



**Community Action Pioneer Valley (CAPV)
Three County Continuum of Care MA 507 (CoC)**

**Fiscal Year (FY) 2022 Continuum of Care
Competition**

**And Noncompetitive Award of
Youth Homelessness Demonstration Program (YHDP) Grants**

REQUEST FOR PROPOSALS (RFP), Released –August 12, 2022

**For CoC Renewal & Expansion Projects (and YHDP Renewal and Replacement Projects)
in Berkshire, Hampshire, and Franklin Counties Providing:**

- **Permanent Housing (PSH & RRH)** for individuals and families and individuals and families experiencing chronic homelessness (PSH only)
- **Transitional Housing (TH)** serving homeless individuals and families
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH)** serving homeless individuals and families

And NEW Bonus Projects Providing:

- **Current Project Expansion Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)
- **Permanent Housing (RHH only), Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH), Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)
- **Permanent Housing (PSH only) Projects** Serving chronically homeless individuals and families
- **Permanent Housing (RRH) Projects** serving Individuals and families experiencing homelessness in categories 1 or 2.
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH)**, serving individuals and families experiencing homelessness in categories 1, 2, or 4.

Total Available Renewal Project Funding: **\$3,057,836**
(Including CoC planning dollars of \$89,063)

Available NEW funding includes new DV (RRH/TH-RHH) Bonus - Approximately \$169,245 & CoC Bonus funding – Approx. \$148,439 (PSH, RHH, TH-RRH)

Additional information can be found at <https://www.threecountycoc.communityaction.us/news-events>

Bidder’s Conference: Wednesday, August 17th at 1pm and Friday August 19th at 10am, 2022

Zoom Link: <https://us02web.zoom.us/j/84395202643?pwd=MUZZZXhEUzFwNVJnK2NZMlczS0NOdz09>

New Project Applications Due: Wednesday, August 31st, 2022 by 8pm.

Application submitted to Keleigh Pereira, CoC Program Director. CoC staff will contact applicants if they met threshold requirements to begin esnaps applications by 9/5 and to provide access.

Renewal Project applications responded to, in esnaps by August 31st, 2022 by 8pm.

Questions? Contact: Keleigh Pereira, CoC Program Director, kpereira@communityaction.us

Timeline Description	Date
Released/posted https://www.threecountycoc.communityaction.us/news-events	8/12/2022
Three County CoC Bidders Conference (optional) – zoom link: https://us02web.zoom.us/j/84395202643?pwd=MUZZZXhEUzFwNVJnK2NZMlczS0NOdz09	8/17 - 1pm 8/19 - 10am
Renewal Project Responses/Applications due in esnaps (applicants will be notified when HUD opens esnaps apps.) https://esnaps.hud.gov/grantium/frontOffice.jsf	8/31/22 at 8pm
New Applicant Applications to Kpereira@communityaction.us <i>Incompleteness: (Due to the reduced time available this year for this process, mostly complete submissions may still be reviewed for threshold requirements and could be given additional time for completion as long as project ranking can be completed.)</i>	8/31/22 at 8pm
New and Renewal Project review and ranking completed by	9/14/22
CoC written notification to Project Applicants regarding whether projects will be accepted as part of the project listing and submission to HUD for approval; reduced or rejected, with explanation. Project selections, scoring and ranking and tier allocations will be provided in writing and published at www.threecountycoc.communityaction.us Applicants not selected may appeal to the board and/or apply directly to HUD.	9/15/22

Full Three County CoC Consolidated Application & Project listing will be posted on the CoC website.	By 9/28/2022 5pm
Expected Project Start Date	2023
CoC Application submitted to HUD (<i>rejected applications can be submitted directly to HUD in esnaps</i>)	By 9/30/22 8pm

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Purpose:

The U.S. Department of Housing and Urban Development (HUD) Community Planning and Development Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants was released on August 1, 2022. View the NOFO and all supporting documents in detail on the FY22 Competition page, [here](#).

HUD's annual NOFO determines the process by which each CoC, through its designated Collaborative Applicant, submits a consolidated application to fund all CoC activities and eligible housing projects to advance the Federal and local goals of Ending Homelessness in our region. The Designee for the Three County CoC (MA-507) is Community Action Pioneer Valley (CAPV), the sole recipient of the CoC funding in the region.

This document provides information to the Three County CoC stakeholders, sub-recipients and other interested parties about the local Process leading up to submission of an application to HUD, including the steps required regarding all Renewal and Replacement applications for Current Continuum of Care and Youth Homelessness Demonstration Programs (YHDP), applying for new funding, the project selection process, and the timeline for project approval and esnaps submission.

The consolidated application will be submitted by CAPV and will include a CoC application, renewal, expansion and new CoC projects, as well as renewal and replacement YHDP projects. CAPV's Three County CoC is seeking proposals from Berkshire, Hampshire, and Franklin County housing and service providers for the following **renewal project** types:

- **Permanent Housing (PSH & RRH)** for individuals and families and individuals and families experiencing chronic homelessness (PSH only)
- **Transitional Housing (TH)** serving homeless individuals and families
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH)** serving homeless individuals and families

In addition, the CoC is seeking proposals for bonus funds to **fund new projects** (new or expansion of current projects) targeted to servicing victims of domestic violence, dating violence, sexual assault, and stalking. DV Bonus funds will target the following project types:

NEW- DV Bonus Projects Providing:

- **Current Project Expansion Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)

- **Permanent Housing (RHH only), Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH), Dedicated to serving survivors** of domestic violence, dating violence, sexual assault, or stalking who are experiencing homelessness (24CFR 578.3)

NEW - CoC Bonus Projects Providing:

- **Permanent Housing (PSH only) Projects** Serving chronically homeless individuals and families
- **Permanent Housing (RRH) Projects** serving Individuals and families experiencing homelessness in categories 1 or 2.
- **Combined Transitional Housing-Rapid Rehousing (TH-RRH)**, serving individuals and families experiencing homelessness in categories 1, 2, or 4.

Total Estimated Annual Renewal Demand (for both Tier 1 CoC Projects and YHDP Projects)	\$2,968,773
CoC Planning (Collaborative Applicant only)	\$89,063
DV Bonus Funds	Up to \$169,245
CoC Bonus Funds	Up to \$148,439
Total Possible Available Funding	\$3,375,520

Eligible applicants include non-profits, local and state government entities, Indian Tribes or Tribally Designated Housing Entities (TDHE), and housing authorities. For more information about eligible applicants, please see section V.A & B. of the NOFO. *For-profit entities are ineligible, and applications submitted from these entities will not be reviewed.*

Applications will be submitted in HUD’s electronic grant application system (*esnaps*) in collaboration with CAPV’s CoC staff. **Due to the limits in timing availability for this year’s competition, and to encourage applicants who have not applied for CoC funds in the past, new projects applications will first be submitted through an application outside of the esnaps system (Appendix F.)** The Three County CoC program staff will provide technical assistance regarding the use of the esnaps system for all applicants. Scoring criteria for new, renewal and expansion CoC projects are attached as **Appendix A. & Appendix B.**

More information is available through the NOFO and at the HUD exchange. HUD guidance is prioritized before this Request for Proposals. If there is conflicting information, HUD guidance will take precedence.

Applicants are strongly encouraged to read the FY2022 CoC NOFO on the HUD Exchange at:
<https://www.hudexchange.info/programs/e-snaps/fy-2022-coc-program-nofa-coc-program-competition/>

And the funding criteria for projects available in the interim rule, which governs the CoC:
www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf.

The Three County CoC's website will provide additional information regarding the annual funding process: <https://www.threecountycoc.communityaction.us/coc-funding-process>

Background on the Continuum of Care (CoC):

The Continuum of Care (CoC) Program was established by the McKinney-Vento Homeless Assistance Act as amended by S.896 Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. The program consists of the former McKinney/Vento Shelter Plus Care (S+C) Program, the former McKinney/Vento Supportive Housing Program, and the former Single-Room-Occupancy program.

The CoC Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

The goal of the Youth Homelessness Demonstration Program (YHDP) is to support the development and implementation of a coordinated community approach to preventing and ending youth homelessness and sharing that experience with and mobilizing communities towards that same end. The population to be served by the demonstration program is youth experiencing homelessness, including unaccompanied and pregnant or parent youth.

In Massachusetts, there are 12 Continuum of Care based on geographic service areas and they collaborate through a state-wide CoC network. HUD competitively funds the CoCs and membership is open to anyone interested in ending homelessness in the CoC geographic area. Examples of members are: state agencies, private non-profit homeless service providers, private non-profit organizations, participants from our funded programs, and individual community members. Our CoC prioritizes the involvement of persons with lived experience of homelessness in decision-making.

Acting as the **Collaborative Applicant for the Three County CoC**, Community Action Pioneer Valley (CAPV) coordinates the submission of the Three County CoC Consolidated Application to HUD. The Three County CoC will act as the recipient for all funding, including the YHDP funding, and applicants approved for

funding will be sub-recipients to the CoC grant process. As the Collaborative Applicant, CAPV is responsible for submitting the consolidated application for funding on behalf of the Continuum, and for fiscal and programmatic monitoring of sub-recipient projects and funding.

Available Funding:

According to HUD, the CoC should expect to be awarded a minimum of \$2,958,295 in this funding round (*including Tier 1, YHDP projects, & planning dollars*), and may apply for up to \$3,375,520. The renewal projects listed in **Attachment C** are eligible to apply for renewal at the amount listed. (*See further down in this section regarding YHDP projects.*)

In addition, the CoC is eligible to apply for Bonus Project funds in the approx. amount of **\$148,439** and DV Bonus Project funds in the approx. amount of **\$169,245**. **Renewal Projects may apply for expansion through the new project application process, specifically to serve survivors of domestic violence and would need to notify Keleigh Pereira, and submit the new project application.**

Renewal projects may have budgets reduced or may be replaced by new projects. The CoC Competition is highly competitive, with HUD placing increasing emphasis on reallocating resources based on project performance and area gaps in resources. The FY 2022 NOFO explains that the available amount of funding may not be sufficient to fund renewal projects, and HUD requires CoCs to competitively rank all projects (*except planning projects & YHDP*) in two tiers.

Project applications submitted to the CoC for inclusion on the FY22 CoC Priority Listing (as part of the Consolidated Application) will be reviewed and either approved accepted and ranked, approved without ranking (i.e. YHDP renewal or replacement projects and CoC planning project), or rejected by the CoC. All project applications approved by the CoC must be listed on the FY22 CoC Priority Listing in rank order, except project applications for YHDP renewal or replacement, and CoC planning. Higher ranked projects will be assigned to Tier 1 (*95% of the Annual Renewal Demand, minus YHDP Projects*) and lower ranked projects may fall into Tier 2 (*Total Project budget – including renewal and new, minus YHDP – beyond 95% of ARD*) as described in Sections II.B.11.a and b of the NOFO. The purpose of this two-tiered approach is for CoCs to notify HUD which projects are prioritized for funding based on performance, local needs, and gaps.

Projects submitted to HUD in Tier 1 are expected to be funded if the project meets HUD eligibility and threshold requirements. Tier 2 projects will be awarded funds by HUD based on a comparative score computation which utilizes the CoC's FY2022 application's competitive score and project ranking.

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, and if applicable, UFA Costs projects, or projects selected with DV Bonus funds). If a CoC's DV Bonus project(s) are selected under the DV Bonus selection process – by HUD, they will not be included in the calculation of Tier 1 or Tier 2. If, however, a CoC's DV Bonus project(s) is/are not selected under the DV Bonus selection process, these projects will be included in the calculation of Tier 1 and Tier

2. In this scenario, if a project is ranked lower than a DV Bonus project it may fall outside of the Tier 2 limit and not be eligible for selection. Since we will not know in advance whether a DV Bonus project submitted will be conditionally selected (under the DV Bonus selection process), the CoC will rank all projects in Tier 1 and Tier 2 based on performance and need for the project under the local ranking process.

