



**HOMELESSNESS
BOARD** **TOLEDO LUCAS COUNTY**

Home for Everyone CoC :

2023 Continuum of Care Funding (Annual NOFO) Policy

Issued by

Toledo Lucas County Homelessness Board

Date Issued: Monday, August 7th, 2023

Response Submission Deadline

ANNUAL NOFO- 5:00 PM on August 25th, 2023

Applications can be accessed at <https://www.endinghomelessnesstoledo.org/funding-opportunities>

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INTRODUCTION AND OVERVIEW

- The Home for Everyone CoC (formally OH-501 Toledo Lucas County Continuum of Care) is issuing the following guidance for the Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2023 CoC Competition. This competition policy is issued in accordance with the U.S. Department of Housing and Urban Development (HUD) NOFO for the FY23 Continuum of Care Program Competition (Docket No. FR-6700-N-25).
- The Toledo Lucas County Homelessness Board (TLCHB), designated as the Collaborative Applicant for the Home for Everyone CoC, is responsible for overseeing and managing the application process for the FY23 NOFO for the Continuum of Care Competition. TLCHB works with the OH-501 Home for Everyone CoC Board, CoC membership, and other relevant stakeholders to develop and approve of the local CoC competition policy and any supplemental documents, collects project applications and any supplemental documents, and completes the Consolidated Application and Priority Listing(s) in accordance with requirements outlined in the HUD NOFO for the FY23 CoC Competition.
- This document outlines the policy and process for the FY23 funding cycle. In addition to the information presented in this document, it is expected that all applicants read the HUD FY23 Continuum of Care NOFO, related scoring criteria, and any supplemental materials in their entirety to ensure there is a complete understanding of the information provided.
- The HUD NOFO for the FY23 Continuum of Care Program Competition and supplemental materials can be accessed here: [CoC Program Competition | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)
- This guidance applies to all renewing CoC grants for permanent supportive housing (PSH), rapid re-housing (RRH), Homeless Management Information System (HMIS), and Supportive Services Only- Coordinated Entry (SSO-CE) projects as well as for new projects submitted either for PSH, RRH, Joint Transitional Housing and Rapid Re-housing component (Joint TH-RRH), or Domestic Violence (DV) Bonus projects.
- HUD will continue the Tier 1 and Tier 2 funding selection process.
 - Project applications in Tier 1 will be conditionally selected from the highest scoring CoC to the lowest scoring CoC, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold. Tier 1 is equal to 93% of the local CoC's Annual

- Renewal Demand (ARD), which is estimated to be \$3,508,477.
- Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds, which is estimated to be \$813,118.
 - Funding for new projects is only available through the process of reallocation, the CoC Bonus, or the DV Bonus.
 - The CoC may only create new project(s) through the CoC Bonus up to 7% of the Final Pro Rata Need (FPRN) amount, which is estimated to be \$549,039.
 - Applications for new projects made available through reallocation will only be considered if an active renewal project does not submit an application for renewal funding or if the CoC Review and Ranking Committee determines the need to reallocate from eligible renewal projects due to those projects failing to meet threshold criteria, poor performance, and underspending due to significantly operating under capacity.
 - The CoC may only create new project(s) under the DV Bonus up to 10% of the Preliminary Pro Rata Need (PPRN), which is estimated to be \$784,342. If a DV Bonus project ranked in Tier 2 is selected with DV Bonus funds, the project will be removed from this tier and the projects below it will move up one rank position. However, if a new DV Bonus project is not selected with DV Bonus funds, the project will retain its ranked position.
 - All agencies submitting an application, whether for a new project or a renewal project, must submit a complete application packet, as described below, in order to be considered for scoring.
 - It is the responsibility of the agencies to ensure that all the application materials are complete and received by TLCHB by the published deadline. Applications will be scored and ranked by the CoC and included in the CoC's project listing submitted to HUD. An applicant's failure to meet deadlines will result in the denial of an applicant's request for funds.
 - Consolidated Projects:
 - In FY 2023, eligible renewal project applications will have the ability to consolidate two or more eligible renewal projects (but no more than 10 projects) into one project application during the application process as described in III.B.4.a.(8) (page 50_ of the HUD NOFO. To be eligible for consolidation, projects must have the same recipient and be for the same component. Applicants that are eligible must submit separate renewal projects for each of the grants that are proposed to be consolidated (to the CoC for scoring and ranking and in e-snaps). Each project application will identify the grant number that will survive after consolidation, which must be the grant number with the earliest start date in CY

2024.

