-Informed, Victim Centered approach with survivors (RFP pg 25) | **5** | **N/A** |
| DV6 | Applicant Experience Meeting Service Needs | Maximum points will be awarded to applicants who clearly and specifically explain the types of services provided and how they meet the needs of survivors (RFP pg 25) | **5** | **N/A** |
| DV7 | Involving Survivors with Lived Experience | Maximum points will be awarded to applicants who clearly describe a plan to involve survivors with lived experience in the policy and program development of the project (RFP pg 25) | **5** | **N/A** |
| TOTAL AVAILABLE POINTS WILL VARY BY PROJECT TYPE | | | | |

Application Cover Sheet

|  |  |
| --- | --- |
| Project Information | |
| Project Name *(please match project name as listed in eSNAPS)* |  |
| Applicant/Recipient Organization Name |  |
| Subrecipient Names(s) (*if applicable)* |  |
| Proposed # of people served annually |  |
| Proposed # of households served annually |  |
| Total Funds Requested\* | $ |

**\**Renewal project requests MAY NOT exceed the amount approved in the***[***2023* Grant Inventory Worksheet**](https://www.hudexchange.info/programs/coc/coc-giw-reports/?filter_Year=2023&filter_State=MD&filter_CoC=MD-514&program=CoC&group=GIW)***.***

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Application Type | | | | | |
| RENEWAL Project | Permanent Supportive Housing | Rapid Rehousing | TH-RRH | TH | SSO-CE |
| NEW Project | Permanent Supportive Housing | Rapid Rehousing | TH-RRH | SSO-CE | |
| NEW DV Bonus Project | Rapid Rehousing | TH-RRH | SSO-CE | | |
| If NEW project, desired start date (must be in calendar 2024) |  | | | | |

|  |  |
| --- | --- |
| Contact Details | |
| Legal Name of Applicant |  |
| Mailing Address |  |
| County of Headquarters’ Office |  |
| Authorized Representative Information | |
| Chief Executive Name |  |
| Title |  |
| Email |  |
| Phone number |  |
| Information of person to contact with CoC Application questions | |
| Name |  |
| Email |  |
| Phone |  |
| Agency eSNAPS Contact (Authorized user submitting your CoC Project Application in eSNAPS) | |
| Name |  |
| Email |  |
| Phone |  |

Applicant Attestation

**REQUIRED FOR: ALL NEW & RENEWAL PROJECT APPLICANTS**

I understand and agree:

1. If awarded Continuum of Care funds by the U.S. Department of Housing and Urban Development, this project will comply with all program regulations as found in the Continuum of Care Program Interim Rule 24 CFR Part 578. The project will also comply with all other applicable federal, State and local regulations.
2. The organization will enter required project and client data into the Homeless Management Information System (HMIS) or a comparable database in accordance with the HMIS Data Standards and HMIS Policies & Procedures.
3. The funded project will participate in the Coordinated Entry System and adhere to all Coordinated Entry [Policies and Procedures.](http://www.camdetroit.org/reports-and-documents/)
4. Data submitted with this project application (including, but not necessarily limited data in the APR, Sage, in HMIS, or within the application itself) is complete, accurate and correct.
5. It is understood that renewal and new projects will be submitted to HUD in accordance with the FY2023 Rating and Ranking Policy and that such project ranking decisions are final. I can access a copy of the FY2023 CoC Competition Policy at the MD BoS website (<https://www.mdboscoc.org/2023-coc-competition>).
6. It is understood that the MD BoS CoC Board is responsible for making decisions on which new and renewal projects are submitted to HUD each year as part of the annual CoC competition, and that the ultimate decision in whether a project is funded is made by HUD. It is further understood that 24 CFR §578.35 describes certain situations in which an agency may submit an appeal directly to HUD. It is agreed that the submission of an appeal to HUD, in accordance with HUD’s policies and procedures, is the final recourse that may be taken for the project.
7. New Project Applications Only: If the new project funding applied for is awarded by HUD, it is expected that the grant agreement for that project will be executed and the project will be implemented. Failure to execute a grant agreement for new project funding may result in that funding being lost to the CoC. If my agency chooses to not execute a grant agreement for new project funding, that agency must attend a meeting with representatives of the CoC Lead Agency and the CoC Executive Committee to discuss why the agency is choosing to not accept new project funding. Additionally, the agency will not be allowed to apply for new CoC project funding for five (5) years. The CoC board also reserves the right to take additional action if needed.
8. If at any time my agency decides to voluntarily relinquish a renewal CoC grant, my agency will notify the CoC Lead Agency of this decision in writing as soon as possible.
9. If my agency voluntarily relinquishes a renewal grant, my agency will work with the CoC Lead Agency and other stakeholders as needed to ramp down the project and ensure that clients being served by the project are able to retain or achieve stable housing by the time the grant ends.
10. It is understood that my project will serve clients based only on HUD’s minimum eligibility criteria and the project target population as written in the grant application. It is understood that clients will not be excluded from the project unless there are other funder requirements with additional eligibility or exclusionary criteria over and above the HUD CoC program criteria. Please answer the following if the project has other funding requirements.
    1. Name of funding source: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
    2. Eligibility or exclusionary criteria of that funding source: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*Note: The CoC Lead may require additional documentation, such as a grant agreement, of other funder eligibility/exclusionary criteria.*

