

**MARYLAND BALANCE OF STATE CONTINUUM OF CARE MD-514
FY2022 CoC PROGRAM
REQUEST FOR PROPOSALS (RFP)**

RFP ISSUE DATE: August 15, 2022

PROPOSAL DEADLINE: 8:00 pm, Wednesday, August 31, 2022

FUNDING OPP #: FR-6600-N-25
[Notice of Funding Opportunity \(NOFO\) for Fiscal Year \(FY\) 2022
Continuum of Care Competition](#)
 FR-6500-N-25S
[Special Notice of Funding Opportunity \(NOFO\) to Address
Unsheltered and Rural Homelessness](#)

ESTIMATED FUNDS AVAILABLE: CoC Tier 1 = \$5,167,268
 CoC Tier 2 = \$543,923
 DV Bonus = \$194,964
 Special NOFO Unsheltered Set Aside = \$2,282,009 (All Counties)
 Special NOFO Rural Set Aside = \$129,435 (Garrett County Only)

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Introduction

The purpose of this Request for Proposal is to solicit project applications from across the MD Balance of State CoC for new and renewing projects in the FY2022 CoC Funding Competition and to solicit new project applications for the FY2022 CoC Special NOFO to Address Unsheltered and Rural Homelessness.

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.

In 2022, HUD published the Special NOFO to Address Unsheltered and Rural Homelessness, whose goal is to target efforts to reduce unsheltered homelessness, particularly in communities with very high levels of unsheltered homelessness and homelessness in rural areas. HUD will award funding to communities to implement coordinated approaches -- grounded in Housing First and public health principles -- to reduce the prevalence of unsheltered homelessness, and improve services engagement, health outcomes, and housing stability among highly vulnerable unsheltered individuals and families.

Policy Priorities

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

CoC NOFO	Special NOFO
Ending Homelessness for All Persons	Unsheltered Homelessness
Use a Housing First Approach	Unsheltered Homelessness and Individuals and Families Experiencing Homelessness with Severe Service Needs in Rural Areas
Reducing Unsheltered Homelessness	Providing Assistance on Tribal Lands
Improving System Performance	Involving a Broad Array of Stakeholders in the CoC's Efforts to Reduce Homelessness
Partnering with Housing, Health, and Service Agencies	Advancing Equity
Racial Equity	Use a Housing First Approach
Improving Assistance to LGBTQ+ Individuals	
Persons with Lived Experience	
Increasing Affordable Housing Supply	

Comprehensive CoC Plan to Serve Individuals and Families Experiencing Homelessness with Severe Service Needs

Projects selected for inclusion in the CoC Special NOFO to Address Unsheltered and Rural Homelessness application to HUD must agree to adhere with the Comprehensive CoC Plan to Serve Individuals and Families Experiencing Homelessness with Severe Service Needs.

The Comprehensive CoC Plan to Serve Individuals and Families Experiencing Homelessness with Severe Service Needs is a required application component of the Special NOFO. The plan must:

- Describe the CoC's current strategies for conducting coordinated and comprehensive outreach, providing access to low-barrier shelter and other temporary accommodations, and providing immediate access to low-barrier permanent housing.
- Demonstrate how the CoC will leverage both mainstream housing and healthcare resources to assist efforts to end unsheltered homelessness and stabilize individuals and their families in housing and increase access to employment opportunities for those experiencing homelessness.
- Demonstrate how CoCs will support underserved communities, identify barriers that led to any disparities in communities being served, and support equitable community development by taking steps to address such barriers when using these funds and how they will involve individuals with lived experience in the decision-making process of the CoC.
- Demonstrate how the CoC will ensure resources funded under this Special NOFO will contribute to reducing unsheltered homelessness in the geographic area.

HUD CoC Application Submission Requirements

HUD requires three separate components be submitted as part of the application package, for both funding sources.

1. Collaborative Application: Overall competition application completed by the CoC Lead Agency (DHCD). Contents highlight the CoC's system-wide coordination and system performance. Must indicate how the CoC facilitated a transparent, data-driven competition process. The collaborative application determines the overall CoC Competition Score, which impacts the number new and renewal projects that will receive CoC funding.
2. Project Applications: Each new & renewing project must complete a project application in the eSNAPS system and submit before the deadline. These applications are completed by the individual project applicants. *NOTE: DHCD will inform all applicants when the eSNAPS project application is due, they are not a part of this RFP process.*
3. Priority Listing: A form in eSNAPS that indicates which project applications the CoC accepted or rejected in the local competition and the ranked priority order of accepted projects. The Priority Listing also includes the overall, finalized budgets for all projects submitted in the competition. DHCD completes this portion of the application.