- Project applications for the grants that are proposed to be consolidated will be ranked (individually), 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.
- Applicants requesting renewal of grants for rental assistance are permitted to request a per-unit amount less than the Fair Market Rent (FMR), if the actual rent per unit under lease is less than the FMR. If a per-unit amount reduction is requested, applicants must provide copies of the leases to establish the actual rents.
- All renewal project applications must pass a threshold review and will then be scored according to specific criteria. The criteria will consist of current data in the Homeless Management Information System (HMIS) including system performance measures, participation in the CoC's Coordinated Entry System, project performance, cost effectiveness, project commitment to serving the most vulnerable participants with severe needs and vulnerability, the most recent HUD monitoring visit, and the scoring of the review application. This will be scored by an independent review and ranking committee that will then consolidate the scores and rank the projects. The independent review and ranking committee will submit their results to the Collaborative Applicant who will publish the results with the OH-501 Home for Everyone CoC Board's approval.
- In line with information presented in the NOFO, the Home for Everyone CoC will seek applications for new permanent supportive housing (PSH) projects that will serve 100 percent chronically homeless individuals and families, new PSH projects classified as DedicatedPLUS that will serve individuals, households with children, and unaccompanied youth, new rapid re-housing (RRH) projects that will serve homeless individuals and families, and new Joint TH & PH-RRH Component that will serve unsheltered homeless and youth.
- Applications may be submitted for the Expansion of an eligible project, and projects may be assigned reallocated funds or bonus funds as applicable (depending on project type), and as funds are available, in the final ranking. For project applicants that are expanding a current CoC Program-funded project and combine it with a current eligible CoC Program renewal project, applicants will be required to submit two project applications to include: the renewal project application that will be expanded and a new project application with just the expansion information. If a project applicant intends to expand a project that is currently funded with other sources, the applicant will submit only a new project application for the expansion portion. For expansion of non-CoC funded projects there is a prohibition against replacing state or local funds for that project.
- All new project applications must pass an organizational threshold review and will then be scored according to specific criteria.

- New project applications that score high enough will be eligible to be included in the prioritization tiering presented to HUD. Please note, however, eligibility does not guarantee funding. The Home for Everyone CoC Board will make the final determination of which projects will be ranked and presented to HUD for funding consideration within the limited funding available.
- The average proposal size for a new PSH project will depend on the area and coverage of the proposed program and funding available. While there is no minimum or maximum award amount, the CoC anticipates the average size of a PSH application to be approximately \$250,000.
- The average proposal size for a new RRH project will depend on the area and coverage of the proposed program and funding available. While there is no minimum or maximum award amount, the CoC anticipates the average size of a RRH application to be approximately \$200,000.
- The average proposal size for a new Joint TH and PH-RRH Component project will depend on the area and coverage of the proposed program and funding available. While there is no minimum or maximum award amount, the CoC anticipates the average size of a Joint TH and PH-RRH application to be approximately \$150,000.
- The CoC is not accepting applications for capital costs in this competition.
- All renewing and new projects must also complete the HUD application in e-snaps. Completing the application in e-snaps does not guarantee that the project will be put forth in the HUD application, nor does it guarantee that the project will be funded. Please note that within e-snaps previously submitted renewal applications may be able to import data into the FY 2023 renewal project application.
- The Home for Everyone CoC is required by federal regulations to operate a HMIS, establish a “centralized or coordinated assessment system,” and carry out planning activities in accordance with the Continuum of Care Program Interim Rule. Therefore, all new and/or renewal applications for HMIS and coordinated assessment submitted by TLCHB to directly support such activities on behalf of the Home for Everyone CoC, shall be exempt from the scoring process and prioritized for placement in Tier 1.
- TLCHB is committed to providing equal access to all of its programs, services and activities regardless of race, color, national origin, religion, sex, familial status, disability or age. Any individual who needs an accommodation because of a disability or documents in accessible electronic formats (e.g.PDF) should contact TLCHB. Individuals who are hearing- or speech-impaired should use the Ohio Relay services by calling 711. Further information on Ohio Relay is available at <https://ohiorelay.com>.

- TLCHB, as the Collaborative Applicant, will post any additional details of the competition and HUD resources as they become available on the Continuum of Care webpage. It is the applicant’s responsibility to ensure that they check both the TLCHB <https://endinghomelessnessstoleo.org/funding-programs> and the HUD CoC (https://www.hud.gov/program_offices/comm_planning/coc/competition) websites regularly for the latest updates. Please note that all of HUD’s competition and e-snaps materials, notices, and training guides can be accessed on the HUD page.

I. TIMELINE:

2023 Annual NOFO	
Action	Date
NOFO released by HUD	July 5 th , 2023
CoC Board meeting to review policy materials and process recommended by committee	August 4 th , 2023
CoC Board approves policy materials and process recommended by committee	By 3:00pm ET August 7 th , 2023
2023 Toledo Lucas CoC NOFO Competition Policy, process, timeline, review applications, scoring criteria, addenda, and other competition materials released	August 7 th , 2023
Notice of Intent for new projects due at 5:00pm	August 10 th , 2023
Informational webinars for applicants (mandatory for new applicants)	August 15 th & 17 th , 2023
Review and scoring process training for CoC Citizens Review Committee	August 18 th , 2023
Draft applications for all projects are due at 5:00 pm in e-snaps (MUST be at least 30 days before HUD NOFO deadline)	August 25 th , 2023
All project applications and updated certifications must be entered into E-SNAPS by 5:00 pm	September 1 st 2023
Applications out to Citizen Review Committee	September 1 st 2023
Citizen Review Committee scores due	September 8 th , 2023
Citizen Review Committee meets to review, score, and rank all applications	September 11 th , 2023
TLCHB will compile scores and create a final ranking to be approved by the Home For Everyone Board.	September 11 th , 2023

