Tulsa City & County Continuum of Care
<u>FY2016 CoC Projects</u>
CoC Standards of Operations and Local Project Criteria for Inclusion in Annual CoC Homeless Program's Consolidated Application to HUD
Adopted by the CoC Governance Council on 7/11/2016

Background

The U.S. Department of Housing and Urban Development ("HUD") holds an annual national competition for Continuum of Care ("CoC") funds. This competition brings funds into Tulsa County to provide housing and services to individuals and families who are experiencing homelessness. HUD requires that CoCs conduct a local review process to review and accept all projects included in the CoC annual consolidated grant application.

FY2016 Available Funding

The CoC program is currently in the process of responding to the HUD Office of Special Needs Assistance's FY2016 CoC Notice of Funding Availability (NOFA) published on June 29, 2016. Due to flat funding levels and budget cuts under sequestration, HUD expects there to be insufficient FY 2016 funding available for all existing renewal projects. Therefore, in FY2016, CoCs will once again rank projects into two funding tiers. The amount available in Tier 1 represents CoC's Annual Renewal Demand (ARD), which is the total sum of all renewal projects eligible for renewal in FY 2016, minus a seven percent cut. The remaining seven percent of the ARD amount will be combined with new Permanent Supportive Housing Bonus funds equal to another five percent of the available ARD. The total of these two components will comprise the amount to be made available in Tier 2. Projects ranked in Tier 1 are considered relatively safe, while projects in Tier 2 are at risk. Again this year, it will be possible that a project can straddle the line between Tier 1 and Tier 2.

The Tulsa CoC anticipates funding in the following tiers:

Tier	Available Funding	Eligible Projects
TIER 1	**$2,522,766**	Renewal Projects ranked as priority by the CoC and new or reallocated funding for new Permanent Supportive Housing (PSH) or Rapid Rehousing (RRH) meeting the CoC priorities and NOFA qualifications; HMIS
TIER 2	**$325,518**	

Declaration of Intent to Submit a Renewal Application or Release Currently Awarded Funds for Reallocation:

In order to respond to the tight timelines of this year's NOFA and efficiently process strategic funding decisions, agencies with currently funded CoC Projects and those that plan to submit applications for new projects are requested to notify the Tulsa CoC of the intent to either submit projects for renewal or to release project funds to CoC for reallocated funding applications. Notifications must be submitted by email to wkindrick@csctulsa.org by July 15, 2016. Agencies that release funds from an existing project will be given the first right of refusal on those funds should they decide to apply for a new eligible project. Otherwise, reallocation will be based on standard competitive factors.

Submission of a Renewal Application is not a guarantee of TIER 1 priority ranking in the local CoC application. A panel of unbiased CoC Project Review Panel Members will comprehensively review all project applications using CoC-approved scoring criteria and selection priorities, to determine the extent to which applications will be included in the consolidated application and their rank order.

Renewal Projects

Only renewal projects verified and submitted in the FY2016 Grants Inventory Worksheet registration in e-snaps will be considered for renewal funding.

New Reallocated or Permanent Housing Bonus Projects

In the FY2016 CoC Program Competition, reallocation can only be used to create new permanent supportive housing projects dedicated 100% to chronically homeless individuals and families or new rapid rehousing projects that will serve individuals, families and unaccompanied youth who come directly from the streets or emergency shelters, or those fleeing domestic violence or who otherwise meet the criteria for homelessness found in paragraph 4 of the definition of homelessness in the CoC Interim Rule.

In light of the possibility of reallocated funding and the availability of new Bonus funding, on July 5, 2016 the Tulsa City & County CoC distributed an RFP for proposals through the A Way Home For Tulsa (AWH4T) and Homeless Service Network (HSN) contact lists.

Local Competition Deadlines

24 CFR 578.9 requires CoCs to design, operate, and follow a collaborative process for the development of an application in response to a NOFA issued by HUD. The implementation of deadlines that meet the standards for FY2016 Project Applications will be considered as part of scoring criteria for the CoC Collaborative Application.

a. *Project Applications*. All project applications are required to be submitted to the Tulsa CoC by **August 15, 2016** in order to meet the NOFA requirements of no later than 30 days before the application deadline. The application must be submitted on time (that is, received by the due date indicated in the Application Process Timeline created using the specifications of the NOFA.) Any corrective actions requested must also be completed and submitted by the due dates requested.

b. *CoC Notification to Project Applicants.* The Tulsa CoC will notify project applicants no later than August 30, 2016, which is no later than 15 days before the FY2016 competition closes on September 14, 2016, regarding whether their project applications will be included as part of the CoC Consolidated Application submission. Any project applicants that submitted projects that were rejected by the CoC will be notified in writing, outside of e-snaps, with an explanation for the decision to reject the project(s). Projects will then have the right of appeal or reconsideration to be included in the current funding cycle as designated in the AWH4T CoC Local Application Reallocation, Review and Appeals Policy.