Youth Homelessness Demonstration Projects (YHDP), listed in **Appendix D.**, may apply for renewal or replacement, based on the Consolidated Appropriations Act of 2022, permitting expiring YHDP projects to renew or replace non-competitively in this competition. YHDP projects will be held harmless, will not be ranked, and will be conditionally approved by HUD. Agencies funded by the Three County CoC should work with CoC staff to determine application type.

Project Types:

All renewal project applications must be completed in *esnaps* (including CoC renewal, expansion or YHDP renewal and replacement projects). New Project applicants will complete the application included in this RFP and include the population(s) they will serve, the type of housing and services that will be provided, and the budget activities that are being requested (**Appendix F.**)

A CoC can apply for new projects, as described in the NOFO, by using amounts available through the bonus process; by making funds available through reallocation; or a combination. Reallocation is the process of shifting funds in whole or in part from renewal projects to create one or more new projects without decreasing the CoC's Annual Renewal Demand (ARD). CoCs may also apply to expand renewal projects if they fall within the eligible new bonus projects types. The Reallocation Plan is found in **Appendix G.**

The Three County CoC is seeking applicants from eligible organizations to submit to HUD, for approval and implementation, **Project types** approved by the Three County CoC Board that will address critical resource needs for persons experiencing homelessness in the region. **HUD is incentivizing new projects utilizing housing subsidies (7 pts) and healthcare (7 pts), therefore the CoC will prioritize projects that can demonstrate either or both of these** (See VII.B.6.a. for leveraging housing resources and VII.B.6.b leveraging healthcare resources.)

In Addition, the CoC Board has set priority for new project applications (*reflected in the scoring tool*) which:

- Demonstrate a plan to move participants into housing within 30 days from entering the project. (*Examples: projects that have housing units included, programs that use a current inventory for housing, demonstrated agreement with area landlord(s).*)
- Fill a gap for a local housing project (*to provide the services on a project being developed/add units wherever we can.*)
- Utilize Rapid Rehousing
- Meet the needs of survivors of DV
- Demonstrate through policies that they have developed anti-discrimination practices that demonstrate racial equity measures in service delivery; and that support equal access and measures that address LGBTQ protections.

The CoC Board has set priorities for renewal projects which:

- Demonstrate robust Supportive Services and agree to follow the CoC-Wide Move-on policy
- Are meeting their target for utilization (bed and funding)
- Demonstrate through policies that they have developed anti-discrimination practices that demonstrate racial equity measures in service delivery; and support equal access and measures that address LGBTQ protections.
- Agree to follow the CoC-wide anti-discrimination and equal access policy.
- Small programs that fill pockets and are critical – high impact – protecting.

Applicants may apply for one or more than one of the projects, and in their application, could choose to subcontract a portion of the project, as part of the description. *(For example: The supportive services aspect of a project could be subcontracted to another organization in your plan and/or be used as match if paid for through other funding resources.)*

See the following sections of the FY 2022 CoC Program NOFO for information regarding New Projects: Section V.B.3.e(1) for project types; Section V.B.3.f - New Project Grant Terms; Section V.B.4.a(3) - New Projects Created Through Reallocation or CoC Bonus processes – this includes the eligible component types available (e.g., PH-PSH, PH-RRH, Joint TH-RRH); Section V.B.4.a(4) - New Projects for DV Bonus – limited to PH-RRH OR Joint TH and PH-RRH (CoC was awarded DV bonus funds for CE-SSO in FY21, so will not apply this year.); See VII.B.6.a. for leveraging housing resources, and VII.B.6.b leveraging healthcare resources.

1. Renewal Projects

Projects currently funded under this CoC Program are eligible to apply for renewal in this competition. Renewal projects apply seeking the same funded items that are in the FY21 grant. These project sub-recipients may request a reduction in rental assistance funds (if the project does not spend all funds) but may not request increases in any line item, and may not move funds between line items. Renewal Project applicants may apply for expansion of renewal projects in which a renewal project submits a new application to expand its current operations specifically to utilize DV Bonus Funds, see section V.B.4.a.(6) – Expansion Project. Renewal Project sub-recipients may also apply for consolidation to combine grants in the same component – See section V.B.4.a.(7) of the NOFO for additional information.

2. YHDP Renewal & Replacement Projects

These projects are not ranked, and will be selected for funding provided they pass project eligibility and quality threshold reviews, or renewal threshold review; as explained in section V.C.4. of the NOFO. YHDP project representatives should work with the CoC to determine if a renewal or replacement application will be submitted. YHDP Renewal projects apply seeking the same funded items that are in the FY21 grant. Replacement applications will be submitted if there are significant changes needed. See sections II.B.11.d, II.B.11.f, and V.B.4.a.(5) of the NOFO for more information.

3. NEW CoC Bonus- Permanent Supportive Housing (PSH)

These projects serve either 100% Chronically Homeless Individuals and/or Families, or designated as DedicatedPLUS project, with a demonstrated plan for healthcare access and integration into the project model. (see section VII.B.6.b. of the NOFO, for additional details re: healthcare access and integration and here for more information on PSH <https://www.hudexchange.info/homelessness-assistance/coc-esq-virtual-binders/coc-program-components/permanent-housing/permanent-supportive-housing/>)

New permanent supportive housing projects that will serve 100% chronically homeless individuals/families or will be designated as DedicatedPLUS are eligible to apply in this competition. Permanent housing is community-based housing, the purpose of which is to provide supportive housing without a designated length of stay.

***Chronically Homeless** refers to (1) An individual who: (i) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years, adding up to a total of 12 months; and (iii) Can be diagnosed with one or more of the following conditions: substance abuse disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; or (2) an individual who has been residing in an institutional care facility, including a jail, mental health or substance abuse facility, hospital or other similar facility for fewer than 90 days and has met all the criteria in paragraph (1) of this definition before entering that facility; or (2) A family with an adult head of household (or if there is no adult in the family, a minor head of household who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

*** Permanent Supportive Housing (PSH)** permanent (not time limited) housing in which supportive services are provided to assist homeless persons with a disability to live independently. Permanent housing is community-based housing without a designated length of stay. To be permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.

***A DedicatedPLUS project** is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless youth, who at intake are:

- experiencing chronic homelessness as defined in 24 CFR 578.3;
- residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;

- residing in transitional housing funded by a Joint TH-RRH project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
- residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
- receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

For PSH and DedicatedPLUS PSH, CoC funds may be used for: Acq, Rehab, New Construction; leasing; rental assistance; operating costs; supportive services; HMIS; and administrative costs. Definitions and guidance for these items are at 24 CFR 578.43-578.63.

These projects should demonstrate the opportunity to utilize housing vouchers and healthcare provided through healthcare service providers.

4. NEW CoC Bonus or DV Bonus - Rapid Rehousing (RRH)

These projects serve Homeless Individuals or Families with a demonstrated plan for healthcare access and integration into the project model. (see section VII.B.6 of the NOFO, for additional details) and here for more information on RRH <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/permanent-housing/rapid-re-housing/>

RRH is permanent housing that provides short-term (up to three months) and medium-term (4-24 months) tenant-based [rental assistance](#) and supportive services to households experiencing homelessness. New rapid rehousing projects that will serve homeless individuals, homeless households with children are eligible to apply in this competition.

For RRH, CoC funds may be used for: supportive services; short-term (up to 3 months) and/or medium-term (3 to 24 months) tenant-based rental assistance (as necessary to help participants move as quickly as possible into permanent housing and achieve stability in that housing); and administrative costs. Definitions and guidance for these items are at 24 CFR 578.43-578.63. ***These projects should demonstrate the opportunity to utilize housing vouchers and healthcare provided through healthcare service providers.***

5. NEW CoC Bonus or DV Bonus – Joint Transitional Housing (TH) and Rapid Rehousing (RRH-PH)

For Homeless Individuals or Families with a demonstrated plan for healthcare access and integration into the project model. (see section VII.B.6 of the NOFO, for additional details and here for more information on the Joint Component <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/joint-th-ph-rrh/>

This project type provides a new way to meet some of the pressing challenges that communities are facing. These projects provide a safe place for people to stay – transitional housing – with financial assistance and wrap around supportive services determined by program participants to help them move to permanent housing as quickly as possible.

Transitional Housing (TH) provides temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing. TH projects can cover housing costs and accompanying supportive services for program participants for up to 24 months.

RRH is permanent housing that provides short-term (up to three months) and medium-term (4-24 months) tenant-based [rental assistance](#) (As necessary to help participants move as quickly as possible into permanent housing and achieve stability in that housing); and supportive services to households experiencing homelessness; and administrative costs. Definitions and guidance for these items are at 24 CFR 578.43-578.63.

*****It is anticipated that only one total project out of Project Types #3, #4 & #5. will be included in the CoC application to HUD in each bonus area because of the maximum funding available, unless additional funds become available through reallocation.***

In the circumstances of a **DV Bonus Project** – These funds are to support projects designed to serve survivors of domestic violence, dating violence, sexual assault, or stalking. These funds may be applied for or used to support providers with new programs dedicated to this population, or may be used to enable an existing program to expand its program by dedicating additional units, beds, persons served, or services provided to this population.

DV Bonus projects that are funded will be eligible for ongoing annual renewals through the regular CoC competition.

The CoC competition and operations are modified for projects designed to serve victims of domestic violence, in order to accommodate the particular need for privacy and safety required by these programs.

The following modifications apply:

- CoC will consider policies and procedures specific to the coordinated entry process to address privacy, confidentiality and safety for victims of domestic violence.
- The performance of CoC programs are evaluated annually and part of the performance evaluation includes review of measures in reports pulled directly by the CoC from the Homeless Management Information System (HMIS). However, domestic violence entities are prohibited from using the CoC's HMIS, but must use a comparable data system. To accommodate the different data-keeping requirements, the CoC will request that DV programs submit their own aggregated data reports for the performance evaluation.

Participant eligibility: The CoC Projects must serve people experiencing homelessness that meet HUD’s definition of Homelessness. PSH projects must support those experiencing Chronic Homelessness. Other project types serve categories 1 (literally homeless), 2 (at imminent risk of homelessness), or 4 (fleeing – DV). DV Bonus projects must serve category 4. Please see HUD categories of homelessness for more information in **Appendix E**, or at <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/>

Eligible Costs and Fiscal Management:

The CoC Program interim rule sets forth the costs eligible for each program component in § 578.37(a). Not all costs are eligible in each program component, and in some cases, certain costs cannot be combined in a single unit or structure. The eligible costs for contributing data to the HMIS designated by the Continuum of Care are also eligible under all components.

<https://www.hudexchange.info/programs/coc/coc-program-eligibility-requirements/>

The eligible costs are summarized below.

Acquisition, Rehabilitation, New Construction (PSH only)

Acquisition funds may be used to pay up to 100 percent of the acquisition cost of real property for the purpose of providing housing (PSH or TH) or supportive services to homeless persons. **Rehabilitation** funds may be used to pay up to 100 percent of the cost to rehabilitate an existing structure that is owned (not leased) by the recipient or subrecipient, and that is used to provide housing (PSH or TH) or supportive services to homeless persons. These costs may include installing cost-effective energy measures or bringing an existing structure to State and local government health and safety standards. **New Construction** funds may be used to pay up to 100 percent of the cost of new construction ([§ 578.43](#)).

