North Dakota-500
Statewide Continuum of Care

HUD Continuum of Care Program Application

2024-2025 Local Competition Packet
Local Materials for Agencies Applying for CoC Funding

CONTINUUM OF CARE PROGRAM APPLICATION OVERVIEW

The Continuum of Care (CoC) Program (24 CFR part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding efforts by nonprofit providers, states, Indian Tribes or Tribally Designated Housing Entities (TDHEs), and local governments to quickly rehouse individuals and families experiencing homelessness, 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 to optimize self-sufficiency among those experiencing homelessness.

The Continuum of Care (CoC) Program Competition occurs annually. Each Fiscal Year (FY) Competition process begins with the Registration of CoCs by the CoC-designated Collaborative Applicants, followed by the CoC's review of Grant Inventory Worksheets and the release of the CoC Program Notice of Funding Opportunity (NOFO). The competition ends when HUD releases the final funding announcement.

To be eligible for CoC funding in the competition, each CoC must submit a Consolidated Application to HUD by the deadline. The Consolidated Application includes:

1. A CoC Application, which describes the CoC's governance structure, overall performance, and strategic planning process;

2. Project Applications from entities seeking funding for new or renewal projects; and

3. The CoC Project Listing that shows the CoC's priorities for funding, ranks each project application, and identifies rejected applications (if applicable).

HUD requires CoCs to hold a local competition to determine which project applications will be included in the Consolidated Application. As a project applicant, <u>your agency must participate in the review and ranking process to have the agency's project considered on the CoC Project Listing and included in the CoC Consolidated Application</u>. Projects rejected during the ranking process can submit a Solo Application to HUD.

This handbook contains essential information that Project Applicants must know about the competition process. Competitive Project Applications must adhere to HUD eligibility criteria and follow ND CoC policies, procedures, and timelines.

Before you begin:

1. Carefully review and ensure that your agency and project meet this document's eligibility and threshold criteria (note some eligibility criteria are found through embedded links). Ineligible projects will not be ranked.

2. CoC ranking and review is a multi-step process. Projects must first complete the Intent to Apply/Threshold steps to be invited to apply. Agencies not submitting this document cannot apply for CoC funding in this competition. Please review each step and submit the required documents by the ND CoC deadline.

3. Incomplete or inaccurate information may negatively affect the project score. **Late submissions or submissions that do not follow the submission instructions will not be considered.**

4. Project applications are submitted through e-snaps, HUD's web-based grants management system. The ND CoC will host two Application Labs to help access e-snaps and answer questions.

5. To access the application, you need an e-snaps registration and UEI number (formerly DUNS number). Registration for a UEI takes time, so begin as soon as possible.

COC PROGRAM COMPETITION NOFO OVERVIEW

Funding Opportunity Number: FR-6800-N-25

CFDA Number: 14.267

IMPORTANT PROJECT APPLICATION DATES AND DEADLINES

- July 31, 2024 – FY2024 NOFO Published
- August 14, 2024 – Intent to Apply and Threshold Forms due to CoC
- August 20, 2024 – NOFO Application Lab – NEW Projects
- August 22, 2024 – NOFO Application Lab – RENEWAL Projects
- September 11, 2024 – Project Applications/Required Documentation submitted to CoC
- September 26, 2024 – Ranking and Review Committee Meeting
- September 26, 2024 – Project Applications notified of inclusion in CoC Collaborative Application
- October 4, 2024 – Project response and appeals due to CoC
- *October 9, 2024 – Vote on appeals to rank and score (if needed)*
- *October 9, 2024 – Projects notified of appeals outcome and amended rank/score (if needed)*
- October 16, 2024 – Final Project Application edits to CoC
- October 16, 2024 – Recommended Collaborative Application posted on CoC website
- October 25, 2024 – CoC Membership vote on Collaborative Application
- October 28, 2024 – Approved Collaborative Application posted on CoC website

HUD DEADLINE
October 30, 7 p.m. CST
Note: Project Applications must be submitted by the Project deadlines listed above, NOT the Consolidated Application deadline.

FUNDING
Approximately $3.5 billion is available in this FY24 CoC Program NOFO, including up to $52 million available for Domestic Violence, Dating Violence, Sexual Assault, and stalking Bonus (DV Bonus) projects and $188.0 million for expiring Round 1 YDHP grants and the non-competitive renewal and replacement of expiring YHDP grants initially funded in Round 2 or later. Funds available in the ND-500 CoC include:

- Estimated Annual Renewal Demand (ARD): $3,272,062
- Tier 1: ~$1,970,579
- Tier 2: ~$327,206
- YHDP Renewal/Replacement (non-competitive): $974,277
- CoC Planning: ~$158,656

RANKING
The ND CoC must rank all projects, except the ND CoC Planning Grant and Youth Homelessness Demonstration Program (YHDP) renewal or replacement projects, placing all accepted projects in tiers. Ranking is based on capacity, quality, priorities, and performance.

