MARYLAND BALANCE OF STATE CONTINUUM OF CARE MD-514
FY2024 CoC FUNDING COMPETITION
REQUEST FOR PROPOSALS (RFP)

RFP ISSUE DATE: **August 15, 2024**
PROPOSAL DEADLINE: **8:00 pm, September 6, 2024**
FUNDING OPPORTUNITY: FR-6800-N-25

<u>Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2024 Continuum of Care Competition</u>

ESTIMATED FUNDS AVAILABLE: CoC Annual Renewal Demand: $7,050,242
CoC Bonus Funds: $846,029
DV Bonus: $ *Pending HUD Notification*

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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 FY2024 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 support the goal of ending homelessness.

2024 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
Building an Effective Workforce
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.

The committee scores new project applications solely based on the responses to this RFP. Eligible renewing project scores are 75% derived from the Renewal Project Scorecard, based on actual project performance, and 25% from this RFP.

All applicants should review the FY2024 BoS CoC Competition Policy Guide for more information. The Competition Guide includes the CoC Rating and Ranking policy, the CoC Reallocation Policy and details of the funding determination process.

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 FY2024.

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

ELIGIBLE NEW PROJECT APPLICATIONS

For the FY2024 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 may receive bonus points. Further, applications from Local Homelessness Coalitions who have not received new CoC project funding in the most recent competition may receive additional preference 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 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 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 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 FFY2024 CoC Funding Competition include projects that are set to expire in calendar year 2025 and must be listed on the 2024 Grant Inventory Worksheet (GIW). A list of eligible renewal projects can also be found here.

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.

Applicants requesting renewal for rental assistance may request a per-unit amount less than the Fair Market Rent (FMR) if the actual rent per unit under lease is less than the FMR. This will help reduce the number of projects receiving rental assistance that have large balances of unspent funds remaining at the end of the operating year. Renewal project applicants must ensure the amount requested will be sufficient to cover all eligible costs as HUD cannot provide funds beyond the amount awarded through the FY 2024 – 2025 CoC Program Competition. Project applications for rental assistance cannot request more than 100 percent of the published FMR.

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 the RFP and upload any required attachments at this link.
   PLEASE DO NOT USE THIS DOCUMENT TO SUBMIT YOUR APPLICATION.
   APPLICATTIONS WILL ONLY BE ACCEPTED WHEN SUBMITTED VIA THE LINK ABOVE.

3. Submit the RFP, including any required attachments via the online submission portal no later than **8:00 p.m., Friday, September 6, 2024.**

4. Questions about the RFP should be submitted by clicking here.
   a. Questions may be submitted until September 5, 2024, at 5:00 PM.

5. DHCD will post clarifications, corrections and announcements at https://www.mdboscoc.org/2024-coc-competition through September 5, 2024, at 5:00 PM.

6. The Performance Review Committee will review and rank all project applications in September and provide recommendations to the CoC Board for final review.

7. All project applicants will be notified of their status no later than September 30, 2024.

PROPOSAL CHECKLIST

	Application Contents	New Project Requirement	Renewal Project Requirement
☐	**RFP**: Competed Online	✓	✓
☐	**e-SNAPS**: Completed New or Renewal Project Application	✓	✓
☐	**Attachment Uploaded:** Violence Against Women Act (VAWA) – Emergency Transfer Plan if applicable (Appendix A)	✓	✓
☐	**Attachment Uploaded:** Anti-Discrimination Policy if applicable (Appendix B)	✓	✓
☐	**Attachment Uploaded:** Agency policies and procedures, termination policy, and other relevant documents demonstrating compliance with Housing First or low barrier to entry if applicable	✓	✓
☐	**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://egov.maryland.gov/BusinessExpress/EntitySearch/Search	✓	✓