1. It is our responsibility to ensure that all proposed program participants will be eligible for the program component type selected; that all proposed activities are eligible under 24 CFR part 578; each project narrative is fully responsive to the question being asked and that it meets all of the criteria for that question as required by this NOFO and included in the detailed instructions provided in eSNAPS; the data provided in various parts of the project application are consistent; and all required attachments correspond to the attachments list in eSNAPS and contain accurate and complete information and are dated between June 30, 2023 and September 30, 2023.
2. All applicants will be required to attest to additional federal regulations in eSNAPS as required for a federal grant. Responses will be considered part of the application process.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Authorized Representative Name Signature Date**

Housing First Assessment

**REQUIRED FOR: ALL NEW & RENEWAL PROJECT APPLICANTS**

For a homelessness service system to work the most efficiently and effectively, individual programs must embrace a Housing First approach. In addition to the Housing First related questions in e-snaps, the Performance Review Committee may review the following Housing First Assessment in the process of reviewing and scoring applications.

*Please check all boxes that apply.*

##### OVERALL

The term “Housing First” is used to describe the program.

Policies clearly delineate that the program is operating under “Housing First” principles as defined by the [U.S. Interagency Council on Homelessness.](https://www.usich.gov/solutions/housing/housing-first)

Project has reviewed the [“USICH Housing First Checklist: Assessing Projects and Systems for a Housing First Orientation”](https://www.usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf) document.

##### ADMISSION

Applicants are accepted regardless of their use of substances or compliance with treatment.

Participation in services is not a condition of program entry.

Poor credit history, rental history, criminal background, or other “housing readiness” factors will not be barriers to housing assistance.

Applicants are not required to have income or employment prior to admission.

Fleeing domestic violence is not a barrier to program access.

People with disabilities are offered clear opportunities to request reasonable accommodations within applications and screening processes and during tenancy and building and apartment units include special physical features that accommodate disabilities.

Programs must exhaust all housing options for applicants, and every effort should be made to avoid continuing an applicant’s homelessness.

##### SERVICE DELIVERY

Engagement and problem-solving are emphasized over therapeutic goals.

Service plans are tenant-driven without predetermined goals.

Participation in services is not a condition of permanent supportive housing tenancy.

Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants’ lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.

##### DISCHARGE

Use of alcohol and drugs in and of itself is not a reason to evict a tenant.

Tenants’ eviction cannot be for failure to follow through with supportive services, participation agreement or a treatment plan.

Tenants may be evicted from the housing program only for serious program violations defined in written policies that are aligned with HUD prescribed Housing First guidance and/or rental property lease violations.

Loss of income or failure to improve income is not a reason to terminate services.

Fleeing domestic violence is not a reason to terminate services.

Tenant must be informed of actions that could possibly cause termination from housing during intake, at recertification, and at any point of substantive change to the termination policy during program participation as verified by tenant signing an acknowledgment document to verify receipt of the termination policy.

Every effort is made to offer a transfer to a tenant from one housing situation to another if tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

To the greatest extent practicable, upon the tenant’s exit the service provider will develop and communicate a comprehensive discharge plan for securing or maintaining permanent housing.

Proposal General Questions

# **REQUIRED FOR: all NEW & RENEWAL PROJECT APPLICANTS**

1. **HEALTHCARE**

Indicate, for each type of healthcare listed below, whether your program assists clients with enrolling in health insurance and/or assists clients effectively utilizing the benefits.

|  |  |  |
| --- | --- | --- |
| Type of Health Care | Assist with Enrollment | Assist with Utilization of Benefits |
| Public Health Care Benefits (State or Federal benefits, Medicaid, Indian Health Services) |  |  |
| Private Insurers |  |  |
| Non-Profit, Philanthropic |  |  |
| Other: |  |  |
| N/A |  | |

1. **EDUCATIONAL ACCESS/SERVICES:**

Indicate if the agency has any written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports listed below.

|  |  |  |
| --- | --- | --- |
| Type of Organization | MOU/MOA | Other Formal Agreement |
| Birth to 3 Years |  |  |
| Child Care and Development Fund |  |  |
| Early Childhood Providers |  |  |
| Early Head Start |  |  |
| Federal Home Visiting Program |  |  |
| Head Start |  |  |
| Healthy Start |  |  |
| Public Pre-K |  |  |
| Tribal Home Visiting Program |  |  |
| Other: |  |  |
| N/A |  | |

1. **GEOGRAPHY:** Please indicate the geographical area your project will serve. Check all that apply.

|  |  |
| --- | --- |
| Geographic Area | Area Served |
| Allegany County |  |
| Calvert County |  |
| Cecil County |  |
| Charles County |  |
| Frederick County |  |
| Garrett County |  |
| Harford County |  |
| St. Mary’s County |  |
| Washington County |  |

1. **SUBPOPULATION:** Please indicate which subpopulation your project will serve. Check all that apply.

