
TOLEDO/LUCAS COUNTY CONTINUUM OF CARE

2021 CONTINUUM OF CARE COMPETITION POLICY

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I. INTRODUCTION AND OVERVIEW

- The Toledo/Lucas County Continuum of Care (CoC) is issuing the following guidance for the 2021 Notice of Funding Opportunity (NOFO) competition. This announcement is being provided in accordance with the HUD NOFO for the 2021 Continuum of Care Program Competition (Docket No. FR-6500-N-25) at:
https://www.hud.gov/program_offices/comm_planning/coc/competition.
- The following document outlines the policy and process for the FY 2021 funding cycle. In addition to the information presented in this document, it is expected that all applicants read the HUD FY 2021 Continuum of Care NOFO, related scoring criteria, and any supplemental materials
https://www.hud.gov/program_offices/comm_planning/coc/competition) in their entirety to ensure there is complete understanding of the information provided.
- This guidance applies to all renewing Continuum of Care grants for permanent supportive housing, rapid re-housing, Homeless Management Information System (HMIS), and Coordinated Assessment projects as well as for new applications

submitted either for rapid re-housing, permanent supportive housing, Joint TH and PH-RRH component, or Domestic Violence bonus projects.

- The HUD NOFO allows for non-competitive renewal and replacement of expiring Youth Homelessness Demonstration Project (YHDP) grants. However, there are currently no expiring YHDP grants in the Toledo/Lucas County CoC. As such, these will not be addressed further in this policy document.
- Funding for new projects is only available through the process of reallocation, the CoC bonus, or the Domestic Violence (DV) Bonus. The CoC may only create new project(s) through the permanent housing bonus up to 5% of the Final Pro Rata Need (FPRN) amount, which is estimated to be \$341,081. The CoC may only create new project(s) under the DV bonus up to 15% of the PPRN amount, which is estimated to be \$1,023,242. 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 application review sub-committees determine the need to reallocate from eligible renewal projects due to those projects not meeting threshold, poor performance, and underspending due to significantly operating under capacity.
- The Toledo Lucas County Homelessness Board (TLCHB), designated as the Collaborative Applicant for the Toledo/Lucas County Continuum of Care (CoC), is responsible for overseeing and managing the application process for the FY 2021 HUD Continuum of Care Homeless Assistance funding process. HUD requires that the CoC develop a process for submitting one consolidated application for the FY 2021 CoC program. The Collaborative Applicant works with its governing Board to develop and recommend the process for approval.
- 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 CoC by 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 may result in the denial of an applicant's request for funds.
- Consolidated Applications:
 - i. In FY 2021, eligible renewal project applications will have the ability to consolidate two or more eligible renewal projects (but no more than ten projects) into one project application during the application process as described in Section II.B.6 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 2022.

- ii. 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 panel that will then consolidate the scores and rank the projects. The independent review panel will submit their results to the Collaborative Applicant who will publish the results with the Toledo/Lucas County CoC Board's approval.
 - In line with information presented in the NOFO, the Toledo/Lucas County 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.
 - 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 Toledo/Lucas County 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 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 \$250,000.
- 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 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 \$250,000. As previously noted, the CoC is not accepting applications for capital costs in this competition.
- As noted in Section III.C.2.j of the NOFO, 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.
- In addition to the application packet, 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 2021 renewal project application.
- The Toledo/Lucas County CoC is required by CoC regulations to operate an 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 Toledo/Lucas County 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>.

- The Toledo Lucas County Homelessness Board believes that housing is a right, not a privilege. We are committed to creating an accessible and inclusive continuum of care to support housing stability and eliminate homelessness within our community. TLCHB is working to analyze and substantively respond to inequities that are known, and those that are not yet identified within our system and to develop a robust response to these inequities. We value quality service delivery and outcome models that prioritize justice and strongly encourage partners to stand with us in this ongoing movement.
- 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 Toledo/Lucas County CoC <https://endinghomelessness Toledo.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.