Rental Assistance

Rental assistance for homeless individuals and families, including tenant-based rental assistance. Grant funds may be used for security deposits in an amount not to exceed one month’s rent, as well as first and last month’s rent. When rental assistance funds are used to pay rent on units, the lease must be between the program participant and the landowner. Each program participant, on whose behalf rental assistance payments are made, must pay a contribution toward rent consistent with the requirements of the interim rule.

Leasing

Funds may be used to lease individual units or all or part of structures. Rents must be reasonable and, in the case of individual units, the rent paid may not exceed HUD-determined Fair Market Rents. Leasing funds may not be used for units or structures owned by the recipient, sub-recipient, their parent

organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure without a HUD-authorized exception. When leasing funds are used to pay rent on units, the lease must be between the recipient or the sub-recipient and the landowner, with a sublease or occupancy agreement with the program participant. The recipient may, but is not required to, charge the program participant an occupancy charge, consistent with the parameters specified in the interim rule. Grant funds may be used to pay security deposits, in an amount not to exceed one month's rent, as well as last month's rent.

****Utilities are not a leasing line item. If utilities are not provided by the landlord, utility costs are an operating cost.***

Operating Costs

Operating costs are eligible under the PH, TH, and HMIS program components. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units, including maintenance (such as scheduled replacement of major systems), repair, building security (when CoC Program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes.

****These costs may not be combined with rental assistance costs within the same unit or structure, and operating costs are not eligible under the SSO program component.***

HMIS Costs

Costs related to contributing client data to or maintaining data in the CoC's HMIS or a comparable database for victim services providers or legal services providers are eligible costs under the PH (PSH & RRH), TH, & SSO program components. Eligible HMIS costs include hardware, equipment and software costs; training and overhead; and staffing costs associated with contributing data to the HMIS designated by the CoC for its geographic area.

Supportive Services

Supportive services are eligible costs under the PH, TH, and SSO program components. The CoC Program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. As in the past, services must be offered to residents of PSH and TH for the full period of their residence. RRH programs must require program participants to meet with a case manager at least monthly.

Services may be provided to formerly homeless individuals for up to six months after their exit from homelessness, including the six months following exit from a transitional housing project. Recipients and sub-recipients are required to perform an annual assessment of the service needs of their program participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services.

Client Specific Supportive Services Costs:

- Reasonable one-time moving costs
- Case management
- Food—meals or groceries for program participants
- Housing search and counseling services
- Life skills training
- Outreach services
- Transportation
- Utility deposits
- Direct provision of services: 1) costs of labor, supplies, and materials; and 2) salary and benefit packages of service delivery staff

**** CoC supportive services provided must help program participants to obtain and maintain housing.***

Project Administration

These costs include expenses related to the overall administration of the grant (24 CFR part 578.59), such as management, coordination, monitoring, and evaluation activities and environmental review. **Sub-recipient projects awarded funds may use up to 50% of the HUD-allowed administrative funds associated with the project – CAPV will retain the other half in order to administer the grant funds & the CoC Program.**

The HUD-allowed administrative costs for new grants are 10% and for renewal grants is the amount previously set by HUD in the grant inventory worksheet and shown in the attached renewal project listing. New projects are encouraged to use the full 10% administrative costs.

Grant Terms/Contracts

All successful applicants in the Three County CoC annual competition will become sub-recipients of CAPV and the agency will enter into a reimbursement contract with the CoC, once the CoC has executed a grant agreement with HUD. Community Action Pioneer Valley is the sole recipient of the grant funds. The sub-recipient policy can be found [here](#).

Renewal projects may only apply for one-year grant terms.

HUD will allow new projects to request a longer initial grant term not to exceed 18 months (See page 35 of the NOFO for more detail).

New projects may request funds for an initial grant term of 1 year, 2 years, 3 years, 4 years, or 5 years, depending on project type and line items. The grant term may be extended consistent with 2 CFR200.308 and 2 CFR 200.309 (See page 34 of the NOFO for exceptions.). Most projects are for 1 year grant terms, which will begin in 2023.

For information regarding fiscal responsibilities, please see the sub-recipient policy and the following:

[https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-financial-management/overview/?utm_source=HUD+Exchange+Mailing+List&utm_campaign=28471fc51e-CoC ESG VB Financial Management 9 8 21&utm_medium=email&utm_term=0_f32b935a5f-28471fc51e-19524653](https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-financial-management/overview/?utm_source=HUD+Exchange+Mailing+List&utm_campaign=28471fc51e-CoC+ESG+VB+Financial+Management+9+8+21&utm_medium=email&utm_term=0_f32b935a5f-28471fc51e-19524653)

Application Process

The FY22 CoC competition is open to renewal and eligible new projects, which will be scored competitively. The highest scoring projects will be included in the CoC application submitted to HUD. (*see sections on Funding Available (pg.7) and Application Scoring and Ranking details (pg. 18) for more information*). Applicants will need to log in to *esnaps* to complete a renewal or new application, however due to the limited time allowed for response to the RFP, we are allowing new project applicants to complete the application outside of *esnaps*, as step 1 for threshold requirements and to begin scoring, and then will expect a very quick turnaround time for the *esnaps* application, when it is available. CoC staff will prioritize support for new project applicants in *esnaps*.

6. Renewal

The CoC will create renewal application files in *esnaps* for each existing project as soon as they have been made available by HUD, and will contact project representatives once it is created. We are awaiting HUD release of these applications. Renewal applicants must open the renewal application, fill in missing information, update existing information, and upload any required supporting documents. **Once complete, applicants must notify Keleigh Pereira** at kpereira@communityaction.us that they have completed their renewal application in *esnaps* and provided all attachments needed – prior to including match documentation, these must be sent to the CoC for approval. **DO NOT HIT SUBMIT. This must be completed by August 31, 2022, 8pm.**

7. Expansion and New Projects

New project applicants must submit a new application and complete the application (**Appendix F**) by **August 31, 2022, 8pm.** (*Due to the reduced time available this year for this process, mostly complete submissions may still be reviewed for threshold requirements and could be given additional time for completion as long as project ranking can be completed.*)

The new project application will be set up in *esnaps* and ready for entry of application information, after first submission. CoC staff will complete parts of the *esnaps* application for applicant ease and then

support additional needs. Expansion and new project sponsors must open the new project application in esnaps, fill in application information, and upload required supporting documents. **Once complete, applicants must notify Keleigh Pereira** at kpereira@communityaction.us that they have completed their renewal application in *esnaps* and *provided all attachments needed* – prior to including match documentation, these must be sent to the CoC for approval. **DO NOT HIT SUBMIT.** The timeframe for completion of these projects will be within 1 week of the initial application due date.

Esnaps is available at www.esnaps.hud.gov. Any applicant that does not already have the ability to log in to the CoCs esnaps account must request access from Michele LaFleur at mlafleur@communityaction.us

CoC staff can also provide technical assistance regarding esnaps use throughout the application process.

See Appendix H. Esnaps & Document Submissions for instructions for submission/use of esnaps.

Application Review

8. Minimum Threshold Requirements:

To be considered for funding through this RFP, projects must meet or be prepared to meet the following requirements (*Applications that do not meet this expectation will not move forward to the ranking and evaluation committee.*)

1. Submit a fully completed application with consistent data, on time;
2. Be an eligible applicant serving/planning to serve an eligible population as described in the Act, including any additional eligibility criteria for certain types of projects contained in the NOFO;
3. Be located and/or provide services in The Three County CoC's geographic area and serve people who are experiencing homelessness, demonstrate that the project is consistent with Jurisdictional Consolidated Plans;
4. Meet the threshold requirements of the FY22 CoC NOFO for new or renewal projects (see sections V.A. & V.B.3 for threshold requirements), including any required certifications & the following:
 - A. Applicant & Project eligibility
 - B. Project eligibility
 - C. Project quality
5. Demonstrate Commitment to Housing First/Low Barrier access to housing;
6. Not debarred from receiving federal funds and in good standing with all government and funding contracts;
7. Demonstrate that the project is financially feasible;

8. Provide documentation of organizational financial stability. (This is a review of audits or financial statements. For renewal projects, this review has been completed as part of program monitoring.);
9. Document secured minimum match;
10. Some applicants may be required to have an active SAM Registration & valid DUNs Number;
11. Demonstrate due process to participants, comply with Fair Housing, Civil Rights, VAWA, and equal access Laws;
12. Has an updated Code of Conduct compliant with 2 CFR Part 200.
13. Compliant with any lobbying – Section 1352, Title 31, US Code.

9. Local CoC Requirements:

1. Agree to work with The CoC Board & Staff on project design and implementation once selected, within 30 days of selection, including the application submission to eSNAPS office, as approved by the Ranking and Evaluation Committee and Selection team. This will include finalizing project scope and proposed budget;
2. Be prepared to begin project implementation at time of funding availability;
3. Agree to adhere to Community Action Pioneer Valley’s fiscal expectations;
4. Participate in evaluation by the CoC and the Project Ranking and Evaluation committee and demonstrate a commitment to Continuous Quality Improvement;
5. Participate in and coordinate all program referrals through the Three County CoC Coordinated Entry Process as defined by the CoC Written Standards and policy manuals.
6. Comply with program requirements as per the Three County Continuum of Care & YHDP Policies and Procedures & HUD Continuum of Care Interim Rule;
8. Participate in the Homeless Management Information System (HMIS): The HMIS is an online database that enables organizations to collect data on the services they provide to people experiencing homelessness and follow any CoC training and reporting expectations. Agencies are required to participate in HMIS and enter participant data per the HMIS data standards, elements, and procedures (VSP use a comparable database).
9. Align with screening standards for program eligibility and CoC documentation requirements
11. Adhere to Housing First practices while serving households experiencing homelessness

Project Application Scoring & Ranking, Selection, and Appeal

All applications that meet the threshold requirements will be forwarded to the CoC Ranking and Evaluation Committee for evaluation, selection and ranking. See **Appendix I** for the roles and responsibilities of this committee. **Appendix A** provides the scoring rubric that will be used for Renewal Project applications and **Appendix B** provides the scoring tool for New Projects.

10. Scoring & Ranking

Renewal Projects

Renewal Projects will be ranked according to the 2022 Three County CoC Renewal Project Outcomes, Measures, & Scoring Tool (**Appendix A**). This plan reviews past performance and is based on this year's site monitoring, equity efforts, and other evaluations. It is customized to the specific needs of a Rural Community and the unique nature of the Three County Area (MA507 Berkshire, Franklin, and Hampshire Counties). It incorporates both strategies identified in the FY22 NOFO and Technical Assistance suggestions. In addition, the CoC's ranking and evaluation committee, the CoC board, and regional network committees were involved in shaping the tool as approved by the Board.

This scoring methodology is intended to improve our local response to homelessness, align our response with regional needs, national policies and best practices, and enhance the competitiveness of our CoC application to HUD. Final scores will reflect the completeness of project applications, adherence to the FY22 Local Competition guidelines, and incorporate additional questions/responses as set forth in the NOFO. The Ranking and Evaluation Committee will score applications and submit their rankings to the CoC Board for final approval.

HMIS and Coordinated Entry Projects are administrative requirements for the CoC and must be funded. the **HMIS and Coordinated Entry grants** will receive the maximum score. In addition, **some projects which are eligible for renewal** and which have not completed an initial year of operation may be placed at the top of Tier 1, below the administrative grants because they reflect HUD priorities and have not yet been able to demonstrate performance.