Home for Everyone Board meeting to approve final ranking	September 12 th , 2023
Applicants notified of placement in scoring and ranking for CoC application OR rejection from CoC application (MUST be at least 15 days before HUD NOFA deadline)	September 13 th , 2023
E-snaps feedback provided to applicants	No later than September 18 th , 2023
Final project applications due in e-snaps by 5:00pm	September 22 nd , 2023
Estimated public posting of CoC application (MUST be at least 2 days before HUD NOFA deadline)	September 25 th , 2023
Estimated CoC application submission to HUD	September 27 th , 2023

II. SUMMARY OF CHANGES AND POLICY PRIORITIES FOR THE FY 2023 FUNDING CYCLE

Please note that there have been significant changes in the process and method by which local CoCs are being scored under Federal priorities in recent years. All applicants and interested parties are strongly encouraged to read this document, as well as the HUD FY 2023 Continuum of Care NOFO and any supplemental materials (https://www.hud.gov/program_offices/comm_planning/coc/competition) and (<https://www.hudexchange.info/programs/e-snaps/>) in their entirety to ensure there is complete understanding of the information provided. Some of the major changes and policy priorities include:

- Amendment to criteria for qualifying as “homeless”.
 - For purposes of the CoC Program and other HUD programs authorized by the McKinney-Vento Homeless Assistance Act, section 605 of VAWA 2022 amended section 103(b) of the McKinney-Vento Homeless Assistance Act to require HUD to consider as homeless: any individual or family who—
 - i. **is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;**
 - ii. **has no other safe residence; and**
 - iii. **lacks the resources to obtain other safe permanent housing.**

This statutory change took effect on October 1, 2022. Rulemaking will be needed to require Continuums of Care (CoCs) and CoC Program recipients and subrecipients to make corresponding changes to the applicable written standards, coordinated entry policies, and documentation policies used to qualify individual and families as homeless under the CoC Program. That said, because HUD must recognize as “homeless” families and individuals who meet the new statutory criteria in section 103(b) of the McKinney-Vento Homeless Assistance Act as of October 1, 2022, CoC recipients may implement the new definition prior to HUD rulemaking, provided that CoCs update the relevant written standards and policies as needed to reflect the new statutory criteria. For further information, please see “The Violence Against Women Act Reauthorization Act of 2022: Overview of Applicability to HUD Programs” which HUD published in the Federal Register on January 4, 2023. **This qualification of HUD’s understanding and use of the “homeless” definition applies for purposes of all references to the “homeless” definition in THE NOFO, including all references to specific paragraphs of the “homeless” definition in 24 CFR 578.3.**

- New budget line items (BLIs) will be built into the CoC Program Competition Application process. Applicants wishing to utilize these new BLIs can request a budget modification during the competition to add funds to these line items from an existing line item. Applicants may also request to expand existing renewal grants to add new funding to these BLIs.
 - o VAWA Costs Budget Line Item. On March 15, 2022, the President signed into law the Consolidated Appropriations Act of 2022 (Pub. L. 117-103, 136 Stat. 49), which included the Violence Against Women Act Reauthorization Act of 2022 (VAWA 2022). VAWA 2022 reauthorizes, amends, and strengthens the Violence Against Women Act of 1994, as amended (VAWA) (Pub. L. 103-322, tit. IV, sec. 40001-40703; 42 U.S.C. 13925 et seq.) Section 605 of VAWA 2022 amends section 423(a) of the McKinney-Vento Homeless Assistance Act to add the following eligible Continuum of Care Program activity:
 - 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 of [the confidentiality requirement in 34 U.S.C. 12491(c)(4)].
 - See section VI.B of the NOFO for more information on compliance with VAWA 2022 and section III.B.4.a.(3) of the NOFO for more information on eligible VAWA costs. For general guidance on implementation of VAWA 2022, please also see “[The Violence Against Women Act Reauthorization Act of 2022: Overview of Applicability to HUD Programs](#),” a notice HUD published in the Federal Register on January 4, 2023. The Federal relay Service previously used has expired and is no longer available. The NOFO is updated to include use of the Federal Communications Commission (FCC) relay services. See: <https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs>.
- Renewing Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH) projects will be eligible for ranking and renewal. In addition, renewing 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, households with children, and unaccompanied youth as described in Section **I.B.2.b.(7)** of the FY 2023 HUD NOFO. Additional guidance for DedicatedPLUS projects can be found on the HUD Exchange website at www.hudexchange.info.