The purpose of the tiered approach is for CoCs to notify HUD which projects are prioritized for funding based on local needs and gaps. Higher-ranked projects are assigned to Tier 1, and lower-ranked projects are assigned to Tier 2.

1. Tier 1. Tier 1 is equal to 90 percent of the CoC's Annual Renewal Demand (ARD) as described in section I.B.2.b.(1) of this NOFO minus the sum of all ARAs of non-competitive YHDP Renewal and YHDP Replacement projects. HUD will conditionally select project applications in

Tier 1 from the highest scoring CoC application to the lowest scoring CoC application and according to the rank assigned by the CoC on the CoC Priority listing, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold. The following project applications can be placed in Tier 1:

 a. <u>New CoC projects created through CoC Reallocation</u>

 b. <u>New CoC Bonus projects</u>

 c. <u>New DV Bonus projects</u>

 d. <u>New DV Reallocation projects created through the reallocation of a DV Renewal grant</u>

 e. <u>CoC Renewal projects (including DV Renewal projects)</u>

2. <u>Tier 2</u>. Tier 2 is the difference between Tier 1 and the maximum amount of CoC Renewal (including DV Renewal), CoC Reallocation, DV Bonus, DV Reallocation, and CoC Bonus funds that a CoC applies for.

   HUD will award a point value to each ranked new and renewal project application that is in Tier 2 using a 100-point scale and conditionally select applications in Tier 2 using this point value from the highest-scoring project application to the lowest:

   a. CoC Score. Up to 50 points in direct proportion to the score received on the CoC Application, e.g., if a CoC received 100 out of 200 points on the CoC Application, the project application would receive 25 out of 50 points for this criterion.

   b. CoC Project Ranking. Up to 40 points for the CoC's ranking of the project application(s). To consider the CoC's ranking of projects, HUD will assign point values directly related to the CoCs' ranking of project applications. The calculation of point values will be 40 times the quantity $(1-x)$ where x is the ratio of the cumulative funding requests for all projects or portions of projects ranked higher by the CoC in Tier 2 plus one-half of the funding of the project of interest to the total amount of funding available in Tier 2 for the CoC. For example, if a CoC is eligible to apply for projects totaling $500,000 in Tier 2 and applies for five projects ranked in Tier 2 of $100,000 each: the highest-ranked project would receive 36 points, and then the subsequently ranked projects would receive 28, 20, 12, and 4 points.

   c. Commitment to Housing First. Up to 10 points based on the project application's commitment to follow a Housing First approach as defined in section I.B.2.b.(15) of this NOFO. Dedicated HMIS projects and supportive service only for coordinated entry (SSO-CE) projects will automatically receive 10 points.

3. All eligible projects submitted by project applicants in e-snaps by the CoC deadline, except CoC planning projects, will be reviewed and ranked. A combination of ranking score, CoC priorities, and anticipated tier thresholds will help inform a recommended Rank and Tier recommendation that the Rating & Ranking Committee will bring to the CoC board and membership for a vote.

4. <u>Straddling Tiers.</u> If a project application straddles the Tier 1 and Tier 2 funding line, HUD will conditionally select the project up to the amount of funding that falls within Tier 1. Using the CoC score and other factors described in section I.B.3.h of the NOFO, HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award the project at the reduced amount based on the amount of funding that falls within Tier 1, provided the project is still feasible with the reduced funding (e.g., is able to continue serving homeless program participants effectively).

5. <u>Rejection or Reallocation.</u> Projects found with outstanding HUD audit findings, history of ineligible participants, evidence of untimely expenditures, financial management concerns, or other performance issues may be eliminated from the competition through rejection or full reallocation. The CoC may also reduce a portion of a submitted project due to underutilization.

6. <u>CoC Planning Projects</u>. CoCs may only submit one project application for CoC Planning costs. The Collaborative Applicant listed on the CoC Applicant Profile in e-snaps is the only eligible

applicant that may apply for CoC Planning projects. Collaborative Applicants are not required to submit applications for FY 2025 CoC Planning projects. HUD will award FY 2025 CoC Planning projects using FY 2024 application submissions.

7. Youth Homeless Demonstration Program (YHDP). Consistent with the requirements of the Consolidated Appropriations Act, 2024, funding for the CoC Program may be used to competitively or non-competitively renew or replace grants for YHDP projects. HUD will non-competitively renew and replace YHDP projects which includes new YHPD projects created from the reallocation of YHDP renewal grants; however, these project applications will be reviewed for compliance with project eligibility, project quality, and if applicable, project renewal thresholds. See sections III.B.4.a.(5), III.B.4.b.(5) and I.B.2.k.(4) of the NOFO for additional information.

