

REPORT OF THE COMMITTEE ON INTERGOVERNMENTAL AFFAIRS AND HUMAN SERVICES

Voting Members

Kymerly Marcos Pine, Chair; Breene Harimoto, Vice-Chair,
Carol Fukunaga, Ann H. Kobayashi, Joey Manahan

Committee Meeting Held
May 22, 2014

Honorable Ernest Y. Martin
Chair, City Council
City and County of Honolulu

Mr. Chair:

Your Committee on Intergovernmental Affairs and Human Services, which considered Resolution 14-99 entitled:

“RESOLUTION AUTHORIZING THE DIRECTOR OF COMMUNITY SERVICES OR THE DIRECTOR’S DESIGNEE TO APPLY FOR GRANT FUNDS UNDER THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT’S 2013 CONTINUUM OF CARE HOMELESS ASSISTANCE PROGRAMS AND TO ENTER INTO INTERGOVERNMENTAL AGREEMENTS RELATED THERETO,”

introduced on May 8, 2014, reports as follows:

The purpose of the Resolution is to authorize the Director of Community Services or the Director’s Designee to apply for Grant Funds under the U.S. Department of Housing and Urban Development’s 2013 Continuum of Care Homeless Assistance Programs and to enter into Intergovernmental Agreements related thereto.

CITY COUNCIL

CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

ADOPTED ON

JUN 4 2014

COMMITTEE REPORT NO.

176

REPORT OF THE COMMITTEE ON INTERGOVERNMENTAL AFFAIRS AND HUMAN SERVICES

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Your Committee amended the Resolution to a CD1 version that makes the following changes:

- A. Incorporates into Exhibit A to the Resolution a missing document – the HUD Notice of Funding Availability (NOFA) for the Fiscal Years 2013 and 2014 Continuum of Care Program Competition.
- B. Attaches as Exhibit B to the Resolution a copy of the proposed agreement between the City and HUD for the grant funds.
- C. Amends the BE IT FURTHER RESOLVED paragraph to clarify the authorization granted to the Director of Community Services to execute the proposed intergovernmental agreement with HUD.
- D. Makes miscellaneous conforming, technical and nonsubstantive amendments.

The Director of the Department of Community Services testified in support of the Resolution and the CD1 version.

CITY COUNCIL

CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

ADOPTED ON JUN 4 2014

COMMITTEE REPORT NO. 176

**REPORT OF THE COMMITTEE ON
INTERGOVERNMENTAL AFFAIRS AND HUMAN SERVICES**

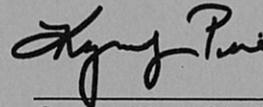
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Your Committee on Intergovernmental Affairs and Human Services is in accord with the intent and purpose of Resolution 14-99, as amended herein, and recommends its adoption in the form attached hereto as Resolution 14-99, CD1. (Ayes: Pine, Harimoto, Manahan - 3; Noes: None; Excused: Fukunaga, Kobayashi - 2.)

Respectfully submitted,



Committee Chair

CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

ADOPTED ON JUN 4 2014

COMMITTEE REPORT NO. 176



RESOLUTION

AUTHORIZING THE DIRECTOR OF COMMUNITY SERVICES OR THE DIRECTOR'S DESIGNEE TO APPLY FOR GRANT FUNDS UNDER THE U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT'S 2013 CONTINUUM OF CARE HOMELESS ASSISTANCE PROGRAMS AND TO ENTER INTO INTERGOVERNMENTAL AGREEMENTS RELATED THERETO.

WHEREAS, Chapter 1, Article 8, Revised Ordinances of Honolulu 1990, as amended (ROH), requires that any intergovernmental agreement or any amendments thereto which place an obligation upon the City or any department or agency thereof shall require prior City Council consent and approval; and

WHEREAS, ROH Chapter 1, Article 8, also requires that, when carrying out the provisions of any intergovernmental agreement, all applications and/or amendments thereof, statistical data programs, reports or other official communications which support the application and which are required to be provided by the City and County of Honolulu (City) or its component departments to any other governmental or quasi-governmental agency shall first be presented to the City Council for its review and approval prior to their transmittal; and

WHEREAS, since 1996, the Department of Community Services has applied for and been awarded federal funds made available under the Continuum of Care Homeless Assistance Programs administered by the U. S. Department of Housing and Urban Development (HUD); and

WHEREAS, the City again seeks approval for its application in 2014 for various new grants and renewals of existing grants; and

WHEREAS, the City possesses the legal authority to apply for and ability to execute the Continuum of Care Homeless Assistance grants; and

WHEREAS, HUD under the Continuum of Care programs has awarded grant funds to Honolulu ranging between \$3.7 million and \$9.7 million each year since 1996 for programs carried out by nonprofit agencies on Oahu; and

WHEREAS, the nonprofit agencies receiving funds shall be responsible for obtaining required matching funds; and

WHEREAS, the City will use \$22,173 from the Provision for Grants, Partnerships and Security to fulfill its matching funds requirement; an authorized use of the Provision is to provide matching funds for federal grants; and



RESOLUTION

WHEREAS, a copy of the City's application to HUD is attached hereto as Exhibit A and incorporated herein by this reference; and

WHEREAS, a copy of the proposed intergovernmental agreement with HUD for Continuum of Care grant funds is attached hereto as Exhibit B and incorporated herein by this reference; and

WHEREAS, Honolulu's receipt of such Continuum of Care grant funds has assisted many persons experiencing homelessness in obtaining a safe place to live and needed services, as well as transitioning to permanent housing with supportive services; and

WHEREAS, without such grant funds, the degree of homelessness in our community would be significantly higher; now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that the application for the U.S. Department of Housing and Urban Development's Continuum of Care grant funds, attached hereto as Exhibit A, is hereby approved; and

BE IT FURTHER RESOLVED that the Director of Community Services or the Director's designee is hereby authorized to:

1. Execute the proposed intergovernmental agreement with HUD for Continuum of Care grant funds in substantially the same form as the agreement attached hereto as Exhibit B; and
2. Execute any incidental or related agreements or documents in furtherance of the above agreements, provided that such agreements and documents do not incur additional obligations on the part of the City;

and

BE IT FURTHER RESOLVED, that any subsequent intergovernmental agreement with HUD for the grant funds shall require the prior consent and approval of the City Council pursuant to ROH Chapter 1, Article 8; and



RESOLUTION

BE IT FINALLY RESOLVED that copies of this Resolution be transmitted to the Director of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813.

INTRODUCED BY:

Ernest Martin (b/r)

DATE OF INTRODUCTION:

May 8, 2014
Honolulu, Hawaii

Councilmembers

RESOLUTION AUTHORIZING THE DIRECTOR OF COMMUNITY SERVICES OR THE DIRECTOR'S DESIGNEE TO APPLY FOR GRANT FUNDS UNDER THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT'S 2013 CONTINUUM OF CARE HOMELESS ASSISTANCE PROGRAMS.

EXHIBIT A

1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

1A-1 CoC Name and Number: HI-501 - Honolulu CoC

1A-2 Collaborative Applicant Name: City and County of Honolulu

1A-3 CoC Designation: CA

1B. Continuum of Care (CoC) Operations

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

1B-1 How often does the CoC conduct meetings of the full CoC membership? Monthly

1B-2 How often does the CoC invite new members to join the CoC through a publicly available invitation? Monthly

1B-3 Does the CoC include membership of a homeless or formerly homeless person? Yes

1B-4 For members who are homeless or formerly homeless, what role do they play in the CoC membership? Organizational employee
Select all that apply.

1B-5 Does the CoC's governance charter incorporate written policies and procedures for each of the following:

1B-5.1 Written agendas of CoC meetings?	Yes
1B-5.2 Centralized or Coordinated Assessment System?	No
1B-5.3 Process for Monitoring Outcomes of ESG Recipients?	No
1B-5.4 CoC policies and procedures?	Yes
1B-5.5 Written process for board selection?	Yes
1B-5.6 Code of conduct for board members that includes a recusal process?	Yes
1B-5.7 Written standards for administering assistance?	No

1C. Continuum of Care (CoC) Committees

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

1C-1 Provide information for up to five of the most active CoC-wide planning committees, subcommittees, and/or workgroups, including a brief description of the role and the frequency of meetings. Collaborative Applicants should only list committees, subcommittees and/or workgroups that are directly involved in CoC-wide planning, and not the regular delivery of services.

	Name of Group	Role of Group (limit 750 characters)	Meeting Frequency	Names of Individuals and/or Organizations Represented
1C-1.1	Executive Committee	Meets on a monthly basis in order to draft the agenda for the following General Meeting, discuss urgent issues, and address other issues before presentation to the general membership. Identifies trends, issues and convenes task groups as necessary to address them. Also reviews and approves the CoC application in partnership with the CoC lead agency. Representatives from governmental entities are regularly invited to attend. This meeting is open to any and all interested members.	Monthly	Homeless service providers, government agency representatives
1C-1.2	Planning Committee	Primary liaison to State & City homeless planning divisions. Coordinates work groups for 10-year plan, disaster and discharge planning, and the review process for CoC renewals. Will oversee the integration of HEARTH Act performance standards, impact measures, and reallocation of resources. Works with the collaborative applicant in completing the Consolidated Application.	Monthly	Homeless service providers, government agency representatives
1C-1.3	Data Committee	Plans and coordinates the implementation of the HMIS, which serves both Hawaii CoCs. Also coordinates the CoC's Point in Time Count, incorporates CoC needs with HUD requirements to ensure data collection and reporting processes allow the CoC to effectively monitor programs and make adjustments as necessary to assure goal achievement.	Monthly	Homeless service providers, government agency representatives, HMIS vendor staff

1C-1.4	Awareness and Organizational Development Committee	This committee focuses on increasing the awareness of homelessness issues to the community at large and includes coordination of an annual conference and events related to the Hunger and Homelessness Awareness Month.	Monthly	Homeless service providers, government agency representatives
1C-1.5	CoC Evaluation Panel	Reviews, scores, and ranks new projects applying for CoC funding. Committee members may be comprised of up to two PIC members, two community members, and one member from the City & County of Honolulu.	Annually	Homeless service providers, government agency representatives, philanthropic agencies

**1C-2 Describe how the CoC considers the full range of opinions from individuals or organizations with knowledge of homelessness or an interest in preventing and ending homelessness in the geographic area when establishing the CoC-wide committees, subcommittees, and workgroups.
 (limit 750 characters)**

Partners In Care (PIC), the Honolulu CoC, participates in the Hawaii Interagency Council on Homelessness (HICH) and the Homeless Action Work Groups (HAWG), which coordinates governmental efforts with ordinary citizens interested in helping. PIC agencies also participate in City Council meetings and neighborhood board, Safe Community groups, Honolulu Police Department collaborations, Dept. of Health meetings, educational presentations to schools, businesses, community and faith based groups, and many other forums.

In its homeless prevention and rapid rehousing activities planning, PIC's Collaborative Applicant (CA), sought public input in the past two years on the allocation of its ESG resources and allocated those resources accordingly.

1D. Continuum of Care (CoC) Project Review, Ranking, and Selection

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

1D-1 Describe the specific ranking and selection process the CoC uses to make decisions regarding project application review and selection, based on objective criteria. Written documentation of this process must be attached to the application along with evidence of making the information publicly available.

(limit 750 characters)

The CoC solicits applications using Request For Interest (RFI), according to City and State procurement guidelines. Applications were due on 1/3/14, and written notices of acceptance or rejection were emailed to applicants on 1/17/14, to meet HUD deadlines. Project selection used scoring criteria distributed with the RFI including project quality, meeting HUD objectives as reported in the most recent APR, and compliance issues. The evaluation committee also held Q&A sessions with every applicant so the committee could ask for clarification and incorporate that information into the final rankings.

1D-2 Describe how the CoC reviews and ranks projects using periodically collected data reported by projects, conducts analysis to determine each project's effectiveness that results in participants rapid return to permanent housing, and takes into account the severity of barriers faced by project participants. Description should include the specific data elements and metrics that are reviewed to do this analysis.

(limit 1000 characters)

The CoC's planning cmte coordinates the ranking and scoring activities, which includes measuring the accomplishment of program specific goals, the accomplishment of HUD goals, and the expenditure of funds. In the coming year the planning cmte will work with the data cmte to ensure the HMIS can capture and report data related to measuring client's return to permanent housing, and the cmte will explore ways to adjust goals according to the severity of barriers faced by project participants.

PIC will also rate programs ability to address the demographic comorbidities identified by the VI-SPDAT.

1D-3 Describe the extent in which the CoC is open to proposals from entities that have not previously received funds in prior Homeless Assistance Grants competitions.

(limit 750 characters)

The RFI process allows any agency that can demonstrate experience in providing successful services to return people to permanent housing to submit applications for funding. When new agencies participate in CoC mtgs, CoC members often meet with the new members afterwards to help them understand the CoC's processes.

There are several programs that could benefit from HUD funding, but because religious programming is a core part of those programs, they cannot qualify for HUD or other governmental funding. Those agencies are also not willing to modify their program design to do access governmental funds.

The new agencies are also informed of the importance of promoting HUD's goals and contributing to the continuum and addressing CoC gaps.

1D-4 On what date did the CoC post on its website all parts of the CoC Consolidated Application, including the Priority Listings with ranking information and notified project applicants and stakeholders the information was available? Written documentation of this notification process (e.g., evidence of the website where this information is published) must be attached to the application. 01/17/2014

1D-5 If there were changes made to the ranking after the date above, what date was the final ranking posted?

1D-6 Did the CoC attach the final GIW approved by HUD either during CoC Registration or, if applicable, during the 7-day grace period following the publication of the CoC Program NOFA without making changes? No

**1D-6.1 If no, briefly describe each of the specific changes that were made to the GIW (without HUD approval) including any addition or removal of projects, revisions to line item amounts, etc. For any projects that were revised, added, or removed, identify the applicant name, project name, and grant number.
(limit 1000 characters)**

After the NOFA was reviewed, the CoC decided on a scoring process that would score all projects and rank the highest scoring projects into Tier 1. Once the Tier 1 projects were selected the CoC allocated the HMIS and planning costs across all Tier 1 projects which resulted in a 2.26% reduction to all Tier 1 projects.

One project was rejected and another was reduced to fit into Tier 1. The rejected project is the Alternative Structures International, Ohana Ola O Kahumana, grant number HI0040L9C011204. The reduced project is The Salvation Army ATS, ATS Homeless Offenders Treatment and Supportive Living Services 2013, grant number HI0017L9C011205.

1D-7 Were there any written complaints received by the CoC in relation to project review, project selection, or other items related to 24 CFR 578.7 or 578.9 within the last 12 months? No

1D-7.1 If yes, briefly describe the complaint(s), how it was resolved, and the date(s) in which it was resolved. (limit 750 characters)

1E. Continuum of Care (CoC) Housing Inventory

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**1E-1 Did the CoC submit the 2013 HIC data in Yes
the HDX by April 30, 2013?**

2A. Homeless Management Information System (HMIS) Implementation

Intructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2A-1 Describe how the CoC ensures that the HMIS is administered in compliance with the CoC Program interim rule, conformance with the 2010 HMIS Data Standards and related HUD Notices. (limit 1000 characters)

Thanks to technical assistance (TA) provided by HUD's Priority Community Initiative, the region IX HMIS specialist helped develop a strategic HMIS plan to ensure the HMIS is administered in compliance with the CoC Program interim rule, conformance with the 2010 HMIS Data Standards and related HUD Notices.

Overall, the TA recognized that many of the HMIS activities are already in compliance with CoC guidelines. The strategic plan prioritized specific activities like the HMIS governance, data quality plan, and policies and procedures, of which the first two were approved and implemented and the last is drafted and currently under review.

2A-2 Does the governance charter in place between the CoC and the HMIS Lead include the most current HMIS requirements and outline the roles and responsibilities of the CoC and the HMIS Lead? (limit 1000 characters) Yes
If yes, a copy must be attached.

2A-3 For each of the following plans, describe the extent in which it has been developed by the HMIS Lead and the frequency in which the CoC has reviewed it: Privacy Plan, Security Plan, and Data Quality Plan. (limit 1000 characters)

Each of the plans will be developed with TA assistance from HUD's Priority Community Initiative. The Data Quality Plan (DQP) was developed by the HMIS vendor for the HMIS Lead, and is being currently being implemented. DQP elements will be tested by City and State grant agencies as part of their routine monitoring procedures.

The Privacy Plan and Security Plan will be developed by the HMIS vendor in collaboration with the Data cmte in the following year.

2A-4 What is the name of the HMIS software selected by the CoC and the HMIS Lead? Integrated Homeless Management Information System
Applicant will enter the HMIS software name (e.g., ABC Software).

2A-5 What is the name of the HMIS vendor? Hybrid International, LLC
Applicant will enter the name of the vendor (e.g., ESG Systems).

2A-6 Does the CoC plan to change the HMIS software within the next 18 months? No

2B. Homeless Management Information System (HMIS) Funding Sources

2B-1 Select the HMIS implementation Statewide coverage area:

2B-2 Select the CoC(s) covered by the HMIS: HI-501 - Honolulu CoC, HI-500 - Hawaii Balance of State CoC
 (select all that apply)

2B-3 In the chart below, enter the amount of funding from each funding source that contributes to the total HMIS budget for the CoC.

2B-3.1 Funding Type: Federal - HUD

Funding Source	Funding
CoC	\$121,703
ESG	\$0
CDBG	\$39,768
HOME	\$0
HOPWA	\$0
Federal-HUD-Total Amount	\$161,471

2B-3.2 Funding Type: Other Federal

Funding Source	Funding
Department of Education	\$0
Department of Health and Human Services	\$0
Department of Labor	\$0
Department of Agriculture	\$0
Department of Veterans Affairs	\$0
Other Federal	\$0
Other Federal-Total Amount	\$0

2B-3.3 Funding Type: State and Local

Funding Source	Funding
City	\$0
County	\$0
State	\$7,800
State and Local - Total Amount	\$7,800

2B-3.4 Funding Type: Private

Funding Source	Funding
Individual	\$0
Organization	\$0
Private - Total Amount	\$0

2B-3.5 Funding Type: Other

Funding Source	Funding
Participation Fees	\$0
Other - Total Amount	\$0

2B-3.6 Total Budget for Operating Year	\$169,271
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2B-4 How was the HMIS Lead selected by the Agency Volunteered CoC?

**2B-4.1 If other, provide a description as to how the CoC selected the HMIS Lead.
 (limit 750 characters)**

2C. Homeless Management Information System (HMIS) Bed Coverage

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2C-1 Indicate the HMIS bed coverage rate (%) for each housing type within the CoC. If a particular housing type does not exist anywhere within the CoC, select "Housing type does not exist in CoC" from the drop-down menu:

* Emergency shelter	86%+
* Safe Haven (SH) beds	86%+
* Transitional Housing (TH) beds	86%+
* Rapid Re-Housing (RRH) beds	86%+
* Permanent Supportive Housing (PSH) beds	86%+

2C-2 How often does the CoC review or assess its HMIS bed coverage? Monthly

2C-3 If the bed coverage rate for any housing type is 64% or below, describe how the CoC plans to increase this percentage over the next 12 months.
(limit 1000 characters)

2C-4 If the Collaborative Applicant indicated that the bed coverage rate for any housing type was 64% or below in the FY2012 CoC Application, describe the specific steps the CoC has taken to increase this percentage.
(limit 750 characters)

2D. Homeless Management Information System (HMIS) Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2D-1 For each housing type, indicate the average length of time project participants remain in housing. If a housing type does not exist in the CoC, enter "0".

Type of Housing	Average Length of Time in Housing
Emergency Shelter	135
Transitional Housing	11
Safe Haven	0
Permanent Supportive Housing	38
Rapid Re-housing	1

2D-2 Indicate the percentage of unduplicated client records with null or missing values on a day during the last 10 days of January 2013 for each Universal Data Element listed below.

Universal Data Element	Percentage
Name	0%
Social security number	0%
Date of birth	0%
Ethnicity	0%
Race	0%
Gender	0%
Veteran status	0%
Disabling condition	1%
Residence prior to program entry	0%
Zip Code of last permanent address	0%
Housing status	8%
Head of household	0%

2D-3 Describe the extent in which HMIS generated data is used to generate HUD required reports (e.g., APR, CAPER, etc.).
 (limit 1000 characters)

The HMIS can produce formatted data that can be used with HUD's APR generation tool. The HMIS was recently updated to allow it to produce CoC wide and agency specific reports on the following HUD measures:
Housing stability - Clients in permanent housing for 6+ months
Employment income - Clients have employment income
Benefits income - Clients have employment income
. The HMIS is currently being updated to incorporate HUD's latest guidance to produce a CAPER report.

2D-4 How frequently does the CoC review the data quality in the HMIS of program level data? Monthly

**2D-5 Describe the process through which the CoC works with the HMIS Lead to assess data quality. Include how the CoC and HMIS Lead collaborate, and how the CoC works with organizations that have data quality challenges.
(Limit 1000 characters)**

The HMIS lead and support staff will measure completeness by running an APR, custom, or data quality report and comparing to the data quality thresholds identified in the Data Quality Plan.

The HMIS Lead and Homeless Programs Office (HPO) will review source documentation from sample records and compare to HMIS data entry. Comparisons will include universal as well as program-specific data elements. HMIS staff will not send sample listings beforehand.

The HMIS Lead and HPO will review deficient areas with agencies and require improvement plans. If the HMIS Lead and HPO cannot provide sufficient technical guidance on improving data quality, they will request help from HUD's TA providers. If deficiencies persist because agencies do not follow their improvement plans, the HMIS Lead and HPO will recommend sanctions which could include reduction in funding.

2D-6 How frequently does the CoC review the data quality in the HMIS of client-level data? Monthly

2E. Homeless Management Information System (HMIS) Data Usage and Coordination

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2E-1 Indicate the frequency in which the CoC uses HMIS data for each of the following activities:

* Measuring the performance of participating housing and service providers	Quarterly
* Using data for program management	Annually
* Integration of HMIS data with data from mainstream resources	Never
* Integration of HMIS data with other Federal programs (e.g., HHS, VA, etc.)	Never

2F. Homeless Management Information System (HMIS) Policies and Procedures

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2F-1 Does the CoC have a HMIS Policy and Procedures Manual? If yes, the HMIS Policy and Procedures Manual must be attached. No

2F-1.1 What page(s) of the HMIS Policy and Procedures Manual or governance charter includes the information regarding accuracy of capturing participant entry and exit dates in HMIS? (limit 250 characters)

Pages 5 and 6 of the HMIS Data Quality Plan provides information regarding accuracy of capturing participant entry and exit dates in HMIS.

2F-2 Are there agreements in place that outline roles and responsibilities between the HMIS Lead and the Contributing HMIS Organizations (CHOs)? Yes

2G. Continuum of Care (CoC) Sheltered Homeless Point-in-Time (PIT) Count

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2G-1 Indicate the date of the most recent sheltered point-in-time count (mm/dd/yyyy): 01/22/2013

2G-2 If the CoC conducted the sheltered point-in-time count outside of the last 10 days of January 2013, was an exception granted by HUD? Not Applicable

2G-3 Enter the date the CoC submitted the sheltered point-in-time count data in HDX: 04/24/2013

2G-4 Indicate the percentage of homeless service providers supplying sheltered point-in-time data:

Housing Type	Observation	Provider Shelter	Client Interview	HMIS
Emergency Shelters	0%	0%	0%	100%
Transitional Housing	0%	0%	0%	100%
Safe Havens	0%	0%	0%	100%

2G-5 Comparing the 2012 and 2013 sheltered point-in-time counts, indicate if there was an increase, decrease, or no change and then describe the reason(s) for the increase, decrease, or no change. (Limit 750 characters)

From 2012 to 2013 Oahu's shelters saw a 2% increase. The sheltered chronic homeless count as reported in the 2013 PIT increased from 101 in 2012 to 187 (85%).

The large change in the sheltered chronic homeless count was due to intensive efforts to identify and serve chronically homeless, which in addition to CoC funds, including funding from CABHI, the City, and the State for the urban and North Shore areas of the island. As the chronically homeless clients were identified they moved into sheltered programs to better assess their needs and refer them to available appropriate services.

The small change in overall shelter counts was due to consistent shelter programs ability to move clients into other housing options, even given the influx of more challenging clients.

2H. Continuum of Care (CoC) Sheltered Homeless Point-in-Time (PIT) Count: Methods

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

* 2H-1 Indicate the method(s) used to count sheltered homeless persons during the 2013 point-in-time count:

Survey providers:	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Extrapolation:	<input type="checkbox"/>
Other:	<input type="checkbox"/>

2H-2 If other, provide a detailed description.
(limit 750 characters)

Not applicable.

2H-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the sheltered homeless population during the 2013 point-in-time count was accurate.
(limit 750 characters)

The count was primarily derived from HMIS data in the sheltered programs section of the HMIS for the PIT count night. Shelters were contacted beforehand and instructed that all clients sleeping in their facility on the PIT count night needed to be entered into the HMIS. Agencies were also instructed to make sure that all client data were up to date. Follow-up with individual service providers, via email surveys and phone calls, was conducted to verify that the HMIS listing matched the nightly census. Shelters not participating in the HMIS (such as domestic violence shelters) were contacted individually, via email surveys and phone calls, to provide the number of homeless individuals and families residing at their shelters on the PIT count night, and specific subpopulation data.

2I. Continuum of Care (CoC) Sheltered Homeless Point-in-Time (PIT) Count: Data Collection

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

*** 2I-1 Indicate the methods used to gather and calculate subpopulation data for sheltered homeless persons:**

HMIS:	<input checked="" type="checkbox"/>
HMIS plus extrapolation:	<input type="checkbox"/>
Sample of PIT interviews plus extrapolation:	<input type="checkbox"/>
Sample strategy: (if Sample of PIT interviews plus extrapolation is selected)	<input type="checkbox"/>
Provider expertise:	<input type="checkbox"/>
Interviews:	<input type="checkbox"/>
Non-HMIS client level information:	<input type="checkbox"/>
Other:	<input checked="" type="checkbox"/>

**2I-2 If other, provide a detailed description.
(limit 750 characters)**

Programs not participating in the HMIS (such as domestic violence shelters) were contacted individually to provide the number of homeless individuals and families residing at their shelters on the night of the count and subpopulation data.

**2I-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the sheltered homeless population count during the 2013 point-in-time count was accurate.
(limit 750 characters)**

The sheltered homeless count was derived from HMIS client and intake data in the Sheltered Programs section of the HMIS for the night of January 22, 2013. To ensure accuracy of all information including the subpopulation data, shelters and transitional housing programs were contacted prior to this date and given specific instructions that all clients sleeping in their facility on the night of January 22, 2013 needed to have active intakes in the HMIS. Agencies were also advised to make sure that all client and intake data were up to date. Programs not participating in the HMIS (such as domestic violence shelters) were contacted individually to provide the number of homeless individuals and families residing at their shelters on the night of the count and subpopulation data.

2J. Continuum of Care (CoC) Sheltered Homeless Point-in-Time Count: Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

*** 2J-1 Indicate the methods used to ensure the quality of the data collected during the sheltered point-in-time count:**

Training:	<input type="checkbox"/>
Follow-up	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Non-HMIS de-duplication :	<input type="checkbox"/>
Other:	<input type="checkbox"/>

**2J-2 If other, provide a detailed description.
(limit 750 characters)**

The CoC requested census data from shelters on the night of the point-in-time count to verify the accuracy of its data in the HMIS.

**2J-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the sheltered homeless population count during the 2013 point-in-time count was accurate.
(limit 750 characters)**

Emergency shelters and transitional housing programs were contacted prior to this date and given specific instructions that all clients sleeping in their facility on the night of January 22, 2013 needed to have active intakes in the HMIS. Agencies were also advised to make sure all client and intake data were up to date. HMIS and City staff followed-up with specific service providers to verify that the HMIS listing matched the nightly census. Shelters not participating in the HMIS (such as domestic violence shelters) were contacted individually to provide the number of homeless individuals and families residing at their shelters on the night of the count, in addition to providing specific subpopulation data.

2K. Continuum of Care (CoC) Unsheltered Homeless Point-in-Time (PIT) Count

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2K-1 Indicate the date of the most recent unsheltered point-in-time count: 01/22/2013

2K-2 If the CoC conducted the unsheltered point-in-time count outside of the last 10 days of January 2013, was an exception granted by HUD? Not Applicable

2K-3 Enter the date the CoC submitted the unsheltered point-in-time count data in HDX: 04/24/2013

2K-4 Comparing the 2013 unsheltered point-in-time count to the last unsheltered point-in-time count, indicate if there was an increase, decrease, or no change and describe the specific reason(s) for the increase, decrease, or no change. (limit 750 characters)

From 2012 to 2013 Oahu's unsheltered population saw a 11% increase from 1,318 to 1,465. The unsheltered chronic homeless count as reported in the 2013 PIT increased from 485 to 505 (4%).

This large unsheltered change is due to continued efforts to reach out to unsheltered people which included a State funded Housing First program, a City funded outreach project, and other activities. Programs also expanded intensive efforts into covering some residential communities. The concentrated efforts resulted in more people accessing all homeless housing programs and slightly higher PIT counts in those programs.

The small chronically homeless change is due to the CoC's success at moving chronically homeless clients into other housing programs.

2L. Continuum of Care (CoC) Unsheltered Point-in-Time Count: Methods

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

* 2L-1 Indicate the methods used to count unsheltered homeless persons during the 2013 point-in-time count:

Public places count:	<input type="checkbox"/>
Public places count with interviews on the night of the count:	<input type="checkbox"/>
Public places count with interviews at a later date:	<input checked="" type="checkbox"/>
Service-based count:	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Other:	<input type="checkbox"/>

2L-2 If other, provide a detailed description. (limit 750 characters)

Not applicable.

2L-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the unsheltered homeless population during the 2013 point-in-time count was accurate. (limit 750 characters)

PIT Count teams used the public places with interviews method for data collection. Surveys recorded the interview discussion. Teams used their familiarity with the region to ensure all of the areas frequented by unsheltered homeless populations were surveyed. Outreach workers established rapport with many of the people they encountered, increased the likelihood of survey participation.

Only unsheltered people that completed a survey (or were present with someone in the household that completed a survey) and provided a name or unique identifying information (detailed description) are included in the count. Although this method does have its limitations, the group decided to only include surveyed people in the count to ensure the data was accurate.

2M. Continuum of Care (CoC) Unsheltered Homeless Point-in-Time Count: Level of Coverage

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2M-1 Indicate where the CoC located Known Locations
unsheltered homeless persons during the
2013 point-in-time count:

2M-2 If other, provide a detailed description.
(limit 750 characters)

Not applicable.

2N. Continuum of Care (CoC) Unsheltered Homeless Point-in-Time Count: Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

* 2N-1 Indicate the steps taken by the CoC to ensure the quality of the data collected for the 2013 unsheltered population count:

Training:	<input checked="" type="checkbox"/>
"Blitz" count:	<input type="checkbox"/>
Unique identifier:	<input checked="" type="checkbox"/>
Survey question:	<input checked="" type="checkbox"/>
Enumerator observation:	<input type="checkbox"/>
Other:	<input type="checkbox"/>

2N-2 If other, provide a detailed description.
(limit 750 characters)

Not applicable.

2N-3 For each method selected, including other, describe how the method was used to reduce the occurrence of counting unsheltered homeless persons more than once during the 2013 point-in-time count. In order to receive credit for any selection, it must be described here.
(limit 750 characters)

Several trainings took place in person and via a webinar for field staff conducting the unsheltered PIT Count. These trainings provided an overview of the purpose and methodology for the PIT Count, safety tips, recommended materials to bring during the field work, and practice regarding the use of the survey instruments. Additionally, PIT Team Coordinators provided training in the field before outreach to ensure that all volunteers understood how to use the survey.

The PIT Count methodology required unsheltered persons complete a survey to obtain the name and/or unique identifying description of each person being counted so that persons could be entered into the HMIS database and unduplicated with confidence.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 1: Increase Progress Towards Ending Chronic Homelessness

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY 2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). The first goal in Opening Doors is to end chronic homelessness by 2015. Creating new dedicated permanent supportive housing beds is one way to increase progress towards ending homelessness for chronically homeless persons. Using data from Annual Performance Reports (APR), HMIS, and the 2013 housing inventory count, complete the table below.

3A-1.1 Objective 1: Increase Progress Towards Ending Chronic Homelessness

	Proposed in 2012 CoC Application	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-1.1a For each year, provide the total number of CoC-funded PSH beds not dedicated for use by the chronically homeless that are available for occupancy.		286	280	270
3A-1.1b For each year, provide the total number of PSH beds dedicated for use by the chronically homeless.	530	400	414	424
3A-1.1c Total number of PSH beds not dedicated to the chronically homeless that are made available through annual turnover.		115	120	140
3A-1d Indicate the percentage of the CoC-funded PSH beds not dedicated to the chronically homeless made available through annual turnover that will be prioritized for use by the chronically homeless over the course of the year.		100%	80%	80%
3A-1.1e How many new PSH beds dedicated to the chronically homeless will be created through reallocation?		34	75	30

**3A-1.2 Describe the CoC's two year plan (2014-2015) to increase the number of permanent supportive housing beds available for chronically homeless persons and to meet the proposed numeric goals as indicated in the table above. Response should address the specific strategies and actions the CoC will take to achieve the goal of ending chronic homelessness by the end of 2015.
(limit 1000 characters)**

To increase PSH beds:

1) PIC will apply for HUD CoC funds through bonuses or reallocation. In this application PIC applied for reallocation funds to provide 33 PSH CH set aside units.

2) PIC's advocacy committee will work with agencies and legislators for State and City funds for housing first programs for chronically homeless individuals.

3) The City's PSH providers will use grant savings to serve more units than are funded. The current PH renewals are funded for 365 units, but thanks to grant savings, serve 505 units.

4) PIC will also advocate for more homeless units from the Adult Mental Health Division.

5) PIC will wrap supportive services around some clients in clean and sober houses to create additional PSH units.

To increase flow through the existing PSH beds, PIC is working with Boot Camp technical assistance providers to streamline its PSH efforts and implement coordinated assessment and Housing First principles. The CoC identified its benchmark PSH placement rate at approximately 20 units per month. By the end of the 100 day period in February, the CoC hopes to double that rate.

**3A-1.3 Identify by name the individual, organization, or committee that will be responsible for implementing the goals of increasing the number of permanent supportive housing beds for persons experiencing chronic homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 2: Increase Housing Stability

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Achieving housing stability is critical for persons experiencing homelessness. Using data from Annual Performance Reports (APR), complete the table below.

3A-2.1 Does the CoC have any non-HMIS projects for which an APR should have been submitted between October 1, 2012 and September 30, 2013? Yes

3A-2.2 Objective 2: Increase Housing Stability

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2013 Proposed Numeric Achievement
3A-2.2a Enter the total number of participants served by all CoC-funded permanent supportive housing projects as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013:	781	790	800
3A-2.2b Enter the total number of participants that remain in CoC-funded funded PSH projects at the end of the operating year PLUS the number of participants that exited from all CoC-funded permanent supportive housing projects to a different permanent housing destination.	724	735	745
3A-2.2c Enter the percentage of participants in all CoC-funded projects that will achieve housing stability in an operating year.	93%	93%	93%

3A-2.3 Describe the CoC's two year plan (2014-2015) to improve the housing stability of project participants in CoC Program-funded permanent supportive housing projects, as measured by the number of participants remaining at the end of an operating year as well as the number of participants that exited from all CoC-funded permanent supportive housing projects to a different permanent housing destination. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit to 1000 characters)

Based on HUD's new measure, the CoC helped 93% of its PSH clients maintain housing and PIC will focus on maintaining its success.

PIC will host a Housing First training on 2/13/14 with Dr. Sam Tsemberis so all agencies can learn how to implement those strategies to maintain housing stability. PIC agencies also received housing options training through the November 2013 PIC conference and a statewide video conference hosted by PIC agency IHS, The Institute for Human Services, Inc.

As Housing First clients move into the PSH program, PIC anticipates more challenges in maintaining these numbers because these clients face more barriers to housing than current clients.

A recent SAMHSA grant will provide new substance abuse and mental health services to assist in maintaining housing.

Recent State DHS insurance streamlining will reduce case worker ratios from 1:30 to 1:20, which will allow more services per client to promote stability.

PSH staff will continue to work with clients on maintaining housing, being good tenants, and they will team with employment and workforce development programs to ensure eligible clients can improve their economic self-sufficiency.

3A-2.4 Identify by name the individual, organization, or committee that will be responsible for increasing the rate of housing stability in CoC-funded projects. (limit 1000 characters)

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 3: Increase project participants income

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Assisting project participants to increase income is one way to ensure housing stability and decrease the possibility of returning to homelessness. Using data from Annual Performance Reports (APR), complete the table below.

3A-3.1 Number of adults who were in CoC-funded projects as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013: 1520

3A-3.2 Objective 3: Increase project participants income

	2013/Actual Numeric/Achievement and Baseline	2014/Proposed Numeric/Achievement	2016/Proposed Numeric/Achievement
3A-3.2a Enter the percentage of participants in all CoC-funded projects that increased their income from employment from entry date to program exit?	4%	6%	8%
3A-3.2b Enter the percentage of participants in all CoC-funded projects that increased their income from sources other than employment from entry date to program exit?	13%	15%	17%

3A-3.3 In the table below, provide the total number of adults that were in CoC-funded projects with each of the cash income sources identified below, as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013.

Cash Income Sources	Number of Participating Adults	Percentage of Total in 3A-3.1
Earned Income	282	18.55 %
Unemployment Insurance	13	0.86 %
SSI	315	20.72 %
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SSDI	118	7.76	%
Veteran's disability	47	3.09	%
Private disability insurance	0		%
Worker's compensation	0		%
TANF or equivalent	93	6.12	%
General Assistance	188	12.37	%
Retirement (Social Security)	61	4.01	%
Veteran's pension	14	0.92	%
Pension from former job	6	0.39	%
Child support	4	0.26	%
Alimony (Spousal support)	1	0.07	%
Other Source	57	3.75	%
No sources	301	19.80	%

**3A-3.4 Describe the CoC's two year plan (2014-2015) to increase the percentage of project participants in all CoC-funded projects that increase their incomes from non-employment sources from entry date to program exit. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table (3A-3.2) above.
 (limit 1000 characters)**

PIC agencies assess non-employment benefits as part of client intake. All agencies prioritize ensuring clients access all available resources to increase income and client self sufficiency.

One PIC agency provides SOAR training annually for other PIC staff to ensure all PIC agencies know how to help clients access those resources for persons with disabilities.

As PIC continues to develop and implement its coordinated assessment system, the improved consistency of intake information combined with the increased access to this information within the CoC, will allow agencies to more efficiently identify eligible non-employment income opportunities and help clients apply for those resources.

As the DQP is implemented and PIC agencies receive more training on providing consistent intake procedures, consistent HMIS updating procedures, and ensuring data is entered in a more timely manner, PIC anticipates the HMIS will be able to capture more of the positive outcomes that are already occurring.

**3A-3.5 Describe the CoC's two year plan (2014-2015) to increase the percentage of project participants in all CoC-funded projects that increase their incomes through employment from entry date to program exit. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above.
 (limit 1000 characters)**

All PIC projects will continue to provide employment support, access governmental programs, and access on-site certification for shelter training programs that allow programs to access WIA funds for employment education and training costs.

PIC agencies will also help clients access community college help with admissions and services to obtain a degree for non-traditional applicants, including homeless.

Most shelters require employment progress and some incentivize participation in activities by adding to consumer housing funds. PIC's planning committee will create standards to help all agencies promote employment as a priority.

IHS, has almost completed Employment Now certification, which will allow more access to Ticket to Work resources.

The Hawaii Interagency Council on Homelessness (HICH) will pursue accessing other Federal resources, including the Department of Labor and the Workforce Investment Act, to help persons that are homeless increase their employment capacity. The HICH will also advocate state legislators to allow SNAP (Supplemental Nutrition Assistance Program) funds to be used for education and employment training costs.