- Reallocation of underperforming projects is contingent on appropriate high-scoring new project applications. If there are not adequate new project applications to include in the final ranking, the CoC reserves the right to include the lower scoring renewal project. Any project that has less than \$10,000 at the end of the grant, that is not deemed to be underperforming or operating under capacity as defined in this policy, will not be in jeopardy of having the grant amount reduced.
- As in previous years, HUD will continue the Tier 1 and Tier 2 funding process.
 - a. Tier 1 is equal to 93 percent of the CoC's Annual Renewal Demand (ARD) as described in section I.B.2.b.(1) of this NOFO minus the Annual Renewal Amounts (ARAs) of YHDP Renewal and YHDP Replacement projects that were initially awarded through the FY 2017 YHDP Competition (Round 2) or later. 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 FY 2023 CoC Priority listing, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold. Tier 1 is estimated to be \$3,508,477
 - b. Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, Round 1 YHDP Renewal, Round 1 YHDP Replacement and CoC Bonus funds that a CoC can apply for but does not include YHDP Renewal or YHDP Replacement projects initially awarded funding in the FY 2017 YHDP Competition (Round 2) or later, CoC Planning projects, and if applicable, UFA Costs projects or projects selected with DV Bonus funds. Tier 2 is estimated to be \$813,118.
- Project evaluation of renewal project applications submitted by victim service providers will be completed utilizing data generated from a comparable database where the CoC can review performance on housing stability and other factors to determine the level projects improve safety for the population they serve. Where complete performance data related to the scoring criteria is not provided, the CoC will assign median points for that criteria.
- Through this competition the following types of new project applications will be accepted: (a) PSH for chronically homeless individuals and families; (b) PSH where 100% of the beds meet the NOFO requirements of a DedicatedPLUS project for individuals, households with children, and unaccompanied youth; (c) RRH for individuals and families, including under the DV Bonus; (d) Joint TH and PH-RRH component projects, including under the DV Bonus; and (e) a SSO-Coordinated Entry project under the DV Bonus.
- New project applications requesting funding for new construction or rehabilitation activities will not be accepted.
- Projects funded through the FY2023 CoC competition are required to commit to using the Housing First model when housing program participants (with a concrete plan of action, to

utilize the Housing First model of service delivery). Applicants should demonstrate that the project is low-barrier, prioritizes rapid placement and stabilization in permanent housing and has minimal service participation requirements and no preconditions to entry.

- Project applicants should demonstrate commitment to providing low barrier projects (or commit to being low barrier projects) and allow entry to program participants that 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 history of domestic violence.
- All renewal Home for Everyone CoC PSH projects that do not already have 100% of their beds dedicated to people who are chronically homeless will be required to prioritize at least 90% of their non-dedicated beds to people who are chronically homeless*. The Home for Everyone 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 full 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/>.
- *Projects that committed to prioritizing 100% of non-dedicated beds to people who are chronically homeless in previous competitions are required to continue at 100%.
- In order maintain alignment to HUD priorities for this funding and to keep people experiencing homelessness with disabilities who are residing in PSH projects from becoming homeless, with the exception of HMIS grants and Coordinated Assessment grants, which are critical to the operations of the CoC, and will therefore be placed mid-Tier 1, the Home for Everyone CoC will rank projects within the following groupings:
 1. Renewal PSH and RRH projects that are currently housing people who are homeless, without significant capacity, compliance, or performance issues that have been in operation over a year (based on score), operational projects transferred in the last 12-months, HMIS, and Coordinated Assessment projects
 2. New RRH and PSH projects that have not been operational for a full year, and do not have data for a complete year to report on (based on score)
 3. New PSH, RRH, and Joint TH and PH-RRH Component projects, including expansions, that are designated by the CoC to utilize any reallocated funds, if available (based on score)
 4. Renewal PSH and RRH projects determined to be significantly underperforming (based on the degree to which they do NOT improve system performance in the areas of serving eligible participants less than 75%, have low rates of housing stability, or a high

rate of participants returning to homelessness), operating significantly out of compliance, or operating significantly under capacity (projects that are both utilizing 50% or less of the units and returning a significant amount of funds with the exception of projects transferred in the last year).