Strategic Resource Allocation

The Tulsa CoC will comprehensively review all existing projects within its geographic area, using CoC-approved scoring criteria and selection priorities, to determine the extent to which each project is still necessary and addresses the HUD priorities contained in the FY2016 NOFA and the goals articulated in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. Funds for projects that are determined to be underperforming, obsolete or ineffective should be reallocated to new projects that are based on proven or promising models.

Continuum of Care Program Statutory and Regulatory Requirement

The CoC Program interim rule at 24 CFR part 578 details the requirements with which grants awarded under in the FY2016 competition must comply. To be eligible for funding under this NOFA, project applicants must meet all statutory and regulatory requirements in the Act and CoC Program Interim Rule. Project applicants can obtain a copy of the Act and the CoC Program Interim Rule on the HUD Exchange website (https://www.hudexchange.info/) or by contacting the NOFA Information Center at 1-800-HUD-8929 (1-800-483-8929).

Tulsa CoC Project Scoring Criteria for FY2016

The FY2016 CoC Program Competition (CoC Program Competition) is administered under the CoC Program Interim Rule. While the NOFA applies to FY2016 funds, the process for project applications will differ according to the funding year.

Scoring criteria and scoring tools have been developed to measure performance and capacity based on the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Performance Measures, in compliance with CoC Interim Rule and HUD FY2016 priorities.

The following project scoring criteria will detail how the Tulsa CoC Project Review Panel Members will evaluate projects for the FY2016 funding year, determine inclusion in the FY2016 CoC Consolidated Application and rank the CoC projects.

In order to best serve our community members by providing the most effective projects possible and capturing the maximum funds available, projects will be prioritized for funding. The prioritization will be based on the Ranking Categories below and projects will compete within their own Ranking Category. The categories are detailed below.

Ranking Categories

Category	Project Type	Notes
1	Permanent Supportive Housing –100% dedicated to chronic homelessness	Renewals/reallocations/new – 1st priority ranking
2	Permanent Supportive Housing – chronic priority when turnover occurs	Renewals/reallocations/new – 2nd priority ranking
3	Permanent Housing - Rapid Rehousing	Renewals/reallocations/new – 3rd priority ranking
4	Safe Havens and Transitional Housing	Not permanent housing - will be assessed for best practices for target populations and community needs – 4th priority ranking
5	HMIS	Ranked last among the fully funded Tier 1 housing projects

Category 1. PSH projects, including reallocated and new PSH which meet HUD's highest priority for funding, will be recommended for full funding and any instances of poor performance will be addressed through the provision of technical assistance and, if necessary, corrective action. This category is reserved for projects which have dedicated 100% of their housing units to housing individuals and families experiencing chronic homelessness. This high prioritization is in line with the Federal Strategic Opening Doors Plan which aims to end chronic homelessness by 2017.

Category 2. Except for instances of serious performance problems, all Category 2 projects, which meet HUD's next priority for funding, will be recommended for funding with priority given to projects that advance the CoC's goal of prioritizing chronic homelessness. The Review Panel may choose to conditionally rank a project based on the project sponsor's agreement to accept technical assistance and complete corrective action. The project may be ranked below projects of another ranking category. However, if indicated, the Review Panel may also choose to reallocate projects should the areas of performance concern be widespread.

Category 3. Renewal, reallocated and new RRH projects submitted in the FY2016 competition would be evaluated for ranking regardless of whether they apply for reallocated or bonus funding. In order to advance the goal of ending family homelessness, rapid rehousing will be a CoC priority for FY2016.

Category 4. As Safe Havens and Transitional Living programs are not permanent housing, the Review Panel will assess individual projects for consistency with best practices targeting populations served. The project review committee will consider the overall project performance, homeless planning participation, financial management, community impact and sustainability of each project. Category 4 projects may be 1) fully ranked, 2) ranked based on the project sponsor's agreement to accept technical assistance and complete corrective action or 3) ranked in FY2016 with a recommendation for reallocation.