Balance of State 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 projects are 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 [FY2022 BoS CoC Competition Overview](#) for more information.

Additionally, [the CoC Rating and Ranking Policy](#) and the [CoC Reallocation Policy](#) are available for review.

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 in the competition timeline document 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 FY2022.

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

Eligible New Project 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 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 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.

Rapid Rehousing has the following core components:

Housing Identification

- Recruit landlords to provide housing opportunities for individuals and families experiencing homelessness.
- Address potential barriers to landlord participation such as concern about short term nature of rental assistance and tenant qualifications.
- Assist households to find and secure appropriate rental housing.

Rent and Move-In Assistance

- Provide assistance to cover move-in costs, deposits, and the rental and/or utility assistance necessary to allow individuals and families to move immediately out of homelessness and to stabilize in permanent housing.

Rapid Rehousing Case Management and Services

- Help individuals and families experiencing homelessness identify and select among various permanent housing options based on their unique needs, preferences, and financial resources.
- Help individuals and families experiencing homelessness address issues that may impede access to housing (such as credit history, arrears, and legal issues).
- Help individuals and families negotiate manageable and appropriate lease agreements with landlords.
- Make appropriate and time-limited services and supports available to families and individuals to allow them to stabilize quickly in permanent housing.
- Monitor participants' housing stability and be available to resolve crises, at a minimum during the time rapid re-housing assistance is provided.
- Provide or assist the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals. This includes providing or ensuring that the household has access to resources related to benefits, employment, and community-based services (if needed and appropriate), so that they can sustain rent payments independently when rental assistance ends.
- Ensure that services provided are client-directed, respectful of individuals' right to self-determination, and voluntary. Unless basic program-related case management is required by statute or regulation, participation in services should not be required to receive rapid re-housing assistance.

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.

Additionally, if CoC Program funds are not being requested for both TH and RRH units, the project application must describe and include the number of TH and RRH units that will be utilized by the project from another funding source, if selected for conditional award, and provide details in the project description of how TH and RRH assistance will be provided.

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.

Supportive Services Only (not including SSO projects for Coordinated Entry)

SSO projects not dedicated to Coordinated Entry must develop a strategy for providing supportive services to those with the highest service needs, including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services. The project must ensure that program participants are assisted to obtain and maintain permanent housing in a manner that fits their needs and must have a specific plan for ensuring program participants will be individually assisted to obtain the benefits of mainstream health, social services, and employment programs for which they are eligible to apply and which meet their needs (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education). SSO projects are required to participate in the coordinated entry system.

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	<ul style="list-style-type: none"> *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	<ul style="list-style-type: none"> * 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	<ul style="list-style-type: none"> *Includes wide range of services such as case management, assistance with moving costs, client assistance, treatment, food, and counseling. 	✓	✓	✓	✓
Operating Costs	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> *Staffing and equipment costs to meet the regulatory requirements for participation in HMIS 	✓	✓	✓	✓
Project Administration	<ul style="list-style-type: none"> *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 through § 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](#). For more information about eligible costs under the CoC Program, review this [Introductory Guide](#) from HUD. For specific details about each eligible activity, refer to [24 CFR Subpart D - Program Components and Eligible Costs](#).

Renewal Projects

When completing the budget template, renewal projects must ensure that the configuration of units and total in each cost category (leasing, rental assistance, etc) are the same as the pre-approved amounts on the FY2022 Grants Inventory Worksheet (GIW). The final GIW can be found on the [MD BoS website](#).