3A-3.6 Identify by name the individual, organization, or committee that will be responsible for increasing the rate of project participants in all CoC-funded projects that increase income from entry date to program exit. (limit 1000 characters)

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 4: Increase the number of participants obtaining mainstream benefits

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Assisting project participants to obtain mainstream benefits is one way to ensure housing stability and decrease the possibility of returning to homelessness. Using data from Annual Performance Reports (APR), complete the table below.

3A-4.1 Number of adults who were in CoC-funded projects as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013. 1939

3A-4.2 Objective 4: Increase the number of participants obtaining mainstream benefits

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-4.2a Enter the percentage of participants in ALL CoC-funded projects that obtained non-cash mainstream benefits from entry date to program exit.	74%	76%	78%

3A-4.3 In the table below, provide the total number of adults that were in CoC-funded projects that obtained the non-cash mainstream benefits from entry date to program exit, as reported on APRs submitted during the period between October 1, 2013 and September 30, 2013.

Non-Cash Income Sources	Number of Participating Adults	Percentage of Total in SA-4.1
Supplemental nutritional assistance program	869	44.82 %
MEDICAID health insurance	274	14.13 %
MEDICARE health insurance	126	6.50 %
State children's health insurance	0	%
WIC	36	1.86 %

VA medical services	210	10.83 %
TANF child care services	3	0.15 %
TANF transportation services	2	0.10 %
Other TANF-funded services	2	0.10 %
Temporary rental assistance	4	0.21 %
Section 8, public housing, rental assistance	34	1.75 %
Other Source	55	2.84 %
No sources	283	13.66 %

3A-4.4 Describe the CoC's two year plan (2014-2015) to increase the percentage of project participants in all CoC-funded projects that access mainstream benefits from entry date to program exit. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit 1000 characters)

Provider staff will continue to: help clients apply for mainstream programs at intake and assist clients with applying for and receiving IDs/birth certificates/social security cards/passports, food stamps, medical and disability insurance and linking them to other employment assistance services, ESL and GED classes. Staff also help with appeals from mainstream benefits denials.

Provider staff will continue to help program participants check the status of their applications. Depending on the program, initial follow up is typically provided by a case manager / staff advocate within 30 days and then on an on-going basis to see whether or not additional steps need to be made until benefits are received.

Some provider staff also report and discuss clients' mainstream benefits status at regular staff meetings to collaborate on overcoming barriers to services.

3A-4.5 Identify by name the individual, organization, or committee that will be responsible for increasing the rate of project participants in all CoC-funded projects that that access non-cash mainstream benefits from entry date to program exit. (limit 1000 characters)

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 5: Using Rapid Re-Housing as a method to reduce family homelessness

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Rapid re-housing is a proven effective housing model. Based on preliminary evidence, it is particularly effective for households with children. Using HMIS and Housing Inventory Count data, populate the table below.

3A-5.1 Objective 5: Using Rapid Re-housing as a method to reduce family homelessness.

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-5.1a Enter the total number of homeless households with children per year that are assisted through CoC-funded rapid re-housing projects.	0	10	15
3A-5.1b Enter the total number of homeless households with children per year that are assisted through ESG-funded rapid re-housing projects.	1	3	5
3A-5.1c Enter the total number of households with children that are assisted through rapid re-housing projects that do not receive McKinney-Vento funding.	255	350	450

3A-5.2 Describe the CoC's two year plan (2014-2015) to increase the number homeless households with children assisted through rapid re-housing projects that are funded through either McKinney-Vento funded programs (CoC Program, and Emergency Solutions Grants program) or non-McKinney-Vento funded sources (e.g., TANF). Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit 1000 characters)

In 2014 IHS will begin implementing an RRH program awarded in the 2012 competition. Although the program focuses 28 of its 36 beds on CH, it may be able to assist eligible families.

To date, PIC agencies with ESG RRH funds have focused its efforts on singles because the State provides a TANF funded Housing Placement Program and another program that are like RRH programs for families.

The State is also funding a one year shallow subsidy program which will add resources to homelessness prevention and rapid re-housing activities.

As PIC continues to consider all available resources and eligibility requirements, it will align its CoC resources to best meet the needs of its client base.

3A-5.3 Identify by name the individual, organization, or committee that will be responsible for increasing the number of households with children that are assisted through rapid re-housing in the CoC geographic area. (limit 1000 characters)

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A-5.4 Describe the CoC's written policies and procedures for determining and prioritizing which eligible households will receive rapid re-housing assistance as well as the amount or percentage of rent that each program participant must pay, if applicable. (limit 1000 characters)

PIC's current RRH policies were developed as part of the required FY11-2 second allotment of ESG funds. At that time, PIC developed a policy based on the ESG eligibility criteria and the RRH program's intent to quickly rehouse client's that will be able to sustain housing after short term assistance.

Based on that criteria the ESG policy included local priorities for people that are new to homelessness (within 6 months) with the logic that those people were most likely to still have income that could help them sustain housing. Due to the public nature of the CoC application, PIC will not share the amounts or percentages of rent that each program participant must pay to prevent participants from assuming their entitlement to the maximum benefit with minimum commitment. This will allow agencies to provide "just enough" assistance to stabilize housing as HUD intended.

Given the CoC's focus on serving families with RRH activities, PIC will develop appropriate CoC RRH guidelines in the coming year to meet its local needs and reflect HUD's priorities.

3A-5.5 How often do RRH providers provide case management to households residing in projects funded under the CoC and ESG Programs? (limit 1000 characters)

RRH providers offer case management services on an as needed basis depending on the severity of the client's situation, with a minimum of monthly contacts.

3A-5.6 Do the RRH providers routinely follow up with previously assisted households to ensure that they do not experience additional returns to homelessness within the first 12 months after assistance ends? (limit 1000 characters)

Currently, RRH providers offer different levels of follow up based on the agency's program design and on the other funding resources that are available to provide supportive services.

To help all PIC agencies understand client homeless recidivism trends, PIC's data committee has prioritized the creation of a recidivism report to help track this behavior throughout the CoC. The group is currently discussing different ways to track and report the behavior aggregately as a CoC measure. Recent HMIS improvements along with improved consent forms allows all providers to access client history of homeless services activities if client's give consent.

3B. Continuum of Care (CoC) Discharge Planning: Foster Care

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3B-1.1 Is the discharge policy in place State Mandated Policy mandated by the State, the CoC, or other?

**3B-1.1a If other, please explain.
(limit 750 characters)**

**3B-1.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.
(limit 1000 characters)**

Hawaii Child Welfare's current policy requires an independent Living Transition Plan (ILTP) for foster youth to address housing and other needs upon discharge to prevent homelessness. Most persons discharged from the foster system successfully transition to positive outcomes.

Hale Kipa's Independent Living Program works with foster youth before and after they age out of care and offers residential, outreach, and a range of appropriate supportive services.

Catholic Charities Hawaii and Hale Kipa partner with the State to provide group homes for young men and women that aged out of foster care which offers case management and employment supportive services.

EPIC Ohana also provide Youth Circles for youth transitioning out of foster care which offers a support team of workers, friends, and family to help plan for or navigate the transition.

The State's Department of Human Services also extends foster care payments, offer stipends for youth working 80 hours per month, and extends Medicaid without income limits up to age 26, to assist in the transition process.

**3B-1.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3B. Continuum of Care (CoC) Discharge Planning: Health Care

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3B-2.1 Is the discharge policy in place State Mandated Policy mandated by the State, the CoC, or other?

**3B-2.1a If other, please explain.
(limit 750 characters)**

**3B-2.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.
(limit 1000 characters)**

Below is the 2012 response which is being reviewed by content experts. Their revisions will be incorporated into our Weds call.

PIC efforts in this area include:

Waianae Coast Comprehensive Health Center, which operates the emergency room in its community, refers eligible patients to its own homeless outreach department to ensure eligible clients have access to support services.

United States Veterans Initiative has a Veterans Affairs (VA) contract to help veterans discharged from a hospital and house them temporarily while they partner with social workers to secure permanent housing.

IHS, The Institute for Human Services, Inc. conducts a high users monthly meetings at the Queen's Hospital to implement collaborative efforts to reduce the frequency of identified high users of emergency services and brainstorm ways to ensure that these users are not discharged into homelessness.

**3B-2.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3B. Continuum of Care (CoC) Discharge Planning: Mental Health

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3B-3.1 Is the discharge policy in place State Mandated Policy mandated by the State, the CoC, or other?

**3B-3.1a If other, please explain.
(limit 750 characters)**

**3B-3.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homelessness and specifically state where persons routinely go upon discharge.
(limit 1000 characters)**

The Hawaii's Department of Health Adult Mental Health Division (AMHD) continues its current policies including discharge planning for all State Hospital patients 90 days prior to discharge and assigned case managers. AMHD also requires tracking all individuals at-risk of losing housing after initial discharge and mandate that case managers include a plan for transitioning the individual into permanent living arrangements.

Discharges from the Kekela mental health wing are linked with case management services upon exit. If the case management services fall through, a call to the AMHD ACCESS line will help clients secure a new case manager.

HICH and PIC advocacy resulted in the following changes from AMHD to help with this issue:

Re-instituting AMHD community planning process in 2013
Increased AMHD case management available by removing the previous cap, increasing the crisis service management window from 10 days to 30 days, and increasing the array of services including the use of peer specialists.
Increasing service quality by requiring face to face service and approving service time based on acuity vs. a monthly maximum of 4 hours per client.

**3B-3.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3B. Continuum of Care (CoC) Discharge Planning: Corrections

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3B-4.1 Is the discharge policy in place State Mandated Policy mandated by the State, the CoC, or other?

**3B-4.1a If other, please explain.
(limit 750 characters)**

**3B-4.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.
(limit 1000 characters)**

PIC agencies Ho'omau Ke Ola (HKO) and Hina Mauka have contracts with the Judiciary, Family Drug Court, and neighbor island correctional system to house and treat houseless inmates with substance abuse problems. 100% hundred percent of HKO clients are placed in either clean and sober homes in the community or are reunited with their family after the program is completed.

Several PIC agencies establish pre-release agreements for clients to access services upon release including: housing programs, substance abuse treatment programs, and clean & sober housing.

DPS coordinates with AMHD and assigns case management to clients that are exiting the system. Parole boards also require discharge plans for all parolees.

PIC agencies participated in the Office of Hawaiian Affairs (OHA) and Department of Public Safety's (DPS) Summit to plan for the development of a pu'uhonua (safe place or refuge) for incarcerated Native Hawaiians that incorporates Native Hawaiian spiritual values and family re-unification.

PIC will advocate that as DPS implements its Justice Reinvestment efforts to return clients to the community, homelessness will be addressed as part of those efforts.

**3B-4.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3C. Continuum of Care (CoC) Coordination

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3C-1 Does the Consolidated Plan for the jurisdiction(s) within the CoC's geography include the CoC's strategic plan goals for addressing and ending homelessness? Yes

3C-1.1 If yes, list the goals in the CoC strategic plan. (limit 1000 characters)

PIC's goals are broader than but inclusive of the ConPlan goals. For example, one CoC goal, Retool the Homeless Crisis Response System, includes several of the ConPlan goals (7,500 homeless people will have access to Emergency Shelters, 3,750 homeless will receive stabilization services, and 150 low income families will be prevented from homelessness or assisted with securing a rental). Another CoC goal, Increase Access to Stable and Affordable Housing, includes this ConPlan goal: 250 households will receive tenant based rental assistance.

3C-2 Describe the extent in which the CoC consults with State and local government Emergency Solutions Grants (ESG) program recipients within the CoC's geographic area on the plan for allocating ESG program funds and reporting on and evaluating the performance of ESG program recipients and subrecipients. (limit 1000 characters)

PIC's collaborative applicant (CA) is also the only recipient of ESG funds, so ESG efforts are coordinated with the CoC. In making ESG allocations the CA relied on public input and considered the ESG resources in light of State TANF funded housing placement programs for families and HUD VASH activities.

This consideration led to ESG programs focusing on singles which are not served by TANF activities, and partnering with HUD VASH to provide deposits.

3C-3 Describe the extent in which ESG funds are used to provide rapid re-housing and homelessness prevention. Description must include the percentage of funds being allocated to both activities. (limit 1000 characters)

60% of FY12 ESG funds were allocated HP activities and 20% of ESG funds were allocated to RRH activities based on public input. 44% of FY13 ESG funds were allocated HP activities and 44% of ESG funds were allocated to RRH activities based on public input.

In light of HUD's focus on using RRH funds for families, the increased collaboration from PIC's Boot Camp activities, the CA will seek additional input in the coming year to ensure ESG resources are used effectively alongside all the other resources to reduce homelessness.

3C-4 Describe the CoC's efforts to reduce the number of individuals and families who become homeless within the CoC's entire geographic area. (limit 1000 characters)

The City allocated 490,000 of 560,000 in ESG funds for Homelessness Prevention and Rapid Re-Housing (HPRR) activities in 2014.

PIC will revisit ESG priorities in 2014 allocations to determine if HPRR funding or other priorities should be increased.

The State continues funding HP programs at \$2M/yr and will start a shallow subsidy program to prevent homelessness and promote housing stability. PIC will continue to advocate for these funds.

The jurisdictions' Analyses of Impediments are included below along with PIC efforts to address those barriers.

Limited supply of reasonable units – PIC coordination with the City to use available funds for homelessness prevention and rapid re-housing efforts enable people at risk of homelessness to maintain housing and those that are newly homeless to acquire housing with short term assistance.

Applicants are unaware of rights and resources – PIC agencies attended a 3 day HUD fair housing training in 2011 so staff can inform applicants about their fair housing rights and the available resources.

Between 7/1/12 – 6/30/13 the State program helped 255 households and the ESG HPRR helped 184 households avoid homelessness.

3C-5 Describe how the CoC coordinates with other Federal, State, local, private and other entities serving the homeless and those at risk of homelessness in the planning and operation of projects. (limit 1000 characters)

PIC agencies include the recipients of grants from HOPWA, TANF, RHY, Head Start. This provides PIC with the "front line" experience of implementing programs, meeting compliance requirements, and acting as liaisons to help clients access services.

PIC then uses this experience to advocate for streamlining opportunities through the available channels which include the HICH, PIC's advocacy committee, and discussions with funding agencies at the State and the City.

Through the Boot Camp effort for chronically homeless, the collaboration has been more focused on implementing Housing First activities that PIC hopes will produce a more effective model which can be replicated in the other strategies to deal with homelessness like outreach and shelters.

PIC also anticipates the a Coordinated Assessment (CA) system will increase the efficiency and effectiveness of the CoC's housing system and reduce unnecessary duplication.

3C-6 Describe the extent in which the PHA(s) within the CoC's geographic area are engaged in the CoC efforts to prevent and end homelessness. (limit 1000 characters)

The Boot Camp effort, along with the prompting of the Governor, has engaged the Hawaii Public Housing Authority (HPHA) to become more involved with PIC activities. HPHA shared one of the barriers for them implementing a homeless preference was the lengthy review process its staff must implement to apply the preference. PIC agencies offered to be the liaisons for clients to HPHA's time searching through outdated contact information. PIC's HMIS vendor also worked with HPHA to share data on CH clients that are also on the HPHA wait list, to further streamline application efforts. HPHA staff are now regularly participating in one of the Boot Camp committees.

3C-7 Describe the CoC's plan to assess the barriers to entry present in projects funded through the CoC Program as well as ESG (e.g. income eligibility requirements, lengthy period of clean time, background checks, credit checks, etc.), and how the CoC plans to remove those barriers. (limit 1000 characters)

The Boot Camp technical assistance initial session with PIC focused on identifying some of PIC's barriers to accessing services. As part of its work to increase the flow through the available units, the Boot Camp committees will work on recommendations to reduce barriers where possible, while still meeting funder's eligibility and documentation requirements.

As PIC implements the role of Housing Navigators, it anticipates these new positions will assist clients in securing documentation to ease that barrier to entry. PIC's partnership with the PHA will also reduce barriers to entry by having PIC agencies help the PHA ensure client contact information is correct to minimize the PHA's application office time spent on unproductive contacts.

3C-8 Describe the extent in which the CoC and its permanent supportive housing recipients have adopted a housing first approach. (limit 1000 characters)

The Boot Camp's 100 day plan has secured 100% of PSH units that become available due to client departures will be prioritized for the most vulnerable clients as identified by the locally adapted the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT).

3C-9 Describe how the CoC's centralized or coordinated assessment system is used to ensure the homeless are placed in the appropriate housing and provided appropriate services based on their level of need. (limit 1000 characters)

HUD's Priority Community Initiative provider noted that PIC's current Aloha United Way 211 Line is sufficient to meet the CoC's definition of a centralized or coordinated assessment system (CAS). PIC will continue working to develop a more comprehensive assessment system, that will consistently assess client needs to ensure appropriate housing and services are provided.

In the beginning of 2013, PIC was focused on a CAS that would act as a screen to identify clients that could be diverted to homelessness prevention or rapid rehousing services. The next planned step would have been a more comprehensive assessment. However, because of lack of resources and other priorities, progress on the work done on a volunteer basis was slow.

The Boot Camp effort redirected the effort to focus the CAS on the Housing First model and incorporated a locally adapted VI-SPDAT as its base. As this CAS is implemented it will be used as a base for other strategies to address homelessness.

3C-10 Describe the procedures used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to request housing or services in the absence of special outreach. (limit 1000 characters)

All PIC programs provide equal professional service without regard to the race, color, religion, sex, handicap, familial status, or national origin of any prospective client, customer, or of the residents of any community.

All HUD funded agencies attended a 3 day fair housing training in August 2011 to keep informed about fair housing law and practices.

According to the 2012 Homeless Service Utilization Report, the lowest participation for sheltered and unsheltered services was by Asians and elderly; the lowest participation for unsheltered services was by Asians and youth ages 6 – 17. PIC considers these groups to be the least likely groups to request housing or services.

To reach Asians (44% of persons in Honolulu) PIC agencies actively market services to the community at large through educational presentations about homelessness and services for businesses, faith based groups, educators, and others.

3C-11 Describe the established policies that are currently in place that require all homeless service providers to ensure all children are enrolled in early childhood education programs or in school, as appropriate, and connected to appropriate services within the community. (limit 1000 characters)

Partners In Care (PIC) requires the following of all homeless assistance providers in the Continuum of Care's geographic area of the island of Oahu.

1. All family shelters will have a plan to ensure children and families access available services from the child's school
2. Staff will ensure shelter children attendance is monitored
3. Staff will ensure shelter children receive educational support services including homework assistance and tutoring
4. Staff will partner with community agencies and business to provide students with school supplies
5. Staff will ensure eligible shelter children receive are enrolled for age appropriate educational programs

3C-12 Describe the steps the CoC, working with homeless assistance providers, is taking to collaborate with local education authorities to ensure individuals and families who become or remain homeless are informed of their eligibility for McKinney-Vento educational services. (limit 1000 characters)

Hawaii's Department of Education (HIDOE) operates all the public schools in the state and is the only local education agency. The Education for Homeless Children and Youth (EHCY) office was created to ensure that the HIDOE complies with the McKinney-Vento Act (MVA) service requirements.

In 2012 the City and State coordinated a 4 hour meeting between all shelters and outreach agencies that serve families with children and EHCY staff to increase collaboration between the frontline EHCY staff and frontline shelter staff. The meeting included all PIC projects, including those with CoC funding, ESG funding, and those with only State funding.

Select outreach programs and shelter staff have established improved relationships with the EHCY office to ensure clients are identified and access services to minimize the trauma of homelessness on students.

3C-13 Describe how the CoC collaborates, or will collaborate, with emergency shelters, transitional housing, and permanent housing providers to ensure families with children under the age of 18 are not denied admission or separated when entering shelter or housing. (limit 1000 characters)

For programs that serve families with children, retaining family unity is a priority as long as safety is not compromised.

It is possible that within the coordinated assessment system, a process to ensure family unity is included.

1) One option that is more family friendly, is for families to be able to select from currently available housing options based on the information provided and currently available spaces in the different programs.

2) Another option to consider is assigning families that face separation priority entry into the next available family unit. This priority will need to be considered along with other factors, like medical need, physical safety, even length of homelessness, and other factors.

3) If the worse case scenario happens, and the family chooses to remain unsheltered rather than be separated in different housing programs, the coordinated assessment could flag outreach teams to prioritize that family for regular check ups. Through information gathered during intake, staff could also ensure that families are aware of all eligible and appropriate housing options so families can make the choice that is best for them.

3C-14 What methods does the CoC utilize to monitor returns to homelessness by persons, including, families who exited rapid re-housing? Include the processes the CoC has in place to ensure minimal returns to homelessness. (limit 1000 characters)

To help all PIC agencies understand client homeless recidivism trends, PIC's data committee has prioritized the creation of a recidivism report to help track this behavior throughout the CoC. The group is currently discussing different ways to track and report the behavior in aggregate as a CoC measure. Recent HMIS improvements along with improved consent forms allows all providers to access client history of homeless services activities if client's give consent.

As PIC receives better information about its recidivism trends it will be able to develop and implement systemic policies to address the underlying issues related to recidivism given its limited resources.

The data committee may also explore tracking recidivism as a distinct but separate event within HMIS to facilitate easier reporting.

3C-15 Does the CoC intend for any of its SSO or TH projects to serve families with children and youth defined as homeless under other Federal statutes? No

3C-15.1 If yes, describe how the use of grant funds to serve such persons is of equal or greater priority than serving persons defined as homeless in accordance with 24 CFR 578.89. Description must include whether or not this is listed as a priority in the Consolidated Plan(s) and its CoC strategic plan goals. CoCs must attach the list of projects that would be serving this population (up to 10 percent of CoC total award) and the applicable portions of the Consolidated Plan. (limit 1000 characters)

3C-16 Has the project been impacted by a major disaster, as declared by President Obama under Title IV of the Robert T. Stafford Act in the 12 months prior to the opening of the FY 2013 CoC Program Competition? No

3C-16.1 If 'Yes', describe the impact of the natural disaster on specific projects in the CoC and how this affected the CoC's ability to address homelessness and provide the necessary reporting to HUD. (limit 1500 characters)

3D. Continuum of Care (CoC) Coordination with Strategic Plan Goals

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In 2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP).

3D-1 Describe how the CoC is incorporating the goals of Opening Doors in local plans established to prevent and end homelessness and the extent in which the CoC is on target to meet these goals. (limit 1000 characters)

PIC's strategic plan goals are a subset of themes from the Federal Strategic Plan, "Opening Doors," and PIC agencies are committed to use its plan to set a path to ending all types of homelessness.

PIC works at ending chronic homelessness through implementing Housing First activities to house 100 of the most vulnerable unsheltered persons within 2 years and exploring the implementation of new program designs proved to be effective with this population including the Housing First model.

PIC works at preventing and ending homelessness among Veterans through its coordinated use and support of VASH vouchers, ongoing outreach services, ongoing housing programs.

PIC works at preventing and ending homelessness for families, youth, and children through offering services at all PIC shelters to improve family stability, address consumer debt, increase income and improve housing readiness and targeting State homelessness prevention resources to reduce the number of homeless families.

3D-2 Describe the CoC's current efforts, including the outreach plan, to end homelessness among households with dependent children. (limit 750 characters)

Families with children living unsheltered are given a choice of options by outreach workers that vary in geography, program fee, program structure and building configuration. This array of options encourages many difficult to serve families to enter the system.

Families with dependent children are a priority for outreach service providers who work with families until they are successfully housed and continue to assist them when they are first housed to ensure that the housing situation is stabilized and prevent clients from returning to homelessness.

PIC's outreach plan covers 100% of the geographic area and divides the island into geographic regions and has agencies assigned to the most populated areas.

3D-3 Describe the CoC's current efforts to address the needs of victims of domestic violence, including their families. Response should include a description of services and safe housing from all funding sources that are available within the CoC to serve this population. (limit 1000 characters)

PIC's area includes several domestic violence shelters which provide safe housing up to 90 days for families and singles who have no safe place to stay, limited to no support system or resources who are in need of a safe place to stay. The shelters provide food, clothing, toiletry items and offer some assistance with transportation. The shelters also offer coping skills, parenting skills safety planning, and referrals for housing, mental health, health issues substance abuse, longer term counseling to help guests heal from domestic violence. Funding sources for these projects include DHS, ESG, VAWA and CoC.

PIC's area also includes two DV transitional housing programs funded by OVW, ESG, CoC, and CDBG where guests may stay longer than 90 days. In addition to the shelter services, the transitional programs offer work related activities which is more appropriate for guest with greater stability in these programs.

Some PIC shelter and program staff are also trained to identify potential DV cases so they can refer for appropriate services.

3D-4 Describe the CoC's current efforts to address homelessness for unaccompanied youth. Response should include a description of services and housing from all funding sources that are available within the CoC to address homelessness for this subpopulation. Indicate whether or not the resources are available for all youth or are specific to youth between the ages of 16-17 or 18-24. (limit 1000 characters)

PIC agencies Hale Kipa and Waikiki Health Center serve runaway and homeless youth and young adults through the Youth Outreach (YO) program. In addition to supportive services, the program also maintains a house in Waikiki that provides basic services such as showers, laundry and casual meals.

For Unaccompanied Minors:

Hale Kipa offers boys' and girls' shelters and short-term foster placements. The emergency shelters are for youth 12 to 18 and the short-term foster placements can take youth from 10 to 18 and/or youth who would do better in a family setting rather than the emergency shelters.

The TLPs as well as Haloa House (for young women transitioning out of foster care) are aimed at 18 to 22 year olds.

Hawaii Youth Services Network is promoting legislation to pass a Safe Places for Youth Network program. The idea is that there will be Safe Places all around the island where a youth in need of assistance/in trouble could go to get referred/linked to services.

**3D-5 Describe the efforts, including the outreach plan, to identify and engage persons who routinely sleep on the streets or in other places not meant for human habitation.
(limit 750 characters)**

PIC outreach workers canvas the island daily, visiting known locations including streets, parks, beaches, under bridges where unsheltered homeless congregate, and other public places.

PIC's outreach plan covers 100% of the geographic area and divides the island into geographic regions and has agencies assigned to the most populated areas.

PIC's outreach plan also targets key unsheltered subpopulations and uses low-demand techniques to build trusting relationships and engage clients to accept services. Services offered include: food, clothing and hygiene, medical services, help obtaining ID, help accessing mainstream benefits and housing, bus passes, and referrals to mental health services, employment assistance, and drug treatment.

**3D-6 Describe the CoC's current efforts to combat homelessness among veterans, particularly those are ineligible for homeless assistance and housing through the Department of Veterans Affairs programs (i.e., HUD-VASH, SSVF and Grant Per Diem). Response should include a description of services and housing from all funding sources that exist to address homelessness among veterans.
(limit 1000 characters)**

Key housing services for veterans not eligible for VA programs include: U.S.VETS Waianae non-VA facility (up to 100 units), IHS Emergency shelter (200 men; 100 women;) and 8 bed Vet House, Next Step Emergency Shelter (up to 200 units), 300+ PSH vouchers from Kalihi-Palama Health and IHS. State funded outreach services serves over 300 unsheltered veterans annually and provide emergency needs including food, hygiene, medical, and mail services. A new \$1.25 million Housing First project vouchers funded by State will serve difficult to engage, veterans who are not eligible for VA services.

Key housing services for eligible veterans include: 1) U.S.VETS 98-bed men's GPD program, 2) U.S.VETS 20 bed women's GPA program, 3) 20 VA-funded emergency and HOPTEL beds, 4) U.S.VETS 33 unit PSH, 5) SSVF programs operated by Catholic Charities and U.S.VETS, 6) DOL veteran programs run by U.S.VETS (men's grant and women and families) and POWER UP! (statewide), 7) Affordable units provided by Cloudbreak Hawaii LLC, and 8) 237 VASH Vouchers. The Hawaii Interagency Coalition prioritizes the reduction of veterans in its strategic plan.

3E. Reallocation

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3E-1 Is the CoC reallocating funds from one or more eligible expiring grant(s) into one or more new permanent supportive housing projects dedicated to chronically homeless persons? Yes

3E-2 Is the CoC reallocating funds from one or more eligible expiring grant(s) into one or more new rapid re-housing project for families? No

**3E-2.1 If the CoC is planning to reallocate funds to create one or more new rapid re-housing project for families, describe how the CoC is already addressing chronic homelessness through other means and why the need to create new rapid re-housing for families is of greater need than creating new permanent supportive housing for chronically homeless persons.
(limit 1000 characters)**

Not applicable.

3E-3 If the CoC responded 'Yes' to either of the questions above, has the recipient of the eligible renewing project being reallocated been notified? Yes

3F. Reallocation - Grant(s) Eliminated

CoCs planning to reallocate into new permanent supportive housing projects for chronically homeless individuals may do so by reducing one or more expiring eligible renewal projects. CoCs that are eliminating projects entirely must identify those projects.

Amount Available for New Project: (Sum of All Eliminated Projects)				
\$142,024				
Eliminated Project Name	Grant Number Eliminated	Component Type	Annual Renewal Amount	Type of Reallocation
Ohana Ola O Kahum...	HI0040L9C011204	TH	\$142,024	Regular

3F. Reallocation - Grant(s) Eliminated Details

3F-1 Complete each of the fields below for each grant that is being eliminated during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Eliminated Project Name: Ohana Ola O Kahumana 2013
Grant Number of Eliminated Project: HI0040L9C011204
Eliminated Project Component Type: TH
Eliminated Project Annual Renewal Amount: \$142,024

3F-2 Describe how the CoC determined that this project should be eliminated.
(limit 750 characters)

Application submitted after CoC submission deadline

3G. Reallocation - Grant(s) Reduced

CoCs that choose to reallocate funds into new rapid rehousing or new permanent supportive housing for chronically homeless persons may do so by reducing the grant amount for one or more eligible expiring renewal projects.

Amount Available for New Project (Sum of All Reduced Projects)					
\$343,465					
Reduced Project Name	Reduced Grant Number	Annual Renewal Amount	Amount Retained	Amount available for new project	Reallocation Type
Kaukama Group Hom...	HI0026L9C011205	\$30,290	\$29,605	\$685	Regular
Komo Mai Group Ho...	HI0027L9C011205	\$37,754	\$36,900	\$854	Regular
Barbers Point Vet...	HI0018L9C011205	\$335,592	\$327,998	\$7,594	Regular
Continuum of Care...	HI0020L9C011205	\$83,084	\$81,204	\$1,880	Regular
Headway House 2013	HI0021L9C011205	\$207,948	\$203,242	\$4,706	Regular
GHP Permanent Hou...	HI0034L9C011205	\$516,801	\$505,106	\$11,695	Regular
IHS NPLH 2013	HI0014C9C010800	\$293,420	\$286,780	\$6,640	Regular
Ka Ohu Hou O Manoa	HI0041L9C011203	\$177,076	\$173,068	\$4,008	Regular
Permanent Support...	HI0046L9C011201	\$255,484	\$249,703	\$5,781	Regular
HEARTH Safe Haven...	HI0031L9C011204	\$845,603	\$826,467	\$19,136	Regular
Ahukini Group Hom...	HI0016L9C011205	\$27,411	\$26,791	\$620	Regular
Vancouver House	HI0037L9C011205	\$53,202	\$51,998	\$1,204	Regular
Kalaeloa Permanen...	HI0025L9C011205	\$138,926	\$135,782	\$3,144	Regular
Homeless Holistic...	HI0024L9C011205	\$63,594	\$62,155	\$1,439	Regular
Transitional Livi...	HI0036L9C011204	\$133,741	\$130,715	\$3,026	Regular
Community Residen...	HI0019L9C011205	\$350,273	\$342,346	\$7,927	Regular
ATS Homeless Offe...	HI0017L9C011205	\$284,496	\$193,670	\$90,826	Regular
Consolidated PH 2013	HI0029L9C011205	\$5,205,467	\$5,048,976	\$156,491	Regular
Consolidated TH 2013	HI0035L9C011205	\$313,457	\$303,039	\$10,418	Regular
CoC Planning Proj...	HI0064L9C011200	\$125,437	\$120,046	\$5,391	Regular

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Kaukama Group Home 2013
Grant Number of Reduced Project: HI0026L9C011205
Reduced Project Current Annual Renewal Amount: \$30,290
Amount Retained for Project: \$29,605
Amount available for New Project(s): \$685
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Komo Mai Group Home 2013
Grant Number of Reduced Project: HI0027L9C011205
Reduced Project Current Annual Renewal Amount: \$37,754
Amount Retained for Project: \$36,900
Amount available for New Project(s): \$854
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Barbers Point Veterans-in-Progress
Grant Number of Reduced Project: HI0018L9C011205
Reduced Project Current Annual Renewal Amount: \$335,592
Amount Retained for Project: \$327,998
Amount available for New Project(s): \$7,594
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Continuum of Care Domestic Abuse Shelter & Transitional Housing Oahu FY2013
Grant Number of Reduced Project: HI0020L9C011205
Reduced Project Current Annual Renewal Amount: \$83,084
Amount Retained for Project: \$81,204

Amount available for New Project(s): \$1,880
(This amount will auto-calculate by selecting
"Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Headway House 2013

Grant Number of Reduced Project: HI0021L9C011205

Reduced Project Current Annual Renewal Amount: \$207,948

Amount Retained for Project: \$203,242

Amount available for New Project(s): \$4,706
(This amount will auto-calculate by selecting
"Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: GHP Permanent Housing 2014-2015

Grant Number of Reduced Project: HI0034L9C011205
Reduced Project Current Annual Renewal Amount: \$516,801
Amount Retained for Project: \$505,106
Amount available for New Project(s): \$11,695
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: IHS NPLH 2013
Grant Number of Reduced Project: HI0014C9C010800
Reduced Project Current Annual Renewal Amount: \$293,420
Amount Retained for Project: \$286,780
Amount available for New Project(s): \$6,640
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Ka Ohu Hou O Manoa
Grant Number of Reduced Project: HI0041L9C011203
Reduced Project Current Annual Renewal Amount: \$177,076
Amount Retained for Project: \$173,068
Amount available for New Project(s): \$4,008
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Permanent Supportive Housing for Chronically Homeless Veterans and Families
Grant Number of Reduced Project: HI0046L9C011201
Reduced Project Current Annual Renewal Amount: \$255,484
Amount Retained for Project: \$249,703
Amount available for New Project(s): \$5,781
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: HEARTH Safe Haven Renewal
Grant Number of Reduced Project: HI0031L9C011204
Reduced Project Current Annual Renewal Amount: \$845,603
Amount Retained for Project: \$826,467
Amount available for New Project(s): \$19,136
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Ahukini Group Home 2013
Grant Number of Reduced Project: HI0016L9C011205
Reduced Project Current Annual Renewal Amount: \$27,411
Amount Retained for Project: \$26,791
Amount available for New Project(s): \$620
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Vancouver House
Grant Number of Reduced Project: HI0037L9C011205
Reduced Project Current Annual Renewal Amount: \$53,202
Amount Retained for Project: \$51,998
Amount available for New Project(s): \$1,204
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Kalaeloa Permanent Housing for Homeless Veterans with Disabilities
Grant Number of Reduced Project: HI0025L9C011205
Reduced Project Current Annual Renewal Amount: \$138,926
Amount Retained for Project: \$135,782

Amount available for New Project(s): \$3,144
(This amount will auto-calculate by selecting
"Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Homeless Holistic Civil Legal Services Program

Grant Number of Reduced Project: HI0024L9C011205

Reduced Project Current Annual Renewal Amount: \$63,594

Amount Retained for Project: \$62,155

Amount available for New Project(s): \$1,439
(This amount will auto-calculate by selecting
"Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Transitional Living Program Housing and Support for Homeless Young Adults

Grant Number of Reduced Project: HI0036L9C011204
Reduced Project Current Annual Renewal Amount: \$133,741
Amount Retained for Project: \$130,715
Amount available for New Project(s): \$3,026
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Community Residential Program 2014-2015
Grant Number of Reduced Project: HI0019L9C011205
Reduced Project Current Annual Renewal Amount: \$350,273
Amount Retained for Project: \$342,346
Amount available for New Project(s): \$7,927
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: ATS Homeless Offenders Treatment and Supportive Living Services 2013
Grant Number of Reduced Project: HI0017L9C011205
Reduced Project Current Annual Renewal Amount: \$284,496
Amount Retained for Project: \$193,670
Amount available for New Project(s): \$90,826
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Consolidated PH 2013
Grant Number of Reduced Project: HI0029L9C011205
Reduced Project Current Annual Renewal Amount: \$5,205,467
Amount Retained for Project: \$5,048,976
Amount available for New Project(s): \$156,491
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Consolidated TH 2013
Grant Number of Reduced Project: HI0035L9C011205
Reduced Project Current Annual Renewal Amount: \$313,457
Amount Retained for Project: \$303,039
Amount available for New Project(s): \$10,418
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: CoC Planning Project Application FY2013
Grant Number of Reduced Project: HI0064L9C011200
Reduced Project Current Annual Renewal Amount: \$125,437
Amount Retained for Project: \$120,046
Amount available for New Project(s): \$5,391
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3H. Reallocation - New Project(s)

CoCs must identify the new project(s) it plans to create and provide the requested information for each project.

Sum of All New Reallocated Project Requests
(Must be less than or equal to total amount(s) eliminated and/or reduced)

Current Priority #	New Project Name	Component Type	Transferred Amount	Reallocation Type
23	IHS New Perm...	PH	\$485,489	Regular

3H. Reallocation - New Project(s) Details

3H-1 Complete each of the fields below for each new project created through reallocation in the FY2013 CoC Program Competition. CoCs can only reallocate funds to new permanent housing—either permanent supportive housing for the chronically homeless or rapid re-housing for homeless households with children.

FY2013 Rank (from Project Listing): 23

Proposed New Project Name: IHS New Permanent Supportive Housing Project
2013

Component Type: PH

Amount Requested for New Project: \$485,489

3I. Reallocation: Balance Summary

3I-1 Below is the summary of the information entered on forms 3D-3H, and the last field, "Remaining Reallocation Balance" should equal "0." If there is a balance remaining, this means that more funds are being eliminated or reduced than the new project(s) requested. CoCs cannot create a new reallocated project for an amount that is greater than the total amount of reallocated funds available for new projects.

Reallocation Chart: Reallocation Balance Summary

Reallocated funds available for new project(s):	\$485,489
Amount requested for new project(s):	\$485,489
Remaining Reallocation Balance:	\$0

4A. Continuum of Care (CoC) Project Performance

Instructions

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

4A-1 How does the CoC monitor the performance of its recipients on HUD-established performance goals? (limit 1000 characters)

PIC uses the following methods to monitor recipients performance:

1) Reporting at PIC meetings – Every month a PIC agency will report progress on goals, challenges, and use the forum to solicit ideas to improve program effectiveness.

2) Annual CoC application review – The City will share all HUD funded agency performance as reported in the CoC application and in the agency's APR. The planning committee, as part of its monthly meetings will facilitate discussion on strengths, challenges, and ways to improve.

3) Quarterly fiscal review – PIC will collect quarterly reports from member agencies, validate with HUD expenditure information, and address any issues with technical assistance and in the worst case scenario, reallocation of funds.

4A-2 How does the CoC assist project recipients to reach HUD-established performance goals? (limit 1000 characters)

In addition to the activities above the PIC planning committee has discussed this issue and provided a forum for agencies to discuss performance challenges, seek guidance from other agencies, and implement suggested strategies.

4A-3 How does the CoC assist recipients that are underperforming to increase capacity? (limit 1000 characters)

In addition to the activities above the PIC planning committee has discussed this issue and provided a forum for agencies to discuss performance challenges, seek guidance from other agencies, and implement suggested strategies.

4A-4 What steps has the CoC taken to reduce the length of time individuals and families remain homeless? (limit 1000 characters)

PIC will be improving HMIS reporting following HUD's guidance on tracking the length of time clients remain homeless.