Category 5. The HMIS project will be included in Tier 1 as the last fully funded Tier 1 project. The Review Panel will assess the overall project performance, financial management, community impact and sustainability of the HMIS project. If warranted, the Review Panel may conditionally accept this project based on the project sponsor's agreement to accept technical assistance and complete corrective action.

The FY2016 NOFA stipulates that the CoC Planning Project will not be ranked in this competition.

Project Review Criteria

The Local Application Review Panel will review applications, Annual Performance Reports (APR) and supporting documents for compliance with CoC local priorities and standards of operations. After discussing the applications, the Review Panel will come to a consensus vote on eligibility. Projects accepted for inclusion in the Tulsa CoC Application will be ranked and prioritized and a recommendation will be made that projects be funded "without condition" or "with condition". A condition is defined as an operational recommendation for action, the performance of which will correct a deficiency or implement an action that result in a satisfactory impact on an applicant's score. Failure to implement an action identified as a condition attached to a recommendation will result in a loss of points by the applicant.

Tulsa CoC Standards of Operations

The CoC Standards of Operations will be used by the Review Panel to determine the "with or without condition" status of renewals and new applications using reallocated or bonus funding. Scoring criteria based on the CoC standards of operations is attached. Scores will be used to rank projects within the applicable ranking categories for inclusion in Tier 1 and Tier 2 funding levels.

The agency should be compliant with the following CoC Agency Standards of Operations:

Agency Standard 1. Continuum of Care Participation
80% or greater participation in AWHFT and CoC committee meetings (the CoC Collaborative Applicant will verify that agencies meet this criterion)

Agency Standard 2. HUD Review Monitoring Compliance
Whether HUD has audited the applicant and the status of unresolved findings, if applicable

Agency Standard 3. Agency Financial Information
The agency verifies its ability to meet payroll obligations and is current on all payroll taxes. The agency submits its most recent letter from its external audit and documents the status of any findings, if applicable

Agency Standard 4. Timeliness of Spending Grant Funds
The agency verifies timeliness of draws from its LOCCS project accounts

Agency Standard 5.   Consumer Interests Represented
A consumer is a board member or the agency has taken other appropriate means to ensure that consumers have representation

Agency Standard 6. Participation in Energy Star
The agency verifies its use of energy star products in all housing programs

Agency Standard 7. Mainstream Program Enrollment
The agency has a process to systematically assist clients in accessing mainstream resources and employment opportunities

Agency Standard 8. HMIS Participation
The agency participates in HMIS and meets data quality and security standards (excluding Domestic Violence programs)

Agency Standard 9. Consistency with Education Subtitle of McKinney-Vento

> If the agency has HUD-funded programs that serve families with children, policies compliant with the HEARTH Act have been implemented

Agency Standard 10. Fair Housing and Other HUD Requirements

> The agency verifies compliance with Federal Fair Housing Policies with
> *Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity and* compliance with other HUD regulatory requirements as specified in the current NOFA

The Project should be compliant with the following CoC Project Standards of Operations:

Project Standard 1. Project Capacity and Population Served

> The project is financially feasible, is compliant with the HEARTH Act and the CoC Interim Rule, meets project thresholds as defined by current NOFA regulations and is a best practice for the population served in alignment with CoC housing needs and target populations

Project Standard 2. Impact on Ending Homelessness

> The project aligns with the goals of the Federal Open Doors Plan and CoC Housing First priorities to connect people to housing with the resources necessary to sustain housing in the most integrated settings possible for the population served

Project Standard 3. Outcomes and Performance

> The project is meeting program outcomes and has a positive impact on the CoC consolidated grant application. New projects will be assessed for planned outcomes.

Project Standard 4. Documentation of Match and Leverage

> Documentation provided for the match requirement which may be in the form of cash or an in-kind match. A 25% match is required except for leasing. All projects must be leveraged.

Site Visit. Site visits may be conducted at the discretion of the local Review Panel in order to familiarize the Review Panel members with the program or to verify compliance with CoC Standards of Operations.