Match

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	With Leasing
<p>Total amount requested from HUD (without leasing):</p> <ul style="list-style-type: none"> • Rental Assistance funding = \$80,000 • Supportive Services funding = \$13,000 • Project Administration funding = \$7,000 • Total amount requested = \$100,000 <p>Total amount requested from HUD x .25 = Minimum Match Requirement \$100,000 x .25 = \$25,000</p>	<p>Total amount requested from HUD (with leasing):</p> <ul style="list-style-type: none"> • Leasing funding = \$70,000 • Supportive Services funding = \$23,000 • Project Administration funding = \$7,000 • Total amount requested = \$100,000 <p>Total amount requested from HUD, excluding amount requested for leasing \$100,000 - \$70,000 = \$30,000</p> <p>Total amount minus leasing x .25 = Minimum Match Requirement \$30,000 x .25 = \$15,000</p>

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)	

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 deadline	5	5
PROPOSAL GENERAL QUESTIONS: NEW & RENEWAL PROJECTS			
Healthcare	Maximum points will be awarded to applicants who identify how they assist clients obtain healthcare	1	1
Educational Access/Services	Maximum points will be awarded to applicants who identify any formal agreements regarding early childhood services and supports	1	1
Geography	Maximum points will be given to applicants who specify geographic areas served by the proposed project	1	1
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	1	1
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	1	1
Summary Budget	Maximum points will be awarded to projects that complete the budget chart	1	1
Match Funds	Maximum points will be awarded to projects that complete the match chart	1	1
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 Attachment (if applicable): Emergency Transfer Plan	1	1
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 Attachment (if applicable): Anti-Discrimination Policy	1	1
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 Attachment (if applicable): Housing First Policies and Procedures, Termination Policy, and Other Documents	1	1
PROPOSAL NARRATIVE QUESTIONS: NEW PROJECTS			
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	10	N/A

	needs, projected project outcome(s), and coordination with other source(s) or partner(s)		
HMIS	Maximum points will be awarded to applicants who clearly articulate how they will ensure staff will attend annual HMIS training, as well as ensure timely and accurate data entry	5	N/A
Coordinated Entry Participation	Maximum points will be awarded to applicants who agree to adhere to CoC CES goals	10	N/A
Housing First	Maximum points will be awarded to applicants who clearly describe how their project quickly and successfully connects 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	15	N/A
System Performance Measures	Maximum points will be awarded to applicants that demonstrate how their project will contribute to the CoC's overall success for the stated system performance measures. Applicants should use quantifiable and measurable data to demonstrate their contributions to the system, as well as how they will continue to improve their performance and strategies to improve the system	15	N/A
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 & help clients access benefits	10	N/A
Educational Access/Services	Maximum points will be awarded to applicants who clearly describe policies and procedures for educational services	10	N/A
PROJECT SPECIFIC NARRATIVE QUESTIONS: NEW PROJECTS			
New PSH Projects	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 affordable housing providers and how they will assist those with complex service needs	5	N/A
New RRH Projects	Maximum points will be awarded to applicants who clearly describe how they will determine the monthly rental subsidy policy	5	N/A
New TH/PH-RRH Description	Maximum points will be awarded to applicants who clearly articulate why the program is vital to the Continuum of Care	5	N/A
New Coordinated Entry Project	Maximum points will be awarded to applicants who clearly demonstrate how the project will contribute to the overall CE System and how it will target those with the highest barriers to service	5	N/A
New SSO	Maximum points will be awarded to applicants who clearly describe the plan to reach those with the highest level of service needs and ensure they are linked to the most appropriate services and housing opportunities	5	N/A

DV BONUS PROJECT NARRATIVE QUESTIONS: NEW DV PROJECTS			
Applicant Housing Experience	Maximum points will be awarded to applicants who clearly describe prior experience providing housing and services to survivors	5	N/A
Applicant Experience Ensuring Survivor Safety	Maximum points will be awarded to applicants who clearly describe prior experience ensuring the safety and confidentiality of survivors	5	N/A
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	5	N/A
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	5	N/A
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	5	N/A
Project Implementation: Trauma-Informed, Victim Centered Approach	Maximum points will be awarded to applicants that demonstrate how a new project will implement Trauma-Informed, Victim Centered approaches, if funded	5	N/A
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	5	N/A
ALL PROJECTS			
Housing First Assessment	Maximum points will be awarded for a complete submission of the form	1	1
Applicant Attestation	Maximum points will be awarded for a complete submission of the form	1	1
TOTAL AVAILABLE POINTS WILL VARY BY PROJECT TYPE			