A total of 225 points are available for PSH, 215 for RRH, Joint Component programs – 230 points, and TH-220. All projects are then provided with a weighted score. Between 23-29% of the points will be for contributing to systems measures outcomes; between 38-42%, depending on project type, will be for Objective Criteria.

Scores may be used to reject applications or to reduce budgets for low-scoring projects or over-funded projects. The CoC may also choose to reallocate all or part of a renewal project in order to fund a new project. See the Reallocation Plan in **Appendix G**.

New project applications

New project applications including reallocation, transition, expansion, and bonus projects will be ranked by the CoC's Ranking and Evaluation committee according to the criteria set forth in in the scoring rubric in **Appendix B**. These criteria should be addressed in your application. The scoring rubric for new projects identifies where in the application reviewers might look to find the information to score each section. *(See also Section II.A. in the NOFO to review HUD's Policy Priorities and Program Highlights to consider what might demonstrate how this project, if funded, might effectively support the overall goal of ending*

homelessness.) The CoC's Board of Directors will determine final approval for the Project Listing submission to HUD.

A total of 185 points is available for New Project Applications. Additional priority bonus points may be awarded as described in section h of Appendix B.

NOTE: The Three County CoC full consolidated application scoring will partially determine HUD approval for bonus funds. The CoC is not guaranteed the availability of these funds.

11. Selection

Once the committee completes the scoring and ranking, the committee may consider the CoC's overall funding priorities, whether the initial scoring is likely to result in any critical service gaps, and strategy related to Tier cut offs and HUD's selection process, and may make adjustments to budgets and produce the final ranking of projects to be included in the CoC application. The Committee's rationale for any adjustments will be recorded and made public with the published rankings.

Scores will determine each project's rank in the CoC's application to HUD, and rank will be the primary determinant of placement into Tier 1 and Tier 2 – see section on Funding Available for further information on the Tier Structure.

Project selections, rankings and tier allocations will be provided to applicants by written notice and published on the following website no later than **September 15, 2022**:

Three County Continuum of Care <https://www.threecountycoc.communityaction.us/>

12. Appeal

Applicants who believe they were denied the opportunity to participate in the local CoC process or who were rejected or reallocated may appeal directly to HUD by submitting a Solo Application.

HUD's Project Requirements:

13. Match Requirements

HUD requires all project applicants to contribute a 25% match on all budget items, except leasing dollars. Match is actual cash or in-kind resources (or a combination of the two) contributed to the grant. Guidance regarding cash and in-kind match is at 24 CFR 578.73 and can be found in the Three County CoC's sub-recipient policy at <https://www.threecountycoc.communityaction.us/three-county-coc-documents>.

All costs paid for with matching funds must be for activities that are eligible under the CoC interim rule or the NOFO, even if the recipient is not receiving CoC grant funds for that activity. In-kind match is the value of any real property, equipment, goods, or services contributed to the project that would have been eligible costs if the recipient/sub-recipient was required to pay for such costs with these Federal grant

funds. Match may be from public or private resources, as long as they are not statutorily prohibited from being used as match and not otherwise leveraged. Cash match with state funding may require pre-approval from the state agency administering the respective funds. Rental income received from program participants may be used as match and must be spent on eligible activities.

All projects will be required to submit letters providing match detail and MOUs for in-kind services. Match letters should include the following information and should be addressed to Keleigh Pereira, Three County CoC Community Action Pioneer Valley, Greenfield MA 01301. (Letters should be emailed to kpereira@communityaction.us for approval prior to attaching to esnaps applications.)

- include the name of the organization providing the match contribution;
- the type of contribution (cash or in-kind match);
- the value of the contribution;
- specific services to be provided;
- the number of participants the contribution will support;
- the value of the contribution per participant;
- the name and the grant number of the project and the name of the organization and program to which the contribution will be given;
- the date the contribution will be available and the grant term;
- In total match documentation should demonstrate 25% of the full grant amount/amount applied for.

14. HMIS Cash Match

In addition to the required 25% match for an individual grant, all grant sub-recipients *may* be required to support match funding for the Region's HMIS grant which supports the CoC in meeting HUD's data collection and reporting requirements. If needed, each Project will contribute funding amounts based on the percentage of the overall award they receive. The total HMIS grant is \$80,080.00 (25% of that is \$20,020.00- which could be divided amongst the sub-recipients). IF this is expected for the FY22 grant terms, CAPV will provide written notice to subrecipients.

15. Reporting and Evaluation Requirements

Applicants are responsible for complying with all HUD Continuum of Care and YHDP reporting requirements. Projects may be required to track additional information inside and outside of our HMIS data tracking system. Recipients must collect and report data on their use of CoC Program funds in an Annual Performance Report (APR) and any additional reports required by HUD. For more information on the APR, see [HUD's APR Training Materials \(link\)](#). Ongoing technical assistance will be available for all funded projects throughout project implementation within the CoC structure, by program staff.

16. Homeless Management Information System (HMIS)

CoC sub-recipients, with the exception of entities that are victim service providers, must participate in the CoC's Homeless Management Information System (HMIS). Access to the HMIS is made available to CoC grantees and the CoC provides training in the use of the system. *Applicants should not include costs for use of HMIS in project budgets, costs included in project budgets for HMIS should be for data collection activities and other eligible costs under HMIS line item.*

Victim services providers are required to use a comparable data collection system for recording client-level data, and may include HMIS costs in program budgets. These service providers MUST provide the CoC with de-identified information & aggregated data to utilize to review performance and complete required reporting.

17. Coordinated Entry System

The CoC oversees a collaborative coordinated entry (CE) system for equitable access to housing for persons experiencing homelessness. Persons are assessed using a local assessment tool, and are placed on a waiting list which prioritizes eligible applicants by vulnerability. All CoC sub-grantees are required to participate in the CoC's coordinated entry system by attending case conferencing when needed; identifying to staff when vacancies occur; and filling vacancies through the CE system.

The coordinated entry system recognizes the unique challenges faced by survivors of domestic violence, and actively maintains safety and confidentiality with providers. Survivors and others concerned with their name being listed can participate in the coordinated entry process by coding names & personally identifying information. We are also actively working with VSPs and consultants to create a robust and equitable system of access specifically for this population.

18. Housing First

Housing First is a model of housing assistance that is offered without preconditions (such as sobriety or a minimum income threshold) or service participation requirements, and rapid placement and stabilization in permanent housing are primary goals. Project applications should demonstrate that housing & services are offered without pre-conditions or background checks; programs work to screen-in rather than screen out; eligibility documentation protocols are streamlined. In addition, CoC Program funded projects should help individuals and families move quickly into permanent housing.

19. Racial Equity

In nearly every community, Black, Indigenous and other people of color are substantially overrepresented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs. Policies, procedures and processes should incorporate how to address racial disparities affecting individuals and families experiencing homelessness. The Three County CoC has a specific racial

equity action plan and requires sub-recipient agencies to adhere to an anti-discrimination and equal access policy.

20. Persons with Lived Experience

Including persons with lived expertise in all levels of program development, monitoring and assessment is a foundational element of the CoC. The project narrative must include the ways in which the project will include the voices of people with lived experience as collaborative partners in meaningful and ongoing ways, including input for project design, rules, service practices and policies; as well as a formal grievance policy that all participants are informed of. All funding recipients will need to have more than one person with lived experience on their board or equivalent governing body, or have an avenue for homeless or formerly homeless neighbors to provide feedback. Applications will be reviewed for information regarding how agencies and programs do or plan to incorporate this in their program and system development.

21. Trauma Informed Care

Trauma Informed Care is a strengths-based framework that is grounded in an understanding of and responsiveness to the impact of trauma experienced by people experiencing homelessness. Project applications should demonstrate that supportive services will include this perspective.

For Applicant Questions and CoC Technical Support:

Keleigh Pereira, CoC Program Director/Representative for the Collaborative Applicant.
kpereira@communityaction.us or

Michele LaFleur, CoC Data and Evaluation Manager/HMIS lead. mlafleur@communityaction.us

Individuals with Disabilities may contact the CoC if they are in need of alternative, accessible application formats.

Appendix:

- A. 2022 Three County CoC Renewal Project Outcomes, Measures, & Scoring Tool**
- B. 2022 Three County CoC New Project Scoring tool**
- C. 2022 Three County CoC Renewal Project Listing**
- D. 2022 Three County CoC YHDP Project Listing**
- E. HUD Categories of Homelessness – Definitions**
- F. 2022 New Project Application –microsoft word version available at <https://www.threecountycoc.communityaction.us/news-events>**
- G. CoC Reallocation and Transition Plan**
- H. Esnaps & Document Submissions**
- I. Ranking and Evaluation Committee Roles and Responsibilities**

Appendix A. 2021 Three County CoC Renewal Project Outcomes, Measures, and Scoring Tool

2022 Project Level Measures & Outcomes for Ranking & Evaluation

Total overall points: All PSH - 225, Adult RRH- 215, Adult Joint Component-230, Adult TH- 220, YHDP RRH - 220, YHDP & YYA Joint Component - 235, YHDP TH – 225

Outcome	Indicator	Measure	Total Points	Points Spread	Project Type					YHDP Project Type			
					TH	NAV RRH	Joint TH/RRH	PSH	RRH	NAV/RRH	Joint TH/RRH	PSH	RRH
System Performance Measures = 55 - TH, 65 - Joint Component, 50 - RRH & PSH													
Episode of homelessness is brief	Average length of participation in transitional project < under 180 days	APR Q22b length of participation - CoC Projects	15	180-300=10 pts, 300-600=5 pts, 600-73=2.5 pts, longer=0 pts	15	N/A	15	N/A	N/A	N/A	15	N/A	N/A
*persons are quickly re-housed	Length of time between project start and housing move-in < 30 days	CoC APR: Q22c Length of Time between project start date and housing move-in date. (searching period)	10	<30=10 pts, 30-60=5 pts, more than 60=0 pts	N/A	10	10	10	10	10	10	10	10
*Limited returns to Homelessness	Less than 15% exits to homelessness	CoC APR Q23c exit destination	15	15-25%=5 pts (small progs opt to advocate)	15	15	15	15	15	15	15	15	15
Obtain/maintain permanent housing	90% exiting to PH destinations > TH-90% exit to PH, PSH - remain or move to PH	CoC APR: Q23c Exit Destination	20	75-90%=10 pts, under 75%=0 pts	20	20	20	20	20	20	20	20	20
increase income since entrance to the project	8% of adults increased earned income of project stayers or leavers	CoC APR Q16-19 to find best measure for your outcomes OR Use SRT Increased Income (Q19 gives final change over time)	2.5	No spread	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
increased income resources	8 % of adults who have unearned income increases for project stayers or leavers	See APR Q17-19. Individuals with increased and earned income	2.5	No spread	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
Total System Performance Measures			65		55	50	65	50	50	50	65	50	50
					Project Type					YHDP Project Type			