II. APPLICANT ELIGIBILITY

- Project applicants must:
 - i. Agree to enter client data into Toledo/Lucas County Homeless Management Information System and participate in the Simtech Data Warehouse;
 - 1. In accordance with Section 407 of the McKinney Vento Homeless Assistance Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about a client. Victim service providers must use a comparable database that meets the needs of the local HMIS.
 - ii. Participate in the CoC's Coordinated Entry System;
 - iii. Participate in the homeless counts in Toledo/Lucas County jurisdiction;
 - iv. Participate in Housing First development and implementation;
 - v. Attend Community Advisory Council Meetings;
 - vi. Not turn away any household because they have previously resided in a different Continuum. However, as these projects are funded to address homelessness in the Toledo/Lucas County 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 Toledo/Lucas County CoC;

- vii. Register with Dun and Bradstreet to obtain a DATA Universal Numbering System (DUNS) number, if they have not already done so;
- viii. Complete or renew their registration in the System for Award Management (SAM) per Section V.A.1 of the FY 2021 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;
- ix. 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*.
- x. Maintain a 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.
 - 1. 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.
- xi. Ensure that applications (Review Application and HUD application in the E-Snaps system) 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

- 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 Toledo/Lucas County Continuum of Care jurisdiction. Applications proposing projects in the following jurisdictions are not eligible to be submitted under the Toledo/Lucas County 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 Toledo/Lucas County 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
 - i. The FY 2021 HUD Appropriations Act provides additional funding for DV Bonus projects for rapid re-housing projects and supportive service projects providing coordinated entry and other eligible activities determined critical in order to assist survivors of domestic violence, dating violence, and stalking. In the FY 2021 CoC Program Competition, the CoC is able to apply for a DV Bonus for PH-RRH projects, Joint TH and PH-RRH component projects, and SSO projects for coordinated entry (SSO-CE). The CoC is only allowed to submit one project application for SSO-CE under the DV Bonus, but there is no limit to the number of PH-RRH and Joint TH and PH-RRH project applications that can be submitted this, which are limited to a 1-year funding request and must demonstrate trauma-informed, victim-centered approaches.
 - ii. Allowed project types under the FY 2021 HUD NOFA are:
 - 1. Rapid Re-housing (PH-RRH) projects that follow a housing first approach

2. Joint TH and PH-RRH component projects as defined in Section III.B.2.q that follow a housing first approach
 3. SSO Projects for Coordinated Entry (SSO-CE) (see below for requirements).
- iii. The CoC is only allowed to submit one project application for SSO-CE under the DV Bonus. The CoC is able to submit any number of PH-RRH and Joint TH and PH-RRH projects provided that each application is for at least \$50,000. For DV Bonus projects submitted, the CoC will rank projects that pass eligibility and quality threshold review according to their application score, as funding allows. DV focused housing projects may be submitted under the DV Bonus, CoC bonus, or utilizing reallocated funds and would then be ranked with any other new projects in the funding area designated An applicant may apply to expand an existing renewal project in accordance with Section III.B.2.j of the NOFA, including one that was previously funded with DV Bonus funding. 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 that meet the definition of homeless in paragraph (4) of 24 CFR 578.3 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.
 - iv. For projects submitted by the CoC to be considered as part of the DV Bonus, following final submission, HUD will award a point value to each project application combining both the CoC Application score and responses to the domestic violence bonus specific questions in the CoC Application using the following 100-point scale:
 1. For Rapid Re-Housing and joint TH and PH-RRH component projects:
 - a. *CoC Score*. Up to 50 points in direct proportion to the score received on the CoC Application
 - b. *Need for the Project*. Up to 25 points based on the extent the CoC quantifies the need for the project in its portfolio, the extent of the need, and how the project will fill that gap.
 - c. *Quality of the Project Applicant*. Up to 25 points based on previous performance of the applicant in serving survivors of domestic violence, dating violence, or stalking, and their ability to house survivors and meet safety outcomes.
 2. For SSO Project for Coordinated Entry:
 - a. *CoC Score*. Up to 50 points in direct proportion to the score received on the CoC Application.
 - b. *Need for the Project*. Up to 50 points based on the extent to which CoC demonstrates the need for a coordinated entry system that better meets the needs of survivors of domestic violence, dating violence, or stalking, and how the project will fit this need.

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, 2021 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 Toledo/Lucas County CoC for the scoring and ranking process.

