

Howard County Continuum of Care Policies & Procedures

Communication

Methods of sharing information to Steering Committee members (and any interested persons/agencies) between meetings will include:

1. Information sent out via email lists
2. Information added to the CoC website, including:
 - a) Information on the work of the Continuum including project ranking for annual competitions
 - b) Plans and implementation
 - c) Data
 - d) Funding availability

CoC Application Process

General Procedure

HUD CoC funds are granted based on a national competition following annual Notice of Funding Availability (NOFA) releases. The Howard County CoC (DCRS Lead Agency) coordinates the process upon receipt of the federal NOFA. Information regarding the NOFA and the community's process and requirements are disseminated to all interested parties (all homeless services and housing providers in the CoC) via the following open solicitation methods:

- Letters/emails
- Responses to public inquiries
- Announcements at meetings
- Posted on the DCRS Lead Agency website

Procedures for Application Submissions

Proposals must be submitted to the DCRS Lead Agency by the designated method, noted in the solicitation, by established due date. Proposals will always be due by 5:00 pm on the due date. Specifics regarding due dates, submission requirements, and other requirements will be posted on DCRS Lead Agency website, <https://www.howardcountymd.gov/Departments/Community-Resources-and-Services/Office-of-Community-Partnerships/Continuum-of-Care-COC>.

Threshold Criteria and Project Requirements

Projects must pass a threshold requirement review before being submitted to the ERA Committee. Late or incomplete applications will not pass threshold requirements for reviewing and ranking by the ERA Committee. These threshold requirements are:

- Project Applicant
 - Must be eligible to apply for CoC funding: Nonprofit organizations, State, or local government
 - Must not require participation in religious services for CoC-funded programs
 - Must be an eligible contractor for federal funds per <https://www.sam.gov/>
 - Must have a current tax exempt status as verified by the IRS
 - Must not owe any overdue tax debts, as documented on IRS 990 submissions to the IRS
 - Must have financial and management capacity to carry out the project(s)
 - Must provide evidence of a homeless or formerly homeless person is on the Board of Directors or in a role in the policy-making process within the Agency

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- Must be able to evidence Agency policies and procedures for the administration for CoC funds
 - Must participate in Homeless Management Information Systems (HMIS)
 - Must administer programs or activities in the most integrated setting appropriate to the needs of homeless persons with disabilities
 - Must identify matching funds in the Budget and Budget Narrative
 - Must not discriminate against households with a registered sex offender and/or person with a criminal record, including a violent crime, for acceptance into the program even if a child is in the household. It is a CoC goal to eliminate as many barriers for the “hardest-to-house” populations.
 - Must provide all required information listed in Required Attachments and be capable of fulfilling all required Work Effort.
- Eligible Project & Activity Type
 - Completeness of the application

Project Review and Ranking

HUD requires all Continuum of Care (CoC) have an evaluation process for ranking all renewal and new projects. In each competition, HUD will state the percentage of renewal amounts that are required to be in either Tier 1 or Tier 2. The Performance Score Card and Assessment (described below) will be used to determine where projects will rank in the Tiers. The ERA will complete all project review and ranking.

Performance Score Card & Assessment

The Performance Score Card (Score Card) is a scoring-based tool based on the Annual Performance Report (APR) that is required annually to HUD. The Score Card reviews project-specific and CoC-wide outcomes, and are directly related to the federal goals to reduce length of homelessness, reduce returns to homelessness and increasing household income. Additional System Performance Measure may be included in future assessments, as HUD releases updates. The Assessment of each project will include:

1. Whether projects operate as “Housing First”
2. Projects with performance outcomes from Annual Performance Reports/HMIS
 - Length of stay
 - % permanent housing exit destinations
 - % increases in income
3. Project Monitoring Criteria/Summaries
 - Participant Eligibility
 - Utilization rates
 - Drawdown rates
 - Frequency or Amount of Funds Recaptured by HUD
4. Project Meeting a need for specialized population services
 - Youth
 - Victims of Domestic Violence
 - Families with Children
 - Persons Experiencing Chronic Homelessness
 - Veterans
 - Persons with Disabilities, including children

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Project Reallocation

The DCRS Lead Agency must ensure projects submitted in the CoC Consolidated Application best align with HUD priorities and contribute to a competitive application that secures these dollars in our community. The DCRS Lead Agency will review reallocation options and will consider reallocation if necessary. Reallocation should occur, if one or more of the following is true:

- The results of the Score Card and Assessment show the Project is under, non-performing or is not cost-effective; or
- If current project cannot demonstrate sufficient capacity to successfully carry out the project, or is unable to be compliant with the its goals; or
- If the current NOFA indicates/recommends reallocation for a component or activity; and
- A sufficient plan is in place to secure and maintain permanent housing for current project participants if any projects are reallocated.

If one or more of the above criteria for reallocation is met, a Reallocation Plan will be created to develop the best program to meet the needs of the community. All reallocation decisions to decrease funding, defund or create new projects will be compared to performance criteria and funding priorities to determine the extent to which each project is aligned to achieve such outcomes. Final decisions will be made by the ERA.

Reallocating to New Projects

The DCRS Lead Agency will release new project applications/opportunities for any funds available as a result of reallocation and BONUS grants. This ERA review process will follow the same steps as renewal projects. The DCRS Lead Agency will notify applicants if their project was rejected or accepted prior to the NOFA determined deadline, as recommended by the ERA. All final rules for reallocation will be defined by HUD in the (Notice of Funding Availability) for the CoC Program Competition. Please note the DCRS Lead Agency may need to revise the requirements described and/or request additional information after the NOFA is released.

Using All Available Funds

The ERA and DCRS Lead Agency will do everything possible to ensure that all funds available to the community are applied for. When all applications have been submitted and it is found that the community is not requesting as much money as is available from HUD or no BONUS projects have been submitted, then:

- The CoC staff will email all CoC and other interested parties (all homeless service and housing providers in the CoC) with specifics regarding, how much money is available for what type of programs
- Applications deadlines for these funds will be set after the notice is distributed.

HUD Reporting Requirements

Annual Performance Reports

Annual Performance Reports (APRs), formerly called Annual Progress Reports, are required by HUD on an annual basis to track the progress and accomplishments of HUD's CoC Programs. The APR gathers information on how programs assist homeless persons to obtain and/or remain in permanent housing, increase skills and income, and obtain greater self-determination. This information is used by HUD and Congress to assess outcomes from federal funding.