PIC's data committee implemented a new Consent to Release Information form to promote information sharing among providers. This allows service providers to track any previous client history in the system to help choose the best services to help the client.

PIC's data committee also worked on refining the lexicon of terms related to HMIS data entry. The HMIS vendor will be training providers on these definitions in the coming year to facilitate consistent data entry that will allow consistent reporting on outcomes including the length of homelessness.

**4A-5 What steps has the CoC taken to reduce returns to homelessness of individuals and families in the CoC's geography?
(limit 1000 characters)**

PIC will be improving HMIS reporting following HUD's guidance on tracking the length of time clients remain homeless.

PIC's data committee implemented a new Consent to Release Information form to promote information sharing among providers. This allows service providers to track any previous client history in the system to choose the best services to help the client.

PIC's data committee also worked on refining the lexicon of terms related to HMIS data entry. The HMIS vendor will be training providers on these definitions in the coming year to facilitate consistent data entry that will allow consistent reporting on outcomes including the length of homelessness.

PIC's planning committee will continue educating PIC agencies about HUD goals and strategies provided through the various technical assistance opportunities that the CoC has received in the past year.

IHS' Housing Department hosted a training to help service providers understand the definition of homelessness, which included a segment on specifically quantifying the duration and episodes of homelessness.

**4A-6 What specific outreach procedures has the CoC developed to assist homeless service providers in the outreach efforts to engage homeless individuals and families?
(limit 1000 characters)**

PIC's outreach plan covers 100% of the geographic area and divides the island into geographic regions and has agencies assigned to the most populated areas.

PIC's outreach plan also allows service providers to target key unsheltered subpopulations and use low-demand techniques to build trusting relationships and engage clients to accept services. Services are delivered in a welcoming and nonjudgmental manner. Some of the services offered include: food, clothing and hygiene, medical services, help obtaining ID, help accessing mainstream benefits and housing, bus passes, and referrals to mental health services, employment assistance, and drug treatment.

The State which funds most of PIC's outreach activities began tracking provider reports of clients with limited English proficiency and has linked PIC agencies with some translation resources.

PIC will advocate for outreach resources from AMHD and the Alcohol and Drug Abuse Division (ADAD), since many homeless struggle with mental health issues and substance abuse and addiction.

PIC agencies will also take advantage of DHS' expanded Medicaid coverage to provide services for medically vulnerable homeless.

4B. Section 3 Employment Policy

Instructions

*** TBD ***

4B-1 Are any new proposed project applications requesting \$200,000 or more in funding? Yes

4B-1.1 If yes, which activities will the project(s) undertake to ensure employment and other economic opportunities are directed to low or very low income persons? (limit 1000 characters)

The reallocation project is proposed by PIC agency IHS, The Institute for Human Services, Inc. IHS Hele 2 Work employment and employment readiness programs provide assistance to both guests and non guests in finding, applying for, and keeping a job. IHS recognizes that increasing sustainable income increases capacity to sustain housing, and that employment provides an important source of resiliency for persons who are recovering from homelessness.

Former IHS guests who have been helped by shelter and housing programs often express a desire to give back to the community and seek volunteer and sometimes employment opportunities with IHS. IHS' hiring policy allows for a former client to obtain employment at IHS after a minimum 1 year period following discharge from services.

IHS will also leverage a Department of Labor Office of Community Services grant to offer core employment services for low income households and is close to receiving Employment Now certification.

4B-2 Are any of the projects within the CoC requesting funds for housing rehabilitation or new constructions? No

4B-2.1 If yes, which activities will the project undertake to ensure employment and other economic opportunities are directed to low or very low income persons:

4C. Accessing Mainstream Resources

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

4C-1 Does the CoC systematically provide information about mainstream resources and training on how to identify eligibility and program changes for mainstream programs to provider staff? Yes

4C-2 Indicate the percentage of homeless assistance providers that are implementing the following activities:

* Homeless assistance providers supply transportation assistance to clients to attend mainstream benefit appointments, employment training, or jobs.	83%
* Homeless assistance providers use a single application form for four or more mainstream programs.	25%
* Homeless assistance providers have staff systematically follow-up to ensure mainstream benefits are received.	92%

4C-3 Does the CoC make SOAR training available for all recipients and subrecipients at least annually? Yes

4C-3.1 If yes, indicate the most recent training date: 08/26/2013

**4C-4 Describe how the CoC is preparing for implementation of the Affordable Care Act (ACA) in the state in which the CoC is located. Response should address the extent in which project recipients and subrecipients will participate in enrollment and outreach activities to ensure eligible households are able to take advantage of new healthcare options.
(limit 1000 characters)**

PIC agencies IHS, Legal Aid Society of Hawaii, and Helping Hands Hawaii are contracted Marketplace Assister Organizations (MAO) for the Hawaii Health Connector. Agency staff were trained to help applicants learn about eligibility, complete applications, and select participating qualified health insurance plans that provide 10 essential health benefits from the Hawaii Health Connector Marketplace.

Mental Health Kokua uses SAMHSA's Four Quadrant Clinical Integration Model and helps to clients in each quadrant reduce barriers and apply for appropriate and eligible services.

PIC will continue to monitor any new guidance from HUD, other governmental agencies, and service providers to learn about different opportunities to leverage ACA resources to serve the homeless population.

PIC will keep advocating for State resources to provide more substance abuse and mental health services to homeless so HUD funds can focus on housing. PIC also advocate for more resources from the business and philanthropic community for homelessness supportive services.

**4C-5 What specific steps is the CoC taking to work with recipients to identify other sources of funding for supportive services in order to reduce the amount of CoC Program funds being used to pay for supportive service costs?
(limit 1000 characters)**

IHS is also working to actively establish Housing Support Services (like Navigators and grand aides) as a Medicaid reimbursable service for clients as authorized under the Affordable Care Act and recently approved by the State of Hawaii Department of Human Services (DHS).

A new SAMHSA grant will offer substance abuse and mental health services for homeless for 3 years, and the PIC will explore options to seek similar additional funding as it becomes available.

All PIC agencies continue to explore other funding resources to support their work, and PIC offers a forum for sharing new funding opportunities and coordinating collaboration in applying for funds.

Attachments

Document Type	Required?	Document Description	Date Attached
Certification of Consistency with the Consolidated Plan	Yes	ConPlan Certifica...	02/02/2014
CoC Governance Agreement	No	CoC Governance	02/03/2014
CoC-HMIS Governance Agreement	No	HMIS Governance	02/03/2014
CoC Rating and Review Document	No	CoC Request for I...	02/03/2014
CoCs Process for Making Cuts	No	CoC Request for I...	02/03/2014
FY2013 Chronic Homeless Project Prioritization List	No		
FY2013 HUD-approved Grant Inventory Worksheet	Yes	HUD approved GIW	02/03/2014
FY2013 Rank (from Project Listing)	No	2013 CoC Project ...	02/03/2014
Other	No	CoC HMIS Data Qua...	02/03/2014
Other	No	Revised GIW - lat...	02/03/2014
Other	No		
Projects to Serve Persons Defined as Homeless under Category 3	No		
Public Solicitation	No	Public notice	02/03/2014

Attachment Details

Document Description: ConPlan Certification

Attachment Details

Document Description: CoC Governance

Attachment Details

Document Description: HMIS Governance

Attachment Details

Document Description: CoC Request for Interest

Attachment Details

Document Description: CoC Request for Interest

Attachment Details

Document Description:

Attachment Details

Document Description: HUD approved GIW

Attachment Details

Document Description: 2013 CoC Project Ranking

Attachment Details

Document Description: CoC HMIS Data Quality Plan

Attachment Details

Document Description: Revised GIW - late projects excluded

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description: Public notice

Submission Summary

Page	Last Updated
1A. Identification	No Input Required
1B. CoC Operations	01/26/2014
1C. Committees	01/29/2014
1D. Project Review	01/30/2014
1E. Housing Inventory	01/23/2014
2A. HMIS Implementation	01/23/2014
2B. HMIS Funding Sources	01/23/2014
2C. HMIS Beds	01/23/2014
2D. HMIS Data Quality	01/30/2014
2E. HMIS Data Usage	01/23/2014
2F. HMIS Policies and Procedures	01/23/2014
2G. Sheltered PIT	01/30/2014
2H. Sheltered Data - Methods	01/23/2014
2I. Sheltered Data - Collection	01/27/2014
2J. Sheltered Data - Quality	01/23/2014
2K. Unsheltered PIT	01/30/2014
2L. Unsheltered Data - Methods	01/23/2014
2M. Unsheltered Data - Coverage	01/23/2014
2N. Unsheltered Data - Quality	01/27/2014
Objective 1	01/30/2014
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Objective 4	01/30/2014
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3B. CoC Discharge Planning: Foster Care	01/30/2014
3B. CoC Discharge Planning: Health Care	01/27/2014
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3B. CoC Discharge Planning: Mental Health	01/30/2014
3B. CoC Discharge Planning: Corrections	01/30/2014
3C. CoC Coordination	01/30/2014
3D. Strategic Plan Goals	01/30/2014
3E. Reallocation	01/26/2014
3F. Grant(s) Eliminated	02/02/2014
3G. Grant(s) Reduced	02/02/2014
3H. New Project(s)	02/03/2014
3I. Balance Summary	No Input Required
4A. Project Performance	01/30/2014
4B. Employment Policy	01/30/2014
4C. Resources	01/30/2014
Attachments	02/03/2014
Submission Summary	No Input Required

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing
and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.
(Type or clearly print the following information:)

Applicant Name: City and County of Honolulu

Project Name: See Attached List

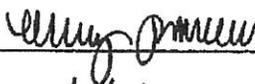
Location of the Project: Various locations within the City and County of Honolulu

Name of the Federal
Program to which the
applicant is applying: Continuum of Care Program

Name of
Certifying Jurisdiction: City and County of Honolulu

Certifying Official
of the Jurisdiction
Name: Holly Kawano

Title: Federal Grants Coordinator

Signature: 

Date: 1/21/14

Partners In Care (Honolulu Continuum of Care (CoC)) HMIS Memorandum of Agreement (MOA)

This Memorandum of Agreement (MOA) is made between Partners In Care (PIC) which represents the Honolulu Continuum of Care, and the City and County of Honolulu's Department of Community Services (DCS), regarding the administration of the required Homeless Management Information System (HMIS). The MOA clarifies the roles and requirements for each party related to the HMIS.

A. PIC Requirements:

As the CoC, PIC is responsible for HMIS implementation including:

1. Planning, software selection, and selection of the HMIS Lead Agency.
2. Establishing HMIS policies/protocols and monitoring compliance with HUD Data Standards.
3. Providing accurate, reliable data reporting for CoC data gathering including: Annual Homeless Assessment Report (AHAR), Housing Inventory Charts (HIC), Point In Time (PIT), HMIS participation coverage rates, data required for the CoC consolidated application, and other HUD required (note: DV agency participation excluded in HMIS coverage rates).
4. Working with the Collaborative Applicant (DCS) to ensure programs meet the standards established by the Data Quality Plan.
5. Participating in the HMIS Data Committee to create an annual HMIS plan that will guide HMIS activities and improvements (Ex: reviewing reporting structures that will be programmed into the HMIS).

B. HMIS Data Committee Requirements:

1. Reviewing and implementing PIC and Bridging the Gap the Balance of State CoC (BTG) Board recommendations.
2. Collaborating with other PIC and BTG committees and the Hawaii Interagency Council on Homelessness (HICH) to improve reporting, outcomes, and analysis
3. Making recommendations to the PIC and BTG Boards based on analysis of program data
4. Creating and reviewing HMIS policy documents.

C. DCS Requirements:

As the Collaborative Applicant for PIC, DCS is responsible for:

1. Working with PIC to implement the HMIS activities as described above.
2. Working with PIC to fund the HMIS Data Committee's annual HMIS plan.
3. Providing the required matching funds for the HMIS renewal application.
4. Working with PIC to ensure programs meet the standards established by the Data Quality Plan; to include periodic updates to PIC on data quality issues.

As the HMIS Lead Agency, DCS is responsible for:

1. Administering HMIS funds for management of HMIS operations.
2. Administering HMIS funds to implement the annual HMIS plan for HMIS activities and improvements.

This agreement shall be in effect from 10/21/13 through 10/20/14.

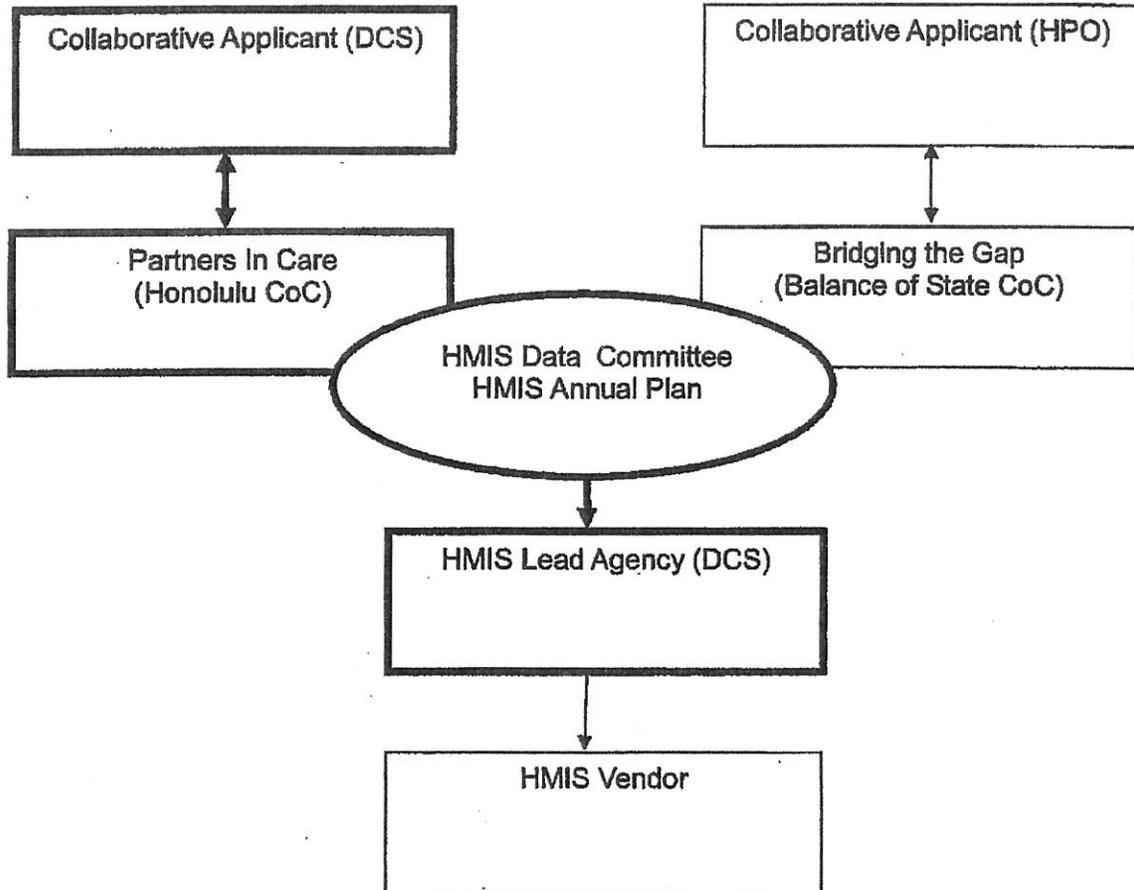
D. V. J.
Authorized representative of PIC

10/15/13
Date

[Signature]
Authorized representative of DCS

10/21/2013
Date

**Partners In Care (Honolulu Continuum of Care (CoC))
HMIS Memorandum of Agreement (MOA)**



**Request for Interest
Continuum of Care Homeless Assistance Programs**

The Department of Community Services, in cooperation with Partners in Care, requests applications from qualified nonprofit agencies providing shelter and supportive services to persons experiencing homelessness. Applications received will be evaluated and prioritized for inclusion into the City's application to the U.S. Department of Housing and Urban Development (HUD) for the Continuum of Care Programs FY2013.

Project applications submitted by qualified organizations will be reviewed based on the experience and capacity of the proposing organization, the degree to which the funding request is consistent with HUD's Continuum of Care (CoC) goals, the degree to which CoC funds will be leveraged with other resources, anticipated accomplishments in relation to CoC priorities, the prospects for the long term operation of the proposed project, the participation of the proposer in the local Continuum of Care process, and the ability of the proposing organization to implement its proposed project in a timely manner.

Interested agencies may download the Request for Interest in electronic format at the City's Purchasing website www.honolulu.gov/pur. If you have any questions regarding this website, please contact the Purchasing Help Desk at 808-768-5535. A printed copy of the Request for Interest will be made available upon request from the Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii, 96813 by calling 768-7749.

The City will conduct an informational meeting from 11:00am – noon on Tuesday December 17, 2013 at Central Union Church, 1660 S Beretania Street, Honolulu.

Applications must be submitted and time-stamped by **noon on Friday, January 3, 2014** to the Department of Community Services at the above address.

Questions regarding the CoC Programs may be directed to Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

KIRK CALDWELL, MAYOR
City and County of Honolulu

Pamela A. Witty-Oakland, Director
Department of Community Services



Request for Interest 2013 Continuum of Care Program

Offered By:

City and County of Honolulu
Department of Community Services
Community-Based Development Division

KIRK CALDWELL, MAYOR
City and County of Honolulu

Pamela A. Witty-Oakland, Director
Department of Community Services

December 2013

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Exhibit A – Notice of Funding Availability (NOFA) for the CoC Program Competition

Exhibit B – “Summary for Renewal Projects” Form

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Exhibit F – City’s Sexual Harassment Policy

Exhibit G – “Summary for Renewal Projects” Calculator

1. Introduction

The City and County of Honolulu, through the Department of Community Services (DCS), is issuing this Request for Interest (RFI) to seek applications from qualified nonprofit agencies providing shelter and supportive services to persons experiencing homelessness. Selected applications will be included in the Honolulu Continuum of Care's (CoC's) federal grant application for funds under the U.S. Department of Housing and Urban Development 's (HUD) CoC Program. The CoC Program is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11381–11389) (the "Act"). The FY 2013 funds for the CoC Program were authorized by the Consolidated and Further Continuing Appropriations Act, 2013 (Public Law 113-6, approved March 26, 2013) (the "HUD Appropriations Act"). For FY 2014, the level of funding for the CoC Program is not yet known. The Continuing Appropriations Act, 2014 (Public Law 113-46, approved October 17, 2013) funds HUD operations and programs at FY 2013 levels, but provides such funding only through January 15, 2014. Nevertheless for purposes of expediency and efficiency, the FY 2013 – FY 2014 CoC Program Notice of Funding Availability (NOFA) will award funds made available for the CoC Program under FY 2013 and FY 2014. When the level of funding is known for FY 2014, HUD will announce this amount through separate notice. In this separate notice; HUD will also publish the deadlines for submitting the information required by HUD.

The City submits the application to HUD as a Collaborative Applicant (CA) in partnership with the Honolulu CoC, which is known as Partners In Care (PIC). PIC is a membership organization of homeless service providers, other professionals, units of local and state government, program participants, and other community representatives in the City and County of Honolulu. PIC is a planning, coordinating, and advocacy body that develops recommendations for programs and services to fill gaps in Honolulu's CoC.

The City will conduct an informational meeting from 11:00am – noon on Tuesday December 17, 2013 at Central Union Church, 1660 South Beretania Street, Honolulu.

Notifications of addenda will be issued to all prospective Applicants known to have obtained the RFI from the City.

Application documents must be submitted to the DCS, Community-Based Development Division at 715 South King Street, Suite 311, Honolulu, Hawaii, by **noon on Friday, January 3, 2014**. Please ensure that applications and copies are time stamped at the time of delivery and that the original application is clearly marked. Applications received after the submission deadline will be time stamped and returned unopened to the proposing agency. Questions regarding this Request for Interest may be directed to Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

The 2013 HUD CoC NOFA is included as Exhibit A in this RFI. Every potential applicant should review the NOFA carefully and in its entirety in conjunction with the CoC Program interim rule in order to gain a comprehensive understanding and to comply with CoC Program requirements. The NOFA frequently makes reference to citations from the CoC Program interim rule (24 CFR part 578). Applicants should review the General Section of the NOFA, published on July 23, 2012 and the General Section Technical Correction, published October 13, 2012. Additional 2013 CoC notices, broadcasts, and HUD guidance are available at <https://www.onecpd.info/e-snaps/fy-2013-coc-program-nofa-coc-program-competition/>.

Electronic Submission for Applications

HUD requires the electronic submission of CoC applications through their e-snaps system, which is available at www.hud.gov/esnaps or can be accessed from HUD's OneCPD Resource Exchange at <https://www.onecpd.info/e-snaps/>. **All agencies submitting CoC applications must use e-snaps. In addition, the City requests additional hard copy documents that are detailed in Section 6 of this RFI.**

Project applicants must establish an e-snaps user ID and password before accessing the Project Application.

Project applicants are strongly encouraged to review training materials about e-snaps that are available on HUD's OneCPD site at <https://www.onecpd.info/e-snaps/fy-2013-coc-program-nofa-coc-program-competition/>.

Questions regarding the CoC NOFA and e-snaps can be submitted to HUD's OneCPD Ask A Question (AAQ) at www.onecpd.info/ask-a-question. HUD strongly suggests utilizing the "Export to PDF" function in e-snaps to print a hard copy of all submission documents for your records.

HUD Administered Projects vs. City Administered Projects

Most of the CoC's projects are direct grants between nonprofit agencies and HUD. In these situations the nonprofit agency is considered the applicant to HUD and the recipient of HUD funds. For a few of the CoC's projects, the City is the recipient of grants from HUD and is considered the applicant to HUD. The City administers these grants for nonprofit agencies, which are considered subrecipients, through subrecipient agreements. The current City administered projects include:

Applicant / Recipient	Subrecipient	Program Component
City	Catholic Charities Hawaii	Transitional Housing
City	Gregory House	Permanent Housing
City	Ho'omau Ke Ola	Transitional Housing
City	IHS, The Institute for Human Services, Inc.	Permanent Housing

Applicant / Recipient	Subrecipient	Program Component
City	Kalihi-Palama Health Center	Permanent Housing
City	Steadfast Housing Development Corporation	Permanent Housing

HUD's CoC Program Interim Rule requires that if a new Project Application includes funding for rental assistance, the rental assistance must be administered by a State, unit of general local government, or a public housing agency.

Nonprofit agencies considering rental assistance in their new Project Application must contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715 to consult with the DCS' Community Assistance Division about administering the rental assistance in compliance with HUD's rule. New Project Applications with rental assistance funding must also follow the instructions below:

- Follow HUD's instructions to register and create an e-snaps profile (make sure to add all of your projects when prompted so that you get multiple Project Application documents).
- Complete your Project Application documents through your e-snaps profile.
- If you are a City administered grant, after your Project Application is filled out, **DO NOT** submit your Project Application to e-snaps. Provide Gabe Naeole with your user name and password so that your Project Application documents can be inputted into the City's e-snaps profile. **Please send Gabe your e-snaps information and submit your hard copy documents to the DCS (detailed in Section 6 of this RFI) by the noon, January 3, 2014 deadline.** If you have any questions, please contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

New Project Applications without rental assistance funds will execute contracts for CoC funding directly with HUD. The City will not be a party to new Project Applications without rental assistance funds nor will the City be responsible for the administration and monitoring of new Project Applications without rental assistance funds.

Annual Renewal Demand Amount

Annual Renewal Demand (ARD) (24 CFR 578.17(b)(2)) is the total amount of all the CoC's projects that will be eligible for renewal in the FY2013 CoC Program Competition. It is the sum of the annual renewal amounts of all projects within the CoC's geographic area eligible to apply for renewal in the FY2013 CoC Program competition, before any adjustments to leasing, rental assistance, and operating line items based on FMR changes.

Honolulu's ARD for the FY2013 CoC Program Competition is estimated \$10,042,420. The NOFA (Exhibit A) states that HUD will publish final ARD information and the City will issue an addendum with that information when it is released.

Tier 1 and Tier 2 Funding Levels

Based on the estimated FY 2013 ARD for each CoC that has a HUD-approved Registration, it is anticipated that the national annual renewal demand for FY 2013 funds under the CoC Program Competition will exceed the \$1.7 billion available under the NOFA (Exhibit A). Therefore, HUD anticipates that the available funding will be inadequate to renew all existing projects eligible to renew for FY 2013 funds in the CoC Program Competition. To ensure that CoCs have the ability to indicate to HUD which projects are of the highest priority for FY 2013, HUD is requiring that CoCs rank projects in Tier 1 or Tier 2. The tiers are financial thresholds.

Tier 1 is equal to the CoC's FY 2013 ARD approved in the Registration process, less 5 percent. For Honolulu the ARD amount is estimated at \$10,042,420 and the Tier 1 amount is estimated at \$9,540,299. The NOFA (Exhibit A) states that HUD will publish final ARD and Tier information and the City will issue an addendum with that information when it is released.

Tier 2 is the amount remaining in FY 2013 ARD plus the approved amounts for CoC planning and UFA costs. HUD will publish final FY 2013 ARD and Tier 1 amounts for each CoC no later than 15 days after publication of the NOFA (Exhibit A). Any project that falls only partially in Tier 1 will be considered by HUD as falling entirely in Tier 2.

The CoC must assign a unique rank to each project that it intends to submit to HUD for FY 2013 funding. HUD strongly advises CoCs to rank higher those project applications the CoC determines are high priority, high performing, and meet the needs and gaps as identified by the CoC. HUD will select projects as described in Section VII.B.1.b of the NOFA (Exhibit A).

Honolulu CoC – New Reallocation Project

PIC has decided that it will accept Project Applications for a new reallocation project for an estimated \$501,121. The funding amount is the difference between the CoC's estimated ARD, \$10,042,420, and the CoC's estimated Tier 1 amount, \$9,540,299.

Reallocation is when a CoC shifts funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD. New projects created through reallocation must meet the requirements set forth in Section II.B.1 and the eligibility and project quality thresholds established by HUD in Section V.E.2 of the NOFA (Exhibit A). In this CoC Program Competition reallocation can only be used to create new permanent supportive housing for the chronically

homeless, or rapid re-housing to serve homeless households with children. CoCs that indicate they will be using the reallocation process will be required to identify all projects being reduced or eliminated along with the new projects being created through reallocation.

PIC has decided to limit new reallocation projects to permanent supportive housing for chronically homeless to align with Honolulu's trend to implementing Housing First initiatives for the chronically homeless population.

Nonprofit agencies considering rental assistance in their new Project Application must contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715 to consult with the DCS' Community Assistance Division about administering the rental assistance in compliance with HUD's rule.

Honolulu CoC – Funding Priorities

The City and PIC have established the following priorities ranking and funding projects in the 2013 application.

- First priority will be given to renewal project applications based on their scores on the renewal scoring sheet (included as Exhibit D). The renewal project applications will be ranked by score from highest to lowest and projects will be funded from the highest score downward until the sum of project applications reach the Tier 1 funding line.
- If a project's funding is divided by the Tier 1 funding line, the CA will request an amended Project Application from the affected project applicant to reduce the budget to fit into the Tier 1 funding limit. Example: If the affected project application is for \$100,000, but only \$80,000 is available in the Tier 1 limit, the project applicant will have to submit a revised Project Application for \$80,000.
- The affected project applicant may also elect to forego the grant, which would allow the next ranked Project Application an opportunity to be included in Tier 1. Example: Project C, score of 45 points, budget of \$100,000, available budget below Tier 1 is \$80,000. CA contacts Project C and they elect to forego the \$80,000. Project D, score of 43 points and the next ranked project, budget of \$100,000 would then be contacted by the CA and can choose to amend their Project Application to \$80,000 or forego the funds. This process would continue until all available Tier 1 funding is accounted for.
- After all the Tier 1 projects are ranked, each project will be reduced proportionately to contribute funds to the HMIS and planning renewal projects. The HMIS and planning renewal grants are estimated at \$252,438 and all Tier 1 renewal projects will be reduced by 2.46%.

- Second priority will be given to the highest scoring new reallocation project(s). If the highest scoring new reallocation project does not request all of the Tier 2 funds, the next highest scoring new reallocation projects will be included until the Tier 2 limit is reached. If there are any Tier 2 funds after the new reallocation project(s) are included, renewal projects that did not make it into Tier 1 will be included based on their scores until the Tier 2 limit is reached.

CoC Application Composition

The CoC application is comprised of three parts:

- The CoC Application. The Collaborative Applicant (CA) will work with PIC to provide information about the CoC planning body, governance structure, overall performance, and the strategic planning process. This part of the application is scored and will determine the order in which CoCs are funded.
- The Project Application is completed by the project applicants for new and renewal project requests. Each agency must submit a Project Application for EACH of its projects. Although the entire CoC application score comes from the CoC Application, the CoC evaluation committee reviews all individual applications to determine its ranking in the CoC application.

The project applicant will provide a description of the proposed new or renewal project including the details as to who the project will serve, the type of housing that will be provided and what budget activities are being requested. The project applicant will provide a description of the activities that will be carried out with grant funds.

- The Priority Listings contain four separate forms that list the new, renewal, CoC planning, and UFA projects the CoC included in the CoC Application. The Priority Listings rank the projects in order of priority and also list any projects rejected by the CoC. This part of the CoC Consolidated Application cannot be completed until all Project Applications have been submitted.
- **CoC awardees are expected to actively participate in the PIC planning and coordination processes and activities. Contributing to the Honolulu CoC's development strengthens the CoC which improves the application score and can result in increased funding for the Honolulu CoC.**

2. Program Guidelines

The Continuum of Care program is designed to assist sheltered and unsheltered homeless people by providing the housing and/or services needed to help individuals move into transitional and permanent housing, with the goal of long-term stability.

Specifically, 24 CFR part 578.1 of the CoC Program interim rule states that the primary purpose of the CoC Program is to:

- Promote community-wide commitment to the goal of ending homelessness
- Provide funding for efforts by nonprofit providers, States, and local governments to re-house homeless individuals and families rapidly while minimizing the trauma and dislocation caused to homeless individuals, families, and communities as a consequence of homelessness
- Promote access to and effective use of mainstream programs by homeless individuals and families
- Optimize self-sufficiency among individuals and families experiencing homelessness

To accomplish CoC Program goals, funds may support activities under five primary program components: permanent housing (permanent supportive housing and rapid re-housing), transitional housing, supportive services only, HMIS and, for HUD-designated high-performing communities, homelessness prevention.

- Permanent housing (PH) is defined as community-based housing without a designated length of stay in which formerly homeless individuals and families live as independently as possible. The CoC Program may fund two types of permanent housing: (1) permanent supportive housing (PSH), which is permanent housing with indefinite leasing or rental assistance paired with services to help homeless people with disabilities achieve housing stability; and (b) rapid re-housing (RRH), a model that emphasizes housing search and relocation services and short- and medium-term rental assistance to move homeless people as rapidly as possible into permanent housing.
- The transitional housing (TH) project component may be used to cover the costs of up to 24 months of housing with accompanying support services, providing a period of stability to enable homeless people to transition successfully to and maintain permanent housing within 24 months of program entry. Program participants must have a lease or occupancy agreement in place when residing in transitional housing. The provisions of the CoC Program's TH program component have not changed significantly from the TH provisions under SHP.
- The supportive services only (SSO) program component is limited to recipients and subrecipients providing services to individuals and families not residing in housing operated by the recipient. SSO recipients and subrecipients may use the funds to conduct outreach to sheltered and unsheltered homeless persons, link clients with housing or other necessary services, and provide ongoing support. SSO projects may be offered in a structure or structures at one central site, or in multiple buildings at scattered sites where services are delivered. Projects may

also be operated independent of a building (e.g., street outreach) and in a variety of community-based settings, including in homeless programs operated by other agencies.

- Homeless Management Information System. Funds under this component may be used only by HMIS leads for leasing a structure in which the HMIS operates, for operating the structure in which the HMIS is housed, and/or for covering other costs related to establishing, operating, and customizing a CoC's HMIS. Other recipients and subrecipients may not apply for funds under the HMIS program component, but may include costs associated with contributing data to the CoC's HMIS within their project under another program component (PH, TH, SSO, or HP).
- Homelessness Prevention. Programs within CoCs that have applied for and been designated by HUD as an HPC may use CoC funds to fund homelessness prevention (HP) assistance for individuals and families at risk of homelessness. The services under this component may include housing relocation and stabilization services as well as short- and medium-term rental assistance to prevent an individual or family from becoming homeless. Through this component, recipients and subrecipients may help individuals and families at-risk of homelessness to maintain their existing housing or transition to new permanent housing. Homelessness prevention must be administered in accordance with 24 CFR part 576.

Although HUD allows all of these programs, the City in partnership with PIC, has prioritized and will only consider renewal Project Applications with the following components in this RFI: Permanent Housing, Transitional Housing, Supportive Services Only, HMIS, and Planning. In alignment with HUD's priorities the City in partnership with PIC, has prioritized and will only consider new Project Applications with the following component in this RFI: Permanent Housing - Permanent Supportive Housing for chronically homeless.

3. Eligible Participants

The CoC program is designed to assist sheltered and unsheltered homeless people. The CoC Program interim rule defines homeless as follows (24 CFR 578.3).

"Homeless means:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised 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, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(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:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing."

In addition, some CoC programs are required to serve those who are chronically homeless. The CoC Program interim rule defines chronically homeless as follows (24 CFR 578.3).

"Chronically homeless.

(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; and

(iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) 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."

Applicants must review the CoC NOFA (Exhibit A) and the CoC Interim Rule thoroughly to ensure only eligible participants will be served by CoC funded activities.

4. Request for Interest Schedule

The schedule for the RFI process shall be as follows:

December 10, 2013	Request for Interest Issued
December 17, 2013 11:00 am - noon	Public Informational Meeting Central Union Church 1660 South Beretania Street
December 18, 2013	RFI Addendum: Public Informational Meeting Q & A
December 10 - 20, 2013	Technical Assistance available through email, phone and by appointment
January 3, 2014 Noon	Deadline to Submit Applications Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813
January 3 - 8, 2014	DCS Application Review
January 8 – 16, 2014	Evaluation Committee Reviews and Scores Applications
January 16, 2014 9:00am - noon	Evaluation Committee Q&A with Applicants Department of Community Services, 715 South King Street, 2 nd Floor Conference Room
January 17, 2014	Notification of Awardees via email
January 17, 2014 to January 30, 2014	Finalize HUD Application
January 31, 2014	Submit HUD Application in e-snaps
February 3, 2014	HUD Application Deadline in e-snaps

5. Requirements for Applicants

Statutory and Regulatory Requirements

CoC program participants shall be responsible for compliance with all applicable federal, state, and local laws, ordinances, directives, rules, and regulations, including but not limited the program requirements listed on pages 21-31 of Exhibit A (i.e.

compliance with the Fair Housing Act, Limited English Proficiency, Section 3 of the Housing and Urban Development Act of 1968, etc.)

All prospective applicants must also comply with the following guidelines:

- Be a public agency or a private nonprofit agency organized and certified under Section 501(c) (3) of the Internal Revenue Code of 1986, as amended.
- Comply with federal non-discrimination, equal opportunity, and non-proselytization requirements.
- Comply with the City's sexual harassment ordinance (Exhibit F).

Have an established record of providing assistance to the homeless and managing state, local or federal grant funds.

Match

All eligible funding costs, except leasing, must be matched with no less than a 25 percent cash or in-kind contribution. No match is required for leasing. The match requirements apply to project administration funds, CoC planning costs, and UFA costs, along with the traditional expenses—operations, rental assistance, supportive services, and HMIS. Match must be met on an annual basis.

For an in-kind match, the recipient or subrecipient may use the value of property, equipment, goods, or services contributed to the project, provided that, if the recipient or subrecipient had to pay for such items with grant funds, the costs would have been eligible. If third-party services are to be used as a match, the recipient or subrecipient and the third-party service provider that will deliver the services must enter into a memorandum of understanding (MOU)—before the grant is executed—documenting that the third party will provide such services and value towards the project.

To be eligible for match, the cash or in-kind services must provide services that are eligible under the activities listed in 24 CFR 578 Subpart D.

Leverage

HUD considers any matching funds above and beyond the minimum required amount to be leverage. Leveraging includes all funds, resources, and/or services that the applicant can secure on behalf of the client being served. While leveraging includes all cash matching funds, it is broader in scope, including any other services, supplies, equipment, space, etc. that are provided by sources other than HUD. An example of leveraging would include a project that provides case management through Medicaid or Department of Mental Health funding. The total costs involved in delivering the case management (percentage of salary, fringes, other benefits) can be included in leveraging.

Example: If a project has \$100,000 supportive services budget, and \$100,000 in cash or in-kind services, \$25,000 is considered match, \$75,000 is considered leverage.

Timeliness

Successful applicants are expected to initiate approved projects promptly after execution of the grant agreement. HUD may take action if certain performance standards are not met. In addition, applicants are expected to expend grant funds on a timely basis.

6. Preparation and Submission of Applications

- For HUD administered projects, the following tasks must be done by the noon, January 3, 2014, application deadline:
 - Submit the SF-424 and Project Application documents to e-snaps at www.hud.gov/esnaps or www.hudhre.info/esnaps.
 - Submit all hard copy documents described below to the Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813.
- For City administered projects, the following tasks must be done by the noon, January 3, 2014, application deadline:
 - E-mail Gabe Naeole at gnaeole@honolulu.gov and provide him with your e-snaps user name and password so that he can input your Project Application documents into the City's e-snaps profile.
 - Submit all hard copy documents described below to the Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813.

For Each RENEWAL Project

Submit **six (6) sets** of the following documents (please use binder clip)

1. Completed Exhibit B - Summary for Renewal Projects which includes:
 - a. A summary cover sheet and leveraging documentation from applicable funding sources or from your agency head
 - b. Relevant sections of the project's 2011 CoC application and most recent Annual Performance Report (APR)
 - c. The most recent HUD and/or City monitoring letter(s) describing the results of the monitoring. If findings and issues were cited, provide the corrective action plan implemented by your agency

2. The project's most recently completed Annual Performance Report (APR)
3. E-snaps webpage providing submission confirmation of the Project Application into e-snaps (not required for City-administered projects)
4. Completed Project Application (e-snaps allows project applicants to export this document into PDF format)
5. The agency's most recent independent financial audit and corrective actions, if applicable
6. Current Board of Directors List
7. If applicable, provide any documents that have been updated since the agency's last CoC application submission (two-sided copies okay; i.e. revised 501(c) (3) certification, Charter of Incorporation, By-Laws, etc.)

For Each NEW Project

Submit **six (6) sets** of the following documents (please use binder clip for each set):

1. Completed Exhibit C - Summary for New Projects which includes:
 - a. A summary cover sheet and leveraging documentation from applicable funding sources or from your agency head
2. E-snaps webpage providing submission confirmation of the Project Application into e-snaps (not required for City-administered projects)
3. Completed Project Application (e-snaps allows project applicants to export this document into PDF format)
4. Provide the following agency documents (2-sided copies are okay):
 - a. 501(c) (3) certification (if applicable, community mental health association documentation)
 - b. Most Recent Independent Financial Audit and Corrective Actions, if applicable
 - c. Current Board of Directors List
 - d. Charter of Incorporation
 - e. By-laws

Nonprofit agencies considering rental assistance in their new Project Application must contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715 to consult with the DCS' Community Assistance Division about administering the rental assistance in compliance with HUD's rule.

Submittals

Application documents must be submitted to the DCS, Community-Based Development Division, 715 South King Street, Suite 311, Honolulu, Hawaii, by **noon, on Friday, January 3, 2014**. Please ensure that applications and copies are time stamped at the time of delivery and that the original application is clearly marked. All applications submitted by the deadline shall be considered for inclusion in the City's CoC application. Applications received after the deadline will be time stamped and returned unopened to the proposing agency. Questions regarding this Request for Interest may be directed to Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

Additional Information

Please read the instructions provided in this RFI and e-snaps before completing application forms.