IV. TIMELINE:

Action	Date
NOFA released by HUD	August 18, 2021
CoC Board meeting to approve policy, materials, and process recommended by committee	September 8, 2021
2021 Toledo Lucas CoC NOFA Competition Policy, process, timeline, review applications, scoring criteria, addenda, and other competition materials released	September 9, 2021
Notice of Intent for new projects due at 5:00pm	September 14, 2021
Informational webinars for applicants (mandatory for new applicants), 10am via Zoom	September 17 and 24, 2021
Review and scoring process meeting	September 29, 2021
CoC application materials for all projects due at 3:00pm (MUST be at least 30 days before HUD NOFA deadline)	October 1, 2021
Applications available for review teams	October 5, 2021
All project applications and updated certifications must be entered into e-snaps by 5:00pm	October 15, 2021
Review team scores due	October 19, 2021
Compile review team scores and create ranking	October 21, 2021
CoC Board meeting to approve final ranking	October 27, 2021
Applicants notified of placement in scoring and ranking for CoC application OR rejection	October 29, 2021

from CoC application (MUST be at least 15 days before HUD NOFA deadline)	
E-snaps feedback provided to applicants	No later than November 3, 2021
Final project applications due in e-snaps by 5:00pm	November 5, 2021
Estimated public posting of CoC application (MUST be at least 2 days before HUD NOFA deadline)	November 10, 2021
Estimated TLCHB CoC application submission to HUD	November 12, 2021

V. SUMMARY OF CHANGES AND POLICY PRIORITIES FOR THE FY 2021 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 2021 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:

 - i. 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 III.B.2.g of the FY 2021 HUD NOFO. Additional guidance for DedicatedPLUS projects can be found on the HUD Exchange website at www.hudexchange.info.
 - ii. In order to be eligible for renewal in FY 2021, projects must be currently in operation and have an executed grant agreement dated no later than December 31, 2021 and expire in CY 2022 (January 1, 2022 through December 31, 2022). Grant agreements for FY 2020 funds must be executed by December 31, 2021. If a project application is not executed by December 31, 2021, HUD will withdraw any funds conditionally awarded for FY 2021.
 - iii. Projects implemented prior to the 2016 competition or transferred prior to 2018 that underspend and/or are significantly operating under capacity may be subject to full or partial reallocation. 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.
- iv. As in previous years, HUD will continue the Tier 1 and Tier 2 funding process. Tier 1 is equal to 100 percent of the Annual Renewal Demand (ARD) minus the Annual Renewal Amounts (ARA) of YHDP renewal and YHDP replacement projects. Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for, but does not include YHDP renewal or YHDP replacement projects, CoC planning projects, or projects selected with DV Bonus funds. Tier 1 is estimated to be \$3,930,721, and the CoC bonus amount is \$341,081.
 - v. Fully operational projects providing permanent housing that were transferred in the last year will be held harmless and automatically included in Tier 1.
 - vi. 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.
 - vii. 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; (e) a SSO-Coordinated Entry project under the DV Bonus, and (f) a SSO-Coordinated Entry project, to be carried out by the Collaborative Applicant, up to \$200,000.
 - viii. New project applications requesting funding for new construction or rehabilitation activities will not be accepted.
 - ix. Toledo/Lucas County CoC bonus points will be available for permanent housing projects (PSH or RRH) that are currently using, or commit to using, the Housing First model with housing program participants (with a concrete plan of action, to utilize the Housing First model of service delivery). To receive any of these bonus points, 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. Please note, renewal applicants must meet, or improve, the level committed in a project application submitted in a

previous competition.

- x. Toledo/Lucas County CoC bonus points will be available to all project applications that are 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. Please note that renewal applicants must meet, or improve, the level committed in a project application submitted in a previous competition.
- xi. Any project application that is reviewed, approved, and ranked by the CoC, and subsequently awarded CoC funds, based on the applicant's indication of commitment to operating with a Housing First and/or low barrier program model, must operate as a Housing First and/or low barrier project. Projects that indicate they will not continue as such in the required Certification Policy Addendum will not receive the bonus points in the area applicable and may be determined out of compliance and placed in the bottom of Tier 2.
- xii. Toledo/Lucas County CoC bonus points will be available for new projects that exclusively dedicate units/beds in order to prioritize Veterans, youth 24 and under, families, and/or those experiencing chronic homelessness. Bonus points will be available for PSH renewal projects dedicated to providing housing to people who are homeless with a disability and for renewal projects that increased the number of beds dedicated to serving persons who are chronically homeless. Bonus points will be available for applicants who actively participated in the 2020 Homeless Count in January of 2020, thus assisting the CoC identify people experiencing homelessness.
- xiii. All renewal Toledo/Lucas County 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 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 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%.