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 9/06/2024 deadline, which include: narrative responses, uploaded policies and documents, and completing the corresponding eSNAPS application	5	5
PROPOSAL GENERAL QUESTIONS: ALL PROJECT APPLICANTS				
1	**Summary Budget**	Maximum points will be awarded to projects that complete the budget chart	1	1
2	**Match Funds**	Maximum points will be awarded to projects that complete the match chart	1	1
3	**Healthcare**	Maximum points will be awarded to applicants who identify how they assist clients obtain healthcare	1	1
4	**Educational Access/Services**	Maximum points will be awarded to applicants who identify any formal agreements with early childhood services	1	1
5	**Subpopulation**	Maximum points will be given to applicants who specific which subpopulation that will be served by the project	1	1
6	**Equity Initiatives**	Maximum points will be awarded to applicants who demonstrate they have assessed their agency for equity related issues and disparities, developed an action plan to address issues and implemented specific strategies	5	5
7	**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	5	5
8	**Lived Experience Feedback**	Maximum points will be awarded to applicants who demonstrate a process to receive and incorporate feedback for persons with lived experience.	5	5
PROPOSAL NARRATIVE QUESTIONS: NEW PROJECT APPLICANTS ONLY				
LHC Preference Points		Points may be available to Local Homelessness Coalitions who did not receive new funds in the most recent CoC competition	10	N/A

#	Category	Description	Points	
9	**General Description**	Maximum points will be awarded to applicants who clearly articulate how their project meets community needs, the target population to be served, the project plan for addressing the identified housing and supportive service needs, projected project outcomes, and coordination with other partners	**5**	**N/A**
10	**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	**5**	**N/A**
11	**Coordinated Entry Participation**	Maximum points will be awarded to applicants who agree to adhere to CoC CES goals	**5**	**N/A**
12	**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	**5**	**N/A**
13	**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	**5**	**N/A**
14	**Educational Access/Services**	Maximum points will be awarded to applicants who clearly describe policies and procedures for educational access services	**5**	**N/A**
15	**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	**10**	**N/A**
16	**Equity Initiatives**	Maximum points will be awarded to applicants who describe strategies to ensure equity in service delivery and accessibility.	**10**	**N/A**

		PROJECT COMPONENT QUESTIONS: NEW PSH PROJECT APPLICANTS ONLY		
17	**New PSH Projects ONLY**	Maximum points will be awarded to applicants who clearly describe how the proposed PSH project intends to assess clients for move-on ability for community-based living.	**10**	**N/A**
18	**New PSH Projects ONLY**	Maximum points will be awarded to applicants who clearly describe how the proposed PSH project will support those needing a higher level of care, specifically for those with medical complexities of those aging in place.	**10**	**N/A**
19	**New PSH Projects ONLY**	Maximum points will be awarded to applicants who clearly describe how the proposed PSH project will support those with higher levels of vulnerability, including active addictions, lack of income or criminal justice involvement.	**10**	**N/A**
20	**New PSH Projects ONLY**	Maximum points will be awarded to applicants who indicate they will utilize housing subsidies or subsidized housing units which are not funded through CoC or ESG programs.	**5**	**N/A**
21	**New PSH Projects ONLY**	Maximum points will be awarded to applicants who indicate they will utilize healthcare resources to assist program participants.	**5**	**N/A**
		PROJECT COMPONENT QUESTIONS: NEW RRH PROJECT APPLICANTS ONLY		
22	**New RRH Projects ONLY**	Maximum points will be awarded to applicants who clearly describe how they will determine the monthly rental subsidy policy.	**10**	**N/A**
23	**New RRH Projects ONLY**	Maximum points will be awarded to applicants who clearly describe how they would determine rental subsidy if a household still enrolled in the project loses income or becomes unable to pay their portion of rent.	**10**	**N/A**
24	**New RRH Projects ONLY**	Maximum points will be awarded to applicants who clearly describe how the proposed project will support those with higher levels of vulnerability, including active addictions, lack of income or criminal justice involvement.	**10**	**N/A**
25	**New RRH Projects ONLY**	Maximum points will be awarded to applicants who indicate they will utilize housing subsidies or subsidized housing units which are not funded through CoC or ESG programs.	**5**	**N/A**

26	**New RRH Projects ONLY**	Maximum points will be awarded to applicants who indicate they will utilize healthcare resources to assist program participants.	**5**	**N/A**