8. Domestic Violence, Dating Violence, Sexual Assault, and Stalking Bonus (DV Bonus). The Consolidated Appropriations Act, 2024 provides $52 million for "new rapid re-housing projects and supportive service projects providing coordinated entry, and for eligible activities that the Secretary determines to be critical in order to assist survivors of domestic violence, dating violence, sexual assault, or stalking." See section I.B.2.b.(6) of the NOFO for additional information.

ELIGIBILITY

To be eligible for funding, applicants must meet all CoC and HUD statutory, regulatory, and threshold requirements. Project Applicants must abide by the CoC deadlines, meet eligibility criteria, request eligible activities, adequately answer all questions, and attach all required documents to be considered eligible for funding.

1. Eligible Applicants. Eligible project applicants for the CoC Program Competition are found at 24 CFR 578.15 and in the Act and include nonprofit organizations, states, local governments, instrumentalities of state and local governments, Indian Tribes and TDHE [as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103) (TDHEs)]. Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. For-profit entities are ineligible to apply for grants and are prohibited from being subrecipients of CoC Program grant funds. Before submitting an application, applicants must have the following:

   a. SAM Registration. Applicants must be registered with https://www.sam.gov/SAM before submitting their application.

   b. Unique Entity Identifier. Applicants must provide a valid UEI number, registered and active at https://www.sam.gov/SAM in the application. A DUNS number is no longer valid.

2. Eligible Projects and Activities. The CoC is accepting applications from eligible entities for the following:

   a. *New projects created through the CoC Reallocation or CoC Bonus processes.* The following new projects can be created through CoC reallocation, CoC Bonus, or a combination of CoC reallocation and CoC Bonus. All new projects must utilize CARES, the CoC coordinated entry system.

      - PH-PSH projects for DedicatedPLUS or Chronic Homeless
      - PH-RRH
      - Joint TH/PH-RRH
      - SSO-CE

   b. *New projects created through the DV Reallocation or DV Bonus processes.* The following new projects can be created through DV reallocation, DV Bonus, or a combination of DV reallocation and DV Bonus. All new projects must serve individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking that are defined as homeless under 24

CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act. All new projects must utilize CARES, the CoC coordinated entry system.

- PH-RRH
- Joint TH/PH-RRH
- SSO-CE

c. *New YHDP projects created through YHDP Replacement processes.* CoCs may replace renewing YHDP project(s) to create one or more new YHDP Replacement projects. The YHDP Replacement process occurs when: (1) a CoC replaces a YHDP Renewal project to create one or more new YHDP project(s) that has the same recipient (referred to as YHDP Replacement in the NOFO); (2) a CoC is reallocating a YHDP Renewal project to create one or more new projects with a new recipient (referred to as YHDP Reallocation in the NOFO).); or (3) a CoC is reallocating YHDP Renewal project(s) to create YHDP Expansion applications through the YHDP Replacement process.

d. *Expansion projects*. HUD will allow project applicants to apply for new expansion projects to expand existing projects to increase the number of units, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-CE projects. [see section I.B.2.b.(9) of the NOFO] CoC Bonus, DV Bonus, CoC Reallocation, and DV Reallocation funds may only be used to expand eligible CoC and DV Renewal projects. Applications to expand YHDP Renewal projects through the YHDP Replacement process can only be funded with funding reallocated from another YHDP Renewal project. The new expansion project applications must meet the project eligibility and project quality thresholds in sections III.C.4.a. and b. of the NOFO and must be for the same component as the project being expanded. Expansion projects must submit separate renewal and new project applications, and both must be ranked by the CoC.

e. *Consolidation Projects.* Applicants intending to use the consolidation process to combine two or more, but no more than 10, eligible renewal projects (including renewing YHDP projects), may do so through the renewal project application. To request the consolidation of eligible renewal projects, project applicants must submit renewal projects for the individual projects to be included in the consolidation and each project application must identify the grant number that will survive which must be the grant number with the earliest start date in CY 2025 for FY 2024 consolidations or CY 2026 for consolidations that occur during the FY 2025 Funding process. Project applications for the grants that are proposed to be part of the consolidation must be ranked with a unique rank number for each project, and if all those grants are selected, HUD will conditionally award the single surviving grant based on its ranked position to include the amount of funding of all grants included in the consolidation.

f. *Transition Grants.* Transition grants to transition from one project type to another.

3. <u>Eligible costs</u>.

a. Eligible costs for YHDP projects originally funded under the YHDP Competition are also eligible YHDP Renewal project costs under this NOFO. Additionally, YHDP Renewal projects may include the YHDP Special Activities described in section III.B.4.b.(5) subject to requirements in sections III.B.4.c. including III.B.4.c.(7)(b) of the NOFO.

b. Section 605(a)(2) of VAWA 2022 amended section 423(a) of the McKinney-Vento Homeless Assistance Act to add the following eligible activity to the CoC program: "Facilitating and coordinating activities to ensure compliance with the emergency transfer plan requirement in [34 U.S.C. 12491(e)] and monitoring compliance with the confidentiality protections in [34 U.S.C. 12491(c)(4)]." HUD has determined that eligible activities paid for under the VAWA costs category are not subject to the CoC program's spending caps on administrative costs under section 423(a)(10), (11), and (12). This activity may be included in new project applications, added to eligible renewal projects through expansion or added to eligible renewal projects by shifting up to 10 percent of funds from one eligible activity to the VAWA costs line item.