Outcome	Indicator	Measure	Total Points	Points Spread	Project Type					YHDP Project Type			
					TH	NAV RRH	Joint TH/RRH	PSH	RRH	NAV/RRH	Joint TH/RRH	PSH	RRH
client identifier - housing units and leases	see site monitoring tool for description	site monitoring/client file review	5	No issues=5 pts, less than 5 issues ident=2.5 pts, more than 5 issues=0 pts	5	5	5	5	5	5	5	5	5
Corrective actions	see site monitoring tool for description	site monitoring/monitoring tool	5	None= 5 pts,	5	5	5	5	5	5	5	5	5
Total Project Effectiveness (Site Monitoring)			42.5		42.5	42.5	42.5	42.5	42.5	42.5	42.5	42.5	42.5
CoC Priority Populations = 5 points - all project types													
serving marginalized groups/high need groups(May include overrepresented populations in local data)	30% of participants meet a high need category (POC, GLBTQ, gender non-conforming, DV survivor)	CoC to determine how to track special populations - CE to track those housed annually/client files	5	30%=5 pts, 10-30%=2.5 pts, Under 10%= 0	5	5	5	5	5	5	5	5	5
Total CoC Priority Populations			5		5	5	5	5	5	5	5	5	5
HUD Priority Populations =15 points - all PSH, 5 - Adult Joint Component TH/RRH & TH & RRH, 10 - YHDP & YYA Joint Component TH/RRH & TH & RRH													
serve participants with limited income	50% of participants with zero income at entry	CoC COC APRQ16 income range at start	5	30%-50%=2.5 pts	5	5	5	5	5	5	5	5	5
serve persons with co-morbidities	50% of participants with more than one disability type	client file, CoC APRQ13 disabling conditions	5	30-50%=2.5 pts	N/A	N/A	N/A	5	N/A	N/A	N/A	5	N/A
Serve Chronically homeless - Non-YHDP only	80% of participants are chronic	client file	5	60-80%=2.5 pts	N/A	N/A	N/A	5	N/A	N/A	N/A	N/A	N/A
serving category 1, 2, and 4 - YYA serving only	All participants are in at least 1 of these categories	client file	5	0 or 5 pts only (no spread)	N/A	N/A	5	N/A	N/A	5	5	5	5
Total HUD Priority Populations			20		5	5	10	15	5	10	10	15	10

	PSH (220)	TH (215)	RRH (210)	Joint Component (225)
System Performance Measure % (20% target)	23%	26%	24%	29%
Objective Criteria % (33% target)	41%	40%	38%	42%



Appendix B. New Project Application Evaluation Criteria and Scoring

Threshold Criteria *(to be completed by CoC prior to moving to ranking & evaluation committee)*

Did project meet threshold criteria? (Yes/No) _____

Any necessary information regarding the Threshold requirements to be considered? Please explain.

<u>Section</u>	<u>Total Points</u>	<u>Score</u>
A - Budget	35 Points	___/35
B - Experience	20 Points	___/20
C - Design & Capacity of Housing and Services	45 Points	___/45
D - Timeliness	5 Points	___/5
E. Equity Factors – Agency Leadership, Governance, and Policies	40 Points	___/40
F. Equity Factors – Program Participant Outcomes	30 Points	___/30
G. DV Bonus	10 points	___/10
Total	185	___/185
H. local priority bonus	5 pts each.	___/15
Total	200	___/200

Financial – 35 Points

<u>Criteria</u>	<u>Response Found</u>	<u>Points</u>	<u>Points Spread</u>
Project is cost-effective, budgeted costs are reasonable, allocable, and allowable.	Project app. – Section A. esnaps Application- <i>Part 6</i>	15	Meets all criteria = 15 Points Budget needs minimal changes – 5-10 pts
Organization’s most recent audit: 1) found no exceptions to standard practices; 2) identified agency as ‘low-risk’, and 3) indicates no findings.	Review of Audit provided esnaps Application- <i>2B</i>	15	Meets 3 criteria = 15 Findings but addressed = 10 Findings not addressed = 0
Documented match amount meets HUD requirements	Review of Match documentation provided. esnaps Application- <i>Part 6</i>	5	No points spread

Experience – 20 Points

<u>Criteria</u>	<u>Application Section</u>	<u>Total Points</u>	<u>Scoring Spread</u>
Experience of the applicant in working with the proposed population and in providing housing similar to that proposed in the application	B.1-3 Esnaps Application – <i>Section 2B</i>	10	5 years experience with population/housing type, and 5 years experience in providing housing = 10 Points 5 years experience with population OR 5 years experience providing housing = 5 points Experience but under 5 years = 2.5 points

			No experience = 0 points
Experience with using a Housing First approach. Include 1) eligibility criteria; 2) process for accepting new clients' 3) process and criteria for exiting clients. Must demonstrate there are no preconditions to entry, allowing entry regardless of past substance abuse, income, criminal records (with exceptions of restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, self-disclosed or perceived sexual orientation, gender identity or gender expression. Must demonstrate the project has a process to address situations that may jeopardize housing or project assistance to ensure that project participation is terminated in only the most severe cases.	B.4 Esnaps Application – <i>Section 5</i>	10	Experience using Housing First approach = 10 points Experience using Low Threshold approach = 5 points No experience using Housing First or Low Threshold = 0 points

Design of Housing and Supportive Services – 50 Points

<u>Criteria</u>		<u>Points</u>	
Demonstrates understanding of the needs of the clients to be served	C1.a.	3	No points spread
Demonstrates that type, scale and location of the housing fits the needs of the clients to be served	C1.b.	3	No points spread
Demonstrates that the type and scale of all the supportive services, regardless of funding source, meets the needs of clients to be served	C1.c.	3	No points spread
Demonstrates how clients will be assisted in obtaining mainstream benefits	C1.d. C12-14.	3	No points spread
Establishes performance measures for housing and income that are objective, measurable, trackable and meet or exceed established HUD or CoC benchmarks.	C1.e	3	No points spread
Demonstrates a need for this type of project for populations served (HUD priority).	C9.	5	No points spread
Has general plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs.	C10.	5	No points spread
Describes how clients will be assisted to increase	C11.	5	No points spread

employment and/or income and to maximize their ability to live independently			
Project leverages housing resources with housing subsidies or units not funded through the CoC or ESG program (HUD Priority/CoC points).	C15.	5	No points spread
Project leverages health resources, including a partnership commitment with a healthcare organization (HUD Priority00/CoC Points for 25%)	C16.	10	10 pts – leverages resources & meets 25% project budget 5 pts - leverages resources, less than 25%.

Timeliness – 5 Points

<u>Criteria</u>	<u>Response Found</u>	<u>Points</u>	<u>Points Spread</u>
Describe plan for rapid implementation of the program, documenting how the project will be ready to begin housing the first program participant.	D1. Esnaps Application – <i>Section 3B Project Milestones (5)</i>	5	No points spread

Equity Factors – Agency Leadership, Governance, and Policies – 40 Points

<u>Criteria</u>	<u>Response Found</u>	<u>Points</u>	<u>Points Spread</u>
Inclusion of under-represented individuals in managerial and leadership positions.	E1.	10	Already in place, satisfactory plan = 10 points Plan to implement/plan needs work = 5 points No Plan/ unsatisfactory answer= 0 points

Board of Directors includes representation from more than one person with lived experience	E.2.	10	<p>Already in place, satisfactory plan = 10 points</p> <p>Plan to implement/plan needs work = 5 points</p> <p>No Plan/ unsatisfactory answer= 0 points</p>
Has relational process for receiving and incorporating feedback from persons with lived experience	E.2.	10	<p>Already in place, satisfactory plan = 10 points</p> <p>Plan to implement/plan needs work = 5 points</p> <p>No Plan/ unsatisfactory answer= 0 points</p>
<p>1. Agency Has reviewed internal policies and procedures with an equity lens demonstrates demonstrate racial equity measures in service delivery; and policies have been introduced in order to ensure safety, privacy, respect, and access regardless of gender identity or sexual orientation for LGBTQ+ persons (HUD & Local Priority)</p>	E.3	10	<p>Already in place, satisfactory plan = 10 points</p> <p>Plan to implement/plan needs work = 5 points</p> <p>No Plan/ unsatisfactory answer= 0 points</p>

Equity Factors – Program Participant Outcomes – 30 Points

<u>Criteria</u>	<u>Response Found</u>	<u>Points</u>	<u>Points Spread</u>
Plan for reviewing program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/or age.	F1.	10	Already in place, satisfactory plan = 10 points

			Plan to implement/plan needs work = 5 points No Plan/ unsatisfactory answer= 0 points
Plan to review whether programmatic changes are needed to make program participant outcomes more equitable and developed a plan to make those changes.	F2. & F1a	10	Already in place, satisfactory plan = 10 points Plan to implement/plan needs work = 5 points No Plan/ unsatisfactory answer= 0 points
Project utilization of Coordinated Entry System while maintaining equity in housing placement and participants served.	F3.	10	Already in place, satisfactory plan = 10 points Plan to implement/plan needs work = 5 points No Plan/ unsatisfactory answer= 0 points

For DV Bonus Projects Only – 10 pts

<u>Criteria</u>	<u>Response Found</u>	<u>Points</u>	<u>Points Spread</u>
Organization or expected subrecipient is a victim service provider defined in 24 CFR 578.3 and use a comparable HMIS database that collects the same data elements	G1.	Not Scored	
Includes plan for strategies to address and improve safety measures/victim centered practices	G2	5	Already in place, satisfactory plan = 5 points Plan to implement/plan needs work = 2.5 points

			No Plan/ unsatisfactory answer= 0 points
Has relational process for receiving and incorporating feedback from persons with lived experience in policy and program development & throughout program development	G3	5	<p>Already in place, satisfactory plan = 10 points</p> <p>Plan to implement/plan needs work =2.5 points</p> <p>No Plan/ unsatisfactory answer= 0 points</p>

Local Priority Bonus Pts.:

<u>Criteria</u>	<u>Response Found</u>	<u>Points</u>	<u>Points Spread</u>
Project demonstrates a plan to move participants into housing within 30 days from program entrance. (<i>Examples: Project has acquired housing units/demonstrated agreement with area landlord/Housing authority/will utilize a current inventory of housing resources.</i>)	Within application	5	No spread
Project demonstrates it will fill a gap/increase support for a local housing project (<i>example: applying to provide services funding or operations on a currently developing project/expansion for a current tier 1 CoC project.</i>)	Within application	5	No spread
Project will create additional Rapid Rehousing (RRH) within the Three County area.		5	No spread

Total Points: _____/185 or 200 (10 pts additional for DV project that meets criteria.)

Local Bonus pts – up to additional 5 additional pts for each listed.