5. New PH Bonus PSH, RRH, and Joint TH and PH-RRH Component projects (based on score)
 6. New DV Bonus RRH and Joint TH and PH-RRH projects (based on score)
 7. New DV Bonus SSO-CE project (1 based on score)
- Projects implemented prior to the 2023 competition that underspend and/or are significantly operating under capacity may be subject to full or partial reallocation. Reallocations, if necessary, will be made based on the guidance in the 2023 NOFO. The two lowest scoring renewal RRH and PSH projects determined to be significantly underperforming, operating under capacity, or found to be operating significantly out of compliance may be subject to replacement by new RRH, PSH, or Joint TH & PH-RRH Component projects, provided the new applications pass threshold review and score highly enough. Project level performance will be further assessed to determine impact on CoC System Performance Measures as part of decisions to reallocate. Reallocation of underperforming projects is contingent on appropriate high-scoring new project applications. If there are not adequate new project applications to include in the final ranking, the CoC may, at its discretion, work with renewal applicants of projects deemed as high performing to facilitate expansion applications for those high performing projects. The CoC reserves the right to place one or both of the two lowest scoring renewal projects at the bottom of Tier 2.
 - HUD will score new and renewal projects ranked in Tier 2 using a 100-point scale (please see full details on page 27 of the NOFO):
 1. CoC Score – up to 50 points will be in direct proportion to the score received on the CoC Application;
 2. CoC Project Ranking – up to 40 points will be based on the CoC’s ranking of the project application(s);
 3. Commitment to Housing First – up to 10 points will be based on the project’s commitment to follow a housing first approach.
 - HUD is allowing for CoCs to apply for Domestic Violence (DV) Bonus funding again this year. The CoC is only allowed to submit one project application for the SSO-CE project type, but the CoC will be able to submit multiple applications for PH-RRH and Joint TH and PH-RRH housing project types.
 - Compliance with Violence Against Women Act (VAWA) Rule. 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 grants to be awarded under this NOFO must comply with the VAWA rule as provided in 24 CFR 578.99(j). To enable full compliance with this rule, the CoC established an emergency transfer plan under 24 CFR 578.7(d) and made related updates to the written standards for administering CoC program assistance under 24 CFR 578.7(a)(9)(ii), (iii) and (v). All CoC- funded projects must follow the *Home for Everyone CoC Violence Against Women Act (VAWA) Policies and Procedures* outlined in the Home for Everyone CoC Written

Standards. First-time renewal projects should be fully compliant by the time the local CPD Field Office issues the FY 2023 grant agreement for a project in the CoC's geographic area.

- The Collaborative Applicant will submit an application for planning funds as allowed by HUD. CoC Planning applications are not required to be ranked, and the funds are not part of the pro rata amounts available for projects.
- The CoC will not reallocate any funding to Transition Projects. While the FY 2023 HUD NOFO is allowing Transition Grants as described in Section I.B.2.b.30 of the NOFO, it would require the CoC to eliminate an eligible renewal project and reallocate the project amount to a new Transition Project that would replace the eligible renewal for a 1-year period

APPLICANT ELIGIBILITY

- Project applicants must:
 - Agree to enter client data into Home for Everyone CoC Homeless Management Information System and participate in the Toledo Lucas County Homelessness Data Warehouse;
 - Participate in the CoC's Coordinated Entry System;
 - Participate in the homeless counts conducted by TLCHB on behalf of the Home for Everyone CoC;
 - Commit to adopting a Housing First approach, participate in Housing First trainings when offered, and agree to complete a Housing First Fidelity Assessment as a component of monitoring.
 - Attend Home for Everyone CoC All-Membership and/or participate in CoC Committees, Subcommittees, and Workgroups;
 - Not turn away any household because they have previously resided in a differing Continuum. However, as these projects are funded to address homelessness in the Home for Everyone Continuum of Care, each project must demonstrate how they are targeting, providing outreach, and participating in local coordinated entry implementation areas (as applicable) to reduce homelessness in the Home for Everyone CoC;
 - Register with Dun and Bradstreet to obtain a DATA Universal Numbering System (DUNS) number, if they have not already done so;
 - Complete or renew their registration in the System for Award Management (SAM) per Section I.B.1 of the FY 2023 HUD NOFO. For more information on DUNS numbers and SAM registration go to: https://portal.hud.gov/hudportal/HUD?src=/program_offices/spm/gmomgmt/grantsinfo. HUD will not enter into a grant agreement with an entity that does not have a DUNS Number or an active SAM registration;
 - 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*.

- Obtain or maintain Certification of Consistency from the jurisdiction in which each of the proposed project(s) will be located. This assures the application for funding is consistent with the jurisdiction’s HUD-approved consolidated plan as described in the NOFO.
 - TLCHB staff will work with applicants and the appropriate Consolidated Planning jurisdiction for the required form *HUD-2991 - Certification of Consistency with the Consolidated Plan*, but 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 manner.
- Ensure that application(s) are complete and the information within the application is consistent throughout the application. Narratives must be fully responsive to the question being asked, and responses should meet all the criteria for that question as required by the NOFO and the detailed instructions provided in E-Snaps. Applicants must also ensure that proposed program participants are eligible for the program component type selected, and proposed activities are eligible under 24 CFR part 578. Applicants should also ensure that all required attachments correspond to the attachments as required in E-Snaps and contain accurate and complete information.

III. THRESHOLD CRITERIA FOR APPLICATIONS

Project Quality Threshold. HUD will review all new project applications to determine if they meet project quality threshold requirements specific to each eligible project type. See Section III.C.5 of the Annual NOFO for more information about HUD’s project quality threshold criteria.