How to Apply

1. Before continuing with this RFP, applicants may wish to review the [MD-514 Balance of State CoC Funding Opportunities webpage](#) for more information.
2. Complete all required components as listed on the proposal checklist. For agencies submitting more than one project proposal, each proposal must be complete in its entirety. **Email all completed elements to boscoc.dhcd@maryland.gov no later than 8:00 p.m., Wednesday, August 31, 2022.**
3. Questions about the RFP should be submitted by email to boscoc.dhcd@maryland.gov. Please include “NOFO-22” in the subject line. Questions may be submitted until August 26, 2022 at 5:00 PM.
4. DHCD will post clarifications, corrections and announcements at <https://www.mdboscoc.org/2022coccompetition> through August 26, 2022 at 5:00 PM.
5. NOTE: eSNAPS applications are NOT required for this portion of the local competition. Projects that are recommended for funding by the Balance of State will be notified in September and will then be required to complete the eSNAPS application. Renewing CoC projects are encouraged to complete their eSNAPS application now.

Proposal Checklist

Applicant Check	Application Contents	Renewal Project Requirement	New Project Requirement
<input type="checkbox"/>	Application Coversheet (RFP Page 15)	✓	✓
<input type="checkbox"/>	Complete CoC Proposal Questions: ALL PROJECTS (RFP Pages 16-19)	✓	✓
<input type="checkbox"/>	Complete CoC Proposal Narratives: NEW PROJECTS ONLY (RFP Pages 20-24, complete as appropriate for project type)	No	✓
<input type="checkbox"/>	Housing First Assessment (RFP Pages 25-26)	✓	✓
<input type="checkbox"/>	Applicant Attestation (RFP Page 27)	✓	✓
<input type="checkbox"/>	Violence Against Women Act (VAWA) – Emergency Transfer Plan Attachment (RFP Page 18; Q8)	✓	✓
<input type="checkbox"/>	Anti-Discrimination Policy Attachment (RFP Page 18; Q9)	✓	✓
<input type="checkbox"/>	Agency policies and procedures, termination policy, and other relevant documents demonstrating compliance with Housing First or low-barrier to entry (RFP Page 19; Q10)	✓	✓
<input type="checkbox"/>	Articles of Incorporation and Bylaws	No	✓
<input type="checkbox"/>	Federal Tax Exemption Determination Letters	No	✓
<input type="checkbox"/>	Certificate of Good Standing from State of Maryland dated within 30 days of application deadline	✓	✓
<input type="checkbox"/>	List of Board of Directors	✓	✓
<input type="checkbox"/>	Project Organizational Chart	✓	✓
<input checked="" type="checkbox"/>	Fair Housing Policy Certification	No	No
<input type="checkbox"/>	Proof of Ownership or Lease (if housing will be provided at site-based location)	No	✓
<input type="checkbox"/>	Most recent A-133 Single Audit or Independent Financial Audit if organization received less than \$750,000 in federal funds	✓	✓

Application Coversheet

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

*Renewal project requests MAY NOT exceed the amount approved in the [2022 Grant Inventory Worksheet](#).

Application Type					
RENEWAL Project	<input type="checkbox"/> Permanent Supportive Housing	<input type="checkbox"/> Rapid Rehousing	<input type="checkbox"/> TH-RRH	<input type="checkbox"/> Transitional Housing	<input type="checkbox"/> SSO-CE
NEW Project	<input type="checkbox"/> Permanent Supportive Housing	<input type="checkbox"/> Rapid Rehousing	<input type="checkbox"/> TH-RRH	<input type="checkbox"/> SSO-CE	<input type="checkbox"/> SSO
NEW DV Bonus Project	<input type="checkbox"/> Rapid Rehousing	<input type="checkbox"/> TH-RRH	<input type="checkbox"/> SSO-CE		
<i>If NEW project, desired project start date (must be in calendar year 2023)</i>					

Contact Details	
Legal Name of Applicant	
Mailing Address <i>(Include City & Zip Code)</i>	
County of Headquarters' Office	
Authorized Representative Information	
Chief Executive - First and Last name	
Title	
Email	
Phone number	
Information of person to contact with CoC Application questions	
First, Middle and Last names	
Email	
Cell Phone	
Agency eSNAPS Contact (Authorized user submitting your CoC Project Application in eSNAPS)	
Name	
Email	
Cell Phone	

Proposal General Questions: ALL NEW & RENEWAL PROJECTS

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 Medicaid and other benefit

Type of Health Care	Assist with Enrollment	Assist with Utilization of Benefits
Public Health Care Benefits (State or Federal benefits, Medicaid, Indian Health Services)	<input type="checkbox"/>	<input type="checkbox"/>
Private Insurers:	<input type="checkbox"/>	<input type="checkbox"/>
Non-Profit, Philanthropic:	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>
N/A		<input type="checkbox"/>

2. EDUCATIONAL ACCESS/SERVICES:

Does the agency have any written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports?