Signature of Reviewer

Date

Print Name of Reviewer

**Appendix C: FY2021 Three County CoC Renewal Project Listing (Projects for Renewal or Reallocation;
Excluding YHDP)**

Applicant	Project Name	Grant Number	Expiration Year	Project Component	Leasing	Rental Assistance	Supportive Services	Operating Costs	HMIS	Admin	Total ARA
CAPV	3 County CoC HMIS Project	MA0064L1T072111	2023	HMIS	\$0	\$0	\$0	\$0	\$76,635	\$3,444	\$80,079
CAPV	3 County CoC CE Project	MA0540L1T072105	2023	SSO	\$0	\$0	\$205,743	\$0	\$11,500	\$19,150	\$236,393
CAPV	Paradise Pond Apartments	MA0072L1T072114	2023	PH	\$0	\$0	\$0	\$28,987	\$0	\$1,461	\$30,448
CAPV	Adult Independent Living Program	MA0142L1T072114	2023	TH	\$0	\$0	\$5,000	\$35,572	\$0	\$2,840	\$43,412
CAPV	Louison House TH	MA0144L1T072114	2023	TH	\$0	\$0	\$43,000	\$86,992	\$0	\$9,099	\$139,091
CAPV	SN Shelter Plus Care North	MA0353L1T072112	2023	PH	\$0	\$82,068	\$0	\$0	\$0	\$7,634	\$89,702
CAPV	A Positive Place	MA0401L1T072110	2023	PH	\$0	\$99,756	\$31,846	\$0	\$0	\$7,234	\$138,836
CAPV	Village Center SHP	MA0468L1T072108	2023	PH	\$0	\$0	\$19,720	\$45,436	\$2,000	\$2,978	\$70,134
CAPV	LH Northern Berkshire PH	MA0604L1T072104	2023	PH	\$124,182	\$0	\$15,750	\$0	\$0	\$11,149	\$177,843
CAPV	CHD PSH	MA0633L1T072103	2023	PH	\$381,368	\$0	\$232,388	\$77,575	\$7,558	\$42,313	\$741,202
CAPV	Dial Self TH/PH RRH	MA0634L1T072103	2023	Joint TH & PH-RRH	\$0	\$0	\$88,905	\$249	\$2,674	\$6,427	\$98,255
CAPV	Independent Housing Solutions	MA0731L1T072100	2023	PH	\$96,736	\$0	\$25,545	\$5,545	\$4,750	\$12,857	\$145,433
TOTAL											\$1,990,828

Appendix D: FY2022 Three County YHDP Renewal Project Listing (Projects for Renewal or Replacement)

Applicant	YHDP Project Name	Grant Number	Expiration Year	Project Component	Leasing	Rental Assistance	Supportive Services	Operating Costs	HMIS	Admin	Total ARA
CAPV	3 County CoC YHDP HMIS	MA0689Y1T072101	2023	HMIS	\$0	\$0	\$0	\$0	\$40,000	\$4,000	\$44,000
CAPV	3 County CoC YHDP SSO-CE	MA0688Y1T072101	2023	SSO	\$0	\$0	\$54,545	\$0	\$0	\$5,455	\$60,000
CAPV	Mental Health Association YHDP RRH Navigators	MA0736Y1T072100	2023	PH	\$0	\$65,448	\$118,800	\$0	\$4,000	\$18,128	\$206,376
CAPV	Mental Health Association YHDP PSH Hope for Home	MA0735Y1T072100	2023	PH	\$0	\$98,172	\$57,992	\$0	\$7,000	\$15,960	\$179,124
CAPV	Gandara SHINE YHDP TH/RRH	MA0733Y1T072100	2023	Joint TH & PH-RRH	\$43,800	\$103,248	\$142,249	\$92,930	\$7,320	\$27,238	\$416,785
CAPV	Dialself YHDP RRH Franklin	MA0734Y1T071800	2023	PH	\$0	\$43,632	\$11,300	\$0	\$10,213	\$6,515	\$71,660
TOTAL											\$977,945

HUD Categories of Homelessness – Definitions

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing



Appendix F. New Project Application

Three County Continuum of Care New Project Application Packet 2022

Instructions:

Complete the following form for the Application process and return with the following to the Three County CoC for a complete application (please note that the CoC may request additional documentation relevant to answers within this application):

1. A copy of applicant's two most recent annual audited financial statements.
2. A Match letter on agency **letterhead** and signed by an **authorized signer**.

Please return this form and the requested additional documents to Keleigh Pereira via email at kpereira@communityaction.us by 8:00pm on August 31, 2022.

- The Continuum of Care reserves the right not to review late or incomplete applications or those in which applicants don't meet threshold eligibility requirements – though will consider applications that have limited additional needs for completion. All fully complete applications which are eligible will be forwarded to a Project Selection team for review.
- Applicants should carefully read the RFP requirements, the CoC FY22 NOFA, and review the scoring sheet before drafting answers to ensure they are compliant and highlighting key areas.
- Please email questions regarding the RFP and application to Keleigh Pereira: kpereira@communityaction.us
- There are no character limits to the questions in the application.

Agency Name:	Program Name (If applicable):
New Project Type:	
Primary Contact Information for Agency Component	
Primary Agency Contact Name:	Title:

Email Address:	Phone:
AGENCY INFORMATION	
1. What is your total FY2022 agency budget?	\$_____.
2. What percentage of your overall budget is Federal Funding?	_____%

HUD THRESHOLD

1. Does the agency provide for the participation of MORE than one homeless or formerly homeless individual on the board of directors or other equivalent policymaking entity?	<input type="checkbox"/> Yes - Board <input type="checkbox"/> Yes - Other <input type="checkbox"/> No
1a. IF "yes, other," please describe the entity, its nature, and how they participate? 1b. IF NO- explain how you plan to engage in this expectation?	
2. Does your agency or program have a relational process for receiving and incorporating feedback from persons with lived experience?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2a. IF YES- Please explain the process:	

3. Does the agency have an independent financial audit completed within 6 months of the end of the fiscal year?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Does your agency have a SAM.gov registration? <u>Please list it:</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. Does your agency have an active DUNS number? <u>Please list it:</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. Does the agency have experience with receiving federal funding to operate similar programming?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6a. IF YES- please describe the agency's experience:	
7. Does the agency have any delinquent federal debt?	<input type="checkbox"/> Yes <input type="checkbox"/> No
7a. IF YES- please explain any delinquent federal debt:	
8. Does the agency provide clients with specialized resources to meet the unique needs of clients with physical, cognitive, or behavioral disabilities and provides reasonable accommodations for clients with linguistic and/or cultural challenges? (I.e. ramps, Spanish language forms, etc.)	<input type="checkbox"/> Yes <input type="checkbox"/> No
8a. IF YES- please explain any specialized resources and reasonable accommodations available:	
9. Will this project serve people experiencing homelessness in Berkshire, Hampshire, or Franklin Counties?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9a. Which HUD categories of homelessness will this project serve? Please refer to the list found in the document here- CoC and ESG Homeless Eligibility - Four Categories in the Homeless Definition - HUD Exchange	<input type="checkbox"/> Literally Homeless (Cat. 1) <input type="checkbox"/> Imminent Risk of Homelessness (Cat. 2)

	<input type="checkbox"/> Homeless Under Other Federal Statutes (Cat. 3, requires requesting permission from HUD) <input type="checkbox"/> Fleeing/Attempting to Flee Domestic Violence (Cat. 4)
10. Does the agency provide due process to clients who are asked to leave any program?	<input type="checkbox"/> Yes <input type="checkbox"/> No
11. Does the agency comply with Public Law 90-284 referring to the Fair Housing Act (42 USC 3601-20), as amended	<input type="checkbox"/> Yes <input type="checkbox"/> No
12. Does your agency have any unresolved Fair Housing or Civil Rights matters?	<input type="checkbox"/> Yes <input type="checkbox"/> No
12a. IF YES- please explain any unresolved Fair Housing or Civil Rights matters:	
13. Has your agency updated its Code of Conduct so that it is compliant with 2 CFR Part 200 and submitted to HUD	<input type="checkbox"/> Yes <input type="checkbox"/> No
14. Is your agency under debarment or suspension from doing business with the Federal Government and/or on the Federal do not pay list?	<input type="checkbox"/> Yes <input type="checkbox"/> No
15. Is your organization in compliance with the prohibition against lobbying Section 1352, Title 31, U.S. Code?	<input type="checkbox"/> Yes <input type="checkbox"/> No
16. Does your organization comply with HUD directives regarding Equal access to housing Docket Number: HUD-2015-0104; Docket Name: FR-5863-P-01	<input type="checkbox"/> Yes <input type="checkbox"/> No
17. Does your agency have any other non-HUD funded homeless projects?	<input type="checkbox"/> Yes <input type="checkbox"/> No
18. Does the agency agree to collect/enter the data from funded homeless projects into the local HMIS and provide required information for reporting to HUD? (Or for VSPs, a comparable database)	<input type="checkbox"/> Yes <input type="checkbox"/> No



19. Does the agency agree to prioritize participants for this project through the Coordinated Entry Process?

Yes

No

Additional Threshold Questions For Current or Previous CoC or other Federally or State Funded Projects Applying for New Funding

(The following questions will not be included in the decision regarding meeting Threshold requirements, but may be followed up on with interest for further documentation, if your agency is chosen by the project selection team)

1. **Have you returned any funds to HUD (or other federal government agency) or the state on any existing grants in the last two years?**
 - a. Yes No
 - b. **IF YES-** *how much has been returned?*
 - c. **AND** *what is the reason that the funds have been returned?*
 - d. **AND** *what actions are you taking to ensure full spending?*

2. **Do you have any outstanding obligation to HUD, other federal or state agencies that is in arrears or for which a payment schedule has not been agreed upon?**
 - a. Yes No
 - b. **IF YES-** *how much has been returned?*
 - c. **AND** *what is the reason that the funds have been returned?*
 - d. **AND** *what actions are you taking to ensure full spending?*

3. **(If applicable) Have you consistently drawn down funds at least quarterly on all HUD CoC grants in the last two years?**
 - a. Yes No
 - b. **IF NO-** *what is the reason that the funds have not been drawn down?*

c. **AND** what actions are you taking to ensure timely draw down?

4. (If applicable) Have you submitted on time Annual Progress Reports (APRs) for all HUD CoC grants in the last two years?

a. Yes No

b. **IF NO-** what is the reason that APRs were late?

c. **AND** what actions are you taking to ensure timely submission?

5. **Attachments:**

- a. **Submit 1 copy of the applicant's two most recent annual financial statements prepared by an Independent Certified Public Accountant, and reviewed or audited in accordance with Generally Accepted Accounting Principles (GAAP) (USA).** Each copy shall include all applicable financial statements, auditor's reports, management letters, and corresponding reissued components.
- b. **Submit a match letter with the following: Amount of cash or in-kind to be provided to the recipient for the project and the source; specific date the cash will be made available; The actual grant and fiscal year to which the cash match will be contributed; Time period during which funding will be available; and Allowable activities to be funded by the cash match.** - *Please note: In general, program participant mainstream benefits are not considered match in the CoC Program because the benefits are not committed to the recipient/subrecipient for the activities funded through the project. Instead, benefits are provided to the program participant and are based on program participant eligibility for that program.*

After reading the following link, are there any additional disclosures your agency should provide in response? Please include those in the space below.

<https://www.hud.gov/sites/dfiles/SPM/documents/ELIG-REQS-GRANTS-2018v2.pdf>

Signature of Agency Representative

Date

<u>A. New Project Application - Funding Request</u>	
1. Will it be feasible for the project to enter grant agreement between July 1, 2023 and September 15, 2023?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. What type of CoC funding is this project applying for in this CoC Program Competition?	<input type="checkbox"/> CoC Bonus <input type="checkbox"/> DV Bonus <input type="checkbox"/> Reallocation <input type="checkbox"/> Reallocation & CoC Bonus
3. Does this project propose to allocate funds according to an indirect cost rate?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Select the costs for which funding is requested, see the chart of “Possible Component Types and Eligible Activities” below for eligible activities by component type:	<input type="checkbox"/> Leased Units <input type="checkbox"/> Leased Structures <input type="checkbox"/> Rental Assistance <input type="checkbox"/> Supportive Services <input type="checkbox"/> Operating <input type="checkbox"/> HMIS <input type="checkbox"/> Acquisition/Rehabilitation/New Construction
5. Is your organization a victim service provider defined in 24 CFR 578.3?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. Will the funds requested in this new project application replace state or local government funds (24 CFR 578.87(a))?	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. Will this project include replacement reserves in the Operating budget?	<input type="checkbox"/> Yes <input type="checkbox"/> No
8. Are you requesting CoC Program funds for construction costs in this application?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9. Is this a “Project Expansion” of an eligible renewal project?	<input type="checkbox"/> Yes <input type="checkbox"/> No

10. Is this project 100% Dedicated or DedicatedPLUS?	<input type="checkbox"/> 100% Dedicated <input type="checkbox"/> DedicatedPLUS
---	---