- New PSH/RRH/Joint TH and PH-RRH Component Applications:
 - i. The CoC reserves the right not to review incomplete applications or projects that don’t meet eligibility requirements. Applications may receive a threshold denial for any of the following reasons;
 1. Agency does not meet HUD’s eligibility criteria.
 2. Agency does not demonstrate adequate capacity to carry out grant.
 3. Application proposes ineligible costs or activities.
 4. Application proposes to serve ineligible populations.
 5. Application does not show required match or insufficient commitments for leveraging.
 6. Proposed project does not have a specific plan to coordinate and integrate with other mainstream health, social, and employment programs to ensure that program participants are assisted to obtain benefits from the mainstream programs for which they may be eligible (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).
 7. Compliance or performance issues on current projects.
 8. Project does not demonstrate adequate impact or cost effectiveness.
 9. Project does not meet key federal requirements.

10. New proposals must be located within Home For Everyone Continuum of Care jurisdiction. Applications proposing projects in the following jurisdictions are not eligible to be submitted under the Home for Everyone CoC application: Cincinnati/Hamilton County, Cleveland/Cuyahoga County, Columbus/Franklin County, Youngstown/Mahoning County, Dayton, Kettering/Montgomery County, Akron, Barberton/Summit County, Canton, Massillon, Alliance/Stark County, Ohio Balance of State Continuum of Care.
 11. Agency submits an incomplete application, which includes not submitting the necessary documents listed above, or certifications/documentation as required in the HUD application.
 12. Agency does not utilize, or commit to utilize, HMIS (or a comparable family violence HMIS alternative) to capture client-level data on all clients in the project.
 13. Agency does not follow, or commit to follow, the CoC's Coordinated Entry System policy and process.
 14. Project does not demonstrate compliance with the Fair Housing Act and 24 CFR 5.105(A)(2) – Equal Access to HUD.
- Additional Threshold Criteria for Joint TH and PH-RRH Component Projects:
 - i. Given the large number of sheltered and unsheltered homeless in the Home for Everyone CoC, Joint TH and PH- RRH component projects must serve people who meet the homeless definition under paragraphs (1), (2), and (4) of the definition of homelessness in 24 CFR 578.3.
 - ii. Joint component projects must
 1. Demonstrate that the project will be low barrier and prioritize rapid placement and stabilization in permanent housing.
 2. Use a Housing First approach with client-driven service models and a focus on helping people move to permanent housing as quickly as possible.
 3. Have low-barriers to entry and accommodate people with possessions, partners, pets, or other needs.
 4. Incorporate client-choice by helping participants find permanent housing based on their unique strengths, needs, preferences, and financial resources. Participants will choose when they are ready to exit the crisis housing portion of the project and move to permanent housing, with providers assisting participants with this move.
 5. Provide or connect participants to resources that help them improve their safety and well-being and achieve their goals.
 6. Target and prioritize people experiencing homelessness with higher needs and who are most vulnerable.
 - iii. Joint component projects must also:
 1. Target people who are living in unsheltered locations or homeless youth in areas in which the PIT demonstrates a need for more housing options

- for homeless households.
- 2. Demonstrate that the proposed service area is not covered by any crisis housing **and** either have a street outreach team or be in a location where Coordinated Entry planning is occurring.
- 3. Demonstrate need of high rates of unsheltered homelessness or unsheltered youth homelessness
- Domestic Violence (DV) Bonus Projects
 1. The Consolidated Appropriations Act, 2023 provides not less than \$52 million for “new rapid rehousing 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.(8) of this NOFO for additional information.
 2. For new projects the CoC indicates it would like considered as part of the DV Bonus, HUD will award a point value to each project application using the following 100-point scale, including points based on CoC Application score and responses to the domestic violence bonus specific questions in the CoC Application [see (1), (2) and (3) below]:
 - a. Rapid Rehousing (PH-RRH) and Joint Transitional Housing and Permanent-Housing Rapid Rehousing (Joint TH/PH-RRH) component projects:
 - i. CoC Score. Up to 50 points in direct proportion to the score received on the CoC Application.
 - ii. CoC Collaboration with Victim Service Providers. Up to 10 points in direct proportion to the score received on the following rating factors in the CoC application: section V.B.1.e, section V.B.2.c, and section V.B.3.b.
 - iii. Need for the Project. Up to 10 points based on the extent the CoC quantifies the need for the project in its portfolio, the extent of need, and how the project will fill that gap.
 - iv. Quality of the Project Applicant Experience. Up to 15 points based on the previous performance of the applicant in serving survivors of domestic violence, dating violence, sexual assault, or stalking, and their ability to house survivors and meet safety outcomes.
 - v. Demonstration of inclusion of victim-centered practices. Up to 8 points based on the quality of the project’s plan to address the housing and safety needs of survivors by adopting victim-centered practices (e.g., Housing First, Trauma-Informed Care, Confidentiality) in operating their project. Full points will be awarded to project applicants that can demonstrate they are already adopting victim-centered practices.