PROJECT COMPONENT QUESTIONS: NEW JOINT TH-RRH PROJECT APPLICANTS ONLY				
27	**New TH/PH-RRH Projects ONLY**	Maximum points will be awarded to applicants who clearly articulate why the program is necessary for the CoC and for the proposed population it will serve.	**10**	**N/A**
28	**New TH/PH-RRH Projects ONLY**	Maximum points will be awarded to applicants who clearly describe how they will determine the monthly rental subsidy policy.	**10**	**N/A**
29	**New TH/PH-RRH Projects ONLY**	Maximum points will be awarded to applicants who clearly describe how they would determine rental subsidy if a household still enrolled in the project loses income or becomes unable to pay their portion of rent.	**10**	**N/A**
30	**New TH/PH-RRH Projects ONLY**	Maximum points will be awarded to applicants who clearly describe how the proposed project will support those with higher levels of vulnerability, including active addictions, lack of income or criminal justice involvement.	**10**	**N/A**
31	**New TH/PH-RRH Projects ONLY**	Maximum points will be awarded to applicants who indicate they will utilize housing subsidies or subsidized housing units which are not funded through CoC or ESG programs.	**5**	**N/A**
32	**New TH/PH-RRH Projects ONLY**	Maximum points will be awarded to applicants who indicate they will utilize healthcare resources to assist program participants.	**5**	**N/A**

DV BONUS PROJECT QUESTIONS: NEW DV PROJECT APPLICANTS ONLY				
33	**Project Need**	Maximum points will be awarded to applicants who provide data and sources to demonstrate need for the project	**5**	**N/A**
34	**Applicant Housing Placement**	Maximum points will be awarded to applicants who provide data and sources to demonstrate rate of housing and retention for survivors	**5**	**N/A**

35	**Applicant Housing Experience**	Maximum points will be awarded to applicants who clearly describe prior experience providing housing and services to survivors	**5**	**N/A**
36	**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**
37	**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**
38	**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**
39	**Applicant Experience Meeting Service Needs**	Maximum points will be awarded to applicants who clearly and specifically explain the types of supportive services provided and how they meet the needs of survivors	**5**	**N/A**
40	**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**
POLICY UPLOAD & ATTACHMENTS: ALL PROJECT APPLICANTS				
	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 start date **Attachment (if applicable): Housing First Policies and Procedures, Termination Policy, and Other Documents**	**5**	**5**
	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**	**5**	**5**
	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**	**5**	**5**
TOTAL AVAILABLE POINTS WILL VARY BY PROJECT TYPE				

Applicant Information

Project Information	
Project Name *(please match project name as listed in eSNAPS)*	
Applicant/Recipient Organization Name	
Legal Name of Applicant Organization	
Mailing Address	
County of Headquarters' Office	

Authorized Representative Information	
Chief Executive Name	
Title	
Email	
Phone number	
Agency Contact CoC Application / RFP Questions	
Name	
Email	
Phone	
Agency eSNAPS Contact (Authorized user submitting your CoC Project Application in eSNAPS)	
Name	
Email	
Phone	
HUD Threshold Requirements	
Applicant has Active SAM registration	
Applicant has Valie UEI (Unique Entity Identifier) Number	
Applicant has Outstanding Delinquent Federal Debts	

Project & Application Details	
Geographical Area Project Will Serve	
Total Anticipated Funding Request	$
Project Status	
Renewal Project Type	

New Project Type	
New DV Bonus Project Type	
If new project, projected start date (must be in calendar year 2025)	
If a new project, will the requested funds support a Stand Alone Project or is the request to Expand an existing Renewal Project	
If the new funding request is for an Expansion Project, please add the name of the Renewal Project that would be expanded	

1   SUMMARY BUDGET (CORRESPONDS WITH eSNAPS APPLICATION Q6J)

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

2. MATCH FUNDS (CORRESPONDS WITH eSNAPS APPLICATION Q6I)

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	$

PROPOSAL GENERAL QUESTIONS

REQUIRED FOR: ALL NEW & RENEWAL PROJECT APPLICANTS

3. 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		

4. 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		

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

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

6. **EQUITY INITATIVES AND INCLUSION:** Describe how your program has assessed its organizational structure, program practices and performance for disparities in representation, service delivery and program outcomes.

   Describe what actions, if any, have been taken to reduce or eliminate identified 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).