- Examples of eligible costs for emergency transfer facilitation include the costs of assessing, coordinating, approving, denying and implementing a survivor's emergency transfer which includes:
    - Assistance with moving costs.
    - Assistance with travel costs.
    - Security deposits.
    - Utilities.
    - Housing Fees.
    - Case management.
    - Housing navigation.
    - Technology to make an available unit safe.
- Examples of eligible costs for monitoring compliance with the VAWA confidentiality requirements include the costs of ensuring compliance with the VAWA confidentiality requirements which includes:
    - Monitoring and evaluating compliance with VAWA confidentiality requirements.
    - Developing and implementing strategies for corrective actions and remedies.
    - Program evaluation of confidentiality policies, practices, and procedures.
    - Training on compliance with VAWA confidentiality requirements.
    - Reporting to Collaborative Applicant, HUD, and other interested parties on compliance with VAWA confidentiality requirements.
    - Costs for establishing methodology to protect survivor information.
    - Staff time associated with maintaining adherence to confidentiality requirements.

c. Section 5707 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (PL 117-263, December 23, 2022, 136 Stat 2395) amended section 423(a) of the McKinney-Vento Homeless Assistance Act to allow projects in rural areas [as defined in section I.B.2.b.(26) of this NOFO] to use program funds to pay for the following eligible Continuum of Care Program activities: Payment of short-term emergency lodging, including in motels or shelters, directly or through vouchers.

- Payment of short-term emergency lodging, including in motels or shelters, directly or through vouchers.
- Repairs to units in which homeless individuals and families will be housed' or are currently not fit for human habitation.
- Staff training, professional development, skill development, and staff retention activities.

HUD has determined that eligible activities paid for under the Rural costs category may be included in new project applications or added to eligible renewal projects through expansion.

4. Special YHDP Activities. YHDP Renewal and YHDP Replacement including YHDP Reallocation projects may submit applications that include the following special YHDP activities, which are ineligible under the CoC Program, subject to the conditions specified in the NOFO.

5. Renewal Projects. As set forth in 24 CFR 578.33, projects may renew under the FY 2024 – FY 2025 CoC Program Competition NOFO to continue ongoing leasing, operating, supportive services, rental assistance, HMIS, and project administrative costs.

6. Threshold Criteria. Threshold criteria is listed in the 2024 ND CoC Intent to Apply. Projects must complete the form and either attest to or submit all required threshold verification categories.

Only projects submitting this form on time and meeting all eligibility criteria will be invited to proceed with the application process.

7. <u>Deadlines.</u> Please refer to the important deadlines listed at the beginning of this document and subscribe to the CoC email list for any changes or updates to the CoC Competition deadlines.

8. <u>HUD.</u> Projects should visit the HUD competition page for additional instructions including the full FY2023 NOFO and Project Application instructions.

    a. The entire FY2024-FY2025 NOFO and associated competition materials can be found on the HUD competition page.

    b. HUD Ask A Question (AAQ) is available for applicant questions. Before asking a question, please review the list of previously answered questions. You may submit questions at: https://www.hudexchange.info/program-support/my-question/.

    c. For issues with e-snaps during the application process, visit: https://www.hudexchange.info/e-snaps/faqs/. You are also encouraged to attend the scheduled Application Lab.

SOLO APPLICANTS
Eligible project applicants that attempted to participate in the CoC planning process in the geographic area in which they operate, that believe they were denied the right to participate in a reasonable manner, may submit a solo project application to HUD by following the procedure found in 24 CFR 578.35. If HUD finds in favor of the solo applicant, HUD may award grant funds. Solo applicants requesting FY 2024 funding must submit their solo project application in e-snaps to HUD by 8:00 PM EDT, on October 30, 2024. If Congressional Appropriations authorize HUD to solicit applications for new FY 2025 CoC and YHDP Funding, solo applicants requesting FY 2025 funding must submit their solo project application in e-snaps to HUD by 8:00 PM EDT, on August 29, 2025. See section VII.C of this NOFO for additional information regarding the Solo Applicant appeal process.