- vi. Demonstration of plan to include survivors with lived expertise. Up to 7 points based on the project's ability to demonstrate its plan to involve survivors in policy and program development throughout the project's operation.
 - b. PH-RRH and Joint TH/PH-RRH component projects must follow a housing-first approach.
 - c. SSO-CE to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of people experiencing homelessness who are survivors of domestic violence, dating violence, sexual assault, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different):
 - i. CoC Score. Up to 50 points in direct proportion to the score received on the CoC Application.
 - ii. CoC Collaboration with Victim Service Providers. Up to 10 points in direct proportion to the score received on the following rating factors in the CoC application: section V.B.1.e, section V.B.2.c, and section V.B.3.b.
 - iii. Need for the Project. Up to 25 points based on the extent to which the CoC demonstrates the need for a coordinated entry system that better meets the needs of survivors of domestic violence, dating violence, sexual assault, or stalking, and how the project will fill this need.
 - iv. Demonstration of plan to include survivors with lived expertise. Up to 15 points based on the project's ability to demonstrate its plan to involve survivors in policy and program development throughout the project's operation.
- 3. Each CoC may only submit one SSO-CE project; however, there is no limit on the number of PH-RRH and Joint TH/PH-RRH projects CoCs may submit, provided that each application is for at least \$50,000. A project applicant may also apply to expand an existing renewal project, including one that was previously awarded with DV Bonus funding, in accordance with section I.B.2.b.(10) of the 2023 NOFO; however, only the new project application for the expansion will be considered for DV Bonus funds through this process. DV Bonus funding may be used to expand an existing renewal project that is not dedicated to serving survivors of domestic violence, dating violence, sexual assault, or stalking who meet the definition of homeless in paragraph (4) of 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act [see section III.B.4.a.(3)], so long as the DV Bonus funds for expansion are solely for additional units, beds, or services dedicated to persons eligible to be

served with DV Bonus funding.

4. CoCs must rank all new DV Bonus project applications on the New Project Listing of the CoC Priority Listing with a unique number ranking and the corresponding renewal project application must be on the Renewal Project Listing with a unique rank number. HUD will only select a new DV Bonus project that expands an existing renewal project if HUD conditionally selects the renewal project in Tier 1 or 2. If HUD selects the renewal project application for conditional award with CoC Program funds and the new DV Bonus expansion project is approved for selection, HUD will only select the new DV Bonus project with DV Bonus funds and HUD will remove the new DV Bonus project from the New Project Listing and all subsequent project applications ranked below the new DV Bonus project will move up one rank position.
- Domestic Violence Bonus SSO-CE Requirements
 - i. As noted, only one SSO-CE project will be included in the final CoC project ranking submitted to HUD. The CoC will consider proposals submitted by interested agencies who meet organizational threshold and demonstrate ability to:
 1. Implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of people experiencing homelessness who are survivors of domestic violence, dating violence, sexual assault, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different;
 2. Include planning where the centralized or coordinated assessment system will be easily available/reachable for all persons within the CoC's geographic area who are seeking information regarding homelessness assistance. The system must also be accessible for persons with disabilities within the CoC's geographic area;
 3. Include a strategy for advertising that is designed specifically to reach homeless persons with the highest barriers within the CoC's geographic area;
 4. Utilizes a standardized assessment process;
 5. Ensures program participants are directed to appropriate housing and services that fit their needs; and
 6. Cover the entire CoC jurisdiction.
 - ii. SSO-CE Applicants interested should submit a proposal to request these funds detailing how listed criteria will be addressed, which includes a budget request itemizing requested funds. The average proposal size is not expected to exceed \$150,000. The grant term is limited to 1-year.
 - iii. TLCHB applications will receive priority for inclusion in the DV Bonus ranking for SSO-CE. If no application is submitted by TLCHB for SSO-CE under the DV Bonus,

the highest scoring application deemed by the application review committee to be consistent with the goals of the CoC will be included.

- Match and Leveraging:
 - i. Applications must meet HUD’s match requirements and have at least 25% of the amount of the HUD funding request in total match (outside of the amount for leasing). Match may be cash or in-kind, however, the CoC encourages cash match when possible. All match must qualify as eligible program expenses under the CoC Program Interim Rule.
 - ii. In addition to HUD’s match requirement, applicants are also requested to report up to an additional 125% amount of the HUD funding request in total leveraging. Bonus points may be awarded to applications that adequately demonstrate leveraging. When bonus points are awarded, maximum bonus points will be awarded to applications adequately demonstrating 25% match and 125% leveraging (150% total match and leveraging). Leveraging includes all funds, resources, and/or services that the applicant can secure on behalf of the client being served by the proposed project. While leveraging includes all cash and in-kind matching resources, it is broader in scope, including any other services, supplies, equipment, space, etc. that are provided by sources other than HUD.
 - iii. Review Application guidelines for New projects state that projects should only report match and leveraging where there are commitment letters on file that are dated July 1, 2023 or later, and documentation should be submitted to HUD if required. New project application packages are required to submit match and leveraging documentation to the Home for Everyone CoC for the scoring and ranking process.

IV. APPLICATION INSTRUCTIONS

General Application Instructions for All Projects. Applicants should review and follow the steps as outlined herein and in the NOFO to ensure that applications are complete and submitted in a timely manner.