	MOU/MOA	Other Formal Agreement
Birth to 3 Years	<input type="checkbox"/>	<input type="checkbox"/>
Child Care and Development Fund	<input type="checkbox"/>	<input type="checkbox"/>
Early Childhood Providers	<input type="checkbox"/>	<input type="checkbox"/>
Early Head Start	<input type="checkbox"/>	<input type="checkbox"/>
Federal Home Visiting Program	<input type="checkbox"/>	<input type="checkbox"/>
Head Start	<input type="checkbox"/>	<input type="checkbox"/>
Healthy Start	<input type="checkbox"/>	<input type="checkbox"/>
Public Pre-K	<input type="checkbox"/>	<input type="checkbox"/>
Tribal Home Visiting Program	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>
N/A		<input type="checkbox"/>

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

Geographic Area	Area Served
Allegany County	<input type="checkbox"/>
Calvert County	<input type="checkbox"/>
Cecil County	<input type="checkbox"/>
Charles County	<input type="checkbox"/>
Garrett County	<input type="checkbox"/>
Harford County	<input type="checkbox"/>
St. Mary's County	<input type="checkbox"/>
Washington County	<input type="checkbox"/>

4. DIVERSITY, EQUITY, AND INCLUSION

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).

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.

5. LIVED EXPERIENCE ENGAGEMENT

Does your agency involve or engage people with lived experience in a meaningful way? Check all that apply.	
Host focus groups to collect feedback on program services	<input type="checkbox"/>
Individuals with Lived Experience Serve on Agency Board	<input type="checkbox"/>
Individuals with Lived Experience Employed by Agency	<input type="checkbox"/>
Individuals with Lived Experience Service in Peer Navigation / Volunteer Role	<input type="checkbox"/>
Individuals with Lived Experience Serve on Working Groups or Advisory Committees	<input type="checkbox"/>
Other:	<input type="checkbox"/>
N/A	<input type="checkbox"/>

6. SUMMARY BUDGET (CORRESPONDS WITH eSNAPS APPLICATION)

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

7. MATCH FUNDS (CORRESPONDS WITH eSNAPS APPLICATION QUESTION)

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	\$

8. 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.

If your agency has an existing Emergency Transfer Plan, please attach it to your application submission. If you do not currently have an Emergency Transfer Plan, please see the APPENDIX A below for policy templates and describe your agency’s strategy to develop and implement the policy.

9. 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.

If your agency has an existing anti-discrimination policy, please attach it to your application submission. If you do not currently have an anti-discrimination policy, please see the APPENDIX B for policy templates and describe your agency’s strategy to develop and implement the policy.

10. HOUSING FIRST POLICY: Attach your agency's policies and procedures, termination policy, and any other relevant documents demonstrating compliance with Housing First or low-barriers to entry. If you do not currently have these policies, please describe your agency's strategy to develop and implement such policies.