HUD'S HOMELESS POLICY PRIORITIES

1. <u>Ending homelessness for all persons.</u> In 2023, the United States Interagency Council on Homelessness (USICH) presented All In: The Federal Strategic Plan to Prevent and End Homelessness to the President and Congress. The plan is built around six pillars: three foundations — equity, data and evidence, and collaboration — and three solutions — housing and supports, crisis response, and prevention. The work funded through this NOFO will support the actions and strategies proposed within the pillars. To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness. CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, older adults, those experiencing chronic homelessness, and people with disabilities, including those living with HIV/AIDS). CoCs should partner with housing, health care, and supportive services providers and agencies to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest periods experiencing homelessness to develop housing and supportive services tailored to their needs.

2. <u>Use a Housing First approach</u>. Housing First prioritizes rapid placement and stabilization in permanent housing and utilizes housing as a platform for providing supportive services that improve a person's health and well-being. CoC Program funded projects should help individuals and families move quickly into permanent housing without preconditions and ensure that participants can choose the services they need to improve their health and well-being and remain in their housing. Additionally, CoCs should engage landlords and property owners to identify housing units available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client centered service practices. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.

3. <u>Reducing Unsheltered Homelessness</u>. In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the country. People living unsheltered have high rates of physical and mental health challenges, including substance use disorders. CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, health care programs, and other supportive services to help improve unsheltered people's well-being and help them move as quickly as possible to permanent housing. CoCs should work with law enforcement and their state and local governments to enlist their support for housing people residing in encampments, and to avoid practices that criminalize homelessness. Criminalization of homelessness risks the health of people living unsheltered and makes it more difficult for them to move into permanent housing. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services, and ensure people experiencing homelessness receive assistance quickly.

4. <u>Improving System Performance</u>. CoCs should be assessing the performance of all homelessness projects using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations). CoCs should review all projects eligible for renewal under this FY 2024 – 2025 CoC NOFO to determine their effectiveness in serving people experiencing homelessness, including their cost-effectiveness. The CoC Competition includes several options to help CoCs improve their effectiveness, including reallocation, expansion, and transition grants, and CoC's should take advantage of these options to improve their overall performance. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.

5. <u>Partnering with Housing, Health, and Service Agencies</u>. Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. HUD

encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:

a. Work closely with health care systems and agencies and assist program participants to obtain health care and supportive services, including behavioral health services, including those covered and financed by Medicaid. In addition, CoCs should develop close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.

b. Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing assistance to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) Vouchers, Fostering Youth Independence (FYI) Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new program resources provided through the Homelessness Assistance and Supportive Services Program (HOME-ARP) that was created through the American Rescue Plan. CoCs should also work with organizations administering other housing assistance, such as assistance provided through HUD's Section 202 and 811 programs, HUD's Project Based Rental Assistance, and U.S. Department of Agriculture's housing assistance programs.

c. Partner with local workforce development centers to improve employment opportunities.

d. Work with Tribal organizations to ensure that Tribal members can access CoC-funded assistance when a CoC's geographic area borders a Tribal area.

6. Racial Equity. In nearly every community, Black, Indigenous, and other people of color are substantially over-represented in the homeless population. In this NOFO, HUD is emphasizing system and program changes to address racial equity within CoCs and projects. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: partnering with a racially diverse set of community partners and people experiencing homelessness and partnering with organizations with experience serving underserved populations. CoCs should review local data, policies, procedures, and processes to identify barriers that result in racial disparities and take steps to eliminate barriers to improve racial equity and to address disparities.

7. Improving Assistance to LGBTQ+ Individuals. Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlaps with other forms of prohibited discrimination. CoCs should address the needs of LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in their planning processes. Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure that all projects provide privacy, respect, safety, and access regardless of gender identity or sexual orientation. CoCs should also partner with organizations with expertise in serving LGBTQ+ populations.

8. Persons with Lived Experience. The people who know best what solutions will effectively end homelessness are those who are experiencing homelessness. HUD expects CoCs to include people with lived homeless expertise and experience in their local planning and decision-making processes. People with lived experience/expertise should determine how local policies may need to be revised and updated to improve the effectiveness of homelessness assistance programs, including participating in planning and oversight activities, developing local competition processes, monitoring and evaluation. CoC leaders and community partners should prioritize hiring people who have experienced homelessness in areas where their expertise is needed.

9. Building an Effective Workforce. Homeless assistance providers need effective, well-supported staff to provide high quality assistance. Unfortunately, recruiting and retaining qualified staff for programs

to assist persons experiencing homelessness has proven difficult due to low pay and the challenging nature of the work. To address this issue, HUD is applying cost of living adjustments to supportive service activities and other staffing-focused budget lines to allow CoC budgets to better keep up with rising costs. HUD also encourages CoCs to work with their funders and other community stakeholders to improve pay and support for people who work in the homelessness sector.

10. <u>Increasing Affordable Housing Supply</u>. The lack of affordable housing is the main driver of homelessness. CoCs play a critical role in educating local leaders and stakeholders about the importance of increasing the supply of affordable housing and the specific consequences of the continued lack of affordable housing. CoCs should be communicating with jurisdiction leaders, including for the development of Consolidated Plans, about the harmful effects of the lack of affordable housing, and they should engage local leaders about steps such as zoning and land use reform that would increase the supply of affordable housing. This NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable and accessible housing supply.