|  |  |
| --- | --- |
| Subpopulation | Served |
| Chronically Homeless Households |  |
| Older & Aging Adults |  |
| Youth 18-24 Years |  |
| Domestic Violence Survivors |  |
| Veterans |  |
| Families with Children |  |
| Individuals / Adults without Children |  |

1. **DIVERSITY, EQUITY, AND INCLUSION**
   1. If a **renewal project,** describe how your program has assessed its organizational structure and program practices for disparities in representation, service delivery, and program outcomes – and if so, what actions have been taken to reduce or eliminate those disparities. (Example: Black shelter clients are less likely to be offered permanent housing opportunities than their white peers; corrective action taken included evaluating case management services and doing staff anti-bias training).
   2. If a **new project,** describe the strategies you will implement to avoid a lack of diversity, ensure equity in services, and ensure the program is accessible to all.
2. **LIVED EXPERIENCE ENGAGEMENT:** Please indicate if your organization involves or engages people with lived experience in a meaningful way. Check all the apply.

|  |  |
| --- | --- |
| Activity | |
| Host focus groups to collect feedback on program services |  |
| Individuals with Lived Experience Serve on Agency Board |  |
| Individuals with Lived Experience Employed by Agency |  |
| Individuals with Lived Experience Service in Peer Navigation / Volunteer Role |  |
| Individuals with Lived Experience Serve on Working Groups or Advisory Committees |  |
| Other: |  |
| N/A |  |

1. **SUMMARY BUDGET (CORRESPONDS WITH eSNAPS APPLICATION)**

|  |  |
| --- | --- |
| Eligible Costs | Annual Assistance Requested |
| Leasing | $ |
| Rental Assistance | $ |
| Supportive Services | $ |
| Operating Costs | $ |
| HMIS | $ |
| Admin | $ |
| Total Request | $ |

1. **MATCH FUNDS (CORRESPONDS WITH eSNAPS APPLICATION)**

|  |  |
| --- | --- |
| Match Source 1 | |
| Type of Commitment (Cash or In-Kind) |  |
| Type of Source (Private, Government) |  |
| Name the Source of the Commitment (Be specific, include the office or grant program as applicable) |  |
| Date of Written Commitment |  |
| Value of Written Commitment | $ |
| Match Source 2 | |
| Type of Commitment (Cash or In-Kind) |  |
| Type of Source (Private, Government) |  |
| Name the Source of the Commitment (Be specific, include the office or grant program as applicable) |  |
| Date of Written Commitment |  |
| Value of Written Commitment | $ |
| Match Source 3 | |
| Type of Commitment (Cash or In-Kind) |  |
| Type of Source (Private, Government) |  |
| Name the Source of the Commitment (Be specific, include the office or grant program as applicable) |  |
| Date of Written Commitment |  |
| Value of Written Commitment | $ |

1. **VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY:** HUD requires that all CoC funded projects are in compliance with the VAWA rule and have an Emergency Transfer Plan in place. Projects must also ensure that all program participants are made aware of the plan.
   1. If your agency has an existing Emergency Transfer Plan, please attach it to your application submission.
   2. If you do not currently have an Emergency Transfer Plan, **please see APPENDIX A** for policy templates and describe below your agency’s strategy to develop and implement the policy.
2. **ANTI-DISCRIMINATION POLICY:** HUD requires CoCs to develop and implement anti-discrimination policies to ensure that individuals and families receive supportive services, shelter and housing free from discrimination. CoCs must adhere to anti-discrimination policies by not denying admission to or separating any family members from other members of their family or caregivers based on age, sex, gender, LGBT status, marital status or disability when entering shelter or housing.
   1. If your agency has an existing anti-discrimination policy, please attach it to your application submission.
   2. If you do not currently have an anti-discrimination policy, **please see the APPENDIX B** for policy templates and describe below your agency’s strategy to develop and implement the policy.
3. **HOUSING FIRST POLICY:** HUD encourages all CoC funded projects to operate using a Housing First approach to prioritize rapid placement and stabilization in permanent housing and to eliminate any service participation requirements or preconditions to entry.
   1. Attach your agency’s policies and procedures, termination policy, and any other relevant documents demonstrating compliance with Housing First or low barriers to entry.
   2. If you do not currently have these policies, please describe below your agency’s strategy to develop and implement such policies.