Proposal Narrative Questions: ALL NEW PROJECT APPLICATIONS

- 11. GENERAL PROJECT DESCRIPTION (CORRESPONDS WITH eSNAPS APPLICATION):** 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:
- a. 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
 - b. Indicate if this is an expansion of a current project
 - c. Type and number of units (scatter-site or single site; single or multi-family homes, etc.)
 - d. Specific services that will be provided
 - e. Projected outcomes
 - f. Coordination with partners including but not limited to trainings, resources, and collaborations
 - g. How the project meets community needs in its service area
- 12. HMIS:**
- a. 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?
 - b. For Non-HMIS participating agencies (Victim Service Providers), describe how you will ensure timely and accurate data quality using a comparable database?
- 13. COORDINATED ENTRY PARTICIPATION:**
- a. 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?
 - i. All clients who enter the homeless services system will be assessed for the Coordinated Entry System
 - ii. 100% of CoC funded housing providers will participate in the Coordinated Entry System
 - iii. 100% of new client enrollments into housing projects will come from the Coordinated Entry System By Name List
 - b. Does your agency currently participate in the local Coordinated Entry Process?
- 14. SYSTEM PERFORMANCE MEASURES:** HUD is increasingly relying on data-driven performance to evaluate community success. CoC's are required to submit [system performance measures](#) 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:
- a. Ensure program participants are successfully exiting to and maintaining permanent housing
 - b. Ensure program participants do not return to homelessness
 - c. Ensure jobs and income growth for homeless persons in CoC-program funded projects
- 15. HOUSING FIRST:** Question 10 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.

- a. 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.

16. INCOME AND MAINSTREAM BENEFITS:

- a. How will your program work with mainstream employment organizations to help individuals and families increase their cash income?
- b. 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?

17. EDUCATIONAL ACCESS/SERVICES:

- a. 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.

18. NEW PERMANENT SUPPORTIVE HOUSING PROJECTS ONLY:

- a. How does/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?
- b. What partnerships has your agency developed with affordable housing and rental assistance programs to increase access to long term resources?
- c. Describe your strategy for serving those in permanent supportive housing who may need a higher level of care; including those with medically complex situation or those aging in place?

19. NEW RAPID REHOUSING PROJECTS ONLY:

Rapid Re-Housing takes a person-centered and progressive engagement approach to providing assistance, taking into account a households strengths and challenges, and targeting resources to each household's level of need (see [link to overview of progressive engagement](#)).

- a. Describe how the project will determine the amount and duration of the monthly rental subsidy that will be provided to participants.
- b. 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.

- 20. NEW JOINT TH/PH-RRH PROJECTS ONLY:** 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.

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.

Factors to consider:

- a. 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.
- b. 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.
- c. 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.

21. NEW COORDINATED ENTRY SERVICE PROJECTS ONLY: *Eligible activities in this category may include staff dedicated to conducting CES assessments, providing navigation services, securing critical documents, participation in case conference meetings or activities related to developing and implementing the coordinated entry process.*

- a. 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.
- b. Describe how the proposed project will target outreach to homeless persons with the highest barriers within the CoC's geographic area.
- c. Describe how the project will ensure that program participants are directed to appropriate housing and services that fit their needs.

22. NEW SSO – STREET OUTREACH PROJECTS ONLY: *Eligible activities may include staff dedicated to providing street outreach services to unsheltered populations, providing basic case management services, connecting clients to health, benefit and employment related services, delivering basic necessities and food, and operating a drop-in center in conjunction with street outreach.*

- a. Describe the proposed project strategy for providing supportive services to those with the highest service needs, including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services.
- b. Describe how the project will ensure that program participants are assisted to obtain and maintain shelter and/or permanent housing in a manner that fits their needs.
- c. Describe the project plan to ensure that program participants will be individually assisted to obtain the benefits of mainstream health, social services, and employment programs for which they are eligible to apply and which meet the needs of the program participants (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).

Proposal Narratives: NEW DV BONUS PROJECT APPLICATIONS ONLY

New DV Bonus projects (RRH, Joint TH/PH-RRH, and SSO-CE) must serve 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 Joint TH/RRH projects must request a minimum of \$50,000 per project.

DV.1 DESCRIBE THE APPLICANT EXPERIENCE WITH THE FOLLOWING:

- a. ensured DV survivors experiencing homelessness were assisted to quickly move into safe affordable housing;
- b. prioritized survivors—you must address the process the project applicant used, e.g., Coordinated Entry, prioritization list, CoC's emergency transfer plan, etc.;
- c. determined which supportive services survivors needed;
- d. connected survivors to supportive services; and
- e. moved clients from assisted housing to housing they could sustain—address housing stability after the housing subsidy ends.

DV.2 DESCRIBE EXAMPLES OF HOW THE APPLICANT ENSURED THE SAFETY AND CONFIDENTIALITY OF DV SURVIVORS EXPERIENCING HOMELESSNESS BY:

- a. taking steps to ensure privacy/confidentiality during the intake and interview process;
- b. making determinations and placements into safe housing;
- c. keeping information and locations confidential;
- d. training staff on safety and confidentiality policies and practices; and
- e. taking security measures for units (congregate or scattered site), that support survivors' physical safety and location confidentiality.