1. **ALL New and Renewal Applicants must complete the Notice of Intent to Submit and submit to communications@tlchb.org by 5pm ET on August 10th, 2023.**
2. Applicants must complete project proposals in the U.S. Department of Housing and Urban Development (HUD) Electronic Special Needs Assistance System (e-Snaps) following the HUD Guidelines by 5pm ET on August 25th, 2023. <https://www.hudexchange.info/programs/e-snaps/> **If project level applications are not yet available in e-SNAPS, applicants are advised to check e-Snaps and the TLCHB Funding Competition websites daily for updates.**
3. Once each section of the Project Application is completed in e-Snaps, create a .pdf version of the application to be sent to communications@tlchb.org. Applicants **must not select the “submit” button** for the initial submittal. This process will be completed **after** the local scoring and ranking of all projects.
4. All attachments requested for the Project Application in the e-Snaps system must be attached to the application in the order listed on the summary page.
5. In addition to completing the project application in e-Snaps, each applicant must ensure that all required documents have been emailed to communications@tlchb.org. Send the application PDF and required documents in a single email.
6. Documents to be submitted with the 2023 NOFO application at on, or prior to, the due date for the e-SNAPS application include:
 - E-Snaps Application:*** A copy of the e-Snaps application exported to a pdf file.
 - Match Documentation:*** Documentation of a minimum of 25% Match (cash or in-kind) for all costs except leasing funds.
 - Certification of Consistency with the Consolidated Plan.***
 - FY2023 Home for Everyone CoC - Competition Certifications and Policy Addendum***
 - FY2023 Home for Everyone CoC – Coordinated Entry System Addendum***
 - HUD Form 2991.*** Each project must be included in the application to HUD must have a Certificate of Consistency with the Consolidated Plan, Form 2991, signed by authorized official from the jurisdiction where the project is located is required. As in

previous years, **providers do not have to secure this form**. The Collaborative Applicant will assist in acquiring these certificates so that each jurisdiction only has to sign the form once for all projects in their respective areas.

- **Performance Improvement Plan Requirements (PIP).** Projects that were required to provide a Performance Improvement Plan in order to be included in the 2022 NOFO were required to submit progress reports. These actions contained in the PIP vary by project, as a result, renewal applicants subject to the 2022 PIP will receive additional instructions about the support documents that will need to be provided for review by the Rating and Ranking Group.
 - **Additional Requirements.** As the review process progresses, Applicants will need to provide other items as announced through the [TLCHB Funding Competition Page](#), or notices sent to your agency Point(s) of Contact.
7. It is the sole responsibility of the applicant to assure that at submission all the application materials are received by TLCHB, by the established deadline. No late submissions of the project application document will be accepted.
 8. **The deadline for application submissions to TLCHB for the Annual NOFO is August 25th, 2023, by 5:00 PM**
 9. Late submissions of the supplemental materials to the application package will result in a deduction of points. Applications for which supplemental materials are received more than 24 hours after the established application deadline may be deemed ineligible and excluded from the competition.
 10. Information regarding scoring criteria will be posted on Continuum of Care webpage at <https://endinghomelessness Toledo.org/funding-programs>. Applicants are strongly advised to review the criteria before submitting an application.
 11. For reference, the [Continuum of Care Program Interim Rule](#) was published in the Federal Register on July 31, 2012, and was effective on August 31, 2012.
 12. TLCHB reserves the right to request additional performance and/or threshold eligibility supporting documentation from any applicant to facilitate the scoring and ranking process. The applicant must provide all requested supporting documentation in the timeframe specified by the Home for Everyone CoC at the time of request. Failure of an applicant to provide adequate supporting documentation may result in negative consequences in the scoring and ranking process, up to and including threshold denial of the project application from the final CoC project ranking.

V. APPEALS

In accordance with 24 CFR part 578.35 and Section VII of the NOFO, applicants

have the right to appeal if they believe that they were improperly denied the right to participate in the CoC planning process in a reasonable manner; were improperly denied or decreased funding; or were improperly denied a Certification of Consistency from the local government with the Consolidated Plan. The appeal MUST be carried out in the timeframe and process announced by HUD within the NOFO.

VI. FEDERAL DISASTER AREA NOTIFICATION

Applicants administering projects in counties that have been impacted by a major disaster, as declared under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act that occurred in the 12 months prior to the application deadline of the HUD NOFO should submit a letter indicating this with the supplemental review packages due on August 6, 2019. This would only include a major disaster that resulted in the Collaborative Applicant, the CoC, or its project(s) inability to continue operations due to flooding, destroyed facilities, lack of power for a long duration, etc. News releases related to Ohio can be found at: <https://www.fema.gov/disasters>. CoCs in impacted areas are required to notify HUD of this prior to the close of this competition.

VII. RELEVANT CONTACT INFORMATION:

Toledo Lucas County Homelessness Board
1220 Madison Avenue
Toledo, OH 43604
Website: www.tlchb.org
Email: communications@tlchb.org
Phone: (419) 244-9440