7. **LIVED EXPERIENCE ENGAGEMENT:** Please indicate if your organization involves or engages people with lived experience in a meaningful way. Check all the apply.

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

8. **LIVED EXPERIENCE ENGAGEMENT:** Please indicate if your organization involves or engages people with lived experience in a meaningful way. Check all the apply.

Proposal Narrative Questions

9. **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:
    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

10. **HMIS:**

    a. How will you ensure new and current employees are up to date on HMIS best practices, requirements and regulations?
    b. How will you ensure timely data entry and excellent data quality?
    c. For Non-HMIS participating agencies (Victim Service Providers), describe how you will ensure timely and accurate data quality using a comparable database?

11. **COORDINATED ENTRY PARTICIPATION:** Participation in Coordinated Entry is a requirement for all CoC funded projects and all organizations must adhere to the following goals:

    All clients who enter the homeless services system will be assessed for the Coordinated Entry System

    100% of CoC funded housing providers will participate in the Coordinated Entry System

    100% of new client enrollments into housing projects will come from the Coordinated Entry System By Name List

How will you ensure that the project is compliant with the goals stated above?

12. **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:

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

13. 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?

14. 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.

15. HOUSING FIRST:

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.

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. EQUITY INITATIVES:

Describe the strategies the organization will implement to ensure there is equity in service delivery, accessibility and performance outcomes, and efforts to avoid a lack of diversity in leadership and decision making.

PROJECT TYPE NARRATIVE QUESTIONS

REQUIRED FOR: NEW PROJECT APPLICATIONS BY COMPONENT TYPE

NEW PERMANENT SUPPORTIVE HOUSING PROJECT APPLICANTS ONLY

PERMANENT SUPPORTIVE HOUSING PROJECTS:

17. 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?

18. 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?

19. Describe your strategy for serving those in permanent supportive housing who may have higher levels of vulnerability, including those with an active addiction, have no income or have criminal justice involvement.

20. 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).
    a. *Will the subsidies provide at least 25% of the total units included in the project?*
    b. *If yes, can the applicant provide a Leveraging Commitment letter on request?*

21. 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).

    a. 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?
    b. Will the value of the services provided by the healthcare organization be equivalent to 25% of the total grant amount being requested?
    c. If yes, can the applicant provide a Leveraging Commitment letter on request?

NEW RAPID REHOUSING PROJECT APPLICANTS ONLY

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).

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

23. 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.

24. Describe your strategy for serving those who may have higher levels of vulnerability, including those with an active addiction, have no income or have criminal justice involvement.

25. 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).

    a. Will the subsidies provide at least 25% of the total units included in the project?

    b. If yes, can the applicant provide a Leveraging Commitment letter on request?

26. 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).

    a. 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?

    b. Will the value of the services provided by the healthcare organization be equivalent to 25% of the total grant amount being requested?

    c. If yes, can the applicant provide a Leveraging Commitment letter on request?

NEW JOINT TRANSITIONAL HOUSING – RAPID REHOUSING PROJECT APPLICANTS ONLY

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.

27. 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.

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.*

28. 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.

29. 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.

30. Describe your strategy for serving those who may have higher levels of vulnerability, including those with an active addiction, have no income or have criminal justice involvement.

31. 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).

    a. Will the subsidies provide at least 25% of the total units included in the project?

    b. If yes, can the applicant provide a Leveraging Commitment letter on request?

32. 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).

a. 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?

b. Will the value of the services provided by the healthcare organization be equivalent to 25% of the total grant amount being requested?

c. If yes, can the applicant provide a Leveraging Commitment letter on request?

DV BONUS PROPOSAL NARRATIVE QUESTIONS

REQUIRED FOR: NEW <u>DV BONUS PROJECT</u> 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.

33. ASSESSING THE NEED FOR DV BONUS PROJECTS.
   a. Enter the number of survivors that need housing or services in the LHC:
   b. Enter the number of survivors the LHC is currently serving:
   c. How was the number of survivors in need of housing and services calculated
   d. 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)
   e. If the LHC is unable to meet the needs of all survivors, please explain the barriers to meeting those needs.