DV.3 DESCRIBE HOW THE PROJECT APPLICANT EVALUATED ITS ABILITY TO ENSURE THE SAFETY OF DV SURVIVORS SERVED BY THE PROJECT, INCLUDING AREAS IDENTIFIED FOR IMPROVEMENT.

DV.4 DESCRIBE THE PROJECT APPLICANT EXPERIENCE USING TRAUMA-INFORMED, VICTIM-CENTERED APPROACH TO MEET THE NEEDS OF DV SURVIVORS IN THE FOLLOWING AREAS:

- a. prioritizing placement and stabilization in permanent housing consistent with participants' wished and stated needs;
- b. 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;
- c. providing program participants access to information on trauma, e.g., training staff on providing program participants with information on trauma;
- d. 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;
- e. 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;
- f. providing a variety of opportunities for connection for program participants, e.g., groups, mentorships, peer-to-peer, spiritual needs; and

- g. offering support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.

DV.5 DESCRIBE THE PROJECT APPLICANT EXPERIENCE: providing supportive services to domestic violence survivors experiencing homelessness while quickly moving them into permanent housing and addressing their safety needs and provide examples of how the applicant provided the supportive services to domestic violence survivors.

DV.6 DESCRIBE HOW THE PROJECT APPLICANT WILL:

- a. prioritize program participant choice and rapid placement and stabilization in permanent housing consistent with participants' wishes and stated needs;
- b. establish and maintain 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;
- c. provide program participants access to information on trauma, e.g., training staff on providing program participants with information on trauma;
- d. place emphasis on program participants' strengths, e.g., strength-based coaching, questionnaires and assessment tools include strength-based measures, case plans works towards survivor-defined goals and aspirations;
- e. center 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;
- f. provide opportunities for connection for program participants, e.g., groups, mentorships, peer-to-peer, spiritual needs; and
- g. offer support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.

DV.7 DESCRIBE THE PLAN TO INVOLVE SURVIVORS WITH A RANGE OF LIVED EXPERTISE IN POLICY AND PROGRAM DEVELOPMENT THROUGHOUT THE OPERATION OF THE PROJECT.

Housing First Assessment: ALL PROJECTS

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](#).

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.

Applicant Attestation: ALL PROJECTS

I understand and agree:

- _____
Initial Time is of the essence in all aspects of the Continuum of Care Program, including the application, the RFP and ongoing reporting requirements: our organization will meet all deadlines and work quickly to correct deficiencies, provide requested information, and support the community-wide application process and implementation of the program.
- _____
Initial Corrections, clarification, updates, and supplemental information will be posted to the DHCD website throughout the application process; therefore, our organization will regularly review the content on the webpage <https://www.mdboscoc.org/2022coccompetition>. If you experience technical difficulties, please contact DHCD at boscoc.dhcd@maryland.gov.
- _____
Initial It is our responsibility to ensure that all relevant staff have subscribed to the Balance of State emails. To sign up, [click here](#).
- _____
Initial It is our responsibility to contact DHCD if changes in the contact information for the point of contact for this application are needed.
- _____
Initial 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, 2022 and September 30, 2022.
- _____
Initial All applicants will be required to attest to additional federal regulations is eSNAPS as required for a federal grant. Responses will be considered part of the application process.

Authorized Representative Name

Signature

Date

Appendix A

VAWA Policy on Housing Protections

As required by the Housing and Urban Development's (HUD) [final rule](#), 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.

Links to sample forms

HUD-5380	<u>NOTICE OF OCCUPANCY RIGHTS UNDER THE VIOLENCE AGAINST WOMEN ACT</u>
HUD-5381	<u>MODEL EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLECE, SEXUAL ASSAULT, OR STALKING</u>
HUD-5382	<u>CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, AND ALTERNATE DOCUMENTATION</u>
HUD-5383	<u>EMERGENCY TRANSFER REQUEST FOR CERTAIN VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING</u>

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](#)), 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\(a\)](#) 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](#), 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](#) 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 clients 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 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 sub-recipients; 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.