Renewal applicants accepted "with condition" will have the opportunity to submit a corrective action plan to the Continuum of Care Governance Council which will review all conditions given and make a determination if that project should be included in the current Continuum of Care grant for funding in the current year. If the Council determines by a majority vote that a project should not be included in the grant it will be deemed "ineligible".   Projects will then have the right of appeal or reconsideration to be included in the current funding cycle as designated in the AWH4T CoC Local Application Reallocation, Review and Appeals Policy.

FY2016 e-snaps Submission

After the local review process has been finalized, all projects accepted for inclusion in the FY2016 CoC Consolidated Application must submit a final online e-snaps project application to the Tulsa CoC no later than one week prior to the deadline published in the most recent NOFA.

Attachment 1: Agency Capacity Assessment and Points

Agency Standard	Description	Max Score
Threshold	Application Complete and Timely	**5**
CoC Planning and Stakeholder Participation • CoC Governance Council • CoC committee participation • Consumer interests represented	80% or greater participation in CoC Governance Council meetings. All renewal agencies have met and exceeded.	10
	Agency participates in the collaborative process to design a system to end chronic homelessness	
	Are consumers represented on the board or policy making body?	
CoC and HEARTH ACT Compliance • Participation in Energy Star • Mainstream Resources • HMIS Participation • Education of homeless children • Fair Housing policies • Other HUD and NOFA regulations	Energy star products used in housing programs	15
	Agency procedures promote mainstream resources	
	HMIS participation (DV is excluded)	
	Agencies with projects that serve families with children must be compliant with the Homeless Education requirements as specified in the HEARTH Act	
	Fair Housing policies consistent with HUD policies have been implemented and the agency verifies compliance with other HUD regulatory requirements in the NOFA	
Agency Financial Information • Agency audit • HUD audit • Timeliness of expenditures	Review audit letter- review and note any outstanding issues in the A-133	20
	Recommendations or findings and status of findings	
	Grantees are expected to make timely draws from their LOCCS project accounts. Minimum frequency will be at least quarterly-ask for LOCCS history.	
Maximum Score		50

Attachment 2: Project Capacity and Impact Assessment and Points

Project Impact Area	Description	Score
Project Capacity and Population Served	Project is financially feasible, is compliant with HEARTH Act and the CoC Interim Rule, meets project thresholds as defined by the current NOFA regulations and is a best practice for population served in alignment with CoC housing needs and target populations	10
Coordinated Assessment and Referral Participation	Commitment to participate in the CoC's coordinated assessment and referral system	10
Alignment with Federal Opening Doors Plan and CoC Priorities to End Homelessness	Review narrative description of project How does project align with the CoC Housing First priorities to connect people to housing and does it have the resources necessary to sustain housing in the most integrated setting possible? Project impact on CoC score - best practice model targeting Chronic Homeless, Veterans, Youth, Families or Victims of DV For PSH - 100% dedicated to chronic homeless, currently prioritizes chronic homeless or made a commitment to prioritize 80% of turnover to chronic homeless Does the project assist individuals to both increase their employment and/or income to maximize their ability to live independently? How would homelessness in the community be impacted if this project was not available?	20
Match and Leverage	Did the agency certify a total of 25% match for all SHP requested funds except leasing? All projects must have some leverage in addition to match. Requires 150% leverage to receive full points. May be cash or in-kind.	10
	Maximum Score	50

Attachment 3: Renewal Performance Assessments and Points

Project Types: PSH, SH and TH	Points
Description of HEARTH and CoC Performance Measure	
Percentage of exits to PH or if PSH remaining after 6mos + exit to PH- HUD Goal 80%	10
Percentage employed at exit - goal 20%	10
Percentage of gained income - goal 54%	5
HMIS data quality - percent of data with less than 10% or less missing data	10
Utilization Rates: per APR & PIT	20
Application Performance Measures, APR & Project Outcome Narratives	5
Maximum Score Available	**60**

Attachment 4: Project Outcome Narratives For New Reallocated Projects

Community Impact-Area	Description	Points
Planned Resident Outcomes Alignment with HEARTH and CoC goals	- Cost effective and sustainable project - Leverages new or existing funds other than HUD SHP funds - Demonstrates adequate, sustainable funding sources - Demonstrates a potential for high rates of successful permanent housing outcomes - Connecting clients to mainstream resources - Increasing clients' links to income - Demonstrates collaboration with other service providers - How the project advances HEARTH and CoC performance measures	60
Total Point Value		**60**