
FY2021 Toledo/Lucas County CoC - Competition Certifications and Policy Addendum

The Toledo/Lucas County Continuum of Care (CoC) is issuing this “Competition Certifications and Policy Addendum” that is a required certification that must be submitted with ALL project review applications. This document addresses the FY2021 CoC policy, items related to project application scoring for Housing First and Low Barrier Housing, and assurance from applicants that all required certifications must be current and submitted in the Application or Applicant Profile within *e-snaps*.

The certifications below must be made by a member of the organization who has been duly authorized to make such commitments. This addendum must be received by the CoC from ALL project applicants no later than the October 1, 2021 deadline in order for an application to be considered complete. It must be delivered in hard copy with the complete application package to Toledo Lucas County Homelessness Board.

Bed Prioritization for Chronically Homeless Policy

The Toledo/Lucas County CoC is prioritizing homeless individuals and families experiencing chronic homelessness consistent with *Notice CPD 16-011: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status*. Chronically homeless individuals and families should be given priority for permanent supportive housing beds not currently dedicated to this population as vacancies become available through turnover. Permanent supportive housing renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance use disorder) must continue to serve those subpopulations, as required in the current grant agreement. However, chronically homeless individuals and families within the specified subpopulation should be prioritized for entry. The most current notice can be found at: <https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>.

All renewal Toledo/Lucas County CoC Permanent Supportive Housing (PSH) projects that do not already have 100% of their beds dedicated to people who are chronically homeless are required to prioritize at least 90% of their non-dedicated beds to people who are chronically homeless. All new Toledo/Lucas County CoC Permanent Supportive Housing (PSH) projects must dedicate 100% of their beds to people who are chronically homeless or operate as a DedicatedPLUS project.

- I certify that I am aware of this policy requirement for PSH projects funded through the Toledo/Lucas County CoC. (RRH projects, enter N/A) (Please initial) _____**

Low Barriers to Entry

Low barrier housing refers to allowing project entry to participants without any or many barriers or restrictions and prioritizes rapid placement and stabilization in permanent housing. This includes low or no income, current or past substance use, criminal records—with the exceptions of restrictions

imposed by federal, state or local law or ordinance (e.g., restrictions on serving people who are listed on sex offender registries), and a history of domestic violence. Although not yet required, the Toledo/Lucas County CoC, in line with HUD, encourages projects to adopt this service model. Please note that renewal applicants must meet, or improve, the level committed in previous competitions.

Select applicable response:

- I certify that my agency will operate this project funded through the Toledo/Lucas County CoC using a Low Barrier approach. (Please initial) _____**
- No, my agency will not operate this project funded through the Toledo/Lucas County CoC using a Low Barrier approach. (Please initial) _____**

Housing First

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing without any preconditions such as sobriety or a minimum income threshold. Once stabilized in housing, any service participation requirements should not result in client termination from the project before a good faith effort is made to identify alternative solutions. The Toledo/Lucas County CoC, in line with HUD, prioritizes adoption of this service model for all projects. Please note, renewal applicants must meet, or improve, the level committed in previous competitions.

Select applicable response:

- I certify that my agency will operate this project funded through the Toledo/Lucas County CoC using a Housing First model. (Please initial) _____**
- No, my agency will not operate this project funded through the Toledo/Lucas County CoC using a Housing First model. (Please initial) _____**

Toledo/Lucas County CoC Written Standards Policy (Required)

Each CoC is required by HUD to establish and follow written standards for recipients and subrecipients for providing assistance with CoC Program funds. At a minimum, these written standards must include policies and procedures for evaluating individuals' and families' eligibility for assistance through the CoC Program, determining and prioritizing eligible individuals and families for transitional housing, rapid re-housing, and permanent supportive housing assistance, and determining the percentage and amount of rent program participants must pay while receiving rapid re-housing assistance.