SF-LLL, Executed Disclosure of Lobbying Activities. The City will complete this document for all City administered projects.

Applicant Code of Conduct. HUD must have the Code of Conduct for every agency submitting a project application. The current list of agencies that have a Code of Conduct filed with HUD is available at <http://www.hud.gov/offices/adm/grants/codeofconduct/cconduct.cfm>. **If your agency is not listed, you must upload your agency's Code of Conduct as an attachment on e-snaps.**

By way of HUD guidance, a Code of Conduct must meet the following minimum requirements:

- Must prohibit the solicitation and acceptance of gifts or gratuities by officers, employees, and agents for their personal benefit in excess of minimal value;
- Outline administrative and disciplinary actions available to remedy violations of such standards;
- Describe the method to be used to ensure that all officers, employees and agents of the organization are aware of the Code of Conduct; and
- Must be written on company letterhead that provides a mailing address, authorized official name, and telephone number.

HUD 40090-4, Applicant Certifications. The City will complete this document for City administered projects.

Project Application. Please note that the HUD-defined name for Honolulu's CoC is **Honolulu CoC**, and Honolulu's CoC number is **HI-501**. Honolulu's Geographic Code is **150144**.

Rental assistance costs in Project Applications may not exceed 100 percent of the Fair Market Rent (FMR) for the Metropolitan Statistical Area (MSA) and unit size in which the unit is located.

FY14 HUD FMR By Unit Bedrooms					
	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
FY14 FMR	\$1,267	\$1,382	\$1,820	\$2,682	\$3,078

7. Evaluation

All new applications will be initially reviewed to determine if the proposed project meets the minimum requirements for participation in the CoC program. Specifically, applications will be initially reviewed to determine that (1) The application is submitted by an agency eligible to receive assistance through the CoC programs; (2) The proposed project will serve eligible CoC beneficiaries; and (3) The activities proposed are eligible for assistance under the CoC programs and appropriate for the population to be served. Applications not meeting any of these minimum requirements will be returned to the proposing agency.

The City will organize an evaluation committee comprised of representatives of the City, and private non-profit and for profit entities to review all projects. Representatives, employees, or officers of agencies submitting a Project Application will be excluded from participation on the evaluation committee. The City reserves the right to request written clarifications or revisions from applicants during the evaluation process. All applications which meet the minimum requirements will be ranked for consideration by HUD for CoC funding.

Project applications submitted by qualified organizations will be reviewed based on the experience and capacity of the proposing organization, the degree to which the funding request is consistent with HUD's Continuum of Care (CoC) goals, the degree to which CoC funds will be leveraged with other resources, anticipated accomplishments in relation to CoC priorities, the prospects for the long term operation of the proposed project, the participation of the proposer in the local Continuum of Care process, and the ability of the proposing organization to implement its proposed project in a timely manner. More details about the evaluation criteria are included in Exhibits B and D for all renewals, and Exhibits C and E for all new applications.

Applicants will also have a Question and Answer (Q&A) session with the evaluation committee on January 16, 2013 from 9:00am – noon at the DCS, Community-Based Development Division at 715 South King Street, 2nd Floor Conference Room, Honolulu, Hawaii. Each agency will be given time to respond to any questions the evaluation committee may have about their Project Application(s). The City will issue via email a schedule of approximate times applicants may meet with the evaluation committee January 8, 2014.

The score sheets that the evaluation committee will use for renewals (Exhibit D) and new projects (Exhibit E) are included in this RFI.

THE CITY AND COUNTY OF HONOLULU RESERVES THE RIGHT, WITHOUT LIABILITY WHATSOEVER, TO REJECT ANY AND ALL APPLICATIONS, IN WHOLE OR IN PART, OR REQUIRE AMENDMENTS TO THE APPLICATIONS IF THE GUIDELINES, REQUIREMENTS, AND/OR ELIGIBILITY CRITERIA SET FORTH IN THIS REQUEST FOR INTEREST ARE NOT MET. THE CITY AND COUNTY OF HONOLULU ALSO RESERVES THE RIGHT TO AMEND OR SUPPLEMENT REQUIREMENTS AND MATERIALS, AND WILL INFORM APPLICANTS OF SUCH CHANGES PRIOR TO THE SUBMITTAL DATE. NEITHER THE CITY NOR THE APPLICANT HAS ANY OBLIGATION UNDER THIS REQUEST.

Exhibit B – Project Summary for Renewal Projects

Complete one form per project. Please reply to all of the questions. Put 'N/A' if not applicable. Keep responses short and succinct.

Project Information

Surecipient (Agency Name): _____
 Project Applicant (Agency Name, City): _____
 Project/Program Name: _____

Program Type (Check One)

- Transitional Housing
- Permanent Housing
- Supportive Services Only

1. Participation in Partners In Care (will be verified with PIC)

Partners in Care (PIC) General Meeting Attendance – Enter the total number of PIC general monthly meetings attended from April 2013 to December 2013: _____ (Note: the Homeless Awareness Conference counts as a General Meeting)

Subcommittee Participation – Check off all that apply and indicate the number of monthly meetings attended from January 2013 to December 2013:

- Executive - Chair or Member Number of meetings attended: _____
- Awareness - Chair or Member Number of meetings attended: _____
- Advocacy - Chair or Member Number of meetings attended: _____
- Planning - Chair or Member Number of meetings attended: _____
- Data - Chair or Member Number of meetings attended: _____

PIC Activities Participation

Please circle how your agency participated in the following PIC activities:

	1 point	2 points
2013 Legislative breakfast	Attended	Provided a display
2012 Hooiaulea	Attended	Provided a booth
2013 Point In Time	Attended	Regional leader

2. Project Leverage

This criterion is a mathematical calculation of ratio of HUDfunds requested to the value of other resources contributed / secured for the project / program by the applicant.

For your proposed CoC project proposal:

- A. Leverage Provided: \$ _____
- B. HUD Funding Request: \$ _____
- Leverage Ratio (B/A): _____%

Please use the Project Leverage Cover Sheet at the back of this document.

3. Project Quality – Meeting Original Goals and Intent of Program

Client Group

Client group proposed in ORIGINAL application: _____
 Client group currently serving is the same as originally proposed? Yes No

Exhibit B – Project Summary for Renewal Projects

If you wish, please provide a brief explanation: _____

Services

Services proposed in ORIGINAL application: _____

Services currently providing are the same as originally proposed? Yes No

If you wish, please provide a brief explanation: _____

4. Project Quality – Accomplishing Program Goals

For the APR submitted to HUD between October 1, 2012, and September 30, 2013:

Number of HUD required performance measures accomplished in your Annual Performance Report (APR): _____

Please attach the related pages of your APR (PH: Q36a, TH: Q36b) to the back of this document (see samples attached).

If you wish, provide brief comments on your performance: _____

5. Project Quality – Accomplishing Program Goals

For the APR submitted to HUD between October 1, 2012, and September 30, 2013:

Number anticipated to be served during the grant term from 5A and 5B of your 2011 application:

a. Individuals: _____ b. Families (households): _____

Actual number served during the grant term from your APR:

c. Individuals: _____ d. Families (households): _____

Percentage accomplished (Actual divided by anticipated):

e. Individuals: _____ f. Families (households): _____

Please attach the related pages (5A and 5B) of your 2011 application and APR (Q8) to the back of this document (see samples attached). An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.

If you wish, provide brief comments on your performance: _____

6. Project Quality – Accomplishing Program Goals

For the APR submitted to HUD between October 1, 2012, and September 30, 2013:

Total Grant Award from the 2011 renewal list: \$ _____

Amount of Grant Award Expended at Grant Expiration from your APR: \$ _____

Percentage Expended at Grant Expiration (Expended divided by Total Grant Award): _____%

Total Duration (Years) of Grant Award: _____

Please attach a copy of the 2011 renewal list with your budget amount circled to the back of this document and the related pages of your APR (PH: Q31, TH: Q30a4). See samples attached.

If you wish, provide brief comments on your performance: _____

7. Project Quality – Accomplishing 2012 HUD CoC Program Objectives

Describe how your CoC project has achieved the following 2012 HUD CoC Objectives.

1. Create new permanent housing (PH) beds for chronically homeless persons.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects achievements related to this outcome: _____

Exhibit B – Project Summary for Renewal Projects

2. Increase percentage of homeless persons staying in PH over 6 months to at least 80%. **An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.**

Check off if this was an objective of the project's most recently completed grant term:
Explain your projects achievements related to this outcome (provide data and percentages from your most recently completed APR): _____

3. Increase percentage of homeless persons moving from transitional housing (TH) to PH to at least 65%. **An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.**

Check off if this was an objective of the project's most recently completed grant term:
Explain your projects achievements related to this outcome (provide data and percentages from your most recently completed APR): _____

4. Increase percentage of homeless persons employed at exit to at least 20%. **An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.**

Check off if this was an objective of the project's most recently completed grant term:
Explain your projects achievements related to this outcome (provide data and percentages from your most recently completed APR): _____

5. Decrease the number of homeless households with children.

Check off if this was an objective of the project's most recently completed grant term:
Explain your projects achievements related to this outcome: _____

8. Project Quality – Unresolved Issues

Please circle any of the applicable issues your program may be experiencing. The City will verify any issues with the HUD field office.

(a) Outstanding obligation to HUD;

(b) Audit finding(s);

(c) History of inadequate financial management accounting practices;

(d) Evidence of untimely expenditures on prior award;

(e) History of other major capacity issues;

(f) History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

Explain any items circled above: _____

Exhibit B – Project Summary for Renewal Projects

Please attach the most recent HUD and/or City monitoring letter(s) describing the results of the monitoring. If findings and issues were cited, provide the corrective action plan implemented by your agency.

Additional Questions

9. Project implementation of the Affordable Care Act

Describe how the project is preparing for implementation of the Affordable Care Act (ACA). Response should address the extent in which project recipients and subrecipients will participate in enrollment and outreach activities to ensure eligible households are able to take advantage of new healthcare options. _____

4) PH APR sample

Q36a. Performance Measures - Permanent Housing Programs

Instructions

Projects funded in the 2010 competition or a subsequent competition: This question relies on performance measurement information you established in the Performance Measures section of the Exhibit 2 application for this project and your project's actual results.

1. The Target # and % of persons who were expected to accomplish this measure have been pre-populated from the response you provided to the Standard Performance Measures question in your Exhibit 2 application. For Measure 1, the pre-populated figure is the sum of the targets provided for questions 1a and 1b.
2. Complete the actual number of persons served by the program for whom the measure is applicable, and the actual number of persons who accomplished the measure. Click 'Save' to automatically calculate the 'Actual % of persons who accomplished this measure' and the '% Difference between your Exhibit 2 Targets and Actual Performance' columns.
3. In the comment box, describe the project's performance relative to the target you set and provide an explanation for any discrepancies. HUD recognizes that the performance measurement question on the APR is not structured in exactly the same way as the Exhibit 2 question, and that this may be part of your explanation.

Projects funded prior to the 2010 competition: Grantees who did not submit their project in the 2010 competition will not have pre-populated targets for each measure, but should still complete step 3 as described above. In the comment box, grantees should reflect on their program performance and the extent to which it was consistent with local expectations.

Permanent Housing Program Performance Measures Key

Key	Domain	Performance measure
Measure 1	Housing Stability	The % of persons who remained in the permanent housing program as of the end of the operating year or exited to permanent housing (subsidized or unsubsidized) during the operating year.
Measure 2a	Increase Total Income	The % of persons age 18 and older who maintained or increased their total income (from all sources) as of the end of the operating year or program exit.
Measure 2b	Increase Earned Income	The % of persons age 18 through 61 who maintained or increased their earned income (i.e., employment income) as of the end of the operating year or program exit.

Performance Measure	Exhibit 2 Target # of persons who were expected to accomplish this measure	Exhibit 2 Target % of persons who were expected to accomplish this measure	Actual # of persons served by the program, as applicable to this measure	Actual # of persons who accomplished this measure	Actual % of persons who accomplished this measure	% Difference between Exhibit 2 Target and Actual Performance
1 - Housing Stability Measure	81	80%	182	162	89%	9%
2a - Total Income Measure	101	100%	182	160	88%	-12%
2b - Earned Income Measure	0	0%	182	141	77%	77%

Describe how your project performed relative to your expectations for its performance. For projects funded in the 2010 competition or a subsequent competition, describe the project's performance relative to the target you set and provide an explanation for any discrepancies.

Maximum Characters: 2000

With cost savings we were able to place additional participants. 6 participants exited the program because they received Section 8 housing assistance.

4) TL APR sample

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2010

075575

Q36b. Performance Measures - Transitional Housing Programs

Instructions

Projects funded in the 2010 competition or a subsequent competition: This question relies on performance measurement information you established in the Performance Measures section of the Exhibit 2 application for this project and your project's actual results.

1. The Target # and % of persons who were expected to accomplish this measure have been pre-populated from the response you provided to Standard Performance Measures question 1b in the Exhibit 2 application. HUD will not review data that SHP-TH project applicants submitted in Standard Performance Measures question 1a because applicants should have entered zeroes for that question.

2. Complete the actual number of persons served by the program for whom the measure is applicable, and the actual number of persons who accomplished the measure. Click 'Save' to automatically calculate the 'Actual % of persons who accomplished this measure' and the '% Difference between your Exhibit 2 Targets and Actual Performance' columns.

3. In the comment box, describe the project's performance relative to the target you set and provide an explanation for any discrepancies. HUD recognizes that the performance measurement question on the APR is not structured in exactly the same way as the Exhibit 2 question, and that this may be part of your explanation.

Projects funded prior to the 2010 competition: Grantees who did not submit their project in the 2010 competition will not have pre-populated targets for each measure, but should still complete step 3 as described above. In the comment box, grantees should reflect on their program performance and the extent to which it was consistent with local expectations.

Transitional Housing Program Performance Measures Key

Key	Domain	Performance Measure
Measure 1	Housing Stability	The % of persons who exited to permanent housing (subsidized or unsubsidized) during the operating year.
Measure 2a	Increase Total Income	The % of persons age 18 or older who increased their total income (from all sources) as of the end of the operating year or program exit.
Measure 2b	Increase Earned Income	The % of persons age 18 through 61 who increased their earned income (i.e., employment income) as of the end of the operating year or program exit.

Performance Measure	Exhibit 2 Target # of persons who were expected to accomplish this measure	Exhibit 2 Target % of persons who were expected to accomplish this measure	Actual # of persons served by the program, as applicable to this measure	Actual # of persons who accomplished this measure	Actual % of persons who accomplished this measure	% Difference between Exhibit 2 Target and Actual Performance
---------------------	--	--	--	---	---	--

1-Housing Stability Measure	10	67%	18	10	56%	-11%
2a-Total Income Measure	9	60%	8	8	100%	40%
2b-Earned Income Measure	0	0%	0	0	0%	0%

Describe how your project performed relative to your expectations for its performance. For projects funded in the 2010 competition or a subsequent competition, describe the project's performance relative to the target you set and provide an explanation for any discrepancies.

Maximum Characters: 2000

Housing Stability-While the # of clients projected in 2010 to exit to PH equaled the actual # of clients exiting to PH in 2012, the actual % in FY11-12 was lower than the % projected in 2010. This is due to clients relapsing back to alcohol and chemical substance abuse and returning to the streets, unable to secure PH.

Total Income-The # of clients who increased their income in FY11-12 equaled the % of clients who increased their income in FY11-12. Income goals are set for clients to attain employment or cash income sources within 45 days of admission.

S) PHTH application sample

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2011

042323

5A. Project Participants - Households with Dependent Children

Instructions:

Identify the demographics of each household with children served (or proposed to be served), at a particular point in time (when the project is at full capacity). The numbers entered here must reflect only those households and persons served using the funds requested in this application.

1. Total number of households: (required) - enter the total number of households served (or proposed to be served).

2. Disabled adults: (in this row) - enter the un-duplicated total number of adult persons with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

3. Non-disabled adults: (in this row) - enter the un-duplicated total number of adult persons without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

4. Disabled children: (in this row) - enter the un-duplicated total number of children with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

5. Non-disabled children: (in this row) - enter the un-duplicated total number of children without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

6. Total persons: (calculated row) - the total number of persons within each subpopulation is automatically calculated.

7. Total number of adults: (calculated row) - the total number of adults served (or proposed to be served) is automatically calculated.

8. Total number of children: (calculated row) - the total number of children served (or proposed to be served) is automatically calculated.

Additional Resources:

Point in time - PIT (definition) - a snap shot of the number of homeless persons that can be served, on any given night or day, when the project is at full capacity. For a new project, this count is based on the applicant's best guess at the time of application. For a renewal project, the PIT is based on the applicant's assessment of the number of participants residing in a facility or served by the program on a particular night or day when the project is at full capacity.

Application Detailed Instructions (on left menu)

<http://esnaps.hudhre.info>

<http://esnaps.hudhre.info/training>

1. Total Number of Households	0						
	Total Persons (unduplicated)	Chronically Homeless	Severely Mentally Ill	Chronic Substance Abuse	Veterans	Persons with HIV/AIDS	Victims of Domestic Violence
2. Disabled Adults	0						
3. Non-Disabled Adults	0						
4. Disabled Children	0						

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2011

042323

6. Non-Disabled Children	0						
6. Total Persons (click on "Save" to auto-calculate)	0	0	0	0	0	0	0
7. Total Number of Adults (click on "Save" to auto-calculate)	0						
8. Total Number of Children (click on "Save" to auto-calculate)	0						

5B. Project Participants - Households without Dependent Children

Instructions:

Identify the demographics of each household without children served (or proposed to be served), at a particular point in time (when the project is at full capacity). The numbers entered here must reflect only those households and persons served using the funds requested in this application.

1. Total number of households: (required) - enter the total number of households without children served (or proposed to be served).

2. Disabled adults: (in this row) - enter the un-duplicated total number of adult persons with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

3. Non-disabled adults: (in this row) - enter the un-duplicated total number of adult persons without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

4. Disabled unaccompanied youth: (in this row) - enter the un-duplicated total number of unaccompanied youth with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

5. Non-disabled unaccompanied youth: (in this row) - enter the un-duplicated total number of unaccompanied youth without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

6. Total persons: (calculated row) - the total number of persons within each subpopulation is automatically calculated.

7. Total number of adults: (calculated row) - the total number of adults served (or proposed to be served) is automatically calculated.

8. Total number of unaccompanied youth: (calculated row) - the total number of unaccompanied youth served (or proposed to be served) is automatically calculated.

Additional Resources:

Point in time - PIT (definition) - a snap shot of the number of homeless persons that can be served, on any given night or day, when the project is at full capacity. For a new project, this count is based on the applicant's best guess at the time of application. For a renewal project, the PIT is based on the applicant's assessment of the number of participants residing in a facility or served by the program on a particular night or day when the project is at full capacity.

Application Detailed Instructions (on left menu)

<http://esnaps.hudhre.info>

<http://www.hudhre.info/index.cfm?do=viewHomelessAndHousingProgramInfo>

1. Total Number of Households	8						
	Total Persons (unduplicated)	Chronically Homeless	Severely Mentally Ill	Chronic Substance Abuse	Veterans	Persons with HIV/AIDS	Victims of Domestic Violence
2. Disabled Adults	8	5		8			
3. Non-Disabled Adults	0						

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2011

042323

4. Disabled Unaccompanied Youth (under 18)	0						
5. Non-Disabled Unaccompanied Youth (under 18)	0	0	0	0	0	0	
6. Total Persons (click on "Save" to auto-calculate)	8	5	0	8	0	0	0
7. Total Number of Adults (click on "Save" to auto-calculate)	8						
8. Total Number of Unaccompanied Youth (click on "Save" to auto-calculate)	0						

5)PH/TH APR
Sample

Q8. Persons Served

Instructions:

Q8 reports on the full universe of non-victim service provider clients served and all future questions will refer back to the answers here. Report the unduplicated count of all people served during the operating year. Each person should be counted in the household type associated with his or her last stay of the operating year.

The household types include:

- a) Households without Children - include single adult persons, or adults with adult companions that have never had a child in their household.
- b) Households with Children and Adults - include any household with at least one adult and one child present regardless of whether the child(ren) is present for the full program stay. (Rule - If ever a child in the household, always a household with children).
- c) Households with only Children - include any household where all persons are younger than age 18. (Age is determined based on: entry date closest to the end of the operating year or if they were in the program during the previous operating year then age is based on the first day of the operating year.)
- d) Unknown Household Type - includes households that cannot be classified in cases when one or more persons are missing dates of birth. Note that in instances when the household already contains at least one known adult and one known child, the household type can be determined and categorized as a Household with Children and Adults.

Number of Persons in Households Served During the Operating Year

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Adults	26	26	0	0	0
Children	0	0	0	0	0
Don't Know/Refused	0	0	0	0	0
Information Missing	0	0	0	0	0
Total	26	26	0	0	0

Average Number of Persons Served Each Night

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Average Number of Persons	9	9	0	0	0

Point-in-Time Count of Persons Served on the Last Wednesday in

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	10	10	0	0	0
April	10	10	0	0	0
July	5	5	0	0	0

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2010

075575

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
October	9	9	0	0	0

Q9. Households Served

Instructions:

Report the unduplicated number of households served by household type. The type of household is determined based on the type of persons in the household, considering all program stays within the operating year.

- a) Households without Children - include single adult persons, or adults with adult companions that have never had a child in their household.
- b) Households with Children and Adults - include a person in any household with at least one adult and one child present regardless of whether the child(ren) is present for the full program stay. (Rule - If ever a child in the household, always a household with children).
- c) Households with only Children - include a person in any household where all persons are younger than age 18. (Age is determined based on: entry date closest to the end of the operating year or if they were in the program during the previous operating year then age is based on the first day of the operating year.)
- d) Unknown Household Type - include households that cannot be classified in cases when one or more persons are missing dates of birth. Note that in instances when the household already contains at least one known adult and one known child, the household type can be determined and categorized as a Household with Children and Adults.

Number of Households Served During the Operating Year

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Households	26	26	0	0	0

Point-in-Time Count of Households Served on the Last Wednesday in

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	10	10	0	0	0
April	10	10	0	0	0
July	5	5	0	0	0
October	9	9	0	0	0

e) PH / TH Sample
2011 Renewal List

Fiscal Year 2011
Continuum of Care Competition
Homeless Assistance Award Report

State

CoC Name

Project Name

Program

Awarded Amount

HI

HI-500

Kauai Shelter Plus Care Program	S+CR	\$74,304
Transitions Project	SHPR	\$77,536
Puamelia Group Home 2011	SHPR	\$33,384
Kulalani Group Home 2011	SHPR	\$36,384
Eha Shelter Plus Care Program	S+CR	\$605,124
Kaulana Group Home 2011	SHPR	\$32,924
Kaahale Group Home 2011	SHPR	\$31,598
Ka Hale A Ke Ola Family Outpatient Program	SHPR	\$46,245
Ka Hale A Ke Ola Chemical Dependency Program	SHPR	\$91,717
HMIS Analysis and Dissemination Project	SHPR	\$41,160
Hawaii State Homeless Management Information System	SHPR	\$31,131
Eono Shelter Plus Care Program	S+CR	\$140,388
Ehiku Shelter Plus Care Program	S+CR	\$61,440
Kukui Program	S+CR	\$489,048
HI-500 Total:		\$1,792,383

HI-501

Continuum of Care - Domestic Abuse Shelters and Transitional Apartments 2011	SHPR	\$84,488
Ahukini Group Home 2011	SHPR	\$27,874
ATS Homeless Offenders Treatment and Supportive Living Services 2011	SHPR TH	\$289,302
Barbers Point Veterans-in-Progress	SHPR	\$341,263
Kalaeloa Permanent Housing for Homeless Veterans with Disabilities	SHPR	\$142,282
Transitional Living Program Housing and Support for Homeless Young Adults	SHPR	\$136,000
Shelter Plus Care Program	S+CR	\$496,404
SHDC S+C 2011	S+CR PH	\$1,646,868
Safe Haven	SHPR	\$876,273
PACT	SHPR	\$29,015
Ohana Ola O Kahumana	SHPR	\$147,175
New Beginnings	S+CR	\$2,055,900
CCH Maili Land PEP 2011	SHPR	\$133,607
Kaukama Group Home 2011	SHPR	\$29,653
Community Residential Program	SHPR	\$363,080
Ka 'Olu Hou O Manoa	SHPR	\$183,498

State

CoC Name

Project Name

Program

Awarded Amount

HUD Homeless Holistic Civil Legal Services Program	SHPR	\$64,669
Home At Last 2011	S+CR	\$1,306,512
HMIS Dedicated Project 2011 A	SHPR	\$68,000
HKO Supportive Housing Program 2011	SHPR	\$185,147
Headway House 2011	SHPR	\$207,198
Vancouver House	SHPR	\$55,132
Komo Mai Group Home 2011	SHPR	\$36,960
HI-501 Total:		\$8,905,300

HI Total:		\$10,698,683
------------------	--	---------------------

6) PH APR Sample

Applicant: Honolulu CoC - Applicant
 Project: SHDC S+C 2011

HI-501_CoC_Applicant
 081787

Q31. S+C Expenditures and Value of Services

Instructions:

Indicate if this Shelter Plus Care (S+C) grant is completing its initial term and save the screen. If it is completing its initial term then, in addition to reporting on the other match requirements on this screen, the grantee must identify at the bottom of the screen the cumulative match amount for the grant.

Report all S+C funds expended on rental assistance during the operating year. (This should include all funds expended out of the rental assistance line item that went towards--rental assistance, deposits, damage expenses, etc.)

Report all of the S+C funds expended during the operating year on administration.

Report the value of all documented services match received by S+C clients during the operating year. Record the values separately, for each service type.

Is this grant completing its initial grant term? No
 Click save to update form.

S+C and Documented Services Match During the Operating Year

	Expenditure Amount
Rental Assistance	\$1,199,489.84
Administration	\$40,298.77
Total S+C Expenditures	\$1,239,788.61

Value of Supportive Services Received by S+C Clients During the Operating Year

Documented Services Match	Value (\$)
Outreach	\$0.00
Case management	\$328,812.90
Life skills (outside of case management)	\$151,759.80
Alcohol and drug abuse services	\$0.00
Mental health services	\$733,505.70
AIDS-related services	\$0.00
Other health care services	\$0.00
Education	\$0.00
Housing placement	\$50,586.60
Employment assistance	\$0.00
Child care	\$0.00
Transportation	\$0.00
Legal	\$0.00
Other	\$59,684.56
Total documented services match	\$1,324,349.56

Co) TIT APR sample

Q30a4. SHP Expenditures - Leasing, Operating, and Administration

Instructions:

Leasing, Operating, & Admin Chart:

Report all SHP and cash match expended during this operating year on leasing, operating, and administration costs. Please note that grantees are not required to have matching funds for leasing or administration costs but may enter such cash match if they in fact acquired cash match for those expenses.

In the SHP Funds column, list all SHP funds expended during the operating year on each line item.

In the cash match column, list all matching funds expended during the operating year on operating costs.

Totals Chart:

The totals chart is pre-populated with the subtotals amounts from Q30a1, Q30a2, Q30a3, and Q30a4. Please note that the leasing and administration costs are not included in the cash match calculation in the totals chart because they are not statutorily required. The only way to correct a mistake identified when reviewing this table is to review and correct the source data for in Q30a1, Q30a2, Q30a3, and Q30a4.

SHP and Cash Match Expenditures During the Operating Year - Leasing, Operating, & Admin

Expenditure Type	SHP Funds	Cash Match	Match %	Total Expenditures
Real Property Leasing	\$32,227.00	\$0.00	0%	\$32,227.00
Operating Costs	\$60,907.00	\$32,750.00	35%	\$93,657.00
Administration	\$13,695.00	\$0.00	0%	\$13,695.00
Leasing, Operating, Admin - Subtotal	\$106,829.00	\$32,750.00		\$139,579.00

SHP and Cash Match Expenditures During the Operating Year - Totals

Total SHP Expenses	SHP Funds	Cash Match	Match %	Total Expenditures
Development	\$0.00	\$0.00	0%	\$0.00
Supportive Services	\$179,717.00	\$120,874.00	40%	\$300,591.00
Real Property Leasing	\$32,227.00	\$0.00	0%	\$32,227.00
Operating Expenses	\$60,907.00	\$32,750.00	35%	\$93,657.00
HMIS	\$0.00	\$0.00	0%	\$0.00
SHP Expenses - Subtotal	\$272,851.00	\$153,624.00		\$426,475.00
Administration	\$13,695.00	\$0.00	0%	\$13,695.00
Total Expenses	\$286,546.00	\$153,624.00		\$440,170.00

(e) For program use

**Fiscal Year 2011
Continuum of Care Competition
Homeless Assistance Award Report**

State

GoC Name

Project Name

Program

Awarded Amount

HI

HI-500

Kauai Shelter Plus Care Program	S+CR	\$74,304
Transitions Project	SHPR	\$77,536
Puamela Group Home 2011	SHPR	\$33,384
Kulalani Group Home 2011	SHPR	\$36,384
Eha Shelter Plus Care Program	S+CR	\$605,124
Kaulana Group Home 2011	SHPR	\$32,924
Kaahale Group Home 2011	SHPR	\$31,598
Ka Hale A Ke Ola Family Outpatient Program	SHPR	\$46,245
Ka Hale A Ke Ola Chemical Dependency Program	SHPR	\$91,717
HMIS Analysis and Dissemination Project	SHPR	\$41,160
Hawaii State Homeless Management Information System	SHPR	\$31,131
Eono Shelter Plus Care Program	S+CR	\$140,388
Ehiku Shelter Plus Care Program	S+CR	\$61,440
Kukui Program	S+CR	\$489,048
HI-500 Total:		\$1,792,383

HI-501

Continuum of Care - Domestic Abuse Shelters and Transitional Apartments 2011	SHPR	\$84,488
Ahukini Group Home 2011	SHPR	\$27,874
ATS Homeless Offenders Treatment and Supportive Living Services 2011	SHPR	\$289,302
Barbers Point Veterans-In-Progress	SHPR	\$341,263
Kalaeloa Permanent Housing for Homeless Veterans with Disabilities	SHPR	\$142,282
Transitional Living Program Housing and Support for Homeless Young Adults	SHPR	\$136,000
Shelter Plus Care Program	S+CR	\$496,404
SHDC S+C 2011	S+CR	\$1,646,868
Safe Haven	SHPR	\$876,273
PACT	SHPR	\$29,015
Ohana Ola O Kahumana	SHPR	\$147,175
New Beginnings	S+CR	\$2,055,900
CCH Mailli Land PEP 2011	SHPR	\$133,607
Kaukama Group Home 2011	SHPR	\$29,653
Community Residential Program	SHPR	\$363,080
Ka 'Ohu Hou O Manoa	SHPR	\$183,498

State

CoC Name

Project Name

Program

Awarded Amount

HUD Homeless Holistic Civil Legal Services Program	SHPR	\$64,669
Home At Last 2011	S+CR	\$1,306,512
HMS Dedicated Project 2011 A	SHPR	\$68,000
HKO Supportive Housing Program 2011	SHPR	\$185,147
Headway House 2011	SHPR	\$207,198
Vancouver House	SHPR	\$55,132
Komo Mai Group Home 2011	SHPR	\$36,960

HI-501 Total: \$8,906,300

HI Total: \$10,698,683

Exhibit C – Project Summary for NEW Projects

Complete one form per project. Please reply to all of the questions. Put 'N/A' if not applicable. Keep responses short and succinct.

Project Information

Subrecipient (Agency Name): _____
 Project Applicant (Agency Name, City): _____
 Project/Program Name: _____

Program Type must be:

Permanent Housing

Number of years requesting funds: _____

Anticipated grant years: 2014 - _____

Funding:

New Reallocation

1. Participation in Partners In Care (will be verified with PIC)

Partners in Care (PIC) General Meeting Attendance – Enter the total number of PIC general monthly meetings attended from April 2013 to December 2013: _____ (Note: the Homeless Awareness Conference counts as a General Meeting)

Subcommittee Participation – Check off all that apply and indicate the number of monthly meetings attended from January 2013 to December 2013:

- | | | | |
|--------------------------------------|-----------------------------------|---------------------------------|------------------------------------|
| <input type="checkbox"/> Executive - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |
| <input type="checkbox"/> Awareness - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |
| <input type="checkbox"/> Advocacy - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |
| <input type="checkbox"/> Planning - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |
| <input type="checkbox"/> Data - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |

PIC Activities Participation

Please circle how your agency participated in the following PIC activities:

	1 point	2 points
2013 Legislative breakfast	Attended	Provided a display
2013 Point In Time	Attended	Regional leader
2012 Hoolaulea	Attended	Provided a booth

2. Project Leverage

This criterion is a mathematical calculation of ratio of HUD funds requested to the value of other resources contributed / secured for the project / program by the applicant.

For your proposed project:

A) Leverage Provided: \$ _____
 B) Total HUD Funding Request: \$ _____
 Leverage Ratio (B/A): _____%

Please use the Project Leverage Cover Sheet at the back of this document.

Exhibit C – Project Summary for NEW Projects

3. Capacity of Applicant – Consistency with Agency Mission and Purpose

State your agency's mission and purpose as stated in the by-laws and charter: _____

Briefly explain how your proposed CoC project is in line with your agency's mission and purpose: _____

4. Capacity of Applicant – Past Experience

Provide a brief overview of your agency's previous experience with CoC grants and/or with similar projects/programs that serve the same client group as your current CoC proposal: _____

Briefly explain how your agency has the adequate management, direct, and/or financial staff to implement the proposed CoC project: _____

5. Capacity of Applicant – Readiness To Proceed

Check off if your agency has secured a site for the proposed CoC project

Provide a brief overview/explanation: _____

Check off if all resources necessary to implement the proposed CoC project have been secured or will be secured with the receipt of the requested funding.

Provide a brief overview/explanation: _____

Check off if program guidelines have been established for the proposed CoC project

Provide a brief overview/explanation: _____

Check off if key staff members have been identified to manage and implement the proposed CoC project

Provide a brief overview/explanation: _____

6. Program Design and Anticipated Outcomes

Briefly describe the need and the population to be addressed by this project: _____

Briefly describe how the program design will address the identified the need: _____

Briefly describe how the program design will address the identified population: _____

Briefly describe how the program design will provide appropriate services for the identified population: _____

Briefly describe how the program design will lead to outcomes that will meet or exceed project goals: _____

Non scoring question: What is HUD's cost of services per person?

a) Proposed HUD Budget:

b) Proposed People served:

a / b = _____ dollars per person

REPORT OF THE COMMITTEE ON INTERGOVERNMENTAL AFFAIRS AND HUMAN SERVICES

Voting Members

Kymerly Marcos Pine, Chair; Breene Harimoto, Vice-Chair,
Carol Fukunaga, Ann H. Kobayashi, Joey Manahan

Committee Meeting Held
May 22, 2014

Honorable Ernest Y. Martin
Chair, City Council
City and County of Honolulu

Mr. Chair:

Your Committee on Intergovernmental Affairs and Human Services, which considered Resolution 14-99 entitled:

“RESOLUTION AUTHORIZING THE DIRECTOR OF COMMUNITY SERVICES OR THE DIRECTOR’S DESIGNEE TO APPLY FOR GRANT FUNDS UNDER THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT’S 2013 CONTINUUM OF CARE HOMELESS ASSISTANCE PROGRAMS AND TO ENTER INTO INTERGOVERNMENTAL AGREEMENTS RELATED THERETO,”

introduced on May 8, 2014, reports as follows:

The purpose of the Resolution is to authorize the Director of Community Services or the Director’s Designee to apply for Grant Funds under the U.S. Department of Housing and Urban Development’s 2013 Continuum of Care Homeless Assistance Programs and to enter into Intergovernmental Agreements related thereto.

CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

ADOPTED ON JUN 4 2014

COMMITTEE REPORT NO. 176

REPORT OF THE COMMITTEE ON INTERGOVERNMENTAL AFFAIRS AND HUMAN SERVICES

Voting Members

Kymerly Marcos Pine, Chair; Breene Harimoto, Vice-Chair,
Carol Fukunaga, Ann H. Kobayashi, Joey Manahan

Committee Meeting Held
May 22, 2014
Page 2

Your Committee amended the Resolution to a CD1 version that makes the following changes:

- A. Incorporates into Exhibit A to the Resolution a missing document – the HUD Notice of Funding Availability (NOFA) for the Fiscal Years 2013 and 2014 Continuum of Care Program Competition.
- B. Attaches as Exhibit B to the Resolution a copy of the proposed agreement between the City and HUD for the grant funds.
- C. Amends the BE IT FURTHER RESOLVED paragraph to clarify the authorization granted to the Director of Community Services to execute the proposed intergovernmental agreement with HUD.
- D. Makes miscellaneous conforming, technical and nonsubstantive amendments.

The Director of the Department of Community Services testified in support of the Resolution and the CD1 version.

CITY COUNCIL

CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

ADOPTED ON

JUN 4 2014

COMMITTEE REPORT NO.

176

**REPORT OF THE COMMITTEE ON
INTERGOVERNMENTAL AFFAIRS AND HUMAN SERVICES**

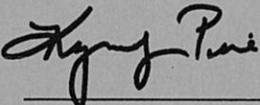
Voting Members

Kymberly Marcos Pine, Chair; Breene Harimoto, Vice-Chair,
Carol Fukunaga, Ann H. Kobayashi, Joey Manahan

Committee Meeting Held
May 22, 2014
Page 3

Your Committee on Intergovernmental Affairs and Human Services is in accord with the intent and purpose of Resolution 14-99, as amended herein, and recommends its adoption in the form attached hereto as Resolution 14-99, CD1. (Ayes: Pine, Harimoto, Manahan - 3; Noes: None; Excused: Fukunaga, Kobayashi - 2.)

Respectfully submitted,



Committee Chair

CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

ADOPTED ON JUN 4 2014

COMMITTEE REPORT NO. 176



RESOLUTION

AUTHORIZING THE DIRECTOR OF COMMUNITY SERVICES OR THE DIRECTOR'S DESIGNEE TO APPLY FOR GRANT FUNDS UNDER THE U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT'S 2013 CONTINUUM OF CARE HOMELESS ASSISTANCE PROGRAMS AND TO ENTER INTO INTERGOVERNMENTAL AGREEMENTS RELATED THERETO.

WHEREAS, Chapter 1, Article 8, Revised Ordinances of Honolulu 1990, as amended (ROH), requires that any intergovernmental agreement or any amendments thereto which place an obligation upon the City or any department or agency thereof shall require prior City Council consent and approval; and

WHEREAS, ROH Chapter 1, Article 8, also requires that, when carrying out the provisions of any intergovernmental agreement, all applications and/or amendments thereof, statistical data programs, reports or other official communications which support the application and which are required to be provided by the City and County of Honolulu (City) or its component departments to any other governmental or quasi-governmental agency shall first be presented to the City Council for its review and approval prior to their transmittal; and

WHEREAS, since 1996, the Department of Community Services has applied for and been awarded federal funds made available under the Continuum of Care Homeless Assistance Programs administered by the U. S. Department of Housing and Urban Development (HUD); and

WHEREAS, the City again seeks approval for its application in 2014 for various new grants and renewals of existing grants; and

WHEREAS, the City possesses the legal authority to apply for and ability to execute the Continuum of Care Homeless Assistance grants; and

WHEREAS, HUD under the Continuum of Care programs has awarded grant funds to Honolulu ranging between \$3.7 million and \$9.7 million each year since 1996 for programs carried out by nonprofit agencies on Oahu; and

WHEREAS, the nonprofit agencies receiving funds shall be responsible for obtaining required matching funds; and

WHEREAS, the City will use \$22,173 from the Provision for Grants, Partnerships and Security to fulfill its matching funds requirement; an authorized use of the Provision is to provide matching funds for federal grants; and



RESOLUTION

WHEREAS, a copy of the City's application to HUD is attached hereto as Exhibit A and incorporated herein by this reference; and

WHEREAS, a copy of the proposed intergovernmental agreement with HUD for Continuum of Care grant funds is attached hereto as Exhibit B and incorporated herein by this reference; and

WHEREAS, Honolulu's receipt of such Continuum of Care grant funds has assisted many persons experiencing homelessness in obtaining a safe place to live and needed services, as well as transitioning to permanent housing with supportive services; and

WHEREAS, without such grant funds, the degree of homelessness in our community would be significantly higher; now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that the application for the U.S. Department of Housing and Urban Development's Continuum of Care grant funds, attached hereto as Exhibit A, is hereby approved; and

BE IT FURTHER RESOLVED that the Director of Community Services or the Director's designee is hereby authorized to:

1. Execute the proposed intergovernmental agreement with HUD for Continuum of Care grant funds in substantially the same form as the agreement attached hereto as Exhibit B; and
2. Execute any incidental or related agreements or documents in furtherance of the above agreements, provided that such agreements and documents do not incur additional obligations on the part of the City;

and

BE IT FURTHER RESOLVED, that any subsequent intergovernmental agreement with HUD for the grant funds shall require the prior consent and approval of the City Council pursuant to ROH Chapter 1, Article 8; and



RESOLUTION

BE IT FINALLY RESOLVED that copies of this Resolution be transmitted to the Director of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813.

