Attachment D

Central Florida Continuum of Care (CoC FL-507)

Selected Policies and Priorities Re: the 2019 Application for HUD CoC Program Funding

A. Projects and Applications

1. Types of Projects Eligible for Consideration through the Community Process

The HUD regional application review and selection process should score and rank submitted applications for funding to form projects within the following six (6) categories:

a. Permanent Supportive Housing (PSH)
b. Rapid Rehousing (RRH)
c. Youth-Specific Transitional Housing (TH) or Supportive Services Only (SSO) Renewals
d. Transitional Housing- Rapid Rehousing (TH-RRH)
e. Essential System Supports – Coordinated Entry System (CES)
f. Essential System Supports – Homeless Management Information System (HMIS)

CoC FL-507 should include at least one project in each of the above categories on its list of highest-priority (Tier 1) projects in the Submission to HUD (assuming at least one eligible project is submitted in each category), with the exception of TH-RRH.

2. Types of Projects Ineligible for Consideration through the Regional Application Process

The following types of projects should be ineligible for consideration through the CoC FL-507 regional application process:

a. All other TH projects
b. All other SSO projects, unless they are or can be directly bundled with a PSH, RRH or are linked to a youth TH project
c. Safe Haven projects
d. Expansion CES or HMIS projects

3. Types of Projects Eligible for Consideration through the Regional Application Process, but Unlikely to be Included in the Submission to HUD

The following types of projects should be eligible for review through the regional application process, but ineligible for inclusion in the Application to HUD without the express approval of the CoC FL-507 Board:

a. Projects that propose to use HUD funding for acquisition, new construction or rehabilitation activity.
b. Projects that propose to use HUD funding to provide project- or sponsor-based rental assistance, but are unable to document that the units will be online throughout calendar year 2020.
c. Projects proposed in applications that do not meet threshold criteria (i.e., do not meet the basic criteria to be eligible for consideration by HUD – ex. does not accept clients through the Coordinated Entry process, do not participate in HMIS or comparable data system (DV providers), do not use a low-barrier approach).

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B. Jurisdictional Issues

1. Option for Jurisdictions to Express Preference for Jurisdiction-Specific Projects

a. The regional application process should include a mechanism whereby each participating jurisdiction has the option to indicate a preference among all Applicants dedicated to serving a particular county, in the event that the CoC receives an application for a single-jurisdiction application.

b. As a secondary option, a jurisdiction should have the opportunity to verify and quantify its history of investing or leveraging funds for Projects administered by the Applicant in the past. This information may be helpful in determining if a jurisdiction is choosing to develop capacity for a specific agency and/or if the HUD funds will be leveraged in a way that reduces the service per HUD dollar ratio.

2. **Option to Corroborate Applicant Claims that a Project Will Serve the Jurisdiction**
    a. Each jurisdiction should be afforded the opportunity to confirm (or deny) jurisdiction-specific activities that an Applicant claims in its proposal. Specifically, if in its application, the Applicant asserts that it has "served" households in/from a particular jurisdiction, that jurisdiction should have the opportunity to confirm the assertion. If the jurisdiction is not aware of any activity, the Applicant would have to provide verification to the jurisdiction.
    b. The definition of "served" will vary based on the nature of the Project. In many cases, however, the determination of whether the jurisdiction will be served will be immediate.
    c. An Applicant that expresses the intent to serve a jurisdiction without a documented history of doing so would not receive points that another applicant with an established history would receive.

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C. **Specific Project Factors Relevant to the Application Process**

1. **Project "Bundling"**
    a. Given the flexibility afforded by an approach that "bundles" housing with supportive services - both with regard to budgeting and programming - application bundling should continue to be the preferred approach to building housing-services linkages within PSH and RRH projects, subject to HUD's expectation that no more than 20 percent of a Project's funding be provided for services.
    b. If existing bundled Projects are selected for renewal, the baseline assumption should be that the distribution of awards to sub-recipient agencies to provide components of the renewal project will be proportionate to the allocation of funding to sub-recipients for FY 2018. However, HSN should conduct a separate competitive process by which sub-recipient funding will be formally awarded for FY 2019. The process should be completed more than 60 days prior to the start of the HUD grant term for the project. Should the sub-recipient portfolio and/or funding allocations associated with any Project change based on the results of that competition, HUD should be notified of the changes.

2. **Administration of Scattered-Site Rental Assistance**
    In light of the fact that the administration of scattered-site rental assistance/leasing funds across the CoC is such a specialized and complex function, HSN should continue to administer these resources CoC-wide. Because of the increased efficiency and reduced regional confusion associated with having a single point of contact, these funds should continue to be administered on a consolidated basis across the region. This recommendation was also based on the recognition that rental assistance funds are pass-through dollars to landlords, stretch an agency's cash flow capacity, and do not tend to build organizational capacity. This policy increases the ability of service providers with limited administrative capacity to apply for CoC funding.