Proposal Narrative Questions

# **REQUIRED FOR: NEW PROJECT APPLications only**

1. **GENERAL PROJECT DESCRIPTION (CORRESPONDS WITH eSNAPS APPLICATION Q3B):** Provide a description that addresses the entire scope of the proposed project. The project description should be complete and concise. The description must be consistent with other parts of this application and should identify the following:
   1. The target population including the number of single adults and the number of families with children to be served when the project is at full capacity
   2. Indicate if this is an expansion of a current project
   3. Type and number of units (scatter-site or single site; single or multi-family homes, etc.)
   4. Specific services that will be provided
   5. Projected outcomes
   6. Coordination with partners including but not limited to trainings, resources, and collaborations
   7. How the project meets community needs in its service area
2. **HMIS:** 
   1. How will you ensure new and current employees attend HMIS user training on an annual basis? How will your project maintain timely data entry and excellent data quality?
   2. For Non-HMIS participating agencies (Victim Service Providers), describe how you will ensure timely and accurate data quality using a comparable database?
3. **COORDINATED ENTRY PARTICIPATION:**
   1. Participation in Coordinated Entry is a requirement for all CoC funded projects, if selected for funding, do you agree to adhere to the following goals?
      1. All clients who enter the homeless services system will be assessed for the Coordinated Entry System
      2. 100% of CoC funded housing providers will participate in the Coordinated Entry System
      3. 100% of new client enrollments into housing projects will come from the Coordinated Entry System By Name List
   2. Does your agency currently participate in the local Coordinated Entry Process?
4. **SYSTEM PERFORMANCE MEASURES:** HUD is increasingly relying on data-driven performance to evaluate community success. CoC’s are required to submit [system performance measures](https://www.hudexchange.info/resources/documents/System-Performance-Measures-Introductory-Guide.pdf) each year to demonstrate community-wide performance.

Describe your project’s strategies to contribute to the CoC’s overall success for each of the following:

* 1. Ensure program participants are successfully exiting to and maintaining permanent housing
  2. Ensure program participants do not return to homelessness
  3. Ensure jobs and income growth for homeless persons in CoC-program funded projects

1. **HOUSING FIRST:** Question 11 pertains to Housing First related policies; this question is intended to understand a new project’s experience and implementation plan of a Housing First approach. Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or minimum income threshold). It is an approach to:

1) quickly and successfully connect individuals and families experiencing homelessness to permanent housing;

2) without barriers to entry, such as sobriety, treatment or service participation requirements; or

3) related preconditions that might lead to the participant’s termination from the project.

* 1. Describe your agency’s experience in operating a successful housing first program, and clearly describe a program design that meets the definition of Housing First, including low-barriers to entry, as described above.

1. **INCOME AND MAINSTREAM BENEFITS:**
   1. How will your program work with mainstream employment organizations to help individuals and families increase their cash income?
   2. How does your agency provide information to staff about mainstream benefits, including up-to-date resources on eligibility and program changes that can affect clients?
2. **EDUCATIONAL ACCESS/SERVICES:**
   1. Indicate the policies and procedures, if any, that have been adopted to inform individuals and families who become homeless of their eligibility for educational services.

Project type Narrative Questions

# **REQUIRED FOR: NEW PRoject applications by component type**

## **NEW PERMANENT SUPPORTIVE HOUSING PROJECT APPLICANTS ONLY**

1. **PERMANENT SUPPORTIVE HOUSING PROJECTS:**
   1. How will your program assess clients for their ability to move-on and exit a permanent supportive housing project and live in community-based housing, with or without an ongoing subsidy?
   2. Describe your strategy for serving those in permanent supportive housing who may need a higher level of care, including those with medically complex situations or those aging in place?
   3. Will this new project utilize housing subsidies or subsidized housing units which are not funded through CoC or ESG programs? (Subsidized units may be funded through any of the following: private organizations, state or local government, Public Housing or Housing Choice Vouchers, faith-based organizations or federal programs other than CoC or ESG).
      1. Will the subsidies provide at least 25% of the total units included in the project?
   4. Will this new project utilize healthcare resources to assist program participants? (Healthcare resources include direct contributions from a public or private insurance provider to the project (e.g. Medicaid), the provision of health care services by a private or public organization tailored to program participants, project eligibility criteria is NOT restricted by eligibility requirements of the health care service provider).
      1. If the healthcare provider includes substance use disorder treatment or a recovery provider, will the project provide access to all program participants who qualify AND choose the services?
      2. Will the value of the services provided by the healthcare organization be equivalent to 25% of the total grant amount being requested?

## **NEW RAPID REHOUSING PROJECT APPLICANTS ONLY**

1. **RAPID REHOUSING PROJECTS:** Rapid Re-Housing takes a person-centered and progressive engagement approach to providing assistance, taking into account a household's strengths and challenges, and targeting resources to each household’s level of need (see [link to overview of progressive engagement](https://endhomelessness.org/blog/what-is-progressive-engagement/)).
   1. Describe how the project will determine the amount and duration of the monthly rental subsidy that will be provided to participants.
   2. If a household still enrolled in the project loses income or becomes unable to pay their portion of rent, describe how the project will determine when the rental subsidy will be reinstated or increased to help the household stabilize and avoid eviction.
   3. Will this new project utilize housing subsidies or subsidized housing units which are not funded through CoC or ESG programs? (Subsidized units may be funded through any of the following: private organizations, state or local government, Public Housing or Housing Choice Vouchers, faith-based organizations or federal programs other than CoC or ESG).
      1. Will the subsidies provide at least 25% of the total units included in the project?
   4. Will this new project utilize healthcare resources to assist program participants? (Healthcare resources include direct contributions from a public or private insurance provider to the project (e.g. Medicaid), the provision of health care services by a private or public organization tailored to program participants, project eligibility criteria is NOT restricted by eligibility requirements of the health care service provider).
      1. If the healthcare provider includes substance use disorder treatment or a recovery provider, will the project provide access to all program participants who qualify AND choose the services?
      2. Will the value of the services provided by the healthcare organization be equivalent to 25% of the total grant amount being requested?