INTRODUCED BY:

Ernest Martin (b/r)

DATE OF INTRODUCTION:

May 8, 2014
Honolulu, Hawaii

Councilmembers

RESOLUTION AUTHORIZING THE DIRECTOR OF COMMUNITY SERVICES OR THE DIRECTOR'S DESIGNEE TO APPLY FOR GRANT FUNDS UNDER THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT'S 2013 CONTINUUM OF CARE HOMELESS ASSISTANCE PROGRAMS.

EXHIBIT A

1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

1A-1 CoC Name and Number: HI-501 - Honolulu CoC

1A-2 Collaborative Applicant Name: City and County of Honolulu

1A-3 CoC Designation: CA

1B. Continuum of Care (CoC) Operations

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

1B-1 How often does the CoC conduct meetings of the full CoC membership? Monthly

1B-2 How often does the CoC invite new members to join the CoC through a publicly available invitation? Monthly

1B-3 Does the CoC include membership of a homeless or formerly homeless person? Yes

1B-4 For members who are homeless or formerly homeless, what role do they play in the CoC membership? Organizational employee
Select all that apply.

1B-5 Does the CoC's governance charter incorporate written policies and procedures for each of the following:

1B-5.1 Written agendas of CoC meetings?	Yes
1B-5.2 Centralized or Coordinated Assessment System?	No
1B-5.3 Process for Monitoring Outcomes of ESG Recipients?	No
1B-5.4 CoC policies and procedures?	Yes
1B-5.5 Written process for board selection?	Yes
1B-5.6 Code of conduct for board members that includes a recusal process?	Yes
1B-5.7 Written standards for administering assistance?	No

1C. Continuum of Care (CoC) Committees

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

1C-1 Provide information for up to five of the most active CoC-wide planning committees, subcommittees, and/or workgroups, including a brief description of the role and the frequency of meetings. Collaborative Applicants should only list committees, subcommittees and/or workgroups that are directly involved in CoC-wide planning, and not the regular delivery of services.

	Name of Group	Role of Group (limit 750 characters)	Meeting Frequency	Names of Individuals and/or Organizations Represented
1C-1.1	Executive Committee	Meets on a monthly basis in order to draft the agenda for the following General Meeting, discuss urgent issues, and address other issues before presentation to the general membership. Identifies trends, issues and convenes task groups as necessary to address them. Also reviews and approves the CoC application in partnership with the CoC lead agency. Representatives from governmental entities are regularly invited to attend. This meeting is open to any and all interested members.	Monthly	Homeless service providers, government agency representatives
1C-1.2	Planning Committee	Primary liaison to State & City homeless planning divisions. Coordinates work groups for 10-year plan, disaster and discharge planning, and the review process for CoC renewals. Will oversee the integration of HEARTH Act performance standards, impact measures, and reallocation of resources. Works with the collaborative applicant in completing the Consolidated Application.	Monthly	Homeless service providers, government agency representatives
1C-1.3	Data Committee	Plans and coordinates the implementation of the HMIS, which serves both Hawaii CoCs. Also coordinates the CoC's Point in Time Count, incorporates CoC needs with HUD requirements to ensure data collection and reporting processes allow the CoC to effectively monitor programs and make adjustments as necessary to assure goal achievement.	Monthly	Homeless service providers, government agency representatives, HMIS vendor staff

1C-1.4	Awareness and Organizational Development Committee	This committee focuses on increasing the awareness of homelessness issues to the community at large and includes coordination of an annual conference and events related to the Hunger and Homelessness Awareness Month.	Monthly	Homeless service providers, government agency representatives
1C-1.5	CoC Evaluation Panel	Reviews, scores, and ranks new projects applying for CoC funding. Committee members may be comprised of up to two PIC members, two community members, and one member from the City & County of Honolulu.	Annually	Homeless service providers, government agency representatives, philanthropic agencies

**1C-2 Describe how the CoC considers the full range of opinions from individuals or organizations with knowledge of homelessness or an interest in preventing and ending homelessness in the geographic area when establishing the CoC-wide committees, subcommittees, and workgroups.
 (limit 750 characters)**

Partners In Care (PIC), the Honolulu CoC, participates in the Hawaii Interagency Council on Homelessness (HICH) and the Homeless Action Work Groups (HAWG), which coordinates governmental efforts with ordinary citizens interested in helping. PIC agencies also participate in City Council meetings and neighborhood board, Safe Community groups, Honolulu Police Department collaborations, Dept. of Health meetings, educational presentations to schools, businesses, community and faith based groups, and many other forums.

In its homeless prevention and rapid rehousing activities planning, PIC's Collaborative Applicant (CA), sought public input in the past two years on the allocation of its ESG resources and allocated those resources accordingly.

1D. Continuum of Care (CoC) Project Review, Ranking, and Selection

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

1D-1 Describe the specific ranking and selection process the CoC uses to make decisions regarding project application review and selection, based on objective criteria. Written documentation of this process must be attached to the application along with evidence of making the information publicly available.

(limit 750 characters)

The CoC solicits applications using Request For Interest (RFI), according to City and State procurement guidelines. Applications were due on 1/3/14, and written notices of acceptance or rejection were emailed to applicants on 1/17/14, to meet HUD deadlines. Project selection used scoring criteria distributed with the RFI including project quality, meeting HUD objectives as reported in the most recent APR, and compliance issues. The evaluation committee also held Q&A sessions with every applicant so the committee could ask for clarification and incorporate that information into the final rankings.

1D-2 Describe how the CoC reviews and ranks projects using periodically collected data reported by projects, conducts analysis to determine each project's effectiveness that results in participants rapid return to permanent housing, and takes into account the severity of barriers faced by project participants. Description should include the specific data elements and metrics that are reviewed to do this analysis.

(limit 1000 characters)

The CoC's planning cmte coordinates the ranking and scoring activities, which includes measuring the accomplishment of program specific goals, the accomplishment of HUD goals, and the expenditure of funds. In the coming year the planning cmte will work with the date cmte to ensure the HMIS can capture and report data related to measuring client's return to permanent housing, and the cmte will explore ways to adjust goals according to the severity of barriers faced by project participants.

PIC will also rate programs ability to address the demographic comorbidities identified by the VI-SPDAT.

1D-3 Describe the extent in which the CoC is open to proposals from entities that have not previously received funds in prior Homeless Assistance Grants competitions.

(limit 750 characters)

The RFI process allows any agency that can demonstrate experience in providing successful services to return people to permanent housing to submit applications for funding. When new agencies participate in CoC mtgs, CoC members often meet with the new members afterwards to help them understand the CoC's processes.

There are several programs that could benefit from HUD funding, but because religious programming is a core part of those programs, they cannot qualify for HUD or other governmental funding. Those agencies are also not willing to modify their program design to do access governmental funds.

The new agencies are also informed of the importance of promoting HUD's goals and contributing to the continuum and addressing CoC gaps.

1D-4 On what date did the CoC post on its website all parts of the CoC Consolidated Application, including the Priority Listings with ranking information and notified project applicants and stakeholders the information was available? Written documentation of this notification process (e.g., evidence of the website where this information is published) must be attached to the application. 01/17/2014

1D-5 If there were changes made to the ranking after the date above, what date was the final ranking posted?

1D-6 Did the CoC attach the final GIW approved by HUD either during CoC Registration or, if applicable, during the 7-day grace period following the publication of the CoC Program NOFA without making changes? No

**1D-6.1 If no, briefly describe each of the specific changes that were made to the GIW (without HUD approval) including any addition or removal of projects, revisions to line item amounts, etc. For any projects that were revised, added, or removed, identify the applicant name, project name, and grant number.
(limit 1000 characters)**

After the NOFA was reviewed, the CoC decided on a scoring process that would score all projects and rank the highest scoring projects into Tier 1. Once the Tier 1 projects were selected the CoC allocated the HMIS and planning costs across all Tier 1 projects which resulted in a 2.26% reduction to all Tier 1 projects.

One project was rejected and another was reduced to fit into Tier 1. The rejected project is the Alternative Structures International, Ohana Ola O Kahumana, grant number HI0040L9C011204. The reduced project is The Salvation Army ATS, ATS Homeless Offenders Treatment and Supportive Living Services 2013, grant number HI0017L9C011205.

1D-7 Were there any written complaints received by the CoC in relation to project review, project selection, or other items related to 24 CFR 578.7 or 578.9 within the last 12 months? No

1D-7.1 If yes, briefly describe the complaint(s), how it was resolved, and the date(s) in which it was resolved. (limit 750 characters)

1E. Continuum of Care (CoC) Housing Inventory

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

**1E-1 Did the CoC submit the 2013 HIC data in Yes
the HDX by April 30, 2013?**

2A. Homeless Management Information System (HMIS) Implementation

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2A-1 Describe how the CoC ensures that the HMIS is administered in compliance with the CoC Program interim rule, conformance with the 2010 HMIS Data Standards and related HUD Notices. (limit 1000 characters)

Thanks to technical assistance (TA) provided by HUD's Priority Community Initiative, the region IX HMIS specialist helped develop a strategic HMIS plan to ensure the HMIS is administered in compliance with the CoC Program interim rule, conformance with the 2010 HMIS Data Standards and related HUD Notices.

Overall, the TA recognized that many of the HMIS activities are already in compliance with CoC guidelines. The strategic plan prioritized specific activities like the HMIS governance, data quality plan, and policies and procedures, of which the first two were approved and implemented and the last is drafted and currently under review.

2A-2 Does the governance charter in place between the CoC and the HMIS Lead include the most current HMIS requirements and outline the roles and responsibilities of the CoC and the HMIS Lead? (limit 1000 characters) Yes
If yes, a copy must be attached.

2A-3 For each of the following plans, describe the extent in which it has been developed by the HMIS Lead and the frequency in which the CoC has reviewed it: Privacy Plan, Security Plan, and Data Quality Plan. (limit 1000 characters)

Each of the plans will be developed with TA assistance from HUD's Priority Community Initiative. The Data Quality Plan (DQP) was developed by the HMIS vendor for the HMIS Lead, and is being currently being implemented. DQP elements will be tested by City and State grant agencies as part of their routine monitoring procedures.

The Privacy Plan and Security Plan will be developed by the HMIS vendor in collaboration with the Data cmte in the following year.

**2A-4 What is the name of the HMIS software selected by the CoC and the HMIS Lead?
Applicant will enter the HMIS software name (e.g., ABC Software).** Integrated Homeless Management Information System

**2A-5 What is the name of the HMIS vendor?
Applicant will enter the name of the vendor (e.g., ESG Systems).** Hybrid International, LLC

2A-6 Does the CoC plan to change the HMIS software within the next 18 months? No

2B. Homeless Management Information System (HMIS) Funding Sources

2B-1 Select the HMIS implementation Statewide coverage area:

2B-2 Select the CoC(s) covered by the HMIS: HI-501 - Honolulu CoC, HI-500 - Hawaii Balance of State CoC
 (select all that apply)

2B-3 In the chart below, enter the amount of funding from each funding source that contributes to the total HMIS budget for the CoC.

2B-3.1 Funding Type: Federal - HUD

Funding Source	Funding
CoC	\$121,703
ESG	\$0
CDBG	\$39,768
HOME	\$0
HOPWA	\$0
Federal - HUD - Total Amount	\$161,471

2B-3.2 Funding Type: Other Federal

Funding Source	Funding
Department of Education	\$0
Department of Health and Human Services	\$0
Department of Labor	\$0
Department of Agriculture	\$0
Department of Veterans Affairs	\$0
Other Federal	\$0
Other Federal - Total Amount	\$0

2B-3.3 Funding Type: State and Local

Applicant: Honolulu CoC
 Project: Registration FY13

HI-501
 COC_REG_2013_084286

Funding Source	Funding
City	\$0
County	\$0
State	\$7,800
State and Local - Total Amount	\$7,800

2B-3.4 Funding Type: Private

Funding Source	Funding
Individual	\$0
Organization	\$0
Private - Total Amount	\$0

2B-3.5 Funding Type: Other

Funding Source	Funding
Participation Fees	\$0
Other - Total Amount	\$0

2B-3.6 Total Budget for Operating Year	\$169,271
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2B-4 How was the HMIS Lead selected by the Agency Volunteered CoC?

**2B-4.1 If other, provide a description as to how the CoC selected the HMIS Lead.
 (limit 750 characters)**

2C. Homeless Management Information System (HMIS) Bed Coverage

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2C-1 Indicate the HMIS bed coverage rate (%) for each housing type within the CoC. If a particular housing type does not exist anywhere within the CoC, select "Housing type does not exist in CoC" from the drop-down menu:

* Emergency shelter	86%+
* Safe Haven (SH) beds	86%+
* Transitional Housing (TH) beds	86%+
* Rapid Re-Housing (RRH) beds	86%+
* Permanent Supportive Housing (PSH) beds	86%+

2C-2 How often does the CoC review or assess its HMIS bed coverage? Monthly

2C-3 If the bed coverage rate for any housing type is 64% or below, describe how the CoC plans to increase this percentage over the next 12 months.
(limit 1000 characters)

2C-4 If the Collaborative Applicant indicated that the bed coverage rate for any housing type was 64% or below in the FY2012 CoC Application, describe the specific steps the CoC has taken to increase this percentage.
(limit 750 characters)

2D. Homeless Management Information System (HMIS) Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2D-1 For each housing type, indicate the average length of time project participants remain in housing. If a housing type does not exist in the CoC, enter "0".

type of Housing	Average Length of time in Housing
Emergency Shelter	135
Transitional Housing	11
Safe Haven	0
Permanent Supportive Housing	38
Rapid Re-housing	1

2D-2 Indicate the percentage of unduplicated client records with null or missing values on a day during the last 10 days of January 2013 for each Universal Data Element listed below.

Universal Data Element	Percentage
Name	0%
Social security number	0%
Date of birth	0%
Ethnicity	0%
Race	0%
Gender	0%
Veteran status	0%
Disabling condition	1%
Residence prior to program entry	0%
Zip Code of last permanent address	0%
Housing status	8%
Head of household	0%

2D-3 Describe the extent in which HMIS generated data is used to generate HUD required reports (e.g., APR, CAPER, etc.). (limit 1000 characters)

The HMIS can produce formatted data that can be used with HUD's APR generation tool. The HMIS was recently updated to allow it to produce CoC wide and agency specific reports on the following HUD measures:
Housing stability - Clients in permanent housing for 6+ months
Employment income - Clients have employment income
Benefits income - Clients have employment income
. The HMIS is currently being updated to incorporate HUD's latest guidance to produce a CAPER report.

2D-4 How frequently does the CoC review the data quality in the HMIS of program level data? Monthly

**2D-5 Describe the process through which the CoC works with the HMIS Lead to assess data quality. Include how the CoC and HMIS Lead collaborate, and how the CoC works with organizations that have data quality challenges.
(Limit 1000 characters)**

The HMIS lead and support staff will measure completeness by running an APR, custom, or data quality report and comparing to the data quality thresholds identified in the Data Quality Plan.

The HMIS Lead and Homeless Programs Office (HPO) will review source documentation from sample records and compare to HMIS data entry. Comparisons will include universal as well as program-specific data elements. HMIS staff will not send sample listings beforehand.

The HMIS Lead and HPO will review deficient areas with agencies and require improvement plans. If the HMIS Lead and HPO cannot provide sufficient technical guidance on improving data quality, they will request help from HUD's TA providers. If deficiencies persist because agencies do not follow their improvement plans, the HMIS Lead and HPO will recommend sanctions which could include reduction in funding.

2D-6 How frequently does the CoC review the data quality in the HMIS of client-level data? Monthly

2E. Homeless Management Information System (HMIS) Data Usage and Coordination

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2E-1 Indicate the frequency in which the CoC uses HMIS data for each of the following activities:

* Measuring the performance of participating housing and service providers	Quarterly
* Using data for program management	Annually
* Integration of HMIS data with data from mainstream resources	Never
* Integration of HMIS data with other Federal programs (e.g., HHS, VA, etc.)	Never

2F. Homeless Management Information System (HMIS) Policies and Procedures

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2F-1 Does the CoC have a HMIS Policy and Procedures Manual? If yes, the HMIS Policy and Procedures Manual must be attached. No

2F-1.1 What page(s) of the HMIS Policy and Procedures Manual or governance charter includes the information regarding accuracy of capturing participant entry and exit dates in HMIS? (limit 250 characters)

Pages 5 and 6 of the HMIS Data Quality Plan provides information regarding accuracy of capturing participant entry and exit dates in HMIS.

2F-2 Are there agreements in place that outline roles and responsibilities between the HMIS Lead and the Contributing HMIS Organizations (CHOs)? Yes

2G. Continuum of Care (CoC) Sheltered Homeless Point-in-Time (PIT) Count

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2G-1 Indicate the date of the most recent sheltered point-in-time count (mm/dd/yyyy): 01/22/2013

2G-2 If the CoC conducted the sheltered point-in-time count outside of the last 10 days of January 2013, was an exception granted by HUD? Not Applicable

2G-3 Enter the date the CoC submitted the sheltered point-in-time count data in HDX: 04/24/2013

2G-4 Indicate the percentage of homeless service providers supplying sheltered point-in-time data:

Housing Type	Observation	Provider Shelter	Client Interview	HMIS
Emergency Shelters	0%	0%	0%	100%
Transitional Housing	0%	0%	0%	100%
Safe Havens	0%	0%	0%	100%

2G-5 Comparing the 2012 and 2013 sheltered point-in-time counts, indicate if there was an increase, decrease, or no change and then describe the reason(s) for the increase, decrease, or no change. (Limit 750 characters)

From 2012 to 2013 Oahu's shelters saw a 2% increase. The sheltered chronic homeless count as reported in the 2013 PIT increased from 101 in 2012 to 187 (85%).

The large change in the sheltered chronic homeless count was due to intensive efforts to identify and serve chronically homeless, which in addition to CoC funds, including funding from CABHI, the City, and the State for the urban and North Shore areas of the island. As the chronically homeless clients were identified they moved into sheltered programs to better assess their needs and refer them to available appropriate services.

The small change in overall shelter counts was due to consistent shelter programs ability to move clients into other housing options, even given the influx of more challenging clients.

2H. Continuum of Care (CoC) Sheltered Homeless Point-in-Time (PIT) Count: Methods

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

* 2H-1 Indicate the method(s) used to count sheltered homeless persons during the 2013 point-in-time count:

Survey providers:	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Extrapolation:	<input type="checkbox"/>
Other:	<input type="checkbox"/>

2H-2 If other, provide a detailed description.
(limit 750 characters)

Not applicable.

2H-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the sheltered homeless population during the 2013 point-in-time count was accurate.
(limit 750 characters)

The count was primarily derived from HMIS data in the sheltered programs section of the HMIS for the PIT count night. Shelters were contacted beforehand and instructed that all clients sleeping in their facility on the PIT count night needed to be entered into the HMIS. Agencies were also instructed to make sure that all client data were up to date. Follow-up with individual service providers, via email surveys and phone calls, was conducted to verify that the HMIS listing matched the nightly census. Shelters not participating in the HMIS (such as domestic violence shelters) were contacted individually, via email surveys and phone calls, to provide the number of homeless individuals and families residing at their shelters on the PIT count night, and specific subpopulation data.

2I. Continuum of Care (CoC) Sheltered Homeless Point-in-Time (PIT) Count: Data Collection

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

*** 2I-1 Indicate the methods used to gather and calculate subpopulation data for sheltered homeless persons:**

HMIS:	<input checked="" type="checkbox"/>
HMIS plus extrapolation:	<input type="checkbox"/>
Sample of PIT interviews plus extrapolation:	<input type="checkbox"/>
Sample strategy: (if Sample of PIT interviews plus extrapolation is selected)	<input type="checkbox"/>
Provider expertise:	<input type="checkbox"/>
Interviews:	<input type="checkbox"/>
Non-HMIS client level information:	<input type="checkbox"/>
Other:	<input checked="" type="checkbox"/>

**2I-2 If other, provide a detailed description.
(limit 750 characters)**

Programs not participating in the HMIS (such as domestic violence shelters) were contacted individually to provide the number of homeless individuals and families residing at their shelters on the night of the count and subpopulation data.

**2I-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the sheltered homeless population count during the 2013 point-in-time count was accurate.
(limit 750 characters)**

The sheltered homeless count was derived from HMIS client and intake data in the Sheltered Programs section of the HMIS for the night of January 22, 2013. To ensure accuracy of all information including the subpopulation data, shelters and transitional housing programs were contacted prior to this date and given specific instructions that all clients sleeping in their facility on the night of January 22, 2013 needed to have active intakes in the HMIS. Agencies were also advised to make sure that all client and intake data were up to date. Programs not participating in the HMIS (such as domestic violence shelters) were contacted individually to provide the number of homeless individuals and families residing at their shelters on the night of the count and subpopulation data.

2J. Continuum of Care (CoC) Sheltered Homeless Point-in-Time Count: Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

*** 2J-1 Indicate the methods used to ensure the quality of the data collected during the sheltered point-in-time count:**

Training:	<input type="checkbox"/>
Follow-up	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Non-HMIS de-duplication :	<input type="checkbox"/>
Other:	<input type="checkbox"/>

**2J-2 If other, provide a detailed description.
(limit 750 characters)**

The CoC requested census data from shelters on the night of the point-in-time count to verify the accuracy of its data in the HMIS.

**2J-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the sheltered homeless population count during the 2013 point-in-time count was accurate.
(limit 750 characters)**

Emergency shelters and transitional housing programs were contacted prior to this date and given specific instructions that all clients sleeping in their facility on the night of January 22, 2013 needed to have active intakes in the HMIS. Agencies were also advised to make sure all client and intake data were up to date. HMIS and City staff followed-up with specific service providers to verify that the HMIS listing matched the nightly census. Shelters not participating in the HMIS (such as domestic violence shelters) were contacted individually to provide the number of homeless individuals and families residing at their shelters on the night of the count, in addition to providing specific subpopulation data.

2K. Continuum of Care (CoC) Unsheltered Homeless Point-in-Time (PIT) Count

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2K-1 Indicate the date of the most recent unsheltered point-in-time count: 01/22/2013

2K-2 If the CoC conducted the unsheltered point-in-time count outside of the last 10 days of January 2013, was an exception granted by HUD? Not Applicable

2K-3 Enter the date the CoC submitted the unsheltered point-in-time count data in HDX: 04/24/2013

2K-4 Comparing the 2013 unsheltered point-in-time count to the last unsheltered point-in-time count, indicate if there was an increase, decrease, or no change and describe the specific reason(s) for the increase, decrease, or no change. (limit 750 characters)

From 2012 to 2013 Oahu's unsheltered population saw a 11% increase from 1,318 to 1,465. The unsheltered chronic homeless count as reported in the 2013 PIT increased from 485 to 505 (4%).

This large unsheltered change is due to continued efforts to reach out to unsheltered people which included a State funded Housing First program, a City funded outreach project, and other activities. Programs also expanded intensive efforts into covering some residential communities. The concentrated efforts resulted in more people accessing all homeless housing programs and slightly higher PIT counts in those programs.

The small chronically homeless change is due to the CoC's success at moving chronically homeless clients into other housing programs.

2L. Continuum of Care (CoC) Unsheltered Point-in-Time Count: Methods

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

* 2L-1 Indicate the methods used to count unsheltered homeless persons during the 2013 point-in-time count:

Public places count:	<input type="checkbox"/>
Public places count with interviews on the night of the count:	<input type="checkbox"/>
Public places count with interviews at a later date:	<input checked="" type="checkbox"/>
Service-based count:	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Other:	<input type="checkbox"/>

2L-2 If other, provide a detailed description. (limit 750 characters)

Not applicable.

2L-3 For each method selected, including other, describe how the method was used to ensure that the data collected on the unsheltered homeless population during the 2013 point-in-time count was accurate. (limit 750 characters)

PIT Count teams used the public places with interviews method for data collection. Surveys recorded the interview discussion. Teams used their familiarity with the region to ensure all of the areas frequented by unsheltered homeless populations were surveyed. Outreach workers established rapport with many of the people they encountered, increased the likelihood of survey participation.

Only unsheltered people that completed a survey (or were present with someone in the household that completed a survey) and provided a name or unique identifying information (detailed description) are included in the count. Although this method does have its limitations, the group decided to only include surveyed people in the count to ensure the data was accurate.

2M. Continuum of Care (CoC) Unsheltered Homeless Point-in-Time Count: Level of Coverage

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

2M-1 Indicate where the CoC located Known Locations
unsheltered homeless persons during the
2013 point-in-time count:

2M-2 If other, provide a detailed description.
(limit 750 characters)

Not applicable.

2N. Continuum of Care (CoC) Unsheltered Homeless Point-in-Time Count: Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

* 2N-1 Indicate the steps taken by the CoC to ensure the quality of the data collected for the 2013 unsheltered population count:

Training:	<input checked="" type="checkbox"/>
"Blitz" count:	<input type="checkbox"/>
Unique identifier:	<input checked="" type="checkbox"/>
Survey question:	<input checked="" type="checkbox"/>
Enumerator observation:	<input type="checkbox"/>
Other:	<input type="checkbox"/>

2N-2 If other, provide a detailed description.
(limit 750 characters)

Not applicable.

2N-3 For each method selected, including other, describe how the method was used to reduce the occurrence of counting unsheltered homeless persons more than once during the 2013 point-in-time count. In order to receive credit for any selection, it must be described here.
(limit 750 characters)

Several trainings took place in person and via a webinar for field staff conducting the unsheltered PIT Count. These trainings provided an overview of the purpose and methodology for the PIT Count, safety tips, recommended materials to bring during the field work, and practice regarding the use of the survey instruments. Additionally, PIT Team Coordinators provided training in the field before outreach to ensure that all volunteers understood how to use the survey.

The PIT Count methodology required unsheltered persons complete a survey to obtain the name and/or unique identifying description of each person being counted so that persons could be entered into the HMIS database and unduplicated with confidence.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 1: Increase Progress Towards Ending Chronic Homelessness

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY 2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). The first goal in Opening Doors is to end chronic homelessness by 2015. Creating new dedicated permanent supportive housing beds is one way to increase progress towards ending homelessness for chronically homeless persons. Using data from Annual Performance Reports (APR), HMIS, and the 2013 housing inventory count, complete the table below.

3A-1.1 Objective 1: Increase Progress Towards Ending Chronic Homelessness

	Proposed in 2013 CoC Application	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-1.1a For each year, provide the total number of CoC-funded PSH beds not dedicated for use by the chronically homeless that are available for occupancy.		286	280	270
3A-1.1b For each year, provide the total number of PSH beds dedicated for use by the chronically homeless.	530	400	414	424
3A-1.1c Total number of PSH beds not dedicated to the chronically homeless that are made available through annual turnover.		115	120	140
3A-1d Indicate the percentage of the CoC-funded PSH beds not dedicated to the chronically homeless made available through annual turnover that will be prioritized for use by the chronically homeless over the course of the year.		100%	80%	80%
3A-1.1e How many new PSH beds dedicated to the chronically homeless will be created through reallocation?		34	75	30

**3A-1.2 Describe the CoC's two year plan (2014-2015) to increase the number of permanent supportive housing beds available for chronically homeless persons and to meet the proposed numeric goals as indicated in the table above. Response should address the specific strategies and actions the CoC will take to achieve the goal of ending chronic homelessness by the end of 2015.
(limit 1000 characters)**

To increase PSH beds:

1) PIC will apply for HUD CoC funds through bonuses or reallocation. In this application PIC applied for reallocation funds to provide 33 PSH CH set aside units.

2) PIC's advocacy committee will work with agencies and legislators for State and City funds for housing first programs for chronically homeless individuals.

3) The City's PSH providers will use grant savings to serve more units than are funded. The current PH renewals are funded for 365 units, but thanks to grant savings, serve 505 units.

4) PIC will also advocate for more homeless units from the Adult Mental Health Division.

5) PIC will wrap supportive services around some clients in clean and sober houses to create additional PSH units.

To increase flow through the existing PSH beds, PIC is working with Boot Camp technical assistance providers to streamline its PSH efforts and implement coordinated assessment and Housing First principles. The CoC identified its benchmark PSH placement rate at approximately 20 units per month. By the end of the 100 day period in February, the CoC hopes to double that rate.

**3A-1.3 Identify by name the individual, organization, or committee that will be responsible for implementing the goals of increasing the number of permanent supportive housing beds for persons experiencing chronic homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 2: Increase Housing Stability

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Achieving housing stability is critical for persons experiencing homelessness. Using data from Annual Performance Reports (APR), complete the table below.

3A-2.1 Does the CoC have any non-HMIS projects for which an APR should have been submitted between October 1, 2012 and September 30, 2013? **Yes**

3A-2.2 Objective 2: Increase Housing Stability

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2013 Proposed Numeric Achievement
3A-2.2a Enter the total number of participants served by all CoC-funded permanent supportive housing projects as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013:	781	790	800
3A-2.2b Enter the total number of participants that remain in CoC-funded funded PSH projects at the end of the operating year PLUS the number of participants that exited from all CoC-funded permanent supportive housing projects to a different permanent housing destination.	724	735	745
3A-2.2c Enter the percentage of participants in all CoC-funded projects that will achieve housing stability in an operating year.	93%	93%	93%

3A-2.3 Describe the CoC's two year plan (2014-2015) to improve the housing stability of project participants in CoC Program-funded permanent supportive housing projects, as measured by the number of participants remaining at the end of an operating year as well as the number of participants that exited from all CoC-funded permanent supportive housing projects to a different permanent housing destination. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit to 1000 characters)

Based on HUD's new measure, the CoC helped 93% of its PSH clients maintain housing and PIC will focus on maintaining its success.

PIC will host a Housing First training on 2/13/14 with Dr. Sam Tsemberis so all agencies can learn how to implement those strategies to maintain housing stability. PIC agencies also received housing options training through the November 2013 PIC conference and a statewide video conference hosted by PIC agency IHS, The Institute for Human Services, Inc.

As Housing First clients move into the PSH program, PIC anticipates more challenges in maintaining these numbers because these clients face more barriers to housing than current clients.

A recent SAMHSA grant will provide new substance abuse and mental health services to assist in maintaining housing.

Recent State DHS insurance streamlining will reduce case worker ratios from 1:30 to 1:20, which will allow more services per client to promote stability.

PSH staff will continue to work with clients on maintaining housing, being good tenants, and they will team with employment and workforce development programs to ensure eligible clients can improve their economic self-sufficiency.

3A-2.4 Identify by name the individual, organization, or committee that will be responsible for increasing the rate of housing stability in CoC-funded projects. (limit 1000 characters)

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 3: Increase project participants income

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Assisting project participants to increase income is one way to ensure housing stability and decrease the possibility of returning to homelessness. Using data from Annual Performance Reports (APR), complete the table below.

3A-3.1 Number of adults who were in CoC- 1520
 funded projects as reported on APRs
 submitted during the period between October
 1, 2012 and September 30, 2013:

3A-3.2 Objective 3: Increase project participants income

	2013/Actual Numeric/Achievement and Baseline	2014/Proposed Numeric/Achievement	2015/Proposed Numeric/Achievement
3A-3.2a Enter the percentage of participants in all CoC-funded projects that increased their income from employment from entry date to program exit?	4%	6%	8%
3A-3.2b Enter the percentage of participants in all CoC-funded projects that increased their income from sources other than employment from entry date to program exit?	13%	15%	17%

3A-3.3 In the table below, provide the total number of adults that were in CoC-funded projects with each of the cash income sources identified below, as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013.

Cash Income Sources	Number of Participating Adults	Percentage of Total In 3A-3.1
Earned Income	282	18.55 %
Unemployment Insurance	13	0.86 %
SSI	315	20.72 %
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SSDI	118	7.76	%
Veteran's disability	47	3.09	%
Private disability insurance	0		%
Worker's compensation	0		%
TANF or equivalent	93	6.12	%
General Assistance	188	12.37	%
Retirement (Social Security)	61	4.01	%
Veteran's pension	14	0.92	%
Pension from former job	6	0.39	%
Child support	4	0.26	%
Alimony (Spousal support)	1	0.07	%
Other Source	57	3.75	%
No sources	301	19.80	%

3A-3.4 Describe the CoC's two year plan (2014-2015) to increase the percentage of project participants in all CoC-funded projects that increase their incomes from non-employment sources from entry date to program exit. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table (3A-3.2) above. (limit 1000 characters)

PIC agencies assess non-employment benefits as part of client intake. All agencies prioritize ensuring clients access all available resources to increase income and client self sufficiency.

One PIC agency provides SOAR training annually for other PIC staff to ensure all PIC agencies know how to help clients access those resources for persons with disabilities.

As PIC continues to develop and implement its coordinated assessment system, the improved consistency of intake information combined with the increased access to this information within the CoC, will allow agencies to more efficiently identify eligible non-employment income opportunities and help clients apply for those resources.

As the DQP is implemented and PIC agencies receive more training on providing consistent intake procedures, consistent HMIS updating procedures, and ensuring data is entered in a more timely manner, PIC anticipates the HMIS will be able to capture more of the positive outcomes that are already occurring.

3A-3.5 Describe the CoC's two year plan (2014-2015) to increase the percentage of project participants in all CoC-funded projects that increase their incomes through employment from entry date to program exit. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit 1000 characters)

All PIC projects will continue to provide employment support, access governmental programs, and access on-site certification for shelter training programs that allow programs to access WIA funds for employment education and training costs.

PIC agencies will also help clients access community college help with admissions and services to obtain a degree for non-traditional applicants, including homeless.

Most shelters require employment progress and some incentivize participation in activities by adding to consumer housing funds. PIC's planning committee will create standards to help all agencies promote employment as a priority.

IHS, has almost completed Employment Now certification, which will allow more access to Ticket to Work resources.

The Hawaii Interagency Council on Homelessness (HICH) will pursue accessing other Federal resources, including the Department of Labor and the Workforce Investment Act, to help persons that are homeless increase their employment capacity. The HICH will also advocate state legislators to allow SNAP (Supplemental Nutrition Assistance Program) funds to be used for education and employment training costs.

3A-3.6 Identify by name the individual, organization, or committee that will be responsible for increasing the rate of project participants in all CoC-funded projects that increase income from entry date to program exit. (limit 1000 characters)

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 4: Increase the number of participants obtaining mainstream benefits

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Assisting project participants to obtain mainstream benefits is one way to ensure housing stability and decrease the possibility of returning to homelessness. Using data from Annual Performance Reports (APR), complete the table below.

3A-4.1 Number of adults who were in CoC-funded projects as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013. 1939

3A-4.2 Objective 4: Increase the number of participants obtaining mainstream benefits

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-4.2a Enter the percentage of participants in ALL CoC-funded projects that obtained non-cash mainstream benefits from entry date to program exit.	74%	76%	78%

3A-4.3 In the table below, provide the total number of adults that were in CoC-funded projects that obtained the non-cash mainstream benefits from entry date to program exit, as reported on APRs submitted during the period between October 1, 2013 and September 30, 2013.

Non-Cash Income Sources	Number of Participating Adults	Percentage of Total in 3A-4.1
Supplemental nutritional assistance program	869	44.82%
MEDICAID health insurance	274	14.13%
MEDICARE health insurance	126	6.50%
State children's health insurance	0	0%
WIC	36	1.86%

VA medical services	210	10.83 %
TANF child care services	3	0.15 %
TANF transportation services	2	0.10 %
Other TANF-funded services	2	0.10 %
Temporary rental assistance	4	0.21 %
Section 8, public housing, rental assistance	34	1.75 %
Other Source	55	2.84 %
No sources	283	13.66 %

3A-4.4 Describe the CoC's two year plan (2014-2015) to increase the percentage of project participants in all CoC-funded projects that access mainstream benefits from entry date to program exit. Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit 1000 characters)

Provider staff will continue to: help clients apply for mainstream programs at intake and assist clients with applying for and receiving IDs/birth certificates/social security cards/passports, food stamps, medical and disability insurance and linking them to other employment assistance services, ESL and GED classes. Staff also help with appeals from mainstream benefits denials.

Provider staff will continue to help program participants check the status of their applications. Depending on the program, initial follow up is typically provided by a case manager / staff advocate within 30 days and then on an on-going basis to see whether or not additional steps need to be made until benefits are received.

Some provider staff also report and discuss clients' mainstream benefits status at regular staff meetings to collaborate on overcoming barriers to services.

3A-4.5 Identify by name the individual, organization, or committee that will be responsible for increasing the rate of project participants in all CoC-funded projects that that access non-cash mainstream benefits from entry date to program exit. (limit 1000 characters)

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 5: Using Rapid Re-Housing as a method to reduce family homelessness

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In FY2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP). Rapid re-housing is a proven effective housing model. Based on preliminary evidence, it is particularly effective for households with children. Using HMIS and Housing Inventory Count data, populate the table below.

3A-5.1 Objective 5: Using Rapid Re-housing as a method to reduce family homelessness.

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-5.1a Enter the total number of homeless households with children per year that are assisted through CoC-funded rapid re-housing projects.	0	10	15
3A-5.1b Enter the total number of homeless households with children per year that are assisted through ESG-funded rapid re-housing projects.	1	3	5
3A-5.1c Enter the total number of households with children that are assisted through rapid re-housing projects that do not receive McKinney-Vento funding.	255	350	450

3A-5.2 Describe the CoC's two year plan (2014-2015) to increase the number homeless households with children assisted through rapid re-housing projects that are funded through either McKinney-Vento funded programs (CoC Program, and Emergency Solutions Grants program) or non-McKinney-Vento funded sources (e.g., TANF). Response should address the specific strategies and actions the CoC will take to meet the numeric achievements proposed in the table above. (limit 1000 characters)

In 2014 IHS will begin implementing an RRH program awarded in the 2012 competition. Although the program focuses 28 of its 36 beds on CH, it may be able to assist eligible families.

To date, PIC agencies with ESG RRH funds have focused its efforts on singles because the State provides a TANF funded Housing Placement Program and another program that are like RRH programs for families.

The State is also funding a one year shallow subsidy program which will add resources to homelessness prevention and rapid re-housing activities.

As PIC continues to consider all available resources and eligibility requirements, it will align its CoC resources to best meet the needs of its client base.

3A-5.3 Identify by name the individual, organization, or committee that will be responsible for increasing the number of households with children that are assisted through rapid re-housing in the CoC geographic area. (limit 1000 characters)

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3A-5.4 Describe the CoC's written policies and procedures for determining and prioritizing which eligible households will receive rapid re-housing assistance as well as the amount or percentage of rent that each program participant must pay, if applicable. (limit 1000 characters)

PIC's current RRH policies were developed as part of the required FY11-2 second allotment of ESG funds. At that time, PIC developed a policy based on the ESG eligibility criteria and the RRH program's intent to quickly rehouse client's that will be able to sustain housing after short term assistance.