3. **Domestic Violence (DV) Bonus Project**
    The CoC should include at least one and perhaps all of the following types of project types, where the project is exclusively dedicated to serving survivors of domestic violence and/or human trafficking under the DV Bonus in the Submission to HUD: 1) a RRH project, 2) a Joint Transitional Housing/Rapid ReHousing (TH-RRH) project, or 3) a DV-specific Coordinated Entry support project.

4. **CoC Bonus Project**
    CoC FL-507 should include at least one of the following as a CoC Bonus Project in the Submission to HUD, all other things being equal: 1) a TH-RRH Project serving youth, 2) a RRH project serving families with children and/or youth, or 3) a project-based, site-specific Permanent Supportive Housing (PSH) project, or 4) a tenant-based, scattered-site PSH project.

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D. Application Ranking and Project Selection Process
1.   Grouping of Applications for Initial Ranking
    a. Each Application should be scored so that it competes only with other projects within the same Project and activity type, at least for purposes of generating the initial ranked project list. For example, all Applicants proposing to provide supportive services to RRH Projects should be scored and ranked as a separate and distinct group, and none would be evaluated in comparison with Applicants proposing to provide services to PSH projects.
    b. The CoC has determined that its current portfolio of HUD-funded projects provides the region with the configuration and distribution of housing and services capacity to best address the current regional need, and that retention of that capacity is of paramount importance. Consequently, Applicants requesting funding through re-allocation should not be considered unless they maintain existing capacity (by project type, geography and modality) without increasing costs and assure the sustained tenancy of persons served by the Project from which funding is re-allocated. Such Applicants could, however, be considered for funding as part of a Bonus Project.

2.   Baseline Assumptions for Use in the Community Ranking and Project Selection Process
Therefore, the baseline assumption for the FY 2019 scoring and selection process should be that:
a. The distribution of FY 2019 awards should favor the current mix, location (county) and modality of PSH vs. RRH project funding (approximately 75%-25%) and housing vs. supportive services funding (80%-20%). The latter split is also an implicit expectation of HUD. This distribution will be reflected in the publication of baseline renewal amounts by Project and activity type.
b. Notwithstanding D.2.a., the need for some adjustments could become clear through the Community Ranking and Project Selection process in the form of documented system and project performance concerns.

5. Baseline Tier 1 Assumptions
Because of the expectation that a PSH unit be made available to a resident for as long as it may be needed, the cost to the region of losing a PSH unit is significantly greater than the cost of losing a RRH unit. Furthermore, CoC FL-507 has prioritized the use of PSH to serve individuals and families experiencing chronic homelessness. All other things being equal, PSH renewals or new projects funded through re-allocations, Youth Projects, CES and HMIS Projects should be funded in Tier 1 and in front of RRH projects in order to reduce the likelihood that these resources are imperiled.

6. Baseline Tier 2 Assumptions
In order to maximize the competitiveness of the Submission to HUD based on published criteria, CoC FL-507 should include only one Project in Tier 2. Assuming consistency with CoC FL-507 priorities, such a Project would be a RRH Project straddling Tier 1 and Tier 2, so that even in a scenario under which Tier 2 is not funded, a portion of the RRH Project would be preserved.

7. Baseline Bonus Project(s) Assumptions.

Given the manner in which HUD has structured the CoC Bonus Project(s) opportunity, funding requests by all Applicants associated with a particular proposed CoC Bonus Project(s) are encouraged to not exceed a total of $150,000, of which no more than 20 percent should be proposed for supportive services.

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E.   CoC FL-507 Prioritization

1.   Definition of Homelessness

In accordance with the CoC's written standards for assistance, in order to be eligible to receive housing assistance and/or supportive services through a HUD CoC Program, a Program Participant must meet the definition of homelessness found in either Category 1 (i.e., is literally homeless) or Category 4 (i.e., fleeing or attempting to flee domestic violence) of the HUD definition of homelessness (24 CFR §578.3).

Category 1:   Any individual or family who lacks, regular and adequate nighttime residence, meaning:
- Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- Is living in a public or privately operated shelter (congregate shelters, transitional housing and hotels and motels are paid for by charitable organizations or federal, state and local government; or
- Is exiting an institution where (s) he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 4:   Any individual or family who:
- Is fleeing, or is attempting to flee domestic violence, human trafficking, dating violence, stalking, or sexual assault;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

2.   Income

Any individual or family with household income exceeding 50 percent of the Area Median Income (AMI) most recently published by HUD for the Orlando-Kissimmee-Sanford MSA is assumed to have sufficient resources to obtain other permanent housing and is not eligible for enrollment into HUD CoC Program funded PSH, RRH or TH assistance.

3.   Chronicity

PSH housing assistance and supportive services are prioritized for individuals and families experiencing the longest histories of homelessness histories and most severe needs. In particular, the CoC has adopted and expanded upon the orders of priority as set forth in HUD Notice CPD-16-11.