NORTH DAKOTA COC REALLOCATION POLICY
Pending Membership approval August 2024

I.   **Introduction**

   A.   The North Dakota Continuum of Care (ND CoC) has created this process to guide the ND CoC in determining if, when, and how the ND CoC should reallocate funds. Reallocating funds is one of the tools the ND CoC uses to make strategic improvements to our homeless response system. Through reallocation, the ND CoC can create new, evidence-informed projects by eliminating projects that are underperforming, underutilized, or are more appropriately funded from other sources. While reallocation can be complicated and does not come without risk, it is necessary to ensure that our homeless response system meets the needs of people experiencing homelessness.

   B.   Definition: Reallocation refers to the process by which the ND CoC shifts funds in whole or in part from one or more existing ND CoC-funded projects that are eligible for renewal to create one or more new projects. A reallocated project must be a new project serving new participants or an expansion project serving additional clients.

   C.   The annual U.S. Housing and Urban Development (HUD) CoC Program Competition Notice of Funding Opportunity (NOFO) dictates the types of projects that may be created through reallocation in each competition. New reallocated projects applied for from the agency reallocating funds must include a component change (i.e., TH to PSH or RRH to PSH) or a significant change in the program's population (i.e., youth to single chronically homeless).

II.   **Identifying Projects for Reallocation**

   A.   The ND CoC Board, Rating and Ranking Committee, and CoC staff all assist in identifying projects that may be considered for reallocation. Projects may also choose to relinquish all or a portion of their renewal funding for reallocation during the CoC competition on the Intent to Apply form.

   B.   Various factors will be considered for identifying projects for reallocation, including:

      1.   Regional need: Existing inventory, system gaps, duplication, over-abundance of a project type, population/sub-population served.

      2.   Program performance: Utilization, data quality, outcome performance, service model, coordination with other services, coordinated entry participation. If applicable, the ND CoC will first attempt to provide technical assistance to underperforming projects through a Performance Improvement Plan. If agencies neglect to follow through with the identified plan or show performance improvement after one year, they may be at risk of reallocation.

      3.   Fiscal Management: Spending down of grant funds, audits, fiscal practices, financial reports, cost-effectiveness, and matching funds.

      4.   Other system needs: Coordinated entry and HMIS funding needs, potential grant mergers/collaborations, and other funding resources or restrictions (both new and existing).

   C.   Underperforming, underutilized, financial mismanagement, or low-need projects may be targeted for reallocation at any time but are most likely identified following an annual performance review or during the ND CoC competition process. However, when appropriate, the ND CoC is dedicated to working with any underperforming or underutilized project to address deficiencies before recommending reallocation. The ND CoC feels it is worth the investment to increase the capacity of existing projects and agencies to meet the needs of our state.

III.   **Reallocation Process**

If a targeted project is not interested in or has not been responsive to an ND CoC Project Improvement Plan, the project's funding may be reallocated. The ND CoC will contact the project in person and in writing, notifying the project of the reason for consideration and helping develop a transition plan. The transition plan will be developed to help ensure compliance with other funding commitments and prevent anyone from becoming homeless because of the reallocation.

NORTH DAKOTA COC RANKING AND REVIEW POLICY
Pending Membership approval August 2024

I.   **Introduction**

A. The North Dakota Continuum of Care (ND CoC) requires an annual project review for all U.S. Housing and Urban Development (HUD) Continuum of Care (CoC) and Emergency Solutions Grant (ESG) projects. This policy applies explicitly to projects seeking funding under the annual HUD CoC competition.

B. These conditions are designed to inform performance evaluation and Notice of Funding Opportunity (NOFO) Rating and Ranking Committee deliberations and provide all new and renewal applicants with clarity regarding how ranking and prioritization occur.

II.   **Roles and Responsibilities, ND CoC Rating and Ranking Committee**

On behalf of the ND CoC Board of Directors, the ND CoC Rating and Ranking Committee oversees the rank and review process. As stated in the ND CoC Governance Charter, the committee is responsible for:

A. Updating ND CoC policies for the annual HUD CoC Competition and presenting them to the CoC Board and CoC Membership for approval;

B. Conducting an annual review of all projects applying for the HUD CoC Competition using established criteria;

C. Ranking projects according to criteria, placing them in a recommended funding order by tier, and presenting ranking recommendations to the CoC Board and CoC Membership for approval; and

D. Conducting meetings for policy review and during the local CoC competition as needed.

III.   **Important Project Application Dates and Deadlines**

The ND CoC publishes annual HUD CoC competition deadlines, including local and HUD deadlines. Any agency applying for CoC funding must comply with the published deadlines or risk point loss and possible ineligibility for the funding competition. The dates and deadlines will be published on the ND CoC website and emailed through the ND CoC membership email list. Projects that do not submit their project application packet by the ND CoC deadline will not be eligible to be ranked.