Based on that criteria the ESG policy included local priorities for people that are new to homelessness (within 6 months) with the logic that those people were most likely to still have income that could help them sustain housing. Due to the public nature of the CoC application, PIC will not share the amounts or percentages of rent that each program participant must pay to prevent participants from assuming their entitlement to the maximum benefit with minimum commitment. This will allow agencies to provide "just enough" assistance to stabilize housing as HUD intended.

Given the CoC's focus on serving families with RRH activities, PIC will develop appropriate CoC RRH guidelines in the coming year to meet its local needs and reflect HUD's priorities.

3A-5.5 How often do RRH providers provide case management to households residing in projects funded under the CoC and ESG Programs? (limit 1000 characters)

RRH providers offer case management services on an as needed basis depending on the severity of the client's situation, with a minimum of monthly contacts.

3A-5.6 Do the RRH providers routinely follow up with previously assisted households to ensure that they do not experience additional returns to homelessness within the first 12 months after assistance ends? (limit 1000 characters)

Currently, RRH providers offer different levels of follow up based on the agency's program design and on the other funding resources that are available to provide supportive services.

To help all PIC agencies understand client homeless recidivism trends, PIC's data committee has prioritized the creation of a recidivism report to help track this behavior throughout the CoC. The group is currently discussing different ways to track and report the behavior aggregately as a CoC measure. Recent HMIS improvements along with improved consent forms allows all providers to access client history of homeless services activities if client's give consent.

3B. Continuum of Care (CoC) Discharge Planning: Foster Care

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3B-1.1 Is the discharge policy in place State Mandated Policy mandated by the State, the CoC, or other?

**3B-1.1a If other, please explain.
(limit 750 characters)**

**3B-1.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.
(limit 1000 characters)**

Hawaii Child Welfare's current policy requires an independent Living Transition Plan (ILTP) for foster youth to address housing and other needs upon discharge to prevent homelessness. Most persons discharged from the foster system successfully transition to positive outcomes.

Hale Kipa's Independent Living Program works with foster youth before and after they age out of care and offers residential, outreach, and a range of appropriate supportive services.

Catholic Charities Hawaii and Hale Kipa partner with the State to provide group homes for young men and women that aged out of foster care which offers case management and employment supportive services.

EPIC Ohana also provide Youth Circles for youth transitioning out of foster care which offers a support team of workers, friends, and family to help plan for or navigate the transition.

The State's Department of Human Services also extends foster care payments, offer stipends for youth working 80 hours per month, and extends Medicaid without income limits up to age 26, to assist in the transition process.

**3B-1.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3B. Continuum of Care (CoC) Discharge Planning: Health Care

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3B-2.1 Is the discharge policy in place State Mandated Policy mandated by the State, the CoC, or other?

**3B-2.1a If other, please explain.
(limit 750 characters)**

**3B-2.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.
(limit 1000 characters)**

Below is the 2012 response which is being reviewed by content experts. Their revisions will be incorporated into our Weds call.

PIC efforts in this area include:

Waianae Coast Comprehensive Health Center, which operates the emergency room in its community, refers eligible patients to its own homeless outreach department to ensure eligible clients have access to support services.

United States Veterans Initiative has a Veterans Affairs (VA) contract to help veterans discharged from a hospital and house them temporarily while they partner with social workers to secure permanent housing.

IHS, The Institute for Human Services, Inc. conducts a high users monthly meetings at the Queen's Hospital to implement collaborative efforts to reduce the frequency of identified high users of emergency services and brainstorm ways to ensure that these users are not discharged into homelessness.

**3B-2.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3B. Continuum of Care (CoC) Discharge Planning: Mental Health

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3B-3.1 Is the discharge policy in place State Mandated Policy mandated by the State, the CoC, or other?

**3B-3.1a If other, please explain.
(limit 750 characters)**

**3B-3.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.
(limit 1000 characters)**

The Hawaii's Department of Health Adult Mental Health Division (AMHD) continues its current policies including discharge planning for all State Hospital patients 90 days prior to discharge and assigned case managers. AMHD also requires tracking all individuals at-risk of losing housing after initial discharge and mandate that case managers include a plan for transitioning the individual into permanent living arrangements.

Discharges from the Kekela mental health wing are linked with case management services upon exit. If the case management services fall through, a call to the AMHD ACCESS line will help clients secure a new case manager.

HICH and PIC advocacy resulted in the following changes from AMHD to help with this issue:

Re-instituting AMHD community planning process in 2013
Increased AMHD case management available by removing the previous cap, increasing the crisis service management window from 10 days to 30 days, and increasing the array of services including the use of peer specialists.
Increasing service quality by requiring face to face service and approving service time based on acuity vs. a monthly maximum of 4 hours per client.

**3B-3.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3B. Continuum of Care (CoC) Discharge Planning: Corrections

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3B-4.1 Is the discharge policy in place State Mandated Policy mandated by the State, the CoC, or other?

**3B-4.1a If other, please explain.
(limit 750 characters)**

**3B-4.2 Describe the efforts that the CoC has taken to ensure persons are not routinely discharged into homeless and specifically state where persons routinely go upon discharge.
(limit 1000 characters)**

PIC agencies Ho'omau Ke Ola (HKO) and Hina Mauka have contracts with the Judiciary, Family Drug Court, and neighbor island correctional system to house and treat houseless inmates with substance abuse problems. 100% hundred percent of HKO clients are placed in either clean and sober homes in the community or are reunited with their family after the program is completed.

Several PIC agencies establish pre-release agreements for clients to access services upon release including: housing programs, substance abuse treatment programs, and clean & sober housing.

DPS coordinates with AMHD and assigns case management to clients that are exiting the system. Parole boards also require discharge plans for all parolees.

PIC agencies participated in the Office of Hawaiian Affairs (OHA) and Department of Public Safety's (DPS) Summit to plan for the development of a pu'uhonua (safe place or refuge) for incarcerated Native Hawaiians that incorporates Native Hawaiian spiritual values and family re-unification.

PIC will advocate that as DPS implements its Justice Reinvestment efforts to return clients to the community, homelessness will be addressed as part of those efforts.

**3B-4.3 Identify the stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.
(limit 1000 characters)**

The CoC's executive committee will be responsible for ensuring these goals are implemented.

3C. Continuum of Care (CoC) Coordination

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3C-1 Does the Consolidated Plan for the jurisdiction(s) within the CoC's geography include the CoC's strategic plan goals for addressing and ending homelessness? Yes

3C-1.1 If yes, list the goals in the CoC strategic plan. (limit 1000 characters)

PIC's goals are broader than but inclusive of the ConPlan goals. For example, one CoC goal, Retool the Homeless Crisis Response System, includes several of the ConPlan goals (7,500 homeless people will have access to Emergency Shelters, 3,750 homeless will receive stabilization services, and 150 low income families will be prevented from homelessness or assisted with securing a rental). Another CoC goal, Increase Access to Stable and Affordable Housing, includes this ConPlan goal: 250 households will receive tenant based rental assistance.

3C-2 Describe the extent in which the CoC consults with State and local government Emergency Solutions Grants (ESG) program recipients within the CoC's geographic area on the plan for allocating ESG program funds and reporting on and evaluating the performance of ESG program recipients and subrecipients. (limit 1000 characters)

PIC's collaborative applicant (CA) is also the only recipient of ESG funds, so ESG efforts are coordinated with the CoC. In making ESG allocations the CA relied on public input and considered the ESG resources in light of State TANF funded housing placement programs for families and HUD VASH activities.

This consideration led to ESG programs focusing on singles which are not served by TANF activities, and partnering with HUD VASH to provide deposits.

3C-3 Describe the extent in which ESG funds are used to provide rapid re-housing and homelessness prevention. Description must include the percentage of funds being allocated to both activities. (limit 1000 characters)

60% of FY12 ESG funds were allocated HP activities and 20% of ESG funds were allocated to RRH activities based on public input. 44% of FY13 ESG funds were allocated HP activities and 44% of ESG funds were allocated to RRH activities based on public input.

In light of HUD's focus on using RRH funds for families, the increased collaboration from PIC's Boot Camp activities, the CA will seek additional input in the coming year to ensure ESG resources are used effectively alongside all the other resources to reduce homelessness.

3C-4 Describe the CoC's efforts to reduce the number of individuals and families who become homeless within the CoC's entire geographic area. (limit 1000 characters)

The City allocated 490,000 of 560,000 in ESG funds for Homelessness Prevention and Rapid Re-Housing (HPRR) activities in 2014.

PIC will revisit ESG priorities in 2014 allocations to determine if HPRR funding or other priorities should be increased.

The State continues funding HP programs at \$2M/yr and will start a shallow subsidy program to prevent homelessness and promote housing stability. PIC will continue to advocate for these funds.

The jurisdictions' Analyses of Impediments are included below along with PIC efforts to address those barriers.

Limited supply of reasonable units – PIC coordination with the City to use available funds for homelessness prevention and rapid re-housing efforts enable people at risk of homelessness to maintain housing and those that are newly homeless to acquire housing with short term assistance.

Applicants are unaware of rights and resources – PIC agencies attended a 3 day HUD fair housing training in 2011 so staff can inform applicants about their fair housing rights and the available resources.

Between 7/1/12 – 6/30/13 the State program helped 255 households and the ESG HPRR helped 184 households avoid homelessness.

3C-5 Describe how the CoC coordinates with other Federal, State, local, private and other entities serving the homeless and those at risk of homelessness in the planning and operation of projects. (limit 1000 characters)

PIC agencies include the recipients of grants from HOPWA, TANF, RHY, Head Start. This provides PIC with the "front line" experience of implementing programs, meeting compliance requirements, and acting as liaisons to help clients access services.

PIC then uses this experience to advocate for streamlining opportunities through the available channels which include the HICH, PIC's advocacy committee, and discussions with funding agencies at the State and the City.

Through the Boot Camp effort for chronically homeless, the collaboration has been more focused on implementing Housing First activities that PIC hopes will produce a more effective model which can be replicated in the other strategies to deal with homelessness like outreach and shelters.

PIC also anticipates the a Coordinated Assessment (CA) system will increase the efficiency and effectiveness of the CoC's housing system and reduce unnecessary duplication.

3C-6 Describe the extent in which the PHA(s) within the CoC's geographic area are engaged in the CoC efforts to prevent and end homelessness. (limit 1000 characters)

The Boot Camp effort, along with the prompting of the Governor, has engaged the Hawaii Public Housing Authority (HPHA) to become more involved with PIC activities. HPHA shared one of the barriers for them implementing a homeless preference was the lengthy review process its staff must implement to apply the preference. PIC agencies offered to be the liaisons for clients to HPHA's time searching through outdated contact information. PIC's HMIS vendor also worked with HPHA to share data on CH clients that are also on the HPHA wait list, to further streamline application efforts. HPHA staff are now regularly participating in one of the Boot Camp committees.

3C-7 Describe the CoC's plan to assess the barriers to entry present in projects funded through the CoC Program as well as ESG (e.g. income eligibility requirements, lengthy period of clean time, background checks, credit checks, etc.), and how the CoC plans to remove those barriers. (limit 1000 characters)

The Boot Camp technical assistance initial session with PIC focused on identifying some of PIC's barriers to accessing services. As part of its work to increase the flow through the available units, the Boot Camp committees will work on recommendations to reduce barriers where possible, while still meeting funder's eligibility and documentation requirements.

As PIC implements the role of Housing Navigators, it anticipates these new positions will assist clients in securing documentation to ease that barrier to entry. PIC's partnership with the PHA will also reduce barriers to entry by having PIC agencies help the PHA ensure client contact information is correct to minimize the PHA's application office time spent on unproductive contacts.

3C-8 Describe the extent in which the CoC and its permanent supportive housing recipients have adopted a housing first approach. (limit 1000 characters)

The Boot Camp's 100 day plan has secured 100% of PSH units that become available due to client departures will be prioritized for the most vulnerable clients as identified by the locally adapted the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT).

3C-9 Describe how the CoC's centralized or coordinated assessment system is used to ensure the homeless are placed in the appropriate housing and provided appropriate services based on their level of need. (limit 1000 characters)

HUD's Priority Community Initiative provider noted that PIC's current Aloha United Way 211 Line is sufficient to meet the CoC's definition of a centralized or coordinated assessment system (CAS). PIC will continue working to develop a more comprehensive assessment system, that will consistently assess client needs to ensure appropriate housing and services are provided.

In the beginning of 2013, PIC was focused on a CAS that would act as a screen to identify clients that could be diverted to homelessness prevention or rapid rehousing services. The next planned step would have been a more comprehensive assessment. However, because of lack of resources and other priorities, progress on the work done on a volunteer basis was slow.

The Boot Camp effort redirected the effort to focus the CAS on the Housing First model and incorporated a locally adapted VI-SPDAT as its base. As this CAS is implemented it will be used as a base for other strategies to address homelessness.

3C-10 Describe the procedures used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to request housing or services in the absence of special outreach. (limit 1000 characters)

All PIC programs provide equal professional service without regard to the race, color, religion, sex, handicap, familial status, or national origin of any prospective client, customer, or of the residents of any community.

All HUD funded agencies attended a 3 day fair housing training in August 2011 to keep informed about fair housing law and practices.

According to the 2012 Homeless Service Utilization Report, the lowest participation for sheltered and unsheltered services was by Asians and elderly; the lowest participation for unsheltered services was by Asians and youth ages 6 – 17. PIC considers these groups to be the least likely groups to request housing or services.

To reach Asians (44% of persons in Honolulu) PIC agencies actively market services to the community at large through educational presentations about homelessness and services for businesses, faith based groups, educators, and others.

3C-11 Describe the established policies that are currently in place that require all homeless service providers to ensure all children are enrolled in early childhood education programs or in school, as appropriate, and connected to appropriate services within the community. (limit 1000 characters)

Partners In Care (PIC) requires the following of all homeless assistance providers in the Continuum of Care's geographic area of the island of Oahu.

1. All family shelters will have a plan to ensure children and families access available services from the child's school
2. Staff will ensure shelter children attendance is monitored
3. Staff will ensure shelter children receive educational support services including homework assistance and tutoring
4. Staff will partner with community agencies and business to provide students with school supplies
5. Staff will ensure eligible shelter children receive are enrolled for age appropriate educational programs

3C-12 Describe the steps the CoC, working with homeless assistance providers, is taking to collaborate with local education authorities to ensure individuals and families who become or remain homeless are informed of their eligibility for McKinney-Vento educational services. (limit 1000 characters)

Hawaii's Department of Education (HIDOE) operates all the public schools in the state and is the only local education agency. The Education for Homeless Children and Youth (EHCY) office was created to ensure that the HIDOE complies with the McKinney-Vento Act (MVA) service requirements.

In 2012 the City and State coordinated a 4 hour meeting between all shelters and outreach agencies that serve families with children and EHCY staff to increase collaboration between the frontline EHCY staff and frontline shelter staff. The meeting included all PIC projects, including those with CoC funding, ESG funding, and those with only State funding.

Select outreach programs and shelter staff have established improved relationships with the EHCY office to ensure clients are identified and access services to minimize the trauma of homelessness on students.

3C-13 Describe how the CoC collaborates, or will collaborate, with emergency shelters, transitional housing, and permanent housing providers to ensure families with children under the age of 18 are not denied admission or separated when entering shelter or housing. (limit 1000 characters)

For programs that serve families with children, retaining family unity is a priority as long as safety is not compromised.

It is possible that within the coordinated assessment system, a process to ensure family unity is included.

1) One option that is more family friendly, is for families to be able to select from currently available housing options based on the information provided and currently available spaces in the different programs.

2) Another option to consider is assigning families that face separation priority entry into the next available family unit. This priority will need to be considered along with other factors, like medical need, physical safety, even length of homelessness, and other factors.

3) If the worse case scenario happens, and the family chooses to remain unsheltered rather than be separated in different housing programs, the coordinated assessment could flag outreach teams to prioritize that family for regular check ups. Through information gathered during intake, staff could also ensure that families are aware of all eligible and appropriate housing options so families can make the choice that is best for them.

3C-14 What methods does the CoC utilize to monitor returns to homelessness by persons, including, families who exited rapid re-housing? Include the processes the CoC has in place to ensure minimal returns to homelessness. (limit 1000 characters)

To help all PIC agencies understand client homeless recidivism trends, PIC's data committee has prioritized the creation of a recidivism report to help track this behavior throughout the CoC. The group is currently discussing different ways to track and report the behavior in aggregate as a CoC measure. Recent HMIS improvements along with improved consent forms allows all providers to access client history of homeless services activities if client's give consent.

As PIC receives better information about its recidivism trends it will be able to develop and implement systemic policies to address the underlying issues related to recidivism given its limited resources.

The data committee may also explore tracking recidivism as a distinct but separate event within HMIS to facilitate easier reporting.

3C-15 Does the CoC intend for any of its SSO or TH projects to serve families with children and youth defined as homeless under other Federal statutes? No

3C-15.1 If yes, describe how the use of grant funds to serve such persons is of equal or greater priority than serving persons defined as homeless in accordance with 24 CFR 578.89. Description must include whether or not this is listed as a priority in the Consolidated Plan(s) and its CoC strategic plan goals. CoCs must attach the list of projects that would be serving this population (up to 10 percent of CoC total award) and the applicable portions of the Consolidated Plan. (limit 1000 characters)

3C-16 Has the project been impacted by a major disaster, as declared by President Obama under Title IV of the Robert T. Stafford Act in the 12 months prior to the opening of the FY 2013 CoC Program Competition? No

3C-16.1 If 'Yes', describe the impact of the natural disaster on specific projects in the CoC and how this affected the CoC's ability to address homelessness and provide the necessary reporting to HUD. (limit 1500 characters)

3D. Continuum of Care (CoC) Coordination with Strategic Plan Goals

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

In 2013, applications submitted to HUD for the Continuum of Care (CoC) Program will be evaluated in part based on the extent in which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP).

3D-1 Describe how the CoC is incorporating the goals of Opening Doors in local plans established to prevent and end homelessness and the extent in which the CoC is on target to meet these goals. (limit 1000 characters)

PIC's strategic plan goals are a subset of themes from the Federal Strategic Plan, "Opening Doors," and PIC agencies are committed to use its plan to set a path to ending all types of homelessness.

PIC works at ending chronic homelessness through implementing Housing First activities to house 100 of the most vulnerable unsheltered persons within 2 years and exploring the implementation of new program designs proved to be effective with this population including the Housing First model.

PIC works at preventing and ending homelessness among Veterans through its coordinated use and support of VASH vouchers, ongoing outreach services, ongoing housing programs.

PIC works at preventing and ending homelessness for families, youth, and children through offering services at all PIC shelters to improve family stability, address consumer debt, increase income and improve housing readiness and targeting State homelessness prevention resources to reduce the number of homeless families.

3D-2 Describe the CoC's current efforts, including the outreach plan, to end homelessness among households with dependent children. (limit 750 characters)

Families with children living unsheltered are given a choice of options by outreach workers that vary in geography, program fee, program structure and building configuration. This array of options encourages many difficult to serve families to enter the system.

Families with dependent children are a priority for outreach service providers who work with families until they are successfully housed and continue to assist them when they are first housed to ensure that the housing situation is stabilized and prevent clients from returning to homelessness.

PIC's outreach plan covers 100% of the geographic area and divides the island into geographic regions and has agencies assigned to the most populated areas.

3D-3 Describe the CoC's current efforts to address the needs of victims of domestic violence, including their families. Response should include a description of services and safe housing from all funding sources that are available within the CoC to serve this population. (limit 1000 characters)

PIC's area includes several domestic violence shelters which provide safe housing up to 90 days for families and singles who have no safe place to stay, limited to no support system or resources who are in need of a safe place to stay. The shelters provide food, clothing, toiletry items and offer some assistance with transportation. The shelters also offer coping skills, parenting skills safety planning, and referrals for housing, mental health, health issues substance abuse, longer term counseling to help guests heal from domestic violence. Funding sources for these projects include DHS, ESG, VAWA and CoC.

PIC's area also includes two DV transitional housing programs funded by OVW, ESG, CoC, and CDBG where guests may stay longer than 90 days. In addition to the shelter services, the transitional programs offer work related activities which is more appropriate for guest with greater stability in these programs.

Some PIC shelter and program staff are also trained to identify potential DV cases so they can refer for appropriate services.

3D-4 Describe the CoC's current efforts to address homelessness for unaccompanied youth. Response should include a description of services and housing from all funding sources that are available within the CoC to address homelessness for this subpopulation. Indicate whether or not the resources are available for all youth or are specific to youth between the ages of 16-17 or 18-24. (limit 1000 characters)

PIC agencies Hale Kipa and Waikiki Health Center serve runaway and homeless youth and young adults through the Youth Outreach (YO) program. In addition to supportive services, the program also maintains a house in Waikiki that provides basic services such as showers, laundry and casual meals.

For Unaccompanied Minors:

Hale Kipa offers boys' and girls' shelters and short-term foster placements. The emergency shelters are for youth 12 to 18 and the short-term foster placements can take youth from 10 to 18 and/or youth who would do better in a family setting rather than the emergency shelters.

The TLPs as well as Haloa House (for young women transitioning out of foster care) are aimed at 18 to 22 year olds.

Hawaii Youth Services Network is promoting legislation to pass a Safe Places for Youth Network program. The idea is that there will be Safe Places all around the island where a youth in need of assistance/in trouble could go to get referred/linked to services.

**3D-5 Describe the efforts, including the outreach plan, to identify and engage persons who routinely sleep on the streets or in other places not meant for human habitation.
(limit 750 characters)**

PIC outreach workers canvas the island daily, visiting known locations including streets, parks, beaches, under bridges where unsheltered homeless congregate, and other public places.

PIC's outreach plan covers 100% of the geographic area and divides the island into geographic regions and has agencies assigned to the most populated areas.

PIC's outreach plan also targets key unsheltered subpopulations and uses low-demand techniques to build trusting relationships and engage clients to accept services. Services offered include: food, clothing and hygiene, medical services, help obtaining ID, help accessing mainstream benefits and housing, bus passes, and referrals to mental health services, employment assistance, and drug treatment.

**3D-6 Describe the CoC's current efforts to combat homelessness among veterans, particularly those are ineligible for homeless assistance and housing through the Department of Veterans Affairs programs (i.e., HUD-VASH, SSVF and Grant Per Diem). Response should include a description of services and housing from all funding sources that exist to address homelessness among veterans.
(limit 1000 characters)**

Key housing services for veterans not eligible for VA programs include: U.S.VETS Waianae non-VA facility (up to 100 units), IHS Emergency shelter (200 men; 100 women;) and 8 bed Vet House, Next Step Emergency Shelter (up to 200 units), 300+ PSH vouchers from Kalihi-Palama Health and IHS. State funded outreach services serves over 300 unsheltered veterans annually and provide emergency needs including food, hygiene, medical, and mail services. A new \$1.25 million Housing First project vouchers funded by State will serve difficult to engage, veterans who are not eligible for VA services.

Key housing services for eligible veterans include: 1) U.S.VETS 98-bed men's GPD program, 2) U.S.VETS 20 bed women's GPA program, 3) 20 VA-funded emergency and HOPTTEL beds, 4) U.S.VETS 33 unit PSH, 5) SSVF programs operated by Catholic Charities and U.S.VETS, 6) DOL veteran programs run by U.S.VETS (men's grant and women and families) and POWER UPI (statewide), 7) Affordable units provided by Cloudbreak Hawaii LLC, and 8) 237 VASH Vouchers. The Hawaii Interagency Coalition prioritizes the reduction of veterans in its strategic plan.

3E. Reallocation

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

3E-1 Is the CoC reallocating funds from one or more eligible expiring grant(s) into one or more new permanent supportive housing projects dedicated to chronically homeless persons? Yes

3E-2 Is the CoC reallocating funds from one or more eligible expiring grant(s) into one or more new rapid re-housing project for families? No

**3E-2.1 If the CoC is planning to reallocate funds to create one or more new rapid re-housing project for families, describe how the CoC is already addressing chronic homelessness through other means and why the need to create new rapid re-housing for families is of greater need than creating new permanent supportive housing for chronically homeless persons.
(limit 1000 characters)**

Not applicable.

3E-3 If the CoC responded 'Yes' to either of the questions above, has the recipient of the eligible renewing project being reallocated been notified? Yes

3F. Reallocation - Grant(s) Eliminated

CoCs planning to reallocate into new permanent supportive housing projects for chronically homeless individuals may do so by reducing one or more expiring eligible renewal projects. CoCs that are eliminating projects entirely must identify those projects.

Amount Available for New Project: (Sum of All Eliminated Projects)				
\$142,024				
Eliminated Project Name	Grant Number Eliminated	Component Type	Annual Renewal Amount	Type of Reallocation
Ohana Ola O Kahum...	HI0040L9C011204	TH	\$142,024	Regular

3F. Reallocation - Grant(s) Eliminated Details

3F-1 Complete each of the fields below for each grant that is being eliminated during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Eliminated Project Name: Ohana Ola O Kahumana 2013
Grant Number of Eliminated Project: HI0040L9C011204
Eliminated Project Component Type: TH
Eliminated Project Annual Renewal Amount: \$142,024

3F-2 Describe how the CoC determined that this project should be eliminated.
(limit 750 characters)

Application submitted after CoC submission deadline

3G. Reallocation - Grant(s) Reduced

CoCs that choose to reallocate funds into new rapid rehousing or new permanent supportive housing for chronically homeless persons may do so by reducing the grant amount for one or more eligible expiring renewal projects.

Amount Available for New Project (Sum of All Reduced Projects)					
\$343,465					
Reduced Project Name	Reduced Grant Number	Annual Renewal Amount	Amount Retained	Amount available for new project	Reallocation Type
Kaukama Group Hom...	HI0026L9C011205	\$30,290	\$29,605	\$685	Regular
Komo Mai Group Ho...	HI0027L9C011205	\$37,754	\$36,900	\$854	Regular
Barbers Point Vet...	HI0018L9C011205	\$335,592	\$327,998	\$7,594	Regular
Continuum of Care...	HI0020L9C011205	\$83,084	\$81,204	\$1,880	Regular
Headway House 2013	HI0021L9C011205	\$207,948	\$203,242	\$4,706	Regular
GHP Permanent Hou...	HI0034L9C011205	\$516,801	\$505,106	\$11,695	Regular
IHS NPLH 2013	HI0014C9C010800	\$293,420	\$286,780	\$6,640	Regular
Ka Ohu Hou O Manoa	HI0041L9C011203	\$177,076	\$173,068	\$4,008	Regular
Permanent Support...	HI0046L9C011201	\$255,484	\$249,703	\$5,781	Regular
HEARTH Safe Haven...	HI0031L9C011204	\$845,603	\$826,467	\$19,136	Regular
Ahukini Group Hom...	HI0016L9C011205	\$27,411	\$26,791	\$620	Regular
Vancouver House	HI0037L9C011205	\$53,202	\$51,998	\$1,204	Regular
Kalaeloa Permanen...	HI0025L9C011205	\$138,926	\$135,782	\$3,144	Regular
Homeless Holistic...	HI0024L9C011205	\$63,594	\$62,155	\$1,439	Regular
Transitional Livi...	HI0036L9C011204	\$133,741	\$130,715	\$3,026	Regular
Community Residen...	HI0019L9C011205	\$350,273	\$342,346	\$7,927	Regular
ATS Homeless Offe...	HI0017L9C011205	\$284,496	\$193,670	\$90,826	Regular
Consolidated PH 2013	HI0029L9C011205	\$5,205,467	\$5,048,976	\$156,491	Regular
Consolidated TH 2013	HI0035L9C011205	\$313,457	\$303,039	\$10,418	Regular
CoC Planning Proj...	HI0064L9C011200	\$125,437	\$120,046	\$5,391	Regular

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Kaukama Group Home 2013
Grant Number of Reduced Project: HI0026L9C011205
Reduced Project Current Annual Renewal Amount: \$30,290
Amount Retained for Project: \$29,605
Amount available for New Project(s): \$685
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Komo Mai Group Home 2013
Grant Number of Reduced Project: HI0027L9C011205
Reduced Project Current Annual Renewal Amount: \$37,754
Amount Retained for Project: \$36,900
Amount available for New Project(s): \$854
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Barbers Point Veterans-in-Progress
Grant Number of Reduced Project: HI0018L9C011205
Reduced Project Current Annual Renewal Amount: \$335,592
Amount Retained for Project: \$327,998
Amount available for New Project(s): \$7,594
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Continuum of Care Domestic Abuse Shelter & Transitional Housing Oahu FY2013
Grant Number of Reduced Project: HI0020L9C011205
Reduced Project Current Annual Renewal Amount: \$83,084
Amount Retained for Project: \$81,204

Amount available for New Project(s): \$1,880
(This amount will auto-calculate by selecting
"Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Headway House 2013

Grant Number of Reduced Project: HI0021L9C011205

Reduced Project Current Annual Renewal Amount: \$207,948

Amount Retained for Project: \$203,242

Amount available for New Project(s): \$4,706
(This amount will auto-calculate by selecting
"Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: GHP Permanent Housing 2014-2015

Grant Number of Reduced Project: HI0034L9C011205
Reduced Project Current Annual Renewal Amount: \$516,801
Amount Retained for Project: \$505,106
Amount available for New Project(s): \$11,695
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: IHS NPLH 2013
Grant Number of Reduced Project: HI0014C9C010800
Reduced Project Current Annual Renewal Amount: \$293,420
Amount Retained for Project: \$286,780
Amount available for New Project(s): \$6,640
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Ka Ohu Hou O Manoa
Grant Number of Reduced Project: HI0041L9C011203
Reduced Project Current Annual Renewal Amount: \$177,076
Amount Retained for Project: \$173,068
Amount available for New Project(s): \$4,008
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Permanent Supportive Housing for Chronically Homeless Veterans and Families
Grant Number of Reduced Project: HI0046L9C011201
Reduced Project Current Annual Renewal Amount: \$255,484
Amount Retained for Project: \$249,703
Amount available for New Project(s): \$5,781
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: HEARTH Safe Haven Renewal
Grant Number of Reduced Project: HI0031L9C011204
Reduced Project Current Annual Renewal Amount: \$845,603
Amount Retained for Project: \$826,467
Amount available for New Project(s): \$19,136
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Ahukini Group Home 2013
Grant Number of Reduced Project: HI0016L9C011205
Reduced Project Current Annual Renewal Amount: \$27,411
Amount Retained for Project: \$26,791
Amount available for New Project(s): \$620
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Vancouver House
Grant Number of Reduced Project: HI0037L9C011205
Reduced Project Current Annual Renewal Amount: \$53,202
Amount Retained for Project: \$51,998
Amount available for New Project(s): \$1,204
(This amount will auto-calculate by selecting "Save" button)

**3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)**

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Kalaeloa Permanent Housing for Homeless Veterans with Disabilities
Grant Number of Reduced Project: HI0025L9C011205
Reduced Project Current Annual Renewal Amount: \$138,926
Amount Retained for Project: \$135,782

Amount available for New Project(s): \$3,144
(This amount will auto-calculate by selecting
"Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Homeless Holistic Civil Legal Services Program
Grant Number of Reduced Project: HI0024L9C011205
Reduced Project Current Annual Renewal Amount: \$63,594
Amount Retained for Project: \$62,155
Amount available for New Project(s): \$1,439
(This amount will auto-calculate by selecting
"Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Transitional Living Program Housing and Support for Homeless Young Adults

Grant Number of Reduced Project: HI0036L9C011204
Reduced Project Current Annual Renewal Amount: \$133,741
Amount Retained for Project: \$130,715
Amount available for New Project(s): \$3,026
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Community Residential Program 2014-2015
Grant Number of Reduced Project: HI0019L9C011205
Reduced Project Current Annual Renewal Amount: \$350,273
Amount Retained for Project: \$342,346
Amount available for New Project(s): \$7,927
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: ATS Homeless Offenders Treatment and Supportive Living Services 2013
Grant Number of Reduced Project: HI0017L9C011205
Reduced Project Current Annual Renewal Amount: \$284,496
Amount Retained for Project: \$193,670
Amount available for New Project(s): \$90,826
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Consolidated PH 2013
Grant Number of Reduced Project: HI0029L9C011205
Reduced Project Current Annual Renewal Amount: \$5,205,467
Amount Retained for Project: \$5,048,976
Amount available for New Project(s): \$156,491
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: Consolidated TH 2013
Grant Number of Reduced Project: HI0035L9C011205
Reduced Project Current Annual Renewal Amount: \$313,457
Amount Retained for Project: \$303,039
Amount available for New Project(s): \$10,418
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3G. Reallocation - Grant(s) Reduced Details

3G-1 Complete each of the fields below for each eligible renewal grant that is being reduced during the FY2013 reallocation process. CoCs should refer to the final HUD approved FY2013 Grant Inventory Worksheet to ensure all information entered here is accurate.

Reduced Project Name: CoC Planning Project Application FY2013
Grant Number of Reduced Project: HI0064L9C011200
Reduced Project Current Annual Renewal Amount: \$125,437
Amount Retained for Project: \$120,046
Amount available for New Project(s): \$5,391
(This amount will auto-calculate by selecting "Save" button)

3G-2 Describe how the CoC determined that this project should be reduced.
(limit 750 characters)

Reduced per guidelines posted in the CoC's Request For Interest

3H. Reallocation - New Project(s)

CoCs must identify the new project(s) it plans to create and provide the requested information for each project.

Sum of All New Reallocated Project Requests
(Must be less than or equal to total amount(s) eliminated and/or reduced)

\$485,489				
Current Priority #	New Project Name	Component Type	Transferred Amount	Reallocation Type
23	IHS New Perm...	PH	\$485,489	Regular

3H. Reallocation - New Project(s) Details

3H-1 Complete each of the fields below for each new project created through reallocation in the FY2013 CoC Program Competition. CoCs can only reallocate funds to new permanent housing—either permanent supportive housing for the chronically homeless or rapid re-housing for homeless households with children.

FY2013 Rank (from Project Listing): 23

Proposed New Project Name: IHS New Permanent Supportive Housing Project
2013

Component Type: PH

Amount Requested for New Project: \$485,489

3I. Reallocation: Balance Summary

3I-1 Below is the summary of the information entered on forms 3D-3H, and the last field, "Remaining Reallocation Balance" should equal "0." If there is a balance remaining, this means that more funds are being eliminated or reduced than the new project(s) requested. CoCs cannot create a new reallocated project for an amount that is greater than the total amount of reallocated funds available for new projects.

Reallocation Chart: Reallocation Balance Summary

Reallocated funds available for new project(s):	\$485,489
Amount requested for new project(s):	\$485,489
Remaining Reallocation Balance:	\$0

4A. Continuum of Care (CoC) Project Performance

Instructions

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

4A-1 How does the CoC monitor the performance of its recipients on HUD-established performance goals? (limit 1000 characters)

PIC uses the following methods to monitor recipients performance:

1) Reporting at PIC meetings – Every month a PIC agency will report progress on goals, challenges, and use the forum to solicit ideas to improve program effectiveness.

2) Annual CoC application review – The City will share all HUD funded agency performance as reported in the CoC application and in the agency's APR. The planning committee, as part of its monthly meetings will facilitate discussion on strengths, challenges, and ways to improve.

3) Quarterly fiscal review – PIC will collect quarterly reports from member agencies, validate with HUD expenditure information, and address any issues with technical assistance and in the worst case scenario, reallocation of funds.

4A-2 How does the CoC assist project recipients to reach HUD-established performance goals? (limit 1000 characters)

In addition to the activities above the PIC planning committee has discussed this issue and provided a forum for agencies to discuss performance challenges, seek guidance from other agencies, and implement suggested strategies.

4A-3 How does the CoC assist recipients that are underperforming to increase capacity? (limit 1000 characters)

In addition to the activities above the PIC planning committee has discussed this issue and provided a forum for agencies to discuss performance challenges, seek guidance from other agencies, and implement suggested strategies.

4A-4 What steps has the CoC taken to reduce the length of time individuals and families remain homeless? (limit 1000 characters)

PIC will be improving HMIS reporting following HUD's guidance on tracking the length of time clients remain homeless.

PIC's data committee implemented a new Consent to Release Information form to promote information sharing among providers. This allows service providers to track any previous client history in the system to help choose the best services to help the client.

PIC's data committee also worked on refining the lexicon of terms related to HMIS data entry. The HMIS vendor will be training providers on these definitions in the coming year to facilitate consistent data entry that will allow consistent reporting on outcomes including the length of homelessness.

**4A-5 What steps has the CoC taken to reduce returns to homelessness of individuals and families in the CoC's geography?
(limit 1000 characters)**

PIC will be improving HMIS reporting following HUD's guidance on tracking the length of time clients remain homeless.

PIC's data committee implemented a new Consent to Release Information form to promote information sharing among providers. This allows service providers to track any previous client history in the system to choose the best services to help the client.

PIC's data committee also worked on refining the lexicon of terms related to HMIS data entry. The HMIS vendor will be training providers on these definitions in the coming year to facilitate consistent data entry that will allow consistent reporting on outcomes including the length of homelessness.

PIC's planning committee will continue educating PIC agencies about HUD goals and strategies provided through the various technical assistance opportunities that the CoC has received in the past year.

IHS' Housing Department hosted a training to help service providers understand the definition of homelessness, which included a segment on specifically quantifying the duration and episodes of homelessness.

**4A-6 What specific outreach procedures has the CoC developed to assist homeless service providers in the outreach efforts to engage homeless individuals and families?
(limit 1000 characters)**

PIC's outreach plan covers 100% of the geographic area and divides the island into geographic regions and has agencies assigned to the most populated areas.

PIC's outreach plan also allows service providers to target key unsheltered subpopulations and use low-demand techniques to build trusting relationships and engage clients to accept services. Services are delivered in a welcoming and nonjudgmental manner. Some of the services offered include: food, clothing and hygiene, medical services, help obtaining ID, help accessing mainstream benefits and housing, bus passes, and referrals to mental health services, employment assistance, and drug treatment.

The State which funds most of PIC's outreach activities began tracking provider reports of clients with limited English proficiency and has linked PIC agencies with some translation resources.

PIC will advocate for outreach resources from AMHD and the Alcohol and Drug Abuse Division (ADAD), since many homeless struggle with mental health issues and substance abuse and addiction.

PIC agencies will also take advantage of DHS' expanded Medicaid coverage to provide services for medically vulnerable homeless.

4B. Section 3 Employment Policy

Instructions

*** TBD ***

4B-1 Are any new proposed project applications requesting \$200,000 or more in funding? Yes

4B-1.1 If yes, which activities will the project(s) undertake to ensure employment and other economic opportunities are directed to low or very low income persons? (limit 1000 characters)

The reallocation project is proposed by PIC agency IHS, The Institute for Human Services, Inc. IHS Hele 2 Work employment and employment readiness programs provide assistance to both guests and non guests in finding, applying for, and keeping a job. IHS recognizes that increasing sustainable income increases capacity to sustain housing, and that employment provides an important source of resiliency for persons who are recovering from homelessness.

Former IHS guests who have been helped by shelter and housing programs often express a desire to give back to the community and seek volunteer and sometimes employment opportunities with IHS. IHS' hiring policy allows for a former client to obtain employment at IHS after a minimum 1 year period following discharge from services.

IHS will also leverage a Department of Labor Office of Community Services grant to offer core employment services for low income households and is close to receiving Employment Now certification.

4B-2 Are any of the projects within the CoC requesting funds for housing rehabilitation or new constructions? No

4B-2.1 If yes, which activities will the project undertake to ensure employment and other economic opportunities are directed to low or very low income persons:

4C. Accessing Mainstream Resources

Instructions:

For guidance on completing this form, please reference the FY 2013 CoC Application Detailed Instructions and the FY 2013 CoC Program NOFA. Please submit technical question to the OneCPD Ask A Question at <https://www.onecpd.info/ask-a-question/>.