## **NEW JOINT TRANSITIONAL HOUSING – RAPID REHOUSING PROJECT Applicants ONLY**

1. **JOINT TH/PH-RRH PROJECTS:** HUD is encouraging CoCs and project applicants to carefully consider and assess whether a joint component project is the best use of resources and will best meet the needs of people experiencing homelessness in the community.
   1. Please review the HUD factors below, then define the specific subpopulation this project is proposing to serve and provide justification that this type of resource is necessary for the Continuum.
      1. Communities with high rates of unsheltered homelessness and where stays in shelter and other forms of crisis housing are usually brief would likely benefit from adding a joint component project to their system. In communities where shelter, crisis housing, and transitional housing stays are long, increasing rapid re-housing and permanent supportive housing resources may be more effective ways to increase capacity.
      2. Communities with no emergency shelter or crisis housing options available for people fleeing domestic violence should consider a joint component project. However, where there are already shelters or crisis housing projects serving survivors, communities should assess whether lowering the barriers in those existing projects and adding rapid re-housing would better meet survivors’ needs and be a better use of resources.
      3. Communities with transitional housing projects, particularly those that are not able to provide their participants with financial resources to obtain permanent housing, should consider whether reallocating funds from those projects to a joint component project would better meet the needs of the people the project is intended to serve.
   2. Describe how the project will determine the amount and duration of the monthly rental subsidy that will be provided to participants enrolled in the Rapid Rehousing component.
   3. If a household still enrolled in the Rapid Rehousing component loses income or becomes unable to pay their portion of rent, describe how the project will determine when the rental subsidy will be reinstated or increased to help the household stabilize and avoid eviction.
   4. Will this new project utilize housing subsidies or subsidized housing units which are not funded through CoC or ESG programs? (Subsidized units may be funded through any of the following: private organizations, state or local government, Public Housing or Housing Choice Vouchers, faith-based organizations or federal programs other than CoC or ESG).
      1. Will the subsidies provide at least 25% of the total units included in the project?
   5. Will this new project utilize healthcare resources to assist program participants? (Healthcare resources include direct contributions from a public or private insurance provider to the project (e.g., Medicaid), the provision of health care services by a private or public organization tailored to program participants, project eligibility criteria is NOT restricted by eligibility requirements of the health care service provider).
      1. If the healthcare provider includes substance use disorder treatment or a recovery provider, will the project provide access to all program participants who qualify AND choose the services?
      2. Will the value of the services provided by the healthcare organization be equivalent to 25% of the total grant amount being requested?

## **NEW COORDINATED ENTRY-SSO PROJECT Applications ONLY**

1. **COORDINATED ENTRY SERVICE PROJECTS:** Eligible activities in this category may include staff dedicated to conducting CES assessments (via street outreach, drop-in centers or emergency shelter), providing navigation services, securing critical documents, participation in case conference meetings or activities related to developing and implementing the coordinated entry process.
   1. Describe how the proposed project will contribute towards the coordinated entry system being easily available/reachable for all persons, including those with a disability or limited English proficiency within the CoC’s geographic area who are seeking homeless assistance.
   2. Describe how the proposed project will target outreach to homeless persons with the highest barriers within the CoC’s geographic area.
   3. Describe how the project will ensure that program participants are directed to appropriate housing and services that fit their needs.

DV bonus Proposal Narrative questions

# **REquired for: NEW DV BONUS PROJECT APPLICATIONS ONLY**

New DV Bonus projects (RRH, Joint TH/PH-RRH, and SSO-CE) must be fully dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking who qualify as homeless under paragraph (4) of 24 CFR 578.3.

All RRH and Joint TH/PH-RRH component projects must follow a housing-first approach.

New DV Bonus RRH and Joint TH/RRH projects must request a minimum of $50,000 per project.