IV.   **Eligibility**

To be eligible for inclusion in the ND CoC Rating and Ranking process, all projects must pass all facets of the ND CoC application process, including:

A. HUD Threshold Requirements including, but not necessarily limited to (*please go to the HUD competition page for a complete list of HUD Threshold requirements*):

1. Applicant has a Unique Entity Identifier (UEI) # and has current SAM registration.

2. The project draws down funds from eLOCCS at least quarterly (this is only applicable to agencies that are currently federally funded).

3. Project applicants and potential subrecipients must meet the eligibility requirements of the CoC program as described in the Act and the Rule (nonprofit organization, state or local government, instrument of state or local government, public housing agency, or Indian Tribe or Tribally Designated Housing Entity) and provide evidence of eligibility required in the application (e.g., nonprofit documentation).

4. Project applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the application and the capacity to administer federal funds.

5. Project applicants must submit the required certifications outlined in the NOFO.

6. The population to be served must meet program eligibility requirements described in the Act, the Rule, and the NOFO.

7. Project applicants must agree to participate in the local HMIS system. Victim Service Providers (VSP) must use a comparable database that meets the needs of the local HMIS.

8. Project applicants agree to meet the criteria set forth by HUD for project quality thresholds for their specified project. The criteria can be found in the NOFO.

B. CoC Eligibility and Threshold Requirements

1. The project agrees to incorporate Housing First principles, including low-barrier access, into agency policies and practices. The agency may be required to submit policies during the local competition.

2. The applicant agrees to comply with Fair Housing, Equal Opportunity, and Equal Access, including assuring adaptations to marketing, access, interpretation, and reasonable accommodations.

3. The project will incorporate CoC housing stability best practices to assist households in achieving and maintaining independent living adapted to their individual needs and goals.

4. The applicant agrees to invite program participants (persons with lived experience) to participate in their board of directors, regional/local coalitions, consumer advisory boards, and any other opportunity for persons with lived experience to provide input on ND CoC or project improvement.

5. The project has a signed CoC Membership Agreement.

6. The project agrees to participate in local and regional planning, including attending ND CoC and local homeless committee/coalition meetings.

7. The project agrees to fill all beds using the CARES prioritization process, tools, and policies (PH, including PSH and RRH, or Joint projects ONLY).

8. The project agrees to utilize CARES Receipts and checklists to ensure the linkage of households to mainstream services.

9. Project agrees to verify recipient eligibility and maintain documentation of eligibility.

10. Project history or assurance (if a new applicant) to maintain current and clean data and promptly respond to quality and compliance issues.

11. History (renewal projects only) or agreement (new projects only) to provide timely documentation and reports.

12. Ability to achieve ND CoC utilization and performance standards or, if not achieved, identify a performance improvement plan approved by the ND CoC.

13. The project agrees to participate in all CoC-required training, including, but not limited to, monthly training sessions, EdApp learning management system training, and HMIS in-person training.

14. Applicant agrees to participate in an annual performance evaluation and follow-up with any technical assistance requirements if your project has been identified as under-performing.

15. The project agrees to follow ND CoC Policies and Written Standards.

C. Project adheres to all local ND CoC competition deadlines.

1. The project submits an Intent to Apply and Threshold Assessment by the deadline.

2. Initial and final Project Application submitted in e-snaps and via PDF by deadline.

D. Provide Annual Performance Reports to the ND CoC with the project application (renewal projects ONLY).

V. Guidance on Required Ranking and Tiers

A. The ND CoC Rating and Ranking Committee will review all projects and rank in either Tier 1 or Tier 2 according to ND CoC ranking criteria including, but not limited to: Housing First, equity, CoC participation, project design, project performance, data quality, and coordinated entry. Tier 1 projects are more likely to be renewed by HUD. Tier 2 projects are conditional and will depend on HUD's CoC competition score, project score, and rank. HUD will award a point value to projects in Tier 2. Projects may straddle Tier 1 and Tier 2, but the portion in Tier 1 must adequately fund the project if funding in Tier 2 is not awarded.

B. New or Expanded Project Ranking Priority Bonus: The ND CoC will award bonus points to projects based on project type to help prioritize new or expanded project applications that fill the gaps and needs within the ND CoC. New or expanded projects will receive bonus points based on the priority of HUD and the ND CoC for the current NOFO.