4C-1 Does the CoC systematically provide information about mainstream resources and training on how to identify eligibility and program changes for mainstream programs to provider staff? Yes

4C-2 Indicate the percentage of homeless assistance providers that are implementing the following activities:

* Homeless assistance providers supply transportation assistance to clients to attend mainstream benefit appointments, employment training, or jobs.	83%
* Homeless assistance providers use a single application form for four or more mainstream programs.	25%
* Homeless assistance providers have staff systematically follow-up to ensure mainstream benefits are received.	92%

4C-3 Does the CoC make SOAR training available for all recipients and subrecipients at least annually? Yes

4C-3.1 If yes, indicate the most recent training date: 08/26/2013

4C-4 Describe how the CoC is preparing for implementation of the Affordable Care Act (ACA) in the state in which the CoC is located. Response should address the extent in which project recipients and subrecipients will participate in enrollment and outreach activities to ensure eligible households are able to take advantage of new healthcare options. (limit 1000 characters)

PIC agencies IHS, Legal Aid Society of Hawaii, and Helping Hands Hawaii are contracted Marketplace Assister Organizations (MAO) for the Hawaii Health Connector. Agency staff were trained to help applicants learn about eligibility, complete applications, and select participating qualified health insurance plans that provide 10 essential health benefits from the Hawaii Health Connector Marketplace.

Mental Health Kokua uses SAMHSA's Four Quadrant Clinical Integration Model and helps to clients in each quadrant reduce barriers and apply for appropriate and eligible services.

PIC will continue to monitor any new guidance from HUD, other governmental agencies, and service providers to learn about different opportunities to leverage ACA resources to serve the homeless population.

PIC will keep advocating for State resources to provide more substance abuse and mental health services to homeless so HUD funds can focus on housing. PIC also advocate for more resources from the business and philanthropic community for homelessness supportive services.

**4C-5 What specific steps is the CoC taking to work with recipients to identify other sources of funding for supportive services in order to reduce the amount of CoC Program funds being used to pay for supportive service costs?
(limit 1000 characters)**

IHS is also working to actively establish Housing Support Services (like Navigators and grand aides) as a Medicaid reimbursable service for clients as authorized under the Affordable Care Act and recently approved by the State of Hawaii Department of Human Services (DHS).

A new SAMHSA grant will offer substance abuse and mental health services for homeless for 3 years, and the PIC will explore options to seek similar additional funding as it becomes available.

All PIC agencies continue to explore other funding resources to support their work, and PIC offers a forum for sharing new funding opportunities and coordinating collaboration in applying for funds.

Attachments

Document Type	Required?	Document Description	Date Attached
Certification of Consistency with the Consolidated Plan	Yes	ConPlan Certifica...	02/02/2014
CoC Governance Agreement	No	CoC Governance	02/03/2014
CoC-HMIS Governance Agreement	No	HMIS Governance	02/03/2014
CoC Rating and Review Document	No	CoC Request for I...	02/03/2014
CoCs Process for Making Cuts	No	CoC Request for I...	02/03/2014
FY2013 Chronic Homeless Project Prioritization List	No		
FY2013 HUD-approved Grant Inventory Worksheet	Yes	HUD approved GIW	02/03/2014
FY2013 Rank (from Project Listing)	No	2013 CoC Project ...	02/03/2014
Other	No	CoC HMIS Data Qua...	02/03/2014
Other	No	Revised GIW - lat...	02/03/2014
Other	No		
Projects to Serve Persons Defined as Homeless under Category 3	No		
Public Solicitation	No	Public notice	02/03/2014

Attachment Details

Document Description: ConPlan Certification

Attachment Details

Document Description: CoC Governance

Attachment Details

Document Description: HMIS Governance

Attachment Details

Document Description: CoC Request for Interest

Attachment Details

Document Description: CoC Request for Interest

Attachment Details

Document Description:

Attachment Details

Document Description: HUD approved GIW

Attachment Details

Document Description: 2013 CoC Project Ranking

Attachment Details

Document Description: CoC HMIS Data Quality Plan

Attachment Details

Document Description: Revised GIW - late projects excluded

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description: Public notice

Submission Summary

Page	Last Updated	
1A. Identification	No Input Required	
1B. CoC Operations	01/26/2014	
1C. Committees	01/29/2014	
1D. Project Review	01/30/2014	
1E. Housing Inventory	01/23/2014	
2A. HMIS Implementation	01/23/2014	
2B. HMIS Funding Sources	01/23/2014	
2C. HMIS Beds	01/23/2014	
2D. HMIS Data Quality	01/30/2014	
2E. HMIS Data Usage	01/23/2014	
2F. HMIS Policies and Procedures	01/23/2014	
2G. Sheltered PIT	01/30/2014	
2H. Sheltered Data - Methods	01/23/2014	
2I. Sheltered Data - Collection	01/27/2014	
2J. Sheltered Data - Quality	01/23/2014	
2K. Unsheltered PIT	01/30/2014	
2L. Unsheltered Data - Methods	01/23/2014	
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3B. CoC Discharge Planning: Foster Care	01/30/2014	
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3B. CoC Discharge Planning: Mental Health	01/30/2014
3B. CoC Discharge Planning: Corrections	01/30/2014
3C. CoC Coordination	01/30/2014
3D. Strategic Plan Goals	01/30/2014
3E. Reallocation	01/26/2014
3F. Grant(s) Eliminated	02/02/2014
3G. Grant(s) Reduced	02/02/2014
3H. New Project(s)	02/03/2014
3I. Balance Summary	No Input Required
4A. Project Performance	01/30/2014
4B. Employment Policy	01/30/2014
4C. Resources	01/30/2014
Attachments	02/03/2014
Submission Summary	No Input Required

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing
and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.
(Type or clearly print the following information:)

Applicant Name: City and County of Honolulu

Project Name: See Attached List

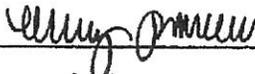
Location of the Project: Various locations within the City and County of Honolulu

Name of the Federal
Program to which the
applicant is applying: Continuum of Care Program

Name of
Certifying Jurisdiction: City and County of Honolulu

Certifying Official
of the Jurisdiction
Name: Holly Kawano

Title: Federal Grants Coordinator

Signature: 

Date: 1/21/14

Partners In Care (Honolulu Continuum of Care (CoC)) HMIS Memorandum of Agreement (MOA)

This Memorandum of Agreement (MOA) is made between Partners In Care (PIC) which represents the Honolulu Continuum of Care, and the City and County of Honolulu's Department of Community Services (DCS), regarding the administration of the required Homeless Management Information System (HMIS). The MOA clarifies the roles and requirements for each party related to the HMIS.

A. PIC Requirements:

As the CoC, PIC is responsible for HMIS implementation including:

1. Planning, software selection, and selection of the HMIS Lead Agency.
2. Establishing HMIS policies/protocols and monitoring compliance with HUD Data Standards.
3. Providing accurate, reliable data reporting for CoC data gathering including: Annual Homeless Assessment Report (AHAR), Housing Inventory Charts (HIC), Point In Time (PIT), HMIS participation coverage rates, data required for the CoC consolidated application, and other HUD required (note: DV agency participation excluded in HMIS coverage rates).
4. Working with the Collaborative Applicant (DCS) to ensure programs meet the standards established by the Data Quality Plan.
5. Participating in the HMIS Data Committee to create an annual HMIS plan that will guide HMIS activities and improvements (Ex: reviewing reporting structures that will be programmed into the HMIS).

B. HMIS Data Committee Requirements:

1. Reviewing and implementing PIC and Bridging the Gap the Balance of State CoC (BTG) Board recommendations.
2. Collaborating with other PIC and BTG committees and the Hawaii Interagency Council on Homelessness (HICH) to improve reporting, outcomes, and analysis
3. Making recommendations to the PIC and BTG Boards based on analysis of program data
4. Creating and reviewing HMIS policy documents.

C. DCS Requirements:

As the Collaborative Applicant for PIC, DCS is responsible for:

1. Working with PIC to implement the HMIS activities as described above.
2. Working with PIC to fund the HMIS Data Committee's annual HMIS plan.
3. Providing the required matching funds for the HMIS renewal application.
4. Working with PIC to ensure programs meet the standards established by the Data Quality Plan; to include periodic updates to PIC on data quality issues.

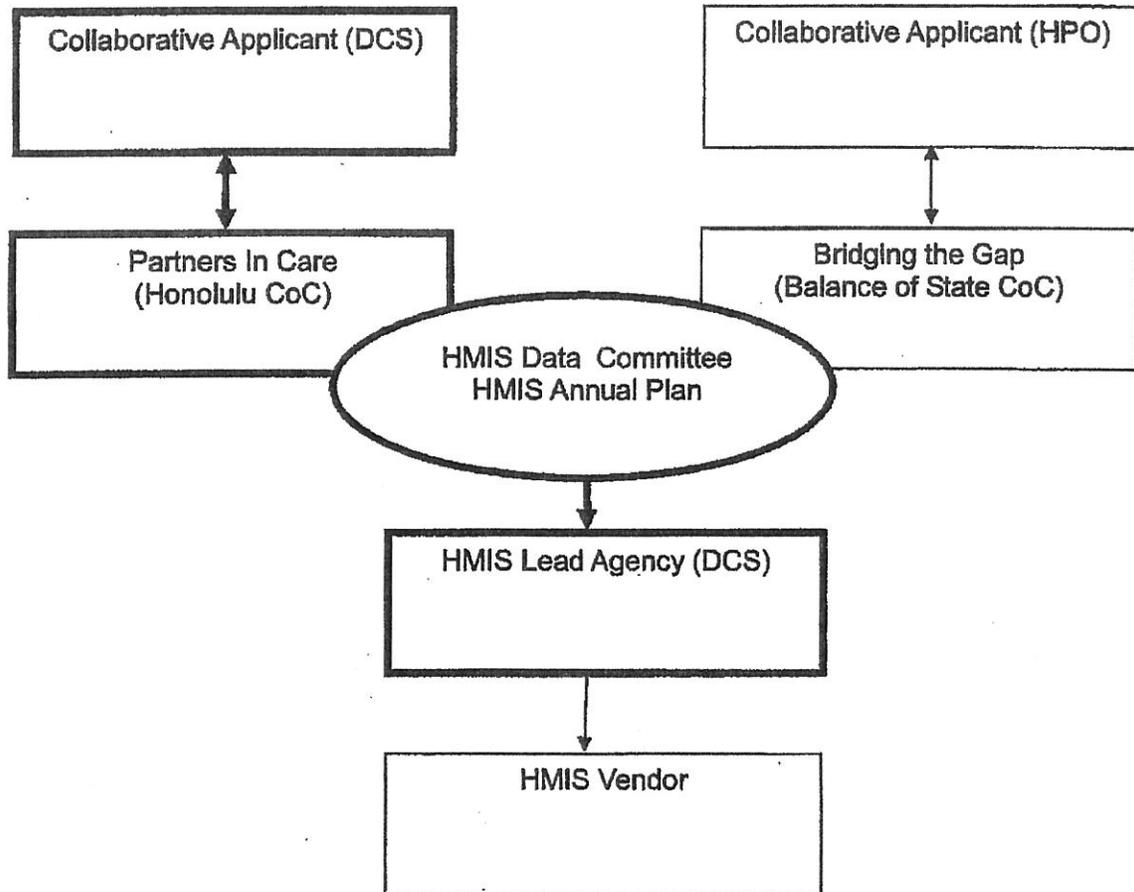
As the HMIS Lead Agency, DCS is responsible for:

1. Administering HMIS funds for management of HMIS operations.
2. Administering HMIS funds to implement the annual HMIS plan for HMIS activities and improvements.

This agreement shall be in effect from 10/21/13 through 10/20/14.

<u>D. V. T.</u>	<u>10/15/13</u>
Authorized representative of PIC	Date
<u>[Signature]</u>	<u>10/21/2013</u>
Authorized representative of DCS	Date

**Partners In Care (Honolulu Continuum of Care (CoC))
HMIS Memorandum of Agreement (MOA)**



**Request for Interest
Continuum of Care Homeless Assistance Programs**

The Department of Community Services, in cooperation with Partners in Care, requests applications from qualified nonprofit agencies providing shelter and supportive services to persons experiencing homelessness. Applications received will be evaluated and prioritized for inclusion into the City's application to the U.S. Department of Housing and Urban Development (HUD) for the Continuum of Care Programs FY2013.

Project applications submitted by qualified organizations will be reviewed based on the experience and capacity of the proposing organization, the degree to which the funding request is consistent with HUD's Continuum of Care (CoC) goals, the degree to which CoC funds will be leveraged with other resources, anticipated accomplishments in relation to CoC priorities, the prospects for the long term operation of the proposed project, the participation of the proposer in the local Continuum of Care process, and the ability of the proposing organization to implement its proposed project in a timely manner.

Interested agencies may download the Request for Interest in electronic format at the City's Purchasing website www.honolulu.gov/pur. If you have any questions regarding this website, please contact the Purchasing Help Desk at 808-768-5535. A printed copy of the Request for Interest will be made available upon request from the Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii, 96813 by calling 768-7749.

The City will conduct an informational meeting from 11:00am – noon on Tuesday December 17, 2013 at Central Union Church, 1660 S Beretania Street, Honolulu.

Applications must be submitted and time-stamped by **noon on Friday, January 3, 2014** to the Department of Community Services at the above address.

Questions regarding the CoC Programs may be directed to Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

KIRK CALDWELL, MAYOR
City and County of Honolulu

Pamela A. Witty-Oakland, Director
Department of Community Services



Request for Interest 2013 Continuum of Care Program

Offered By:

City and County of Honolulu
Department of Community Services
Community-Based Development Division

KIRK CALDWELL, MAYOR
City and County of Honolulu

Pamela A. Witty-Oakland, Director
Department of Community Services

December 2013

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Exhibit A – Notice of Funding Availability (NOFA) for the CoC Program Competition

Exhibit B – “Summary for Renewal Projects” Form

Exhibit C – “Summary for New Projects” Form

Exhibit D – Renewal Project Score Sheet

Exhibit E – New Project Score Sheet

Exhibit F – City’s Sexual Harassment Policy

Exhibit G – “Summary for Renewal Projects” Calculator

1. Introduction

The City and County of Honolulu, through the Department of Community Services (DCS), is issuing this Request for Interest (RFI) to seek applications from qualified nonprofit agencies providing shelter and supportive services to persons experiencing homelessness. Selected applications will be included in the Honolulu Continuum of Care's (CoC's) federal grant application for funds under the U.S. Department of Housing and Urban Development's (HUD) CoC Program. The CoC Program is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11381–11389) (the "Act"). The FY 2013 funds for the CoC Program were authorized by the Consolidated and Further Continuing Appropriations Act, 2013 (Public Law 113-6, approved March 26, 2013) (the "HUD Appropriations Act"). For FY 2014, the level of funding for the CoC Program is not yet known. The Continuing Appropriations Act, 2014 (Public Law 113-46, approved October 17, 2013) funds HUD operations and programs at FY 2013 levels, but provides such funding only through January 15, 2014. Nevertheless for purposes of expediency and efficiency, the FY 2013 – FY 2014 CoC Program Notice of Funding Availability (NOFA) will award funds made available for the CoC Program under FY 2013 and FY 2014. When the level of funding is known for FY 2014, HUD will announce this amount through separate notice. In this separate notice; HUD will also publish the deadlines for submitting the information required by HUD.

The City submits the application to HUD as a Collaborative Applicant (CA) in partnership with the Honolulu CoC, which is known as Partners In Care (PIC). PIC is a membership organization of homeless service providers, other professionals, units of local and state government, program participants, and other community representatives in the City and County of Honolulu. PIC is a planning, coordinating, and advocacy body that develops recommendations for programs and services to fill gaps in Honolulu's CoC.

The City will conduct an informational meeting from 11:00am – noon on Tuesday December 17, 2013 at Central Union Church, 1660 South Beretania Street, Honolulu.

Notifications of addenda will be issued to all prospective Applicants known to have obtained the RFI from the City.

Application documents must be submitted to the DCS, Community-Based Development Division at 715 South King Street, Suite 311, Honolulu, Hawaii, by **noon on Friday, January 3, 2014**. Please ensure that applications and copies are time stamped at the time of delivery and that the original application is clearly marked. Applications received after the submission deadline will be time stamped and returned unopened to the proposing agency. Questions regarding this Request for Interest may be directed to Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

The 2013 HUD CoC NOFA is included as Exhibit A in this RFI. Every potential applicant should review the NOFA carefully and in its entirety in conjunction with the CoC Program interim rule in order to gain a comprehensive understanding and to comply with CoC Program requirements. The NOFA frequently makes reference to citations from the CoC Program interim rule (24 CFR part 578). Applicants should review the General Section of the NOFA, published on July 23, 2012 and the General Section Technical Correction, published October 13, 2012. Additional 2013 CoC notices, broadcasts, and HUD guidance are available at <https://www.onecpd.info/e-snaps/fy-2013-coc-program-nofa-coc-program-competition/>.

Electronic Submission for Applications

HUD requires the electronic submission of CoC applications through their e-snaps system, which is available at www.hud.gov/esnaps or can be accessed from HUD's OneCPD Resource Exchange at <https://www.onecpd.info/e-snaps/>. **All agencies submitting CoC applications must use e-snaps. In addition, the City requests additional hard copy documents that are detailed in Section 6 of this RFI.**

Project applicants must establish an e-snaps user ID and password before accessing the Project Application.

Project applicants are strongly encouraged to review training materials about e-snaps that are available on HUD's OneCPD site at <https://www.onecpd.info/e-snaps/fy-2013-coc-program-nofa-coc-program-competition/>.

Questions regarding the CoC NOFA and e-snaps can be submitted to HUD's OneCPD Ask A Question (AAQ) at www.onecpd.info/ask-a-question. HUD strongly suggests utilizing the "Export to PDF" function in e-snaps to print a hard copy of all submission documents for your records.

HUD Administered Projects vs. City Administered Projects

Most of the CoC's projects are direct grants between nonprofit agencies and HUD. In these situations the nonprofit agency is considered the applicant to HUD and the recipient of HUD funds. For a few of the CoC's projects, the City is the recipient of grants from HUD and is considered the applicant to HUD. The City administers these grants for nonprofit agencies, which are considered subrecipients, through subrecipient agreements. The current City administered projects include:

Applicant / Recipient	Subrecipient	Program Component
City	Catholic Charities Hawaii	Transitional Housing
City	Gregory House	Permanent Housing
City	Ho'omau Ke Ola	Transitional Housing
City	IHS, The Institute for Human Services, Inc.	Permanent Housing

Applicant / Recipient	Subrecipient	Program Component
City	Kalihi-Palama Health Center	Permanent Housing
City	Steadfast Housing Development Corporation	Permanent Housing

HUD's CoC Program Interim Rule requires that if a new Project Application includes funding for rental assistance, the rental assistance must be administered by a State, unit of general local government, or a public housing agency.

Nonprofit agencies considering rental assistance in their new Project Application must contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715 to consult with the DCS' Community Assistance Division about administering the rental assistance in compliance with HUD's rule. New Project Applications with rental assistance funding must also follow the instructions below:

- Follow HUD's instructions to register and create an e-snaps profile (make sure to add all of your projects when prompted so that you get multiple Project Application documents).
- Complete your Project Application documents through your e-snaps profile.
- If you are a City administered grant, after your Project Application is filled out, DO NOT submit your Project Application to e-snaps. Provide Gabe Naeole with your user name and password so that your Project Application documents can be inputted into the City's e-snaps profile. **Please send Gabe your e-snaps information and submit your hard copy documents to the DCS (detailed in Section 6 of this RFI) by the noon, January 3, 2014 deadline.** If you have any questions, please contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

New Project Applications without rental assistance funds will execute contracts for CoC funding directly with HUD. The City will not be a party to new Project Applications without rental assistance funds nor will the City be responsible for the administration and monitoring of new Project Applications without rental assistance funds.

Annual Renewal Demand Amount

Annual Renewal Demand (ARD) (24 CFR 578.17(b)(2)) is the total amount of all the CoC's projects that will be eligible for renewal in the FY2013 CoC Program Competition. It is the sum of the annual renewal amounts of all projects within the CoC's geographic area eligible to apply for renewal in the FY2013 CoC Program competition, before any adjustments to leasing, rental assistance, and operating line items based on FMR changes.

Honolulu's ARD for the FY2013 CoC Program Competition is estimated \$10,042,420. The NOFA (Exhibit A) states that HUD will publish final ARD information and the City will issue an addendum with that information when it is released.

Tier 1 and Tier 2 Funding Levels

Based on the estimated FY 2013 ARD for each CoC that has a HUD-approved Registration, it is anticipated that the national annual renewal demand for FY 2013 funds under the CoC Program Competition will exceed the \$1.7 billion available under the NOFA (Exhibit A). Therefore, HUD anticipates that the available funding will be inadequate to renew all existing projects eligible to renew for FY 2013 funds in the CoC Program Competition. To ensure that CoCs have the ability to indicate to HUD which projects are of the highest priority for FY 2013, HUD is requiring that CoCs rank projects in Tier 1 or Tier 2. The tiers are financial thresholds.

Tier 1 is equal to the CoC's FY 2013 ARD approved in the Registration process, less 5 percent. For Honolulu the ARD amount is estimated at \$10,042,420 and the Tier 1 amount is estimated at \$9,540,299. The NOFA (Exhibit A) states that HUD will publish final ARD and Tier information and the City will issue an addendum with that information when it is released.

Tier 2 is the amount remaining in FY 2013 ARD plus the approved amounts for CoC planning and UFA costs. HUD will publish final FY 2013 ARD and Tier 1 amounts for each CoC no later than 15 days after publication of the NOFA (Exhibit A). Any project that falls only partially in Tier 1 will be considered by HUD as falling entirely in Tier 2.

The CoC must assign a unique rank to each project that it intends to submit to HUD for FY 2013 funding. HUD strongly advises CoCs to rank higher those project applications the CoC determines are high priority, high performing, and meet the needs and gaps as identified by the CoC. HUD will select projects as described in Section VII.B.1.b of the NOFA (Exhibit A).

Honolulu CoC – New Reallocation Project

PIC has decided that it will accept Project Applications for a new reallocation project for an estimated \$501,121. The funding amount is the difference between the CoC's estimated ARD, \$10,042,420, and the CoC's estimated Tier 1 amount, \$9,540,299.

Reallocation is when a CoC shifts funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD. New projects created through reallocation must meet the requirements set forth in Section II.B.1 and the eligibility and project quality thresholds established by HUD in Section V.E.2 of the NOFA (Exhibit A). In this CoC Program Competition reallocation can only be used to create new permanent supportive housing for the chronically

homeless, or rapid re-housing to serve homeless households with children. CoCs that indicate they will be using the reallocation process will be required to identify all projects being reduced or eliminated along with the new projects being created through reallocation.

PIC has decided to limit new reallocation projects to permanent supportive housing for chronically homeless to align with Honolulu's trend to implementing Housing First initiatives for the chronically homeless population.

Nonprofit agencies considering rental assistance in their new Project Application must contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715 to consult with the DCS' Community Assistance Division about administering the rental assistance in compliance with HUD's rule.

Honolulu CoC – Funding Priorities

The City and PIC have established the following priorities ranking and funding projects in the 2013 application.

- First priority will be given to renewal project applications based on their scores on the renewal scoring sheet (included as Exhibit D). The renewal project applications will be ranked by score from highest to lowest and projects will be funded from the highest score downward until the sum of project applications reach the Tier 1 funding line.
- If a project's funding is divided by the Tier 1 funding line, the CA will request an amended Project Application from the affected project applicant to reduce the budget to fit into the Tier 1 funding limit. Example: If the affected project application is for \$100,000, but only \$80,000 is available in the Tier 1 limit, the project applicant will have to submit a revised Project Application for \$80,000.
- The affected project applicant may also elect to forego the grant, which would allow the next ranked Project Application an opportunity to be included in Tier 1. Example: Project C, score of 45 points, budget of \$100,000, available budget below Tier 1 is \$80,000. CA contacts Project C and they elect to forego the \$80,000. Project D, score of 43 points and the next ranked project, budget of \$100,000 would then be contacted by the CA and can choose to amend their Project Application to \$80,000 or forego the funds. This process would continue until all available Tier 1 funding is accounted for.
- After all the Tier 1 projects are ranked, each project will be reduced proportionately to contribute funds to the HMIS and planning renewal projects. The HMIS and planning renewal grants are estimated at \$252,438 and all Tier 1 renewal projects will be reduced by 2.46%.

- Second priority will be given to the highest scoring new reallocation project(s). If the highest scoring new reallocation project does not request all of the Tier 2 funds, the next highest scoring new reallocation projects will be included until the Tier 2 limit is reached. If there are any Tier 2 funds after the new reallocation project(s) are included, renewal projects that did not make it into Tier 1 will be included based on their scores until the Tier 2 limit is reached.

CoC Application Composition

The CoC application is comprised of three parts:

- The CoC Application. The Collaborative Applicant (CA) will work with PIC to provide information about the CoC planning body, governance structure, overall performance, and the strategic planning process. This part of the application is scored and will determine the order in which CoCs are funded.
- The Project Application is completed by the project applicants for new and renewal project requests. Each agency must submit a Project Application for EACH of its projects. Although the entire CoC application score comes from the CoC Application, the CoC evaluation committee reviews all individual applications to determine its ranking in the CoC application.

The project applicant will provide a description of the proposed new or renewal project including the details as to who the project will serve, the type of housing that will be provided and what budget activities are being requested. The project applicant will provide a description of the activities that will be carried out with grant funds.

- The Priority Listings contain four separate forms that list the new, renewal, CoC planning, and UFA projects the CoC included in the CoC Application. The Priority Listings rank the projects in order of priority and also list any projects rejected by the CoC. This part of the CoC Consolidated Application cannot be completed until all Project Applications have been submitted.
- **CoC awardees are expected to actively participate in the PIC planning and coordination processes and activities. Contributing to the Honolulu CoC's development strengthens the CoC which improves the application score and can result in increased funding for the Honolulu CoC.**

2. Program Guidelines

The Continuum of Care program is designed to assist sheltered and unsheltered homeless people by providing the housing and/or services needed to help individuals move into transitional and permanent housing, with the goal of long-term stability.

Specifically, 24 CFR part 578.1 of the CoC Program interim rule states that the primary purpose of the CoC Program is to:

- Promote community-wide commitment to the goal of ending homelessness
- Provide funding for efforts by nonprofit providers, States, and local governments to re-house homeless individuals and families rapidly while minimizing the trauma and dislocation caused to homeless individuals, families, and communities as a consequence of homelessness
- Promote access to and effective use of mainstream programs by homeless individuals and families
- Optimize self-sufficiency among individuals and families experiencing homelessness

To accomplish CoC Program goals, funds may support activities under five primary program components: permanent housing (permanent supportive housing and rapid re-housing), transitional housing, supportive services only, HMIS and, for HUD-designated high-performing communities, homelessness prevention.

- Permanent housing (PH) is defined as community-based housing without a designated length of stay in which formerly homeless individuals and families live as independently as possible. The CoC Program may fund two types of permanent housing: (1) permanent supportive housing (PSH), which is permanent housing with indefinite leasing or rental assistance paired with services to help homeless people with disabilities achieve housing stability; and (b) rapid re-housing (RRH), a model that emphasizes housing search and relocation services and short- and medium-term rental assistance to move homeless people as rapidly as possible into permanent housing.
- The transitional housing (TH) project component may be used to cover the costs of up to 24 months of housing with accompanying support services, providing a period of stability to enable homeless people to transition successfully to and maintain permanent housing within 24 months of program entry. Program participants must have a lease or occupancy agreement in place when residing in transitional housing. The provisions of the CoC Program's TH program component have not changed significantly from the TH provisions under SHP.
- The supportive services only (SSO) program component is limited to recipients and subrecipients providing services to individuals and families not residing in housing operated by the recipient. SSO recipients and subrecipients may use the funds to conduct outreach to sheltered and unsheltered homeless persons, link clients with housing or other necessary services, and provide ongoing support. SSO projects may be offered in a structure or structures at one central site, or in multiple buildings at scattered sites where services are delivered. Projects may

also be operated independent of a building (e.g., street outreach) and in a variety of community-based settings, including in homeless programs operated by other agencies.

- Homeless Management Information System. Funds under this component may be used only by HMIS leads for leasing a structure in which the HMIS operates, for operating the structure in which the HMIS is housed, and/or for covering other costs related to establishing, operating, and customizing a CoC's HMIS. Other recipients and subrecipients may not apply for funds under the HMIS program component, but may include costs associated with contributing data to the CoC's HMIS within their project under another program component (PH, TH, SSO, or HP).
- Homelessness Prevention. Programs within CoCs that have applied for and been designated by HUD as an HPC may use CoC funds to fund homelessness prevention (HP) assistance for individuals and families at risk of homelessness. The services under this component may include housing relocation and stabilization services as well as short- and medium-term rental assistance to prevent an individual or family from becoming homeless. Through this component, recipients and subrecipients may help individuals and families at-risk of homelessness to maintain their existing housing or transition to new permanent housing. Homelessness prevention must be administered in accordance with 24 CFR part 576.

Although HUD allows all of these programs, the City in partnership with PIC, has prioritized and will only consider renewal Project Applications with the following components in this RFI: Permanent Housing, Transitional Housing, Supportive Services Only, HMIS, and Planning. In alignment with HUD's priorities the City in partnership with PIC, has prioritized and will only consider new Project Applications with the following component in this RFI: Permanent Housing - Permanent Supportive Housing for chronically homeless.

3. Eligible Participants

The CoC program is designed to assist sheltered and unsheltered homeless people. The CoC Program interim rule defines homeless as follows (24 CFR 578.3).

"Homeless means:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised 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, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(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:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing."

In addition, some CoC programs are required to serve those who are chronically homeless. The CoC Program interim rule defines chronically homeless as follows (24 CFR 578.3).

"Chronically homeless.

(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; and

(iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) 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."

Applicants must review the CoC NOFA (Exhibit A) and the CoC Interim Rule thoroughly to ensure only eligible participants will be served by CoC funded activities.

4. Request for Interest Schedule

The schedule for the RFI process shall be as follows:

December 10, 2013	Request for Interest Issued
December 17, 2013 11:00 am - noon	Public Informational Meeting Central Union Church 1660 South Beretania Street
December 18, 2013	RFI Addendum: Public Informational Meeting Q & A
December 10 - 20, 2013	Technical Assistance available through email, phone and by appointment
January 3, 2014 Noon	Deadline to Submit Applications Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813
January 3 - 8, 2014	DCS Application Review
January 8 – 16, 2014	Evaluation Committee Reviews and Scores Applications
January 16, 2014 9:00am - noon	Evaluation Committee Q&A with Applicants Department of Community Services, 715 South King Street, 2 nd Floor Conference Room
January 17, 2014	Notification of Awardees via email
January 17, 2014 to January 30, 2014	Finalize HUD Application
January 31, 2014	Submit HUD Application in e-snaps
February 3, 2014	HUD Application Deadline in e-snaps

5. Requirements for Applicants

Statutory and Regulatory Requirements

CoC program participants shall be responsible for compliance with all applicable federal, state, and local laws, ordinances, directives, rules, and regulations, including but not limited the program requirements listed on pages 21-31 of Exhibit A (i.e.

compliance with the Fair Housing Act, Limited English Proficiency, Section 3 of the Housing and Urban Development Act of 1968, etc.)

All prospective applicants must also comply with the following guidelines:

- Be a public agency or a private nonprofit agency organized and certified under Section 501(c) (3) of the Internal Revenue Code of 1986, as amended.
- Comply with federal non-discrimination, equal opportunity, and non-proselytization requirements.
- Comply with the City's sexual harassment ordinance (Exhibit F).

Have an established record of providing assistance to the homeless and managing state, local or federal grant funds.

Match

All eligible funding costs, except leasing, must be matched with no less than a 25 percent cash or in-kind contribution. No match is required for leasing. The match requirements apply to project administration funds, CoC planning costs, and UFA costs, along with the traditional expenses—operations, rental assistance, supportive services, and HMIS. Match must be met on an annual basis.

For an in-kind match, the recipient or subrecipient may use the value of property, equipment, goods, or services contributed to the project, provided that, if the recipient or subrecipient had to pay for such items with grant funds, the costs would have been eligible. If third-party services are to be used as a match, the recipient or subrecipient and the third-party service provider that will deliver the services must enter into a memorandum of understanding (MOU)—before the grant is executed—documenting that the third party will provide such services and value towards the project.

To be eligible for match, the cash or in-kind services must provide services that are eligible under the activities listed in 24 CFR 578 Subpart D.

Leverage

HUD considers any matching funds above and beyond the minimum required amount to be leverage. Leveraging includes all funds, resources, and/or services that the applicant can secure on behalf of the client being served. While leveraging includes all cash matching funds, it is broader in scope, including any other services, supplies, equipment, space, etc. that are provided by sources other than HUD. An example of leveraging would include a project that provides case management through Medicaid or Department of Mental Health funding. The total costs involved in delivering the case management (percentage of salary, fringes, other benefits) can be included in leveraging.

Example: If a project has \$100,000 supportive services budget, and \$100,000 in cash or in-kind services, \$25,000 is considered match, \$75,000 is considered leverage.

Timeliness

Successful applicants are expected to initiate approved projects promptly after execution of the grant agreement. HUD may take action if certain performance standards are not met. In addition, applicants are expected to expend grant funds on a timely basis.

6. Preparation and Submission of Applications

- For HUD administered projects, the following tasks must be done by the noon, January 3, 2014, application deadline:
 - Submit the SF-424 and Project Application documents to e-snaps at www.hud.gov/esnaps or www.hudhre.info/esnaps.
 - Submit all hard copy documents described below to the Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813.
- For City administered projects, the following tasks must be done by the noon, January 3, 2014, application deadline:
 - E-mail Gabe Naeole at gnaeole@honolulu.gov and provide him with your e-snaps user name and password so that he can input your Project Application documents into the City's e-snaps profile.
 - Submit all hard copy documents described below to the Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813.

For Each RENEWAL Project

Submit **six (6) sets** of the following documents (please use binder clip)

1. Completed Exhibit B - Summary for Renewal Projects which includes:
 - a. A summary cover sheet and leveraging documentation from applicable funding sources or from your agency head
 - b. Relevant sections of the project's 2011 CoC application and most recent Annual Performance Report (APR)
 - c. The most recent HUD and/or City monitoring letter(s) describing the results of the monitoring. If findings and issues were cited, provide the corrective action plan implemented by your agency

2. The project's most recently completed Annual Performance Report (APR)
3. E-snaps webpage providing submission confirmation of the Project Application into e-snaps (not required for City-administered projects)
4. Completed Project Application (e-snaps allows project applicants to export this document into PDF format)
5. The agency's most recent independent financial audit and corrective actions, if applicable
6. Current Board of Directors List
7. If applicable, provide any documents that have been updated since the agency's last CoC application submission (two-sided copies okay; i.e. revised 501(c) (3) certification, Charter of Incorporation, By-Laws, etc.)

For Each NEW Project

Submit **six (6) sets** of the following documents (please use binder clip for each set):

1. Completed Exhibit C - Summary for New Projects which includes:
 - a. A summary cover sheet and leveraging documentation from applicable funding sources or from your agency head
2. E-snaps webpage providing submission confirmation of the Project Application into e-snaps (not required for City-administered projects)
3. Completed Project Application (e-snaps allows project applicants to export this document into PDF format)
4. Provide the following agency documents (2-sided copies are okay):
 - a. 501(c) (3) certification (if applicable, community mental health association documentation)
 - b. Most Recent Independent Financial Audit and Corrective Actions, if applicable
 - c. Current Board of Directors List
 - d. Charter of Incorporation
 - e. By-laws

Nonprofit agencies considering rental assistance in their new Project Application must contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715 to consult with the DCS' Community Assistance Division about administering the rental assistance in compliance with HUD's rule.

Submittals

Application documents must be submitted to the DCS, Community-Based Development Division, 715 South King Street, Suite 311, Honolulu, Hawaii, by **noon, on Friday, January 3, 2014**. Please ensure that applications and copies are time stamped at the time of delivery and that the original application is clearly marked. All applications submitted by the deadline shall be considered for inclusion in the City's CoC application. Applications received after the deadline will be time stamped and returned unopened to the proposing agency. Questions regarding this Request for Interest may be directed to Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

Additional Information

Please read the instructions provided in this RFI and e-snaps before completing application forms.

SF-LLL, Executed Disclosure of Lobbying Activities. The City will complete this document for all City administered projects.

Applicant Code of Conduct. HUD must have the Code of Conduct for every agency submitting a project application. The current list of agencies that have a Code of Conduct filed with HUD is available at <http://www.hud.gov/offices/adm/grants/codeofconduct/cconduct.cfm>. **If your agency is not listed, you must upload your agency's Code of Conduct as an attachment on e-snaps.**

By way of HUD guidance, a Code of Conduct must meet the following minimum requirements:

- Must prohibit the solicitation and acceptance of gifts or gratuities by officers, employees, and agents for their personal benefit in excess of minimal value;
- Outline administrative and disciplinary actions available to remedy violations of such standards;
- Describe the method to be used to ensure that all officers, employees and agents of the organization are aware of the Code of Conduct; and
- Must be written on company letterhead that provides a mailing address, authorized official name, and telephone number.

HUD 40090-4, Applicant Certifications. The City will complete this document for City administered projects.

Project Application. Please note that the HUD-defined name for Honolulu's CoC is **Honolulu CoC**, and Honolulu's CoC number is **HI-501**. Honolulu's Geographic Code is **150144**.

Rental assistance costs in Project Applications may not exceed 100 percent of the Fair Market Rent (FMR) for the Metropolitan Statistical Area (MSA) and unit size in which the unit is located.

FY14 HUD FMR By Unit Bedrooms					
	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
FY14 FMR	\$1,267	\$1,382	\$1,820	\$2,682	\$3,078

7. Evaluation

All new applications will be initially reviewed to determine if the proposed project meets the minimum requirements for participation in the CoC program. Specifically, applications will be initially reviewed to determine that (1) The application is submitted by an agency eligible to receive assistance through the CoC programs; (2) The proposed project will serve eligible CoC beneficiaries; and (3) The activities proposed are eligible for assistance under the CoC programs and appropriate for the population to be served. Applications not meeting any of these minimum requirements will be returned to the proposing agency.

The City will organize an evaluation committee comprised of representatives of the City, and private non-profit and for profit entities to review all projects. Representatives, employees, or officers of agencies submitting a Project Application will be excluded from participation on the evaluation committee. The City reserves the right to request written clarifications or revisions from applicants during the evaluation process. All applications which meet the minimum requirements will be ranked for consideration by HUD for CoC funding.

Project applications submitted by qualified organizations will be reviewed based on the experience and capacity of the proposing organization, the degree to which the funding request is consistent with HUD's Continuum of Care (CoC) goals, the degree to which CoC funds will be leveraged with other resources, anticipated accomplishments in relation to CoC priorities, the prospects for the long term operation of the proposed project, the participation of the proposer in the local Continuum of Care process, and the ability of the proposing organization to implement its proposed project in a timely manner. More details about the evaluation criteria are included in Exhibits B and D for all renewals, and Exhibits C and E for all new applications.

Applicants will also have a Question and Answer (Q&A) session with the evaluation committee on January 16, 2013 from 9:00am – noon at the DCS, Community-Based Development Division at 715 South King Street, 2nd Floor Conference Room, Honolulu, Hawaii. Each agency will be given time to respond to any questions the evaluation committee may have about their Project Application(s). The City will issue via email a schedule of approximate times applicants may meet with the evaluation committee January 8, 2014.

The score sheets that the evaluation committee will use for renewals (Exhibit D) and new projects (Exhibit E) are included in this RFI.