34. APPLICANT HOUSING PLACEMENT AND RETENTION
   a. Rate of Housing Placement of DV Survivors Percentage
   b. Rate of Housing Retention of DV Survivors Percentage
   c. how the project applicant calculated the rate of housing placement;
   d. whether the rate for housing placement accounts for exits to safe housing destinations;
   e. how the project applicant calculated the rate of housing retention; and
   f. the data source (e.g., comparable databases, other administrative data, external data source, HMIS for non-DV projects)

35. DESCRIBE THE APPLICANT EXPERIENCE IN PROVIDING HOUSING TO DV SURVIVORS. HOW HAS THE APPLICANT:
   a. ensured DV survivors experiencing homelessness were quickly moved 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.

36. 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 to minimize potential coercion of survivors;
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.

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

38. 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:
a. prioritizing placement and stabilization in permanent housing consistent with participants' wishes and stated needs;
b. placing survivors in permanent housing;
c. placing and stabilizing survivors consistent with their preferences;
d. placing and stabilizing survivors consistent with their stated needs;
e. 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;
f. providing program participants access to information on trauma, e.g., training staff on providing program participants with information on trauma;
g. 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;
h. 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;
i. providing a variety of opportunities for connection for program participants, e.g., groups, mentorships, peer-to-peer, spiritual needs; and
j. offering support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.

39. 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.

40. 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.

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 Quick Screen Assessment in the process of reviewing and scoring applications.

Please check all that apply to the project.

☐ Policies clearly delineate that the program is operating under "Housing First" principles as defined by the National Alliance to End Homelessness.

☐ Project has reviewed the "USICH Housing First Checklist: Assessing Projects and Systems for a Housing First Orientation" document.

☐ The term "Housing First" is used to describe the program.

☐ Are applicants allowed to enter the program without income?

☐ Are applicants allowed to enter the program even if they aren't "clean and sober" or "treatment compliant"?

☐ Are applicants allowed to enter the program even if they have criminal justice system involvement?

☐ Are service and treatment plans voluntary, such that tenants cannot be evicted for not following through?

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.

HOUSING FIRST POLICY DEVELOPMENT

If you do not currently have these policies, please describe your agency's strategy to develop and implement such policies.

ANTI-DISCRIMINATION

REQUIRED FOR: ALL NEW & RENEWAL PROJECT APPLICANTS

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.

ANTI-DISCRIMINATION POLICY

If your agency has an existing anti-discrimination policy, please attach it to your application submission.

ANTI-DISCRIMINATION POLICY DEVELOPMENT

If you do not currently have an anti-discrimination policy, please describe below your agency's strategy to develop and implement the policy.

VIOLENCE AGAINST WOMEN ACT

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.

VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY
If your agency has an existing Emergency Transfer Plan, please attach it to your application submission.

VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY DEVELOPMENT
If you do not currently have an Emergency Transfer Plan, please describe below your agency's strategy to develop and implement the policy.

Applicant Attestation

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.

4. Data submitted with this project application (including, but not necessarily limited to 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 FY2024 Rating and Ranking Policy and that such project ranking decisions are final. I can access a copy of the FY2024 CoC Competition Policy at the MD BoS website https://www.mdboscoc.org/2024-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.

    a. Name of funding source: _____

    b. 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.

11. 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, 2024 and September 30, 2024.

12. 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.

APPENDIX A: VAWA POLICY ON HOUSING PROTECTION

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.

Link to sample forms

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

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:
    o Ensure that staff and volunteers understand that a client may present their gender differently than the way staff and volunteers identify their gender.
    o Not consider a client or potential client to be ineligible for services because their appearance or behavior does not conform to gender stereotypes.
    o 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.
    o When possible, ensure that new construction and rehabilitation includes and promotes privacy and safety in sleeping areas, bathrooms and showers.
    o Take prompt action to resolve inappropriate behavior, treatment, harassment, or any other equal access issues by staff, volunteers or clients.
    o 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.
    o Not ask questions or seek information concerning a person's anatomy or medical history beyond that necessary to determine program eligibility.
    o Not require a person's gender identity to match the gender listed on an ID or other documents
    o Help clients understand the resources available to help them obtain legal identification documents.
    o 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:

- o The age or gender of a child under age 18; or
- o The gender of a parent or parents; or
- o 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 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.

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)	