Possible Component Types and Eligible Activities

PH (PSH)	PH (RRH)	Joint TH/PH-RRH
Acquisition/ Rehabilitation/New Constructions		
Leased Units		Leased Units
Leased Structures		Leased Structures
Rental Assistance	Rental Assistance	Rental Assistance
Supportive Services Operations	Supportive Services	Supportive Services
HMIS	HMIS	HMIS

Acquisition/ Rehabilitation/New Construction Budget Detail

For each structure, enter the following information:

Name of Structure	Street Address 1	Street Address 2	City	State	Zip Code	Acquisition Assistance Requested	Rehabilitation Assistance Requested	New Construction Assistance Requested	Total Assistance Requested

Leased Units Budget Detail

Please enter the number of units of each bedroom size for which the project is requesting leased units assistance and the rent to be paid by the CoC Program grant each month per unit. This "HUD Paid Rent" column cannot exceed the FMR amount (FMR by location can be identified at this link: [FY 2022 Final Fair Market Rents Documentation System — Select Geography \(huduser.gov\)](#)):

Size of Units	Number of units	HUD Paid Rent	Total Request = number of units * HUD Paid Rent * 12



SRO			
0 Bedroom			
1 Bedroom			
2 Bedroom			
3 Bedroom			
4 Bedroom			
5 Bedroom			
6 Bedroom			
7 Bedroom			
8 Bedroom			
9 Bedroom			

Rental Assistance Budget Detail

Type of Rental Assistance:

- Project-Based
- Tenant-Based
- Sponsor-Based

Please enter the number of units of each bedroom size for which the project is requesting rental assistance and the rent to be paid by the CoC Program grant each month per unit. This "HUD Paid Rent" column cannot exceed the FMR amount (FMR by location can be identified at this link: [FY 2022 Final Fair Market Rents Documentation System – Select Geography \(huduser.gov\)](#)):

Size of Units	Number of units	FY2021 FMR	Total Request = number of units * FMR * 12
----------------------	------------------------	-------------------	---

SRO			
0 Bedroom			
1 Bedroom			
2 Bedroom			
3 Bedroom			
4 Bedroom			
5 Bedroom			

Supportive Services Budget Detail

Please complete the following table describing the quantity and description of any supportive services for which assistance is requested. For a description of the categories listed in this table, please review the CoC Program interim rule at [2016-22589.pdf \(govinfo.gov\)](https://www.govinfo.gov/procurement/2016-22589.pdf):

Eligible Costs	Quantity AND Description	Annual Assistance Requested
Assessment of Service Needs		
Assistance with Moving Costs		
Child Care		
Education Services		
Employment Assistance		
Food		
Housing/Counseling Services		
Legal Services		
Life Skills		
Mental Health Services		

Outreach Services		
Substance Abuse Treatment Services		
Transportation		
Utility Deposits		
Operating Costs		
Total Annual Assistance Requested		

Operating Budget Detail

Please complete the following table describing the quantity and description of any operating items for which assistance is requested. For a description of the categories listed in this table, please review the CoC Program interim rule at [2016-22589.pdf \(govinfo.gov\)](https://www.govinfo.gov/pds2/2016-22589.pdf):

Eligible Costs	Quantity AND Description	Annual Assistance Requested
Maintenance/Repair		
Property Taxes and Insurance		
Replacement Reserve		
Building Security		
Electricity, Gas, and Water		
Furniture		
Equipment (lease, buy)		
Total Annual Assistance Requested		

HMIS Budget Detail

Please complete the following table describing the quantity and description of any HMIS items for which assistance is requested. For a description of the categories listed in this table, please review the CoC Program interim rule at [2016-22589.pdf \(govinfo.gov\)](https://www.govinfo.gov/pds2/2016-22589.pdf):

Eligible Costs	Quantity AND Description	Annual Assistance Requested
Equipment		

Software		
Services		
Personnel		
Space & Operations		
Total Annual Assistance Requested		

Sources of Match

Will this project generate program income described in 24 CFR 578.97 to use as Match for this project?

Yes No

IF YES- Briefly describe the source of the program income AND estimate the amount of program income that will be used as Match for this project:

Match Detail (25% of overall budget, less any leasing funds)- For each source, please enter the following information (must be for eligible activities):

Name of Source (Be as specific as possible)	Cash or In-Kind?	Private or Government Contribution?	Amount of Written Commitment (\$)

Summary Budget

Please complete the following table describing the funding requested for each year of the grant term:

Eligible Costs	Total Assistance Requested for Grant Term
Acquisition	
Rehabilitation	
New Construction	
Leased Units	
Leased Structures	

Rental Assistance	
Supportive Services	
Operating	
HMIS	
Sub-total Costs Requested	
Admin	
Total Assistance Plus Admin Requested	
Cash Match	
In-Kind Match	
Total Match	
Total Budget	

See below for additional rating criteria that will be included for New Projects in terms of meeting threshold expectations. Keep in mind as you complete the following questions.

HUD's New Project Rating

Permanent Supportive Housing or Rapid Rehousing

<u>Criteria</u>	<u>Response Found</u>	<u>HUD's Point Structure*</u>
Demonstrates type of housing proposed, including the number of configuration and units, will fit the needs of program participants (e.g., two or more bedrooms for families).	<i>Three County CoC New Project Application – C1a, C1b</i>	1
Demonstrates that the type of supportive services offered to program participants will ensure successful retention in or help in obtaining PH, including all supportive services regardless of funding source.	<i>Three County CoC New Project Application – C1c</i>	1
Plan for ensuring program participants will be individually assessed to obtain the benefits of mainstream health, social, and employment programs for which they are eligible to apply meet the needs of program participants (e.g. Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education, etc.)	<i>Three County CoC New Project Application – C1d, C12, C13, C14</i>	1
Demonstrates program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g. provides the participants with some type of transportation to access needed services, safety planning, case management, and additional assistance to ensure retention of PH).	<i>Three County CoC New Project Application – C10</i>	1

*As identified in the NOFO

Joint Transitional Housing/Rapid Re-Housing

<u>Criteria (in addition to all criteria listed in the PSH/RRH chart above)</u>	<u>Response Found</u>	<u>HUD's Point Structure*</u>
Demonstrates that the proposed project will provide enough rapid rehousing assistance to ensure that at any given time a program participant may move from transitional housing to permanent housing. This may be demonstrated by identifying	<i>Three County CoC New Project Application – C19</i>	1

<p>a budget that has twice as many resources for the rapid rehousing portion of the project than the TH portion, by having twice as many PHRRH units at a point in time as TH units, or by demonstrating that the budget and units are appropriate for the population being served by the project.</p>		
<p>The project adheres to a housing first model as defined in Section III.B.2.o of this NOFO.</p>	<p><i>Three County CoC New Project Application – C5, C6</i></p>	<p>1</p>

*As identified in the NOFO

B. Experience

- 1. Describe your organization's experience in effectively utilizing federal funds and performing the activities proposed in the application. Please include details on your organization's experience in working with the proposed population and in providing housing and services similar to those proposed in the application. For example, DV Bonus project applicants should demonstrate successful performance in serving survivors of domestic violence, dating violence, sexual assault, or stalking, and ability to house survivors and meet safety outcomes.**

Response:

- 2. Describe your organization's experience in leveraging Federal, State, local and private sector funds.**

Response:

- 3. Describe your organization's financial management structure.**

Response:

4. **Describe experience with using a Housing First approach.** Include: 1) Eligibility criteria; 2) Process for accepting new clients; and 3) Process and criteria for exiting clients. *Must demonstrate there are no preconditions to entry, allowing entry regardless of past substance abuse, income, criminal records (with exceptions of restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, self-disclosed or perceived sexual orientation, gender identity or gender expression. Must demonstrate the project has a process to address situations that may jeopardize housing or project assistance to ensure that project participation is terminated in only the most severe cases.*

Response:

C. Design and Capacity of Housing and Supportive Services

1. **Provide a description that addresses the entire scope of the proposed project. Please be sure to describe the extent to which this project:**
 - a. Demonstrates understanding of the needs of the clients to be served;
 - b. Demonstrates that type, scale and location of the housing fits the needs of the clients to be served.
 - c. Demonstrates that the type and scale of all the supportive services, regardless of funding source, meets the needs of clients to be served;
 - d. Demonstrates how clients will be assisted in obtaining mainstream benefits;
 - e. Establishes performance measures for housing and income that are objective, measurable, trackable and meet or exceed established HUD or CoC benchmarks;
 - f. Demonstrates coordination in creation of housing or services;

Response:

2. Will the project move participants quickly into permanent housing (within 30 days)? (CoC Local Priority)

Yes No

2a. IF YES- Explain how participants will be moved into permanent housing quickly. Some examples of strategies include agreements with landlords or housing authorities, housing units included in project design, and projects which use a current inventory for housing.

Response:

3. If requesting capital costs (i.e., acquisition, rehabilitation, or new construction), describe the proposed development activities with responsibilities of the agency to develop and maintain the property using CoC Program funds.

Response:

4. Check the appropriate box(s) if this project will have a specific subpopulation focus. (Select ALL that apply)

N/A – Project Serves All Subpopulations

Veterans

Youth (under 25)

Families

Domestic Violence

Substance Abuse

Mental Illness

HIV/AIDS

Chronic Homelessness

Other

If Other, please explain:

5. Will the project enroll program participants who have the following barriers? (Select ALL that apply)

Having too little or little income

Active or history of substance use

Having a criminal record with exceptions for state-mandated restrictions

History of victimization (e.g. domestic violence, sexual assault, childhood abuse)

None of the above

6. Will the project prevent program participant termination for the following reasons? (Select ALL that apply)

Failure to participate in supportive services

Failure to make progress on a service plan

Loss of income or failure to improve income

Any other activity not covered in a lease agreement typically found for unassisted persons in the project's geographic area

None of the above

7. Will program participants be required to live in a specific structure, unit, or locality at any time while in the program?

Yes No

7a. IF YES – Explain how and why the project will implement this requirement.

Response:

8. Will more than 16 persons live in a single structure?

Yes No

8a. IF YES- Describe the local market conditions that necessitate a project of this size:

8b. AND Describe how the project will be integrated into the neighborhood:

9. Describe the extent of need for this type of project for the proposed populations it will serve and demonstrate how this project will fill that gap.

Response:

10. Describe how program participants will be assisted to rapidly obtain and remain in permanent housing that is safe, affordable, accessible, and acceptable to their needs.

Response:

11. Describe how clients will be assisted to increase employment and/or income and to maximize their ability to live independently.

Response:

12. Will the project include:

a. Transportation assistance to clients to attend mainstream benefit appointments, employment training, or jobs?

Yes No

b. Annual follow-ups with program participants to ensure mainstream benefits are received and renewed?

Yes No

13. Will program participants have access to SSI/SSDI technical assistance provided by this project the applicant, a subrecipient, or partner agency?

Yes No

13a. IF YES - Has the staff person technical assistance completed SOAR training in the past 24 months?