- I certify that my agency will ensure that policies and procedures of each CoC-funded project will be maintained to meet the requirements set forth in the *Toledo/Lucas County Continuum of Care Written Standards* upon approval and publication of such standards, including updates that may be published from time to time. These written standards will furthermore be in practice for each project subject to this certification. (Please initial) _____**

Toledo/Lucas County CoC Violence Against Women Act (VAWA) Policy (Required)

The 2013 reauthorization (VAWA 2013) expands housing protections to HUD programs beyond HUD's public housing program and HUD's tenant-based and project-based Section 8 programs (collectively, the Section 8 programs) that were covered by the [Reauthorization of VAWA in 2005 \(VAWA 2005\)](#). Additionally, the 2013 law provides enhanced protections and options for victims of domestic violence, dating violence, sexual assault, and stalking.

On November 16, 2016, HUD published its VAWA final rule (81 FR 80798), which provides various protections to victims of domestic violence, dating violence, sexual assault, and stalking under the CoC Program and other HUD programs. The core statutory protections of VAWA also prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. Under the HUD Final Rule, the Toledo/Lucas County Continuum of Care written standards include provisions for protection of those aforementioned protected classes.

The grants to be awarded under this NOFO will be required to comply with the VAWA rule as provided in 24 CFR 578.99(j). All CoC-funded projects must follow the *Toledo/Lucas County CoC Violence Against Women Act (VAWA) Policies and Procedures* and be fully compliant. First-time renewal projects should be fully compliant by the time the local CPD Field Office issues the first grant agreement for a project in the CoC's geographic area.

Select applicable response:

- I certify that my agency will update our policies and procedures and ensure compliance with the *Toledo/Lucas County CoC Violence Against Women Act (VAWA) Policies and Procedures*. (Please initial) _____

Projects Classified as DedicatedPLUS

DedicatedPLUS projects must be permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals, households with children, and unaccompanied youth (including pregnant and parenting youth) that meet eligibility requirements described in Section III.B.2.g of the FY 2021 NOFO.

Renewing Permanent Supportive Housing (PSH) projects will have the opportunity to change the classification of project type to DedicatedPLUS where 100% of the beds will be dedicated to serve individuals, families, and youth as defined in Section III.B.2.g of the 2021 HUD NOFO.

PSH projects that were awarded as DedicatedPLUS in previous competitions are required to include households with children to qualify as a DedicatedPLUS project in the FY 2021 CoC Program Competition. Additional guidance for DedicatedPLUS projects can be found on the HUD Exchange at: <https://www.hudexchange.info>.

- I certify that I am aware of this policy requirement for PSH projects that changed their classification to DedicatedPLUS. (RRH projects, enter N/A) (Please initial)
- _____

Application Submission Assurances (Required)

In addition to the requirement of applicants to complete all required certifications are current and submitted in the Application or Applicant Profile within *e-snaps* as required:

- All project applicants must ensure their organization has a Code of Conduct that complies with the requirements of 2 CFR part 200 and is on file with HUD at https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants. If the organization's Code of Conduct does not appear on HUD's website, the project must attach its Code of Conduct that includes all required information to its Project Applicant Profile in *e-snaps*.
 - The CoC Program requires a Certification of Consistency with the Consolidated Plan under 24 CFR 91.2. This certification means the proposed activities in the project applications are consistent with the jurisdiction's strategic plan, and the location of the proposed activities is consistent with the geographic areas specified in the Consolidated Plan, of each jurisdiction. As Collaborative Applicant, Toledo Lucas County Homelessness Board staff will work with applicants and the appropriate Consolidated Planning jurisdictions in order to combine all required form HUD-2991 certifications into one document (to be submitted by the CA and dated between August 17, 2021 and November 16, 2021). However, it is the **applicant's responsibility to follow up with respective jurisdictions to ensure those jurisdictions have the project information they need to provide the certification(s) in a timely fashion.**
- I certify that I am aware of these NOFO requirements, and that my agency will review/update Code of Conduct information and provide project information to related Consolidated Planning jurisdictions as required. (Please initial) _____
- My agency is a Sub-Recipient and not the entity using *e-snaps*, however, I am aware that I need to provide project information to related Consolidated Planning jurisdictions as required. (Please initial) _____

Signature of Authorized Representative	
<input type="checkbox"/> "X" indicates electronic signature submitted	
Print Name	
Title	
Agency and Project Name(s)	
Date	