1. **ASSESSING THE NEED FOR DV BONUS PROJECTS.** 
   1. Enter the number of survivors that need housing or services in the LHC:
   2. Enter the number of survivors the LHC is currently serving:
   3. How was the number of survivors in need of housing and services calculated
   4. What data source was used to identify the number of survivors (e.g., comparable databases, other administrative data, external data source, HMIS for non-DV projects)
   5. If the LHC is unable to meet the needs of all survivors, please explain the barriers to meeting those needs.
2. **DESCRIBE THE APPLICANT EXPERIENCE IN PROVIDING HOUSING TO DV SURVIVORS. HOW HAS THE APPLICANT:** 
   1. ensured DV survivors experiencing homelessness were quickly moved into safe affordable housing;
   2. prioritized survivors–you must address the process the project applicant used, e.g., Coordinated Entry, prioritization list, CoC’s emergency transfer plan, etc.;
   3. determined which supportive services survivors needed;
   4. connected survivors to supportive services; and
   5. moved clients from assisted housing to housing they could sustain–address housing stability after the housing subsidy ends.
3. **DESCRIBE EXAMPLES OF HOW THE APPLICANT ENSURED THE SAFETY AND CONFIDENTIALITY OF DV SURVIVORS EXPERIENCING HOMELESSNESS BY:**
   1. taking steps to ensure privacy/confidentiality during the intake and interview process to minimize potential coercion of survivors;
   2. making determinations and placements into safe housing;
   3. keeping information and locations confidential;
   4. training staff on safety and confidentiality policies and practices; and
   5. taking security measures for units (congregate or scattered site), that support survivors’ physical safety and location confidentiality.
4. **DESCRIBE HOW THE PROJECT APPLICANT EVALUATED ITS ABILITY TO ENSURE THE SAFETY OF DV SURVIVORS SERVED BY THE PROJECT, INCLUDING AREAS IDENTIFIED FOR IMPROVEMENT.**
5. **DESCRIBE THE PROJECT APPLICANT EXPERIENCE AND PLAN FOR USING TRAUMA-INFORMED, VICTIM-CENTERED APPROACH TO MEET THE NEEDS OF DV SURVIVORS IN THE FOLLOWING AREAS:**
   1. prioritizing placement and stabilization in permanent housing consistent with participants’ wishes and stated needs;
   2. establishing and maintaining an environment of agency and mutual respect, e.g., the project does not use punitive interventions, ensures program participant staff interactions are based on equality and minimize power differentials;
   3. providing program participants access to information on trauma, e.g., training staff on providing program participants with information on trauma;
   4. emphasizing program participants’ strengths, e.g., strength-based coaching, questionnaires and assessment tools include strength-based measures, case plans work towards survivor defined goals and aspirations;
   5. centering on cultural responsiveness and inclusivity, e.g., training on equal access, cultural competence, nondiscrimination, language access, improving services to be culturally responsive, accessible and trauma-informed;
   6. providing a variety of opportunities for connection for program participants, e.g., groups, mentorships, peer-to-peer, spiritual needs; and
   7. offering support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.
6. **DESCRIBE EXAMPLES OF SUPPORTIVE SERVICES THAT THE PROJECT APPLICANT HAS PROVIDED TO DOMESTIC VIOLENCE SURVIVORS WHILE QUICKLY MOVING THEM INTO PERMANENT HOUSING AND ADDRESSING THEIR SAFETY NEEDS.**
7. **DESCRIBE THE PROJECT APPLICANT PLAN TO INVOLVE SURVIVORS WITH A RANGE OF LIVED EXPERTISE IN POLICY AND PROGRAM DEVELOPMENT THROUGHOUT THE OPERATION OF THE PROJECT.**

Appendix A: VAWA Policy on Housing Protection

As required by the Housing and Urban Development’s (HUD[) final rule](https://www.federalregister.gov/documents/2016/11/16/2016-25888/violence-against-women-reauthorization-act-of-2013-implementation-in-hud-housing-programs), CoCs are required to adopt and implement certain protections and develop emergency transfer plan protocols that are available to all victims of domestic violence, dating violence, sexual assault and stalking, regardless of sex, gender identity or sexual orientation. This requirement is in response to the Reauthorization of the Violence Against Women Act (VAWA) of 2013 which extends the enhanced housing protections and options to all HUD housing programs.

Core components of the rule which should be included in agency policy include:

* **Extension of the core VAWA protections:** Survivors are *not denied assistance* as an applicant or be *evicted or have assistance terminated* as a tenant, because the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, and stalking.
* **Emergency transfers:** The *implementation of an emergency transfer plan* which allows for survivors to move to another safe and available unit if they fear for their life and safety.
* **Protections against denials, terminations, and evictions that directly result from being a victim of domestic violence, dating violence, sexual assault, or stalking:** The *prohibition of any denial, termination, or eviction* that is “a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.”
* **Low-barrier certification process:** The final rule makes it clear that under most circumstances, a survivor *need only to self-certify* in order to document the domestic violence, dating violence, sexual assault, or stalking, ensuring third party documentation does not cause a barrier in a survivor expressing their rights and receiving the protections needed to keep themselves safe.

HUD has provided model templates and sample forms that may be customized and adopted for specific agency use. Sample forms attached. Providers will be required to notify and explain housing rights and provide a list of local domestic violence service providers to clients at program intake.

**Link to sample forms**

|  |  |
| --- | --- |
| HUD-5380 | [**NOTICE OF OCCUPANCY RIGHTS UNDER THE VIOLENCE AGAINST WOMEN ACT**](https://portal.hud.gov/hudportal/documents/huddoc?id=5380.docx) |
| HUD-5381 | [**MODEL EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLECE, SEXUAL ASSAULT, OR STALKING**](https://portal.hud.gov/hudportal/documents/huddoc?id=5381.docx) |
| HUD-5382 | [**CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, AND ALTERNATE DOCUMENTATION**](https://portal.hud.gov/hudportal/documents/huddoc?id=5382.docx) |
| HUD-5383 | [**EMERGENCY TRANSFER REQUEST FOR CERTAIN VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING**](https://portal.hud.gov/hudportal/documents/huddoc?id=5383.docx) |

Appendix B: Anti-Discrimination Policy

As required by the Housing and Urban Development’s (HUD) final rule, CoCs are required to comply with applicable civil rights laws through the adoption and implementation of the fair housing and equal opportunity policy. The final rule ([24 CFR 578.93](https://www.gpo.gov/fdsys/granule/CFR-2013-title24-vol3/CFR-2013-title24-vol3-sec578-93)), addressing nondiscrimination and equal opportunity requirements, is provided to offer greater direction to recipients and subrecipients on the use of grant funds. It states that the nondiscrimination and equal opportunity requirements set forth in [24 CFR 5.105(a)](https://www.gpo.gov/fdsys/granule/CFR-2013-title24-vol3/CFR-2013-title24-vol3-sec578-93) apply. This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 (Section 504), and title II of the Americans with Disabilities Act.