- xiv. In order maintain alignment to HUD priorities for this funding and to keep homeless people 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 Toledo/Lucas County 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 (based on score)
- xv. Projects implemented prior to the 2018 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 2021 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.

- xvi. HUD will score new and renewal projects ranked in Tier 2 using a 100-point scale (please see full details on page 10 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.
- xvii. More than one project can be submitted for the permanent housing bonus funding. HUD guidance shows that for CoCs to receive grants for new projects, other than through reallocation, CoCs must competitively rank projects based on how they improve system performance as outlined in Section VII.B.2.b of the NOFO.
- xviii. 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 new this year the CoC will be able to submit multiple applications for PH-RRH and Joint TH and PH-RRH housing project types. For the SSO-CE project type, the CoC will submit the highest ranked project that passes eligibility and quality threshold review. Applications for SSO-CE submitted by TLCHB will take priority. For the highest ranked housing projects that pass eligibility and quality threshold review, the CoC will submit as funding availability allows.
- xix. 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 *Toledo/Lucas County CoC Violence Against Women Act (VAWA) Policies and Procedures* outlined in the Toledo/Lucas County CoC Written Standards. First-time renewal projects should be fully compliant by the time the local CPD Field Office issues the FY 2021 grant agreement for a project in the CoC's geographic area.

- xx. 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.
- xxi. The CoC will not reallocate any funding to Transition Projects. While the FY 2021 HUD NOFO is allowing Transition Grants as described in Section III.B.2.z 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.

VI. APPLICATIONS

- **General Application Instructions for All Projects**
 - i. 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.
 - ii. For information on accessing HUD's *E-Snaps* system to complete and submit a full Toledo/Lucas County CoC Project Application, please go to: <https://www.hudexchange.info/programs/e-snaps/>. Note that once the competition begins, there will be a significant time delay if applicants need to register new users on the *E-Snaps* system. All applicants should ensure that they have access to the system immediately.
 - iii. In addition to the *E-Snaps* submission, all applicants must submit a hard copy of the Toledo/Lucas County CoC review application with all supplemental materials described herein. Application materials must be delivered in person to 1220 Madison Ave., Toledo OH no later than the posted deadline.
 - iv. It is the responsibility of the applicant to assure that a hard copy of all the application materials are received by TLCHB, by the established deadline. No late submissions of the project application document will be accepted.
 - v. 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.

- vi. All projects must complete and submit the HUD application in *e-snaps*, including any certifications, attachments, or other items required pursuant to HUD's instructions by 5:00 pm on October 15, 2021.
- vii. Information regarding scoring criteria will be posted on Continuum of Care webpage at <https://endinghomelessnessstoledo.org/funding-programs>. Applicants are strongly advised to review the criteria before submitting an application.
- viii. 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. This information can be accessed at:
<https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>.
- ix. The Toledo/Lucas County CoC 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 Toledo/Lucas County 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.

- ***Instructions for Renewal Projects***

- i. All applicants for renewing PSH and RRH projects must submit the following for each project no later than October 1, 2021 at 3:00 pm at TLCHB (1220 Madison Ave., Toledo OH, 43604). The following materials must be received for each project in order for an application to be considered complete:
 1. Five (5) copies of the 2021 Toledo/Lucas County CoC Renewal Project Review Application for each renewal project;
 2. Five (5) copies of the Competition Certification and Policy Addendum document for all projects;
 3. Five (5) copies of the Competition Coordinated Entry System Policy Addendum for all projects;
 4. One (1) copy of the Notice of Intent - 2021 PSH Change to DedicatedPLUS (if applicable);
 5. One (1) copy of the Notice of Intent 2021 Grant Consolidation (if applicable);
 6. If HUD monitoring has occurred, one (1) copy of the most recent HUD monitoring report, including corrective action plans and documentation regarding resolution of findings, when applicable; and
 7. One (1) copy of supportive documents showing timely draw downs (eLOCCS reports).
- ii. For renewal projects that were consolidated under the FY 2019 CoC Competition, the consolidated project replaces the individual projects. As such, the review application and all materials submitted for each consolidated project should represent the combined projects.