THE CITY AND COUNTY OF HONOLULU RESERVES THE RIGHT, WITHOUT LIABILITY WHATSOEVER, TO REJECT ANY AND ALL APPLICATIONS, IN WHOLE OR IN PART, OR REQUIRE AMENDMENTS TO THE APPLICATIONS IF THE GUIDELINES, REQUIREMENTS, AND/OR ELIGIBILITY CRITERIA SET FORTH IN THIS REQUEST FOR INTEREST ARE NOT MET. THE CITY AND COUNTY OF HONOLULU ALSO RESERVES THE RIGHT TO AMEND OR SUPPLEMENT REQUIREMENTS AND MATERIALS, AND WILL INFORM APPLICANTS OF SUCH CHANGES PRIOR TO THE SUBMITTAL DATE. NEITHER THE CITY NOR THE APPLICANT HAS ANY OBLIGATION UNDER THIS REQUEST.

Exhibit B – Project Summary for Renewal Projects

Complete one form per project. Please reply to all of the questions. Put 'N/A' if not applicable. Keep responses short and succinct.

Project Information

Surecipient (Agency Name): _____
 Project Applicant (Agency Name, City): _____
 Project/Program Name: _____

Program Type (Check One)

- Transitional Housing
- Permanent Housing
- Supportive Services Only

1. Participation in Partners In Care (will be verified with PIC)

Partners in Care (PIC) General Meeting Attendance – Enter the total number of PIC general monthly meetings attended from April 2013 to December 2013: _____ (Note: the Homeless Awareness Conference counts as a General Meeting)

Subcommittee Participation – Check off all that apply and indicate the number of monthly meetings attended from January 2013 to December 2013:

- Executive* - Chair or Member Number of meetings attended: _____
- Awareness* - Chair or Member Number of meetings attended: _____
- Advocacy* - Chair or Member Number of meetings attended: _____
- Planning* - Chair or Member Number of meetings attended: _____
- Data* - Chair or Member Number of meetings attended: _____

PIC Activities Participation

Please circle how your agency participated in the following PIC activities:

	1 point	2 points
2013 Legislative breakfast	Attended	Provided a display
2012 Hoolaulea	Attended	Provided a booth
2013 Point In Time	Attended	Regional leader

2. Project Leverage

This criterion is a mathematical calculation of ratio of HUDfunds requested to the value of other resources contributed / secured for the project / program by the applicant.

For your proposed CoC project proposal:

A. Leverage Provided: \$ _____
 B. HUD Funding Request: \$ _____
 Leverage Ratio (B/A): _____%

Please use the Project Leverage Cover Sheet at the back of this document.

3. Project Quality – Meeting Original Goals and Intent of Program

Client Group

Client group proposed in ORIGINAL application: _____
 Client group currently serving is the same as originally proposed? Yes No

Exhibit B – Project Summary for Renewal Projects

If you wish, please provide a brief explanation: _____

Services

Services proposed in ORIGINAL application: _____

Services currently providing are the same as originally proposed? Yes No

If you wish, please provide a brief explanation: _____

4. Project Quality – Accomplishing Program Goals

For the APR submitted to HUD between October 1, 2012, and September 30, 2013:

Number of HUD required performance measures accomplished in your Annual Performance Report (APR): _____

Please attach the related pages of your APR (PH: Q36a, TH: Q36b) to the back of this document (see samples attached).

If you wish, provide brief comments on your performance: _____

5. Project Quality – Accomplishing Program Goals

For the APR submitted to HUD between October 1, 2012, and September 30, 2013:

Number anticipated to be served during the grant term from 5A and 5B of your 2011 application:

a. Individuals: _____ b. Families (households): _____

Actual number served during the grant term from your APR:

c. Individuals: _____ d. Families (households): _____

Percentage accomplished (Actual divided by anticipated):

e. Individuals: _____ f. Families (households): _____

Please attach the related pages (5A and 5B) of your 2011 application and APR (Q8) to the back of this document (see samples attached). An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.

If you wish, provide brief comments on your performance: _____

6. Project Quality – Accomplishing Program Goals

For the APR submitted to HUD between October 1, 2012, and September 30, 2013:

Total Grant Award from the 2011 renewal list: \$ _____

Amount of Grant Award Expended at Grant Expiration from your APR: \$ _____

Percentage Expended at Grant Expiration (Expended divided by Total Grant Award): _____%

Total Duration (Years) of Grant Award: _____

Please attach a copy of the 2011 renewal list with your budget amount circled to the back of this document and the related pages of your APR (PH: Q31, TH: Q30a4). See samples attached.

If you wish, provide brief comments on your performance: _____

7. Project Quality – Accomplishing 2012 HUD CoC Program Objectives

Describe how your CoC project has achieved the following 2012 HUD CoC Objectives.

1. Create new permanent housing (PH) beds for chronically homeless persons.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects achievements related to this outcome: _____

Exhibit B – Project Summary for Renewal Projects

2. Increase percentage of homeless persons staying in PH over 6 months to at least 80%. **An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.**

Check off if this was an objective of the project's most recently completed grant term:
Explain your projects achievements related to this outcome (provide data and percentages from your most recently completed APR): _____

3. Increase percentage of homeless persons moving from transitional housing (TH) to PH to at least 65%. **An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.**

Check off if this was an objective of the project's most recently completed grant term:
Explain your projects achievements related to this outcome (provide data and percentages from your most recently completed APR): _____

4. Increase percentage of homeless persons employed at exit to at least 20%. **An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.**

Check off if this was an objective of the project's most recently completed grant term:
Explain your projects achievements related to this outcome (provide data and percentages from your most recently completed APR): _____

5. Decrease the number of homeless households with children.

Check off if this was an objective of the project's most recently completed grant term:
Explain your projects achievements related to this outcome: _____

8. Project Quality – Unresolved Issues

Please circle any of the applicable issues your program may be experiencing. The City will verify any issues with the HUD field office.

(a) Outstanding obligation to HUD;

(b) Audit finding(s);

(c) History of inadequate financial management accounting practices;

(d) Evidence of untimely expenditures on prior award;

(e) History of other major capacity issues;

(f) History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

Explain any items circled above: _____

Exhibit B – Project Summary for Renewal Projects

Please attach the most recent HUD and/or City monitoring letter(s) describing the results of the monitoring. If findings and issues were cited, provide the corrective action plan implemented by your agency.

Additional Questions

9. Project implementation of the Affordable Care Act

Describe how the project is preparing for implementation of the Affordable Care Act (ACA). Response should address the extent in which project recipients and subrecipients will participate in enrollment and outreach activities to ensure eligible households are able to take advantage of new healthcare options. _____

4) P4 APR sample

Q36a. Performance Measures - Permanent Housing Programs

Instructions

Projects funded in the 2010 competition or a subsequent competition: This question relies on performance measurement information you established in the Performance Measures section of the Exhibit 2 application for this project and your project's actual results.

1. The Target # and % of persons who were expected to accomplish this measure have been pre-populated from the response you provided to the Standard Performance Measures question in your Exhibit 2 application. For Measure 1, the pre-populated figure is the sum of the targets provided for questions 1a and 1b.

2. Complete the actual number of persons served by the program for whom the measure is applicable, and the actual number of persons who accomplished the measure. Click 'Save' to automatically calculate the 'Actual % of persons who accomplished this measure' and the '% Difference between your Exhibit 2 Targets and Actual Performance' columns.

3. In the comment box, describe the project's performance relative to the target you set and provide an explanation for any discrepancies. HUD recognizes that the performance measurement question on the APR is not structured in exactly the same way as the Exhibit 2 question, and that this may be part of your explanation.

Projects funded prior to the 2010 competition: Grantees who did not submit their project in the 2010 competition will not have pre-populated targets for each measure, but should still complete step 3 as described above. In the comment box, grantees should reflect on their program performance and the extent to which it was consistent with local expectations.

Permanent Housing Program Performance Measures Key

Key	Domain	Performance measure
Measure 1	Housing Stability	The % of persons who remained in the permanent housing program as of the end of the operating year or exited to permanent housing (subsidized or unsubsidized) during the operating year.
Measure 2a	Increase Total Income	The % of persons age 18 and older who maintained or increased their total income (from all sources) as of the end of the operating year or program exit.
Measure 2b	Increase Earned Income	The % of persons age 18 through 61 who maintained or increased their earned income (i.e., employment income) as of the end of the operating year or program exit.

Performance Measure	Exhibit 2 Target # of persons who were expected to accomplish this measure	Exhibit 2 Target % of persons who were expected to accomplish this measure	Actual # of persons served by the program, as applicable to this measure	Actual # of persons who accomplished this measure	Actual % of persons who accomplished this measure	% Difference between Exhibit 2 Target and Actual Performance
1 - Housing Stability Measure	81	80%	182	162	89%	-9%
2a - Total Income Measure	101	100%	182	160	88%	-12%
2b - Earned Income Measure	0	0%	182	141	77%	-77%

Describe how your project performed relative to your expectations for its performance. For projects funded in the 2010 competition or a subsequent competition, describe the project's performance relative to the target you set and provide an explanation for any discrepancies.

Maximum Characters: 2000

With cost savings we were able to place additional participants. 6 participants exited the program because they received Section 8 housing assistance.

4) TL APR sample

Applicant: The Salvation Army ATS

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2010

021754601

075575

Q36b. Performance Measures - Transitional Housing Programs

Instructions

Projects funded in the 2010 competition or a subsequent competition: This question relies on performance measurement information you established in the Performance Measures section of the Exhibit 2 application for this project and your project's actual results.

1. The Target # and % of persons who were expected to accomplish this measure have been pre-populated from the response you provided to Standard Performance Measures question 1b in the Exhibit 2 application. HUD will not review data that SHP-TH project applicants submitted in Standard Performance Measures question 1a because applicants should have entered zeroes for that question.

2. Complete the actual number of persons served by the program for whom the measure is applicable, and the actual number of persons who accomplished the measure. Click 'Save' to automatically calculate the 'Actual % of persons who accomplished this measure' and the '% Difference between your Exhibit 2 Targets and Actual Performance' columns.

3. In the comment box, describe the project's performance relative to the target you set and provide an explanation for any discrepancies. HUD recognizes that the performance measurement question on the APR is not structured in exactly the same way as the Exhibit 2 question, and that this may be part of your explanation.

Projects funded prior to the 2010 competition: Grantees who did not submit their project in the 2010 competition will not have pre-populated targets for each measure, but should still complete step 3 as described above. In the comment box, grantees should reflect on their program performance and the extent to which it was consistent with local expectations.

Transitional Housing Program Performance Measures Key

Key	Domain	Performance Measure
Measure 1	Housing Stability	The % of persons who exited to permanent housing (subsidized or unsubsidized) during the operating year.
Measure 2a	Increase Total Income	The % of persons age 18 or older who increased their total income (from all sources) as of the end of the operating year or program exit.
Measure 2b	Increase Earned Income	The % of persons age 18 through 61 who increased their earned income (i.e., employment income) as of the end of the operating year or program exit.

Performance Measure	Exhibit 2 Target # of persons who were expected to accomplish this measure	Exhibit 2 Target % of persons who were expected to accomplish this measure	Actual # of persons served by the program, as applicable to this measure	Actual # of persons who accomplished this measure	Actual % of persons who accomplished this measure	% Difference between Exhibit 2 Target and Actual Performance
---------------------	--	--	--	---	---	--

1-Housing Stability Measure	10	67%	18	10	56%	-11%
2a-Total Income Measure	9	60%	8	8	100%	40%
2b-Earned Income Measure	0	0%	0	0	0%	0%

Describe how your project performed relative to your expectations for its performance. For projects funded in the 2010 competition or a subsequent competition, describe the project's performance relative to the target you set and provide an explanation for any discrepancies.

Maximum Characters: 2000

Housing Stability-While the # of clients projected in 2010 to exit to PH equaled the actual # of clients exiting to PH in 2012, the actual % in FY11-12 was lower than the % projected in 2010. This is due to clients relapsing back to alcohol and chemical substance abuse and returning to the streets, unable to secure PH.

Total Income-The # of clients who increased their income in FY11-12 equaled the % of clients who increased their income in FY11-12. Income goals are set for clients to attain employment or cash income sources within 45 days of admission.

S) PHTH application sample

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2011

042323

5A. Project Participants - Households with Dependent Children

Instructions:

Identify the demographics of each household with children served (or proposed to be served), at a particular point in time (when the project is at full capacity). The numbers entered here must reflect only those households and persons served using the funds requested in this application.

1. Total number of households: (required) - enter the total number of households served (or proposed to be served).

2. Disabled adults: (in this row) - enter the un-duplicated total number of adult persons with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

3. Non-disabled adults: (in this row) - enter the un-duplicated total number of adult persons without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

4. Disabled children: (in this row) - enter the un-duplicated total number of children with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

5. Non-disabled children: (in this row) - enter the un-duplicated total number of children without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

6. Total persons: (calculated row) - the total number of persons within each subpopulation is automatically calculated.

7. Total number of adults: (calculated row) - the total number of adults served (or proposed to be served) is automatically calculated.

8. Total number of children: (calculated row) - the total number of children served (or proposed to be served) is automatically calculated.

Additional Resources:

Point in time - PIT (definition) - a snap shot of the number of homeless persons that can be served, on any given night or day, when the project is at full capacity. For a new project, this count is based on the applicant's best guess at the time of application. For a renewal project, the PIT is based on the applicant's assessment of the number of participants residing in a facility or served by the program on a particular night or day when the project is at full capacity.

Application Detailed Instructions (on left menu)

<http://esnaps.hudhre.info>

<http://esnaps.hudhre.info/training>

1. Total Number of Households	0						
	Total Persons (unduplicated)	Chronically Homeless	Severely Mentally Ill	Chronic Substance Abuse	Veterans	Persons with HIV/AIDS	Victims of Domestic Violence
2. Disabled Adults	0						
3. Non-Disabled Adults	0						
4. Disabled Children	0						

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2011

042323

5. Non-Disabled Children	0						
6. Total Persons (click on "Save" to auto-calculate)	0	0	0	0	0	0	0
7. Total Number of Adults (click on "Save" to auto-calculate)	0						
8. Total Number of Children (click on "Save" to auto-calculate)	0						

5B. Project Participants - Households without Dependent Children

Instructions:

Identify the demographics of each household without children served (or proposed to be served), at a particular point in time (when the project is at full capacity). The numbers entered here must reflect only those households and persons served using the funds requested in this application.

1. Total number of households: (required) - enter the total number of households without children served (or proposed to be served).

2. Disabled adults: (in this row) - enter the un-duplicated total number of adult persons with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

3. Non-disabled adults: (in this row) - enter the un-duplicated total number of adult persons without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

4. Disabled unaccompanied youth: (in this row) - enter the un-duplicated total number of unaccompanied youth with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

5. Non-disabled unaccompanied youth: (in this row) - enter the un-duplicated total number of unaccompanied youth without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

6. Total persons: (calculated row) - the total number of persons within each subpopulation is automatically calculated.

7. Total number of adults: (calculated row) - the total number of adults served (or proposed to be served) is automatically calculated.

8. Total number of unaccompanied youth: (calculated row) - the total number of unaccompanied youth served (or proposed to be served) is automatically calculated.

Additional Resources:

Point in time - PIT (definition) - a snap shot of the number of homeless persons that can be served, on any given night or day, when the project is at full capacity. For a new project, this count is based on the applicant's best guess at the time of application. For a renewal project, the PIT is based on the applicant's assessment of the number of participants residing in a facility or served by the program on a particular night or day when the project is at full capacity.

Application Detailed Instructions (on left menu)

<http://esnaps.hudhre.info>

<http://www.hudhre.info/index.cfm?do=viewHomelessAndHousingProgramInfo>

1. Total Number of Households	8						
	Total Persons (unduplicated)	Chronically Homeless	Severely Mentally Ill	Chronic Substance Abuse	Veterans	Persons with HIV/AIDS	Victims of Domestic Violence
2. Disabled Adults	8	5		8			
3. Non-Disabled Adults	0						

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2011

042323

4. Disabled Unaccompanied Youth (under 18)	0						
5. Non-Disabled Unaccompanied Youth (under 18)	0	0	0	0	0	0	
6. Total Persons (click on "Save" to auto-calculate)	8	5	0	8	0	0	0
7. Total Number of Adults (click on "Save" to auto-calculate)	8						
8. Total Number of Unaccompanied Youth (click on "Save" to auto-calculate)	0						

S)PH/TH APR
Sample

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2010

075575

Q8. Persons Served

Instructions:

Q8 reports on the full universe of non-victim service provider clients served and all future questions will refer back to the answers here. Report the unduplicated count of all people served during the operating year. Each person should be counted in the household type associated with his or her last stay of the operating year.

The household types include:

- a) Households without Children - include single adult persons, or adults with adult companions that have never had a child in their household.
- b) Households with Children and Adults - include any household with at least one adult and one child present regardless of whether the child(ren) is present for the full program stay. (Rule - If ever a child in the household, always a household with children).
- c) Households with only Children - include any household where all persons are younger than age 18. (Age is determined based on: entry date closest to the end of the operating year or if they were in the program during the previous operating year then age is based on the first day of the operating year.)
- d) Unknown Household Type - includes households that cannot be classified in cases when one or more persons are missing dates of birth. Note that in instances when the household already contains at least one known adult and one known child, the household type can be determined and categorized as a Household with Children and Adults.

Number of Persons in Households Served During the Operating Year

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Adults	26	26	0	0	0
Children	0	0	0	0	0
Don't Know/Refused	0	0	0	0	0
Information Missing	0	0	0	0	0
Total	26	26	0	0	0

Average Number of Persons Served Each Night

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Average Number of Persons	9	9	0	0	0

Point-in-Time Count of Persons Served on the Last Wednesday in

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	10	10	0	0	0
April	10	10	0	0	0
July	5	5	0	0	0

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2010

075575

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
October	9	9	0	0	0

Q9. Households Served

Instructions:

Report the unduplicated number of households served by household type. The type of household is determined based on the type of persons in the household, considering all program stays within the operating year.

a) Households without Children - include single adult persons, or adults with adult companions that have never had a child in their household.

b) Households with Children and Adults - include a person in any household with at least one adult and one child present regardless of whether the child(ren) is present for the full program stay. (Rule - If ever a child in the household, always a household with children).

c) Households with only Children - include a person in any household where all persons are younger than age 18. (Age is determined based on: entry date closest to the end of the operating year or if they were in the program during the previous operating year then age is based on the first day of the operating year.)

d) Unknown Household Type - include households that cannot be classified in cases when one or more persons are missing dates of birth. Note that in instances when the household already contains at least one known adult and one known child, the household type can be determined and categorized as a Household with Children and Adults.

Number of Households Served During the Operating Year

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Households	26	26	0	0	0

Point-in-Time Count of Households Served on the Last Wednesday in

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	10	10	0	0	0
April	10	10	0	0	0
July	5	5	0	0	0
October	9	9	0	0	0

(e) PH / TH Sample
2011 Renewal List

**Fiscal Year 2011
Continuum of Care Competition
Homeless Assistance Award Report**

State

CoC Name

Project Name

Program

Awarded Amount

HI

HI-500

Kauai Shelter Plus Care Program	S+CR	\$74,304
Transitions Project	SHPR	\$77,536
Puamela Group Home 2011	SHPR	\$33,384
Kulalani Group Home 2011	SHPR	\$36,384
Eha Shelter Plus Care Program	S+CR	\$605,124
Kaulana Group Home 2011	SHPR	\$32,924
Kaahale Group Home 2011	SHPR	\$31,598
Ka Hale A Ke Ola Family Outpatient Program	SHPR	\$46,245
Ka Hale A Ke Ola Chemical Dependency Program	SHPR	\$91,717
HMIS Analysis and Dissemination Project	SHPR	\$41,160
Hawaii State Homeless Management Information System	SHPR	\$31,131
Eono Shelter Plus Care Program	S+CR	\$140,388
Ehiku Shelter Plus Care Program	S+CR	\$61,440
Kukui Program	S+CR	\$489,048
HI-500 Total:		\$1,792,383

HI-501

Continuum of Care - Domestic Abuse Shelters and Transitional Apartments 2011	SHPR	\$84,488
Ahukini Group Home 2011	SHPR	\$27,874
ATS Homeless Offenders Treatment and Supportive Living Services 2011	SHPR	\$289,302
Barbers Point Veterans-in-Progress	SHPR	\$341,283
Kalaeloa Permanent Housing for Homeless Veterans with Disabilities	SHPR	\$142,282
Transitional Living Program Housing and Support for Homeless Young Adults	SHPR	\$136,000
Shelter Plus Care Program	S+CR	\$496,404
SHDC S+C 2011	S+CR	\$1,646,868
Safe Haven	SHPR	\$876,273
PACT	SHPR	\$29,015
Ohana Ola O Kahumana	SHPR	\$147,175
New Beginnings	S+CR	\$2,055,900
CCH Maui Land PEP 2011	SHPR	\$133,607
Kaukama Group Home 2011	SHPR	\$29,653
Community Residential Program	SHPR	\$363,080
Ka 'Oahu Hou O Manoa	SHPR	\$183,498

State

CoC Name

<u>Project Name</u>	<u>Program</u>	<u>Awarded Amount</u>
HUD Homeless Holistic Civil Legal Services Program	SHPR	\$64,669
Home At Last 2011	S+CR	\$1,306,512
HMIS Dedicated Project 2011 A	SHPR	\$68,000
HKO Supportive Housing Program 2011	SHPR	\$185,147
Headway House 2011	SHPR	\$207,198
Vancouver House	SHPR	\$55,132
Komo Mai Group Home 2011	SHPR	\$36,960
HI-501 Total:		\$8,905,300
HI Total:		\$10,698,683

6) PH APR Sample

Applicant: Honolulu CoC - Applicant
 Project: SHDC S+C 2011

HI-501_CoC_Applicant
 081787

Q31. S+C Expenditures and Value of Services

Instructions:

Indicate if this Shelter Plus Care (S+C) grant is completing its initial term and save the screen. If it is completing its initial term then, in addition to reporting on the other match requirements on this screen, the grantee must identify at the bottom of the screen the cumulative match amount for the grant.

Report all S+C funds expended on rental assistance during the operating year. (This should include all funds expended out of the rental assistance line item that went towards—rental assistance, deposits, damage expenses, etc.)

Report all of the S+C funds expended during the operating year on administration.

Report the value of all documented services match received by S+C clients during the operating year. Record the values separately, for each service type.

Is this grant completing its initial grant term? No
 Click save to update form.

S+C and Documented Services Match During the Operating Year

	Expenditure Amount
Rental Assistance	\$1,199,489.84
Administration	\$40,298.77
Total S+C Expenditures	\$1,239,788.61

Value of Supportive Services Received by S+C Clients During the Operating Year

Documented Services Match	Value (\$)
Outreach	\$0.00
Case management	\$328,812.90
Life skills (outside of case management)	\$151,759.80
Alcohol and drug abuse services	\$0.00
Mental health services	\$733,505.70
AIDS-related services	\$0.00
Other health care services	\$0.00
Education	\$0.00
Housing placement	\$50,586.60
Employment assistance	\$0.00
Child care	\$0.00
Transportation	\$0.00
Legal	\$0.00
Other	\$59,684.56
Total documented services match	\$1,324,349.56

Co) TIT APR sample

Q30a4. SHP Expenditures - Leasing, Operating, and Administration

Instructions:

Leasing, Operating, & Admin Chart:

Report all SHP and cash match expended during this operating year on leasing, operating, and administration costs. Please note that grantees are not required to have matching funds for leasing or administration costs but may enter such cash match if they in fact acquired cash match for those expenses.

In the SHP Funds column, list all SHP funds expended during the operating year on each line item.

In the cash match column, list all matching funds expended during the operating year on operating costs.

Totals Chart:

The totals chart is pre-populated with the subtotals amounts from Q30a1, Q30a2, Q30a3, and Q30a4. Please note that the leasing and administration costs are not included in the cash match calculation in the totals chart because they are not statutorily required. The only way to correct a mistake identified when reviewing this table is to review and correct the source data for in Q30a1, Q30a2, Q30a3, and Q30a4.

SHP and Cash Match Expenditures During the Operating Year - Leasing, Operating, & Admin

Expenditure Type	SHP Funds	Cash Match	Match %	Total Expenditures
Real Property Leasing	\$32,227.00	\$0.00	0%	\$32,227.00
Operating Costs	\$60,907.00	\$32,750.00	35%	\$93,657.00
Administration	\$13,695.00	\$0.00	0%	\$13,695.00
Leasing, Operating, Admin - Subtotal	\$106,829.00	\$32,750.00		\$139,579.00

SHP and Cash Match Expenditures During the Operating Year - Totals

Total SHP Expenses	SHP Funds	Cash Match	Match %	Total Expenditures
Development	\$0.00	\$0.00	0%	\$0.00
Supportive Services	\$179,717.00	\$120,874.00	40%	\$300,591.00
Real Property Leasing	\$32,227.00	\$0.00	0%	\$32,227.00
Operating Expenses	\$60,907.00	\$32,750.00	35%	\$93,657.00
HMIS	\$0.00	\$0.00	0%	\$0.00
SHP Expenses - Subtotal	\$272,851.00	\$153,624.00		\$426,475.00
Administration	\$13,695.00	\$0.00	0%	\$13,695.00
Total Expenses	\$286,546.00	\$153,624.00		\$440,170.00

(e) For program use

**Fiscal Year 2011
Continuum of Care Competition
Homeless Assistance Award Report**

State

GoC Name

Project Name

Program

Awarded Amount

HI

HI-500

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State

CoC Name

Project Name

Program

Awarded Amount

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Vancouver House	SHPR	\$55,132
Komo Mai Group Home 2011	SHPR	\$36,960
HI-501 Total:		\$8,906,300

HI Total: \$10,698,683

Exhibit C – Project Summary for NEW Projects

Complete one form per project. Please reply to all of the questions. Put 'N/A' if not applicable. Keep responses short and succinct.

Project Information

Subrecipient (Agency Name): _____
 Project Applicant (Agency Name, City): _____
 Project/Program Name: _____

Program Type must be:

Permanent Housing

Number of years requesting funds: _____

Anticipated grant years: 2014 - _____

Funding:

New Reallocation

1. Participation in Partners In Care (will be verified with PIC)

Partners in Care (PIC) General Meeting Attendance – Enter the total number of PIC general monthly meetings attended from April 2013 to December 2013: _____ (Note: the Homeless Awareness Conference counts as a General Meeting)

Subcommittee Participation – Check off all that apply and indicate the number of monthly meetings attended from January 2013 to December 2013:

- | | | | |
|--------------------------------------|-----------------------------------|---------------------------------|------------------------------------|
| <input type="checkbox"/> Executive - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |
| <input type="checkbox"/> Awareness - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |
| <input type="checkbox"/> Advocacy - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |
| <input type="checkbox"/> Planning - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |
| <input type="checkbox"/> Data - | <input type="checkbox"/> Chair or | <input type="checkbox"/> Member | Number of meetings attended: _____ |

PIC Activities Participation

Please circle how your agency participated in the following PIC activities:

	1 point	2 points
2013 Legislative breakfast	Attended	Provided a display
2013 Point In Time	Attended	Regional leader
2012 Hoolaulea	Attended	Provided a booth

2. Project Leverage

This criterion is a mathematical calculation of ratio of HUD funds requested to the value of other resources contributed / secured for the project / program by the applicant.

For your proposed project:

A) Leverage Provided: \$ _____
 B) Total HUD Funding Request: \$ _____
 Leverage Ratio (B/A): _____%

Please use the Project Leverage Cover Sheet at the back of this document.

Exhibit C – Project Summary for NEW Projects

3. Capacity of Applicant – Consistency with Agency Mission and Purpose

State your agency's mission and purpose as stated in the by-laws and charter: _____

Briefly explain how your proposed CoC project is in line with your agency's mission and purpose: _____

4. Capacity of Applicant – Past Experience

Provide a brief overview of your agency's previous experience with CoC grants and/or with similar projects/programs that serve the same client group as your current CoC proposal: _____

Briefly explain how your agency has the adequate management, direct, and/or financial staff to implement the proposed CoC project: _____

5. Capacity of Applicant – Readiness To Proceed

Check off if your agency has secured a site for the proposed CoC project

Provide a brief overview/explanation: _____

Check off if all resources necessary to implement the proposed CoC project have been secured or will be secured with the receipt of the requested funding.

Provide a brief overview/explanation: _____

Check off if program guidelines have been established for the proposed CoC project

Provide a brief overview/explanation: _____

Check off if key staff members have been identified to manage and implement the proposed CoC project

Provide a brief overview/explanation: _____

6. Program Design and Anticipated Outcomes

Briefly describe the need and the population to be addressed by this project: _____

Briefly describe how the program design will address the identified the need: _____

Briefly describe how the program design will address the identified population: _____

Briefly describe how the program design will provide appropriate services for the identified population: _____

Briefly describe how the program design will lead to outcomes that will meet or exceed project goals: _____

Non scoring question: What is HUD's cost of services per person?

a) Proposed HUD Budget:

b) Proposed People served:

a / b = _____ dollars per person

7. Project Quality – Anticipated Achievement of 2013 HUD CoC Objectives

Describe how your proposed project will achieve the following 2013 HUD CoC Objectives.

1. Create new permanent housing (PH) beds for chronically homeless persons.

Check off if this is an objective of your proposed CoC project:

Explain your projects proposed achievements related to this outcome:

2. Increase percentage of homeless persons staying in PH over 6 months to at least 80%.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects proposed achievements related to this outcome (provide your proposed %, numbers, etc.):

3. Increase percentage of homeless persons moving from transitional housing (TH) to PH to at least 80%.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects proposed achievements related to this outcome (provide your proposed %, numbers, etc.):

4. Increase percentage of homeless persons employed at exit to at least 20%.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects proposed achievements related to this outcome (provide your proposed %, numbers, etc.):

5. Decrease the number of homeless households with children.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects proposed achievements related to this outcome:

8. Housing First Bonus

Describe how the project will meet the following criteria:

Housing Stabilization _____

Crisis Intervention _____

Long Term Action Plan _____

Additional Questions

9. Project implementation of the Affordable Care Act

Describe how the project is preparing for implementation of the Affordable Care Act (ACA).

Response should address the extent in which project recipients and subrecipients will participate in enrollment and outreach activities to ensure eligible households are able to take advantage of new healthcare options. _____

10. Economic opportunities for persons with low or very low income

Describe activities the project will undertake to ensure employment and other economic opportunities are directed to persons with low or very low income. _____

Exhibit D – Renewal Project Score Sheet

Project Information		Continuum of Care Program	
Subrecipient:		<input type="checkbox"/> Transitional Housing	
Project Applicant:		<input type="checkbox"/> Permanent Housing	
Project/Program Name:		<input type="checkbox"/> Supportive Services Only	
		Number of years requesting funds: 1	
		Anticipated grant year: 2014-2015	
Project/Program Description			
Scoring Summary			
RENEWAL PROJECTS Criteria		Max Points	My Scores
1.	Participation in Partners In Care	5	
2.	Project Leverage	10	
3.	Project Quality - Meeting Goals and Intent of Program	5	
4.	Project Quality - Accomplishing Program Goals (APR)	15	
5.	Project Quality - Accomplishing Program Goals (number served)	5	
6.	Project Quality - Accomplishing Program Goals (Expend funds)	5	
7.	Project Quality –Achievement of 2012 HUD CoC Objectives	10	
8.	Unresolved Issues	-6	
TOTAL		60	

Partners In Care

Preface

Partners in Care (PIC), with the support of the City and County of Honolulu's Department of Community Services, provides leadership and structure for the annual application for the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care Competition for Homeless program funding. We are committed to building a system of care to meet the needs of persons experiencing homelessness or threatened with homelessness. Projects emphasizing core values essential to developing a system of care will score more favorably. These include: participation in planning and decision making, collaboration, leveraging and cost-effectiveness, responding to identified needs and the use of practices that have been shown to result in better outcomes than others. Scoring has changed in some areas this year to reflect these values. Others will be rolling out in future years.

PIC is also committed to availing ourselves of wisdom offered by the U.S. Inter-Agency Council on Homelessness (USICH) and the Federal *Opening Doors* Plan to End Homelessness. Funding from HUD's Homeless Programs is meant to promote projects that lead to or provide permanent housing to homeless persons. Evaluation of projects will also take these elements into consideration.

Notes for the Evaluation Committee

- 1) The evaluation committee is not limited to the point values listed below and may assign points between those values to reflect their ratings.
- 2) In addition to the written material provided, the evaluation committee will have a question and answer session with each applicant on from 9:00am - noon on January 16, 2014. The written material and the responses during the question and answer session should be factored into the final scores.

Criteria	Maximum Points	Points Awarded												
<p>1. Participation in Partners In Care</p> <p>1a. Partners In Care (PIC) General Meeting Attendance</p> <ul style="list-style-type: none"> • Applicant attended 7 - 9 of the last 9 meetings. (5 Points) • Applicant attended 4 - 6 of the last 9 meetings. (3 Points) • Applicant attended 1 - 3 of the last 9 meetings. (1 Points) • Applicant attended no meetings. (0 Points) <p>1b. PIC Subcommittee and PIC Activities Participation</p> <p>a. Agencies will receive the points as noted below for participation in PIC Subcommittees:</p> <ul style="list-style-type: none"> • Applicant chairs and coordinates a subcommittee. (3 Points) • Applicant <u>regularly participates</u> in more than 75% subcommittee meetings. (2 Points) • Applicant <u>frequently participates</u> in between 50% - 75% of subcommittee meetings. (1 Points) • Applicant <u>occasionally participates</u> in less than 50% of subcommittee meetings. (0 Points) <p>1c. Participation points as noted in the table below for the following PIC activities are added to the subcommittee participation points above up to a maximum of 3 points.</p> <table border="1" data-bbox="201 974 945 1167"> <thead> <tr> <th></th> <th>1 point</th> <th>2 points</th> </tr> </thead> <tbody> <tr> <td>2013 Legislative breakfast</td> <td>Attended</td> <td>Provided a display</td> </tr> <tr> <td>2012 Hoolaulea</td> <td>Attended</td> <td>Provided a booth</td> </tr> <tr> <td>2013 Point In Time</td> <td>Attended</td> <td>Regional leader</td> </tr> </tbody> </table>		1 point	2 points	2013 Legislative breakfast	Attended	Provided a display	2012 Hoolaulea	Attended	Provided a booth	2013 Point In Time	Attended	Regional leader	<p style="text-align: center;">2</p> <p style="text-align: center;">3</p>	<p>1a. _____</p> <p>1b. _____</p> <p>1c. _____</p> <p style="text-align: center;">Total (1a+1b+1c)</p> <p style="text-align: center;">_____</p>
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<p>2. Project Leverage</p> <p>This criterion is a mathematical calculation of the ratio of CoC funds requested to the value of other resources contributed/secured to the project/program by the applicant.</p> <ul style="list-style-type: none"> • Applicant's leveraging ratio is 150% or more. (10 Points) • Applicant's leveraging ratio between 120% and 139%. (8 Points) • Applicant's leveraging ratio between 100% and 119%. (6 Points) • Applicant's leveraging ratio between 80% and 99%. (4 Points) • Applicant's leveraging ratio between 60% and 79%. (2 Points) • Applicant's leveraging ratio less than 60%. (0 Points) <p>A. Leverage Provided: \$</p> <p>B. HUD Funding Request: \$</p> <p>Leverage Ratio (B/A): %</p>	<p style="text-align: center;">10</p>													

<p>3. Project Quality - Meeting Original Goals and Intent of Program or as Amended</p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project has been successful in serving the intended client group, providing the intended services, and meeting the intended overall goals of the program. (5 Points) <input type="checkbox"/> The proposed project has, for the most part, been serving the intended client group, providing the intended services, and meeting the intended overall goals of the program, although some variations may have been made. (3 Points) <input type="checkbox"/> The proposed project has not been serving the intended client group, providing the intended services, and meeting the intended overall goals of the program. (0 Points) 	5	
<p>4. Project Quality - Accomplishing Program Goals <u>Annual Progress Report (APR) Goals</u> <i>For the APR submitted to HUD between October 1, 2012, and September 30, 2013:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project achieved all of the HUD required program goals. (15 Points) <input type="checkbox"/> The proposed project achieved one of the HUD required program goals (8 Points) <input type="checkbox"/> The proposed project achieved none of the HUD required program goals (0 Points) 	15	
<p>5. Project Quality - Accomplishing Program Goals <u>Projected Number of Consumers to be Served</u> From 5A and 5B of the 2011 application: Number anticipated to be served during the grant term from 5A and 5B of your 2011 application:</p> <p style="margin-left: 40px;">a. Individuals: b. Families (households):</p> <p>Actual number served during the grant term from your APR:</p> <p style="margin-left: 40px;">c. Individuals: d. Families (households):</p> <p>Percentage accomplished (Actual divided by anticipated):</p> <p style="margin-left: 40px;">e. Individuals: f. Families (households):</p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project served 100% or more of the anticipated number of individuals and/or families. (5 Points) <input type="checkbox"/> The proposed project served 90 - 99% of the anticipated number of individuals and/or families. (4 Points) <input type="checkbox"/> The proposed project served 80 - 89% of the anticipated number of individuals and/or families. (3 Points) <input type="checkbox"/> The proposed project served 70 - 79% of the anticipated number of individuals and/or families. (2 Points) <input type="checkbox"/> The proposed project served 60 - 69% of the anticipated number of individuals and/or families. (1 Point) <input type="checkbox"/> The proposed project served less than 60% of the anticipated number of individuals and/or families. (0 Points) 	5	

<p>6. Project Quality - Accomplishing Program Goals Grant Award Expenditure For the most recently completed grant year: Total Grant Award from the 2011 renewal list: \$ _____ Amount of Grant Award Expended at Grant Expiration from your APR: \$ _____ Percentage Expended at Grant Expiration (Expended divided by Total Grant Award): _____% Total Duration (Years) of Grant Award: _____</p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project expended 100% of its grant award. (5 Points) <input type="checkbox"/> The proposed project expended 90 - 99% of its grant award. (4 Points) <input type="checkbox"/> The proposed project expended 80 - 89% of its grant award. (3 Points) <input type="checkbox"/> The proposed project expended 70 - 79% of its grant award. (2 Points) <input type="checkbox"/> The proposed project expended 60 - 69% of its grant award. (1 Point) <input type="checkbox"/> The proposed project expended less than 60% of its grant award. (0 Points) 	5	
<p>7. Project Quality - Accomplishing 2012 HUD CoC Objectives HUD CoC Objectives:</p> <ol style="list-style-type: none"> 1. Create new permanent housing (PH) beds for chronically homeless persons. 2. Increase percentage of homeless persons staying in PH over 6 months to at least 80%. 3. Increase percentage of homeless persons moving from transitional housing (TH) to PH to at least 65% 4. Increase percentage of homeless persons employed at exit to at least 20%. 5. Decrease the number of homeless households with children. <p>For the most recently completed grant year:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project met or exceeded three (3) or more HUD objectives. (15 Points) <input type="checkbox"/> The proposed project met two (2) HUD objectives. (10 Points) <input type="checkbox"/> The proposed project met one (1) HUD objective. (5 Points) <input type="checkbox"/> The proposed project met none of the HUD objectives. (0 Points) 	15	
<p>8. Project Quality - Unresolved Issues (a) Outstanding obligation to HUD; (b) Audit finding(s); (c) History of inadequate financial management accounting practices; (d) Evidence of untimely expenditures on prior award; (e) History of other major capacity issues; (f) History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes. Evaluation committee will subtract 1 point for each of factors a - f above</p>	-6	

Exhibit E – New Project Score Sheet

Project Information	Continuum of Care Program Component
Subrecipient:	<input checked="" type="checkbox"/> Permanent Housing
Project Applicant:	Number of years requesting funds:
Project/Program Name:	Anticipated grant