All HUD funded projects in the Continuum of Care are required to adopt and implement an Anti-Discrimination policy that ensures that all housing and services must be available to all eligible persons, regardless of race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, gender expression or marital status.

**POLICY CORE COMPONENTS**

Core components which should be included in agency policy include:

* **Nondiscrimination**

24 CFR 578.93(a) requires CoC Programs to operate in compliance with federal nondiscrimination and equal opportunity requirements. Through this final rule, HUD implements policy to ensure that its core programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status; see 24 CFR 5.105(a) for a full list of applicable laws, regulations, and Executive Orders.

* **Housing for Specific Subpopulations**

Recipients and subrecipients may exclusively serve a particular homeless subpopulation in transitional or permanent housing if the housing addresses a need identified by the Continuum of Care for the geographic area. It must meet HUD criteria in 24 CFR 578.93.

* **Fair Housing**

A recipient must implement its programs in a manner that [affirmatively furthers fair housing](https://www.hud.gov/AFFH#:~:text=WHAT%20IS%20AFFH%3F,-Title%20VIII%20of&text=Generally%2C%20in%20administering%20programs%20and,Promote%20integration%20and%20reduce%20segregation), which means the recipient must:

(1) Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;

(2) Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and

(3) Provide program participants with information on rights and remedies available under applicable federal, State and local fair housing and civil rights laws.

* **Equal Access to Housing**

Recipients must act in accordance with the [Equal Access to Housing Rule](https://www.federalregister.gov/documents/2012/02/03/2012-2343/equal-access-to-housing-in-hud-programs-regardless-of-sexual-orientation-or-gender-identity) which ensures that programs are open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status.

Recipients must:

* Ensure that staff and volunteers understand that a client may present their gender differently than the way staff and volunteers identify their gender.
* Not consider a client or potential client to be ineligible for services because their appearance or behavior does not conform to gender stereotypes.
* Ensure that all staff and volunteers maintain the confidentiality of a client’s legal name and sex at birth and understand the potential impact that disclosure can have on a client’s progress toward self-sufficiency.
* When possible, ensure that new construction and rehabilitation includes and promotes privacy and safety in sleeping areas, bathrooms and showers.
* Take prompt action to resolve inappropriate behavior, treatment, harassment, or any other equal access issues by staff, volunteers or clients.
* Include policies and procedures in employee handbooks and training that prohibit discrimination and provide guidance to staff to ensure that all persons have equal access to the agency’s services.
* Not ask questions or seek information concerning a person’s anatomy or medical history beyond that necessary to determine program eligibility.
* Not require a person’s gender identity to match the gender listed on an ID or other documents
* Help clients understand the resources available to help them obtain legal identification documents.
* Use the client's preferred gender and pronoun.
* **Accessibility and Integrative Housing and Services for Persons with Disabilities**

For persons with disabilities, fair housing law makes it illegal to fail to make reasonable accommodation in rules, policies, and services to give a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit; and fail to allow reasonable modification to the premises if the modification is necessary to allow full use of the premises.

* **Prohibition Against Involuntary Family Separation**

In accordance with HUD’s CoC and ESG program regulations, involuntary family separation is prohibited in CoC-funded and ESG-funded projects. CoC-funded and ESG-funded projects may not deny admission to any household on the basis of:

* + The age or gender of a child under age 18; or
  + The gender of a parent or parents; or
  + The marital status of a parent or parents.
* **Faith-Based Activities**

Service providers and their staff shall not discriminate against any client or prospective client on the basis of religion, religious beliefs, a refusal to hold a religious belief, or a refusal to attend or participate in religious activities.

**Guidance for Creation of Nondiscrimination and Fair Housing Policies**

* Policy should state that the agency does not discriminate and complies with all nondiscrimination, fair housing, and equal opportunity laws.
* Policy should indicate the availability of aids and services, upon request, to ensure effective communication, such as the availability of qualified sign language interpreters, documents in Braille, or other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.
* Policy should state that the agency will make reasonable accommodations in rules, policies, and services to give a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit.
* If the agency acts as a landlord, the policy should state that the agency will permit reasonable modification to the premises if the modification is necessary to allow full use of the premises.
* Policy should provide contact information for submitting a complaint or reporting discrimination.
* Policy should apply to all staff, volunteers, interns working for CoC Program recipients and subrecipients; Coordinated Entry Implementers; CoC Lead Agency; Collaborative Applicant, HMIS Lead and all other applicable individuals in service to those experiencing homelessness in the Maryland Balance of State CoC.
* Policy should ensure that all clients shall be informed of their right to access housing and services without discrimination, and of their right to initiate a grievance if they believe they have been discriminated against.