Yes No

14. Describe the specific plan to coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible.

Response:

15. Please describe how this project leverages housing resources with housing subsidies or units not funded through the CoC or ESG program. (HUD Priority)

Response:

16. Please describe how this project leverages health resources, including a partnership commitment with a healthcare organization. (HUD Priority)

Response:

17. Indicate the maximum number of units and beds available for program participants.

Total Units:

Total Beds:

18. How many of the beds entered above are dedicated to persons experiencing chronic homelessness?

Total CH Dedicated Beds:

19. FOR JOINT TH-RRH APPLICATIONS ONLY- (HUD Priority) *Joint TH-RRH projects must be able to accommodate client choice of entering TH or RRH, and for anyone in TH to move to RRH if they would like. This means that Joint Component TH-RRH Projects must have twice the RRH capacity as TH. Please indicate the inventory available for each portion:*

Transitional Housing Units:

Rapid Re-Housing Beds:

Transitional Housing Beds:

D. Timeliness

- 1. Following the plan for Project Milestones identified in the New Project application on *esnaps*, please describe plan for rapid implementation of the program, documenting how the project will be ready to begin housing the first program participant.**

Response:

E. Equity Factors – Agency Leadership, Governance, and Policies

- 1. Please describe how this project will include under-represented individuals in managerial and leadership positions.**

Response:

- 2. Please describe the scope of representation of people with lived in experience in this project, including Board of Director's Representation and the process for receiving and incorporating feedback from persons with lived experience.**

Response:

- 3. Describe agency efforts that demonstrate agency policies and procedures have been evaluated with an equity lens/have developed anti-discrimination practices that demonstrate racial equity measures in service delivery; and which have been introduced in order to ensure safety, privacy, respect, and access regardless of gender identity or sexual orientation for LGBTQ+ persons (HUD & Local Priority):**

Response:

F. Equity Factors – Program Participant Outcomes

- 1. Please describe the plan for reviewing program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/or age. If already implementing a plan, describe findings from outcomes review.**

Response:

1a. Does the agency agree to work with the HMIS Lead to review HMIS data with disaggregation by race, ethnicity, gender identity, and/or age?

Yes No

- 2. Please describe a plan to review whether programmatic changes are needed to make program participant outcomes more equitable. If already implementing plan, describe findings from review.**

Response:

- 3. Please share how this project will utilize the Coordinated Entry system for all program participant referrals and maintain a commitment to equity in housing placement and participants served.**

Response:

G. *For DV Bonus Projects Only

1. *(This question is informational only – provider/applicant does not HAVE to be a VSP) Is your organization or expected subrecipient a victim service provider defined in 24 CFR 578.3 and use a comparable HMIS database that collects the same data elements? If yes, what is the name of the database? If no, what is the plan for acquiring a database?*

Response:

2. **Demonstrate how the project will include victim-centered practices.** Points awarded will be 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 and strategies identified to address and improve safety measures for this population. Full points will be awarded to project applicants that can demonstrate they are already adopting victim-centered practices.

Response:

3. **Demonstrate the project’s plan to include survivors with lived expertise in policy and program development.** Points awarded will be based on the project’s ability to demonstrate its plan to involve survivors in policy and program development throughout the project’s operation.

Response:

Appendix G. Three County CoC (MA 507) REALLOCATION/TRANSITION PLAN

Reallocation. Reallocation is a process used by CoCs to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoCs ARD. New projects created through reallocation must meet the requirements set forth in Section 11.B.1 & VII.B.2.b of the FY22 NOFO and the project eligibility and quality thresholds established by HUD in Sections V.C.4.b and c of the NOFO.

Transition. A grant to fund a new project from one or more eligible renewal projects being eliminated through reallocation from one program component to another eligible new component over a 1 year period. See page 26 of the FY22 NOFO for additional details/requirements.

To create a **Transition Grant** (see section III.B.2.cc of the FY22 NOFO, the CoC would wholly eliminate one or more projects and use those funds to create a single, new transition grant. *For FY22, YHDP Projects cannot be reallocated.*

Background

To ensure the strategic allocation of resources and continued progress toward the goal of ending homelessness, in 24 CFR § 578.105(b)(2) and § 578.107(b)(1)(iv), the United States Department of Housing and Urban Development (HUD) authorizes Continuums of Care (CoCs) to reallocate funds from underperforming, underutilized, redundant, non-cost effective, or obsolete programs to create new projects which:

- meet the eligibility and quality thresholds established by HUD under 24 CFR § 578.39 through § 578.63
- ☐ meet the requirements as set forth in the annual Notice of Funding Opportunity (NOFO)
- ☐ serve new participants, focusing on the most vulnerable chronically homeless and other populations identified by the local CoC and by HUD.
- ☐ increase local housing stock, and
- ☐ ensure that all resources are being utilized toward achieving the goal of ending homelessness

Under 24 CFR § 578.7(a)(6), CoCs are mandated to consult with grantees and sub-grantees to establish performance targets appropriate for their specific populations and program types; monitor grantee and sub-grantee performance; evaluate outcomes; and take corrective action where performance does not meet expectation.

Appendix G. Three County CoC (MA 507) REALLOCATION/TRANSITION PLAN

POLICY STATEMENT

Reallocation is intended to optimize CoC system performance to achieve the following objectives:

- (1) Meet housing needs for persons as identified in the Coordinated Entry System (CES)
- (2) Provide high-quality, equitable, and effective programming
- (3) Align funded programming with HEARTH Act priorities as defined in § 427 and HUD priorities as defined in 24 § CFR 576.2

Appendix G. Three County CoC (MA 507) REALLOCATION/TRANSITION PLAN

TYPES OF REALLOCATION

Reallocation may be self-initiated by a funded agency (voluntary) or initiated by the 3-County CoC Board (Continuum-initiated). Decisions related to Continuum-initiated reallocations will be made in accordance with 24 CFR 578.107(a) and (c), which hold each CoC responsible for the performance, fiduciary accountability, and strategic value of each CoC program project included in its annual Collaborative Application.

Project funding may be reallocated in the following ways:

- Funding (in whole or part) from one project into a new project by the same provider
- Funding (in whole or part) from one project into a new project by a different provider
- Funding (in whole or part) from one project into more than one new project
- Funding (in whole or part) from multiple projects into one new project
- Funding (in whole or part) from multiple projects into more than one new project

Self-Initiated (Voluntary) Reallocation - A grantee may voluntarily request reallocation of project funding if:

- (1) The grantee wishes to move funds to a new eligible project or projects,
- (2) The grantee is no longer interested in continuing a project or part of a project,
or
- (3) The grantee no longer needs CoC funding as funding becomes available through other sources.

Grantees may request the reallocation of funds by submitting written notification to the MA-507 Collaborative Applicant and HUD Field Office CoC Representative. A grantee wishing to return funds through the voluntary process must do so in accordance with federal and state requirements and develop a transition plan with the Collaborative Applicant and HUD Field Office to minimize disruption to clients whose housing is supported by CoC grant funds.

Appendix G. Three County CoC (MA 507) REALLOCATION/TRANSITION PLAN

Continuum-Initiated (Involuntary) Reallocation.

- Changes in local priorities based on HUD's annual NOFO and other identified gaps in services and housing availability;
- Inability to meet threshold requirements for annual expectations;
- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
- Audit findings where response is overdue or unsatisfactory;
- History of inadequate financial management or accounting, including untimely billing responses;
- History of Underspent Funds;
- Evidence of untimely expenditures on prior award;
- History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly;
- History of other major capacity issues that have significantly affected the operation of the project and its performance;
- History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes;
- Serious or significant concerns in serving participants in a way that does not meet the CoC's standards of expectation.
- Serious or significant privacy or security data breaches.

Appendix H. Instructions For ESNAPS & Additional Document Submissions

Accessing *esnaps*. <https://esnaps.hud.gov/grantium/frontOffice.jsf>

- The applicant must designate a staff person to access *esnaps*.
- The designated individual must visit the *esnaps* site, click the “Create Profile” button, and provide the required information. Following this step, the individual must send an email to mlafleur@communityaction.us, and request that the individual be linked to the Three County CoC’s account. Michele Lafleur will then confirm when they have been added to the account.
- For new projects: Keleigh Pereira will communicate information regarding the new project application for the proposed project, and the opportunity to access it in *esnaps*.

Accessing the application in *esnaps*.

- The applicant’s staff person should log-in to *esnaps* and click the “Submissions” button in the left-hand column. At the top middle of the page that opens is a section named “Submissions Filters” and the top line is “Applicant Project Name.” Use the drop-down menu to find your project. Once your agency and program name are in the box from the drop-down menu, click the “Filter” button.
- Once the system filters to only your program, look in the second column for “Renewal Project Application FY2022” or “New Project Application FY2022.” To open the application, click on the orange and grey icon to the left of the program name.

Completing the *esnaps* application.

- Note that Part 1 of the application will be completed by the Collaborative Applicant (and for new projects, much of the answers, based on your applications.). Because HUD grants are awarded to the Community Action Pioneer Valley as the recipient, CAPV is considered the applicant. Each program grantee is a subrecipient. Subrecipient information begins in Part 2.
- Detailed instructions for completing the application will be made available at the following sites:
 - <https://www.hud.gov/program/ε-σναπσ/ψψ-2022-χολ-προγραμ-νοφα-χολ-προγραμ-χομπετιτιον/>

Esnaps attachment

- All new applications must contain documentation of the agency’s 501(c)(3) status, which must be uploaded at screen 7A.

Application submission.

- Once the application is complete, all sections should demonstrate completion with a check mark on the final page. **Do not hit the Submit button.**

Appendix H. Instructions For ESNAPS & Additional Document Submissions

Additional Documents needed:

In addition to the esnaps submission, applicants must submit the following documents to Keleigh Pereira at kpereira@communityaction.us or by mail at 393 Main Street, Greenfield, MA 01301.

Renewal Projects:

- List of Board of Directors with identification of Officers and terms – if this was not submitted with Monitoring docs.
- Documentation of required match (Approved by the CoC and then uploaded to the project application.
- MOU for any formal Service Agreements, inkind match plans.

New projects:

- Completed Application for New Projects
- Agency Articles of Incorporation
- List of Board of Directors with identification of Officers and terms
- Certified Organization Audit/Financial Statements of most recent year:
 - Copy of OMB A-133 Audit (Required if \$500,000 or more in aggregate Federal funds expended); or
 - Financial statements audited by a CPA (if not bound by the requirements of OMB A-133)
- Agency Financial Management Policies and Procedures
- Agency Procurement Policies and Procedures
- Documentation of required match/ MOU for any formal Service Agreements, inkind match plans.
- Formal Written agreement with Health Care Providers for incorporated Health Care Access (CoC Bonus)

THE ESNAPS SUBMISSION will be opened after application submission.

Appendix I.– Three County CoC Ranking and Evaluation Committee

Roles and Responsibilities

The 3 County (Berkshire, Franklin Hampshire) Board is responsible for establishing policy priorities for the CoC. The CoC Project Ranking and Evaluation Committee is charged with evaluating and ranking CoC projects for inclusion in the annual application for funding submitted to HUD by the Collaborative Applicant. The Project R&E Committee must include members who are not CoC funding sub-recipients, and should reflect the voices of people with lived experience of homelessness & under-represented populations.

Annually, members of the CoC Project Ranking and Evaluation Committee will:

1. Attest that they do not have a conflict of interest in reviewing and ranking any of the CoC's new or renewal projects;
2. Design and implement a collaborative process for developing a consolidated application for Three County programs and projects seeking CoC funding.
3. Assess the review and ranking process for renewal and new CoC applications and, if necessary, make recommendations to improve to the process, based on previous conditions within the CoC or NOFO/HUD changes & recommendations;
4. Review findings and program priorities established by the Board or Collaborative Applicant and the applications for new programs or projects, and make recommendations to the Board about which programs/projects to include in the annual CoC application, and rank projects for the application.
5. Develop and oversee operation of a grievance process for agencies whose applications for funding have not been selected by the CoC.
6. Agree to commit approximately 6-10 hours on an annual basis to undertake the duties described above.

Note: Final Approval for Submission and Ranking of New and Renewal Projects will be determined by the CoC Board of Directors.

Adopted by the 3 County CoC Board, updated August 2021.