VI. Scoring and Ranking Process: HMIS Projects

The ND CoC recognizes that a quality HMIS is not only required by HUD but is used as a valuable tool to operate and evaluate our regional homeless response system. However, ranking and scoring HMIS like Supportive Housing Projects is not feasible due to the unique aspects of our statewide system. Therefore, the ND CoC will rely on the ND CoC Data Committee to evaluate our HMIS system administrator's performance annually and provide the ND CoC with a letter of review and recommendation for renewed funding or reallocation. Furthermore, the ND CoC recognizes that a robust homeless management information system needs sufficient funding and, therefore, will strive to renew or reallocate funding for our system by placing one or more HMIS applications for a minimum of 2.5 percent of the CoC's Annual Renewal Demand (ARD) at the top of Tier 1 if the request comes from the designated state system administrator. Requests for over the ARD or 2.5 percent, whichever is greater, may be placed in Tier 2.

VII. Scoring and Ranking Process: Supportive Housing and Supportive Services Only Projects

A. The following describes the ND CoC process to score and rank supportive housing projects for CoC funding. It should be noted that the ND CoC uses "scoring," "reallocation," and "ranking" as three distinct steps. Scoring informs, but does not dictate, the final ranking decisions. The ND CoC Rating and Ranking Committee may recommend adjustments where ranking and scoring do not correlate. The committee will indicate in comments why the project is ranked in its position versus directly following scoring.

B. Scoring criteria: The ND CoC Rating and Ranking Committee or other designated committee is responsible for reviewing, updating, and distributing ranking criteria to the ND CoC Board and Membership for approval each year. The process utilizes non-biased, objective criteria based on the HUD ranking tool, established ND CoC priorities, and project performance. The ND CoC uses the e-SNAPS project application, project threshold assessment, an ND CoC ranking scorecard, and required attachments. The Rating and Ranking Committee will score each project using the ranking scorecard to rate and rank each project application.

C. Specifically, ranking incorporates the following categories:

1. Housing First

2. Equity

3. Client participation in project design

4. CoC participation

5. Project design

6. Spending history, annual performance report, and monitoring

7. HMIS/data quality

8. Coordinated entry participation

9. Performance/Evaluation

D. Scoring & Ranking Process

1. The ND CoC solicits interest for the Rating and Ranking Committee through the annual membership drive. No representatives from applicant agencies (staff, clients, or board members) are accepted.

2. Intent to Apply: The ND CoC solicits Intent to Apply and project threshold assessments to renewal applicants and an open invite for new projects via the ND CoC email list and notice at other regional meetings or public notices.

3. The ND CoC coordinator follows up with agencies interested in applying for new or expanded projects.

4. Within ten days after the NOFO publication, application packets are posted on the ND CoC website.

5. The ranking process, criteria, submitted Intent to Apply, and timelines are presented at the first ND CoC meeting after the NOFO release. Any proposed updates to the policy in response to the NOFO are presented and voted upon at this time.

6. The ND CoC promotes and hosts, at a minimum, two application labs to assist with completing the application in e-snaps.

7. Submission: To be eligible for ranking, project applicants must submit their application packet (project application and required supporting documentation) to the ND CoC by the deadline in PDF format.

8. Review and Ranking

   a. The ND CoC coordinator collects and organizes the application ranking materials and shares them with the Rating and Ranking Committee.

   b. The committee reviews the application packet (project application and required supporting documentation) and scores each application. This includes:

      • Reviewing project eligibility.

      • Identifying specific concerns or noting questions for the applicant.

      • Assigning a preliminary score and rank to each project.

   c. The Rating and Ranking Committee meets to collectively review and align scores and rankings. Each project is assigned a score based on the percent of eligible points and any adjustments (note adjustments may be made for extenuating circumstances like a change in agency leadership, disaster, etc.).

   d. The ND CoC coordinator notifies applicants of the inclusion/exclusion in the ND CoC Collaborative Application that will be submitted to HUD.

   e. Projects have up to seven days (depending on HUD's deadlines) to appeal the committee's recommendation to exclude their application from the ND CoC Collaborative Application that will be submitted to HUD.

   f. If received, appeals are reviewed by the Rating and Ranking Committee. Scores may be adjusted if validated (supporting documentation or appropriate clarification is provided). The Rating and Ranking Committee will meet to deliberate score adjustments if needed.

g. The committee will recommend one to three ranking scenarios to the ND CoC Board based on project score, ND CoC priorities, and eligible funding. When ties exist, the committee shall rank the following preferences:

- The project with the highest housing stability and the fewest returns to homelessness shall be ranked first.

- Projects with existing clients shall also be ranked higher if scores are identical or within one point.

9. Vote on Rank

   a. The ND CoC Rating and Ranking Committee presents final applicant scores and the board-approved ranking scenario to the ND CoC Membership. Although rare, members may reject the proposed options and identify another desired option. The membership votes on the proposed rank and tier.

   b. Projects are notified of final rank, tier, and inclusion/exclusion in the collaborative application. Projects not accepted or ranked in Tier 2 are also again notified of their ability to appeal to HUD.

10. Public Posting: The approved priority listing will be placed on the ND CoC website and mailed to the ND CoC email list, which includes project applicants.