Appendix C: New Project Eligible Costs

Under the Continuum of Care Program, new projects can request funding in up to 6 categories, dependent on project type:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Eligible Costs | Description | Permanent Supportive Housing | Rapid Rehousing | Joint TH-RRH | SSO |
| Leasing | \*Individual Units or Entire Structure  \*Rent must be reasonable and not exceed FMR  \*Lease between service provider and unit owner  \*Client is sublessee of service provider  \*Responsible for 100% of rent costs and damages  \*Service provider must pay for vacancies | ✔ |  | ✔ |  |
| Rental Assistance | \* Apartments, houses, facilities  \*Lease between client and housing owner  \*Written rental assistance agreement between housing owner and service provider  \*Client pays portion of rent according to 24 CFR 578.77. Service provider pays remaining portion of rent  \*Service provider cannot make rental assistance payments on a vacant unit except as provided in 24 CFR 578.51(i) | ✔ | ✔ Tenant Based Only | ✔ |  |
| Supportive Services | \*Includes a wide range of services such as case management, assistance with moving costs, client assistance, treatment, food, and counseling. | ✔ | ✔ | ✔ | ✔ |
| Operating Costs | Costs for housing units:  \*Property Taxes/Insurance  \*Maintenance and repair  \*Security  \*Utilities  \*Furniture and equipment  \*Cannot be requested if project is using rental assistance funds in same structure | ✔ |  | ✔ |  |
| HMIS | \*Staffing and equipment costs to meet the regulatory requirements for participation in HMIS | ✔ | ✔ | ✔ | ✔ |
| Project Administration | \*Up to 10% of grant  \*Administrative costs related to the planning and execution of Continuum of Care activities  \* Does not include staff & overhead costs directly related to carrying out activities eligible under [§578.43](https://www.law.cornell.edu/cfr/text/24/578.43) through [§ 578.57](https://www.law.cornell.edu/cfr/text/24/578.57), because they are eligible as part of those activities | ✔ | ✔ | ✔ | ✔ |

For more information about the differences between leasing and rental assistance under the CoC Program, refer to the [HUD website.](https://www.hudexchange.info/coc/coc-2-0-training-materials/coc-program-components-and-eligible-costs/) For more information about eligible costs under the CoC Program, review this [Introductory Guide](https://www.hudexchange.info/resources/documents/CoCProgramIntroductoryGuide.pdf) from HUD. For specific details about each eligible activity, refer to [24 CFR Subpart D - Program Components and Eligible Costs](https://www.law.cornell.edu/cfr/text/24/part-578/subpart-D).

Appendix D: Match Requirements

Match refers to actual cash or in-kind resources contributed to the grant. All costs paid for with matching funds must be for activities that are eligible under the CoC Program, even if the recipient is not receiving CoC Program grant funds for that activity. All grant funds must be matched with an amount no less than 25% of the awarded grant amount (excluding the amount awarded to the leasing budget line item) with cash or in-kind resources. Match resources may be from public (not statutorily prohibited by the funding agency from being used as a match) or private resources.

To determine the amount of match required for a new project, develop a proposed budget for the funds being requested through the CoC Program.  Subtract the amount requested for leasing and multiply the new total by 25%.  This is the amount of match required.

|  |  |
| --- | --- |
| Match Calculation Examples | |
| Without Leasing  Total amount requested from HUD (without leasing):   * Rental Assistance funding = $80,000 * Supportive Services funding = $13,000 * Project Administration funding = $7,000 * Total amount requested = $100,000   Total amount requested from HUD x .25 = Minimum Match Requirement  $100,000 x .25 = $25,000 | **With Leasing**  Total amount requested from HUD (with leasing):   * Leasing funding = $70,000 * Supportive Services funding = $23,000 * Project Administration funding = $7,000 * Total amount requested = $100,000   Total amount requested from HUD, excluding amount requested for leasing  $100,000 - $70,000 = $30,000  Total amount minus leasing x .25 = Minimum Match Requirement  **$30,000 x .25 = $15,000** |

*Eligible Costs for Match*

All match contributions (cash or in-kind) in the CoC Program must be for eligible activities/costs per Subpart D of the CoC Program Interim rule, regardless of whether the activities/costs are included in the HUD-approved project budget.  The eligible categories of match are as follows:

|  |  |
| --- | --- |
| Supportive Services | Operating |
| 1. Assessment of Service Needs | 1. Maintenance/Repair |
| 2. Assistance with Moving Costs | 2. Property Taxes and Insurance |
| 3. Case Management | 3. Replacement Reserve |
| 4. Child Care | 4. Building Security |
| 5. Education Services | 5. Electricity, Gas, and Water |
| 6. Employment Assistance | 6. Furniture |
| 7. Food | 7. Equipment (lease, buy) |
| 8. Housing/Counseling Services |  |
| 9. Legal Services |  |
| 10. Life Skills |  |
| 11. Mental Health Services |  |
| 12. Outpatient Health Services |  |
| 13. Outreach Services |  |
| 14. Substance Abuse Treatment Services |  |
| 15. Transportation |  |
| 16. Utility Deposits |  |
| 17. Operating Costs (SSO Projects ONLY) |  |