- iii. All renewal projects will be evaluated and scored for performance using data from the HMIS. It is critical for all renewal projects to have accurate and complete data in the HMIS, as data quality and completeness will have a direct impact on scoring and ranking. The Toledo/Lucas County CoC will only consider modifications to project scores based on data if it is determined that there was an error on the part of the CoC. Project data will be evaluated for the time period of July 1, 2020 through June 30, 2021.
- iv. Victim Service Providers funded by HUD are prohibited from entering data in the HMIS. However, they are required by HUD to use a comparable database that is capable of collecting the same information for their program participants and producing HUD reports. Renewal projects for Victim Service Providers will be required to submit deidentified project performance data from the comparable database to facilitate scoring and ranking. The Toledo/Lucas County CoC will not collect any personally identifying information for any program participants at Victim Service Providers. Project data for Victim Service Providers must cover the time period of July 1, 2020 through June 30, 2021.

- ***Instructions for New Projects***

- i. Eligible applicants for new PSH, RRH, Joint TH and PH-RRH Component, and SSO-CE projects include all agencies with existing CoC NOFO grants within the CoC and nonprofits, units of Government, and Housing Authorities that wish to make application for new grants.
- ii. HUD will allow new reallocated projects, DV Bonus projects, and new expansion projects of existing CoC Program-funded projects to request funding limited to 1 year. For projects requesting the regular permanent housing bonus funds, the grant term for new project applications requested should be limited to 1-year. However, as additional funding is available, the review team may allow higher scoring new projects to request a term allowed as defined on pages 32-33 of the HUD NOFO, as match requirements can be met. However, the CoC may elect to decrease the term for any new project that is approved for the final priority ranking list to allow additional projects to be included in the request for funding.
- iii. All agencies interested in applying for a new PSH, RRH, Joint TH and PH-RRH Component, or SSO-CE project should complete and submit a Proposal Outline (Letter of Intent) to alert the Collaborative Applicant of their intent no later than September 14, 2021. The Proposal Outline form is attached to the notice, and it will also be available at: <https://endinghomelessnessstoleado.org/funding-programs>. Submitting a Proposal Outline will signal staff to forward information regarding CoC webinars, HUD training events, updated CoC policies, updated scoring criteria, notice of CoC changes, and/or any other relevant information.
- iv. Applicants must clearly demonstrate that they have experience and sufficient capacity to serve fragile, chronically homeless, and service resistant clients, and that sufficient services will be provided to clients proposed to be served.

- v. Bonus points will be awarded to new projects that commit, with a concrete plan of action, to having a low-barrier to entry project, as well as to utilize the Housing First model of service delivery.
- vi. All agencies submitting an application for a new PSH, new RRH, new Joint TH and PH-RRH component, or SSO-CE project must submit a complete application package to TLCHB (1220 Madison Ave., Toledo OH) by October 1, 2021. A complete application package includes:
 - 1. Five (5) copies of the Review Application for new projects;
 - 2. Five (5) copies of the Competition Certification and Policy Addendum document for all projects;
 - 3. Five (5) copies of the Competition Coordinated Entry System Policy Addendum for all projects;
 - 4. Five (5) copies of all match and leveraging documentation;
 - 5. One (1) copy of the agency 501(c)(3), if applicable (copies of the 501(c)(3) for any sub-recipients must also be attached);
 - 6. One (1) copy of a current list of Board of Directors;
 - 7. One (1) copy of the most recent independent financial audit, or equivalent financial statement; and
 - 8. One (1) copy of current IRS Form 990: Return of Organization Exempt from Income Tax, if applicable.

VII. APPEALS

In accordance with *24 CFR part 578.35* and Section X 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.

VIII. 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 October 1, 2021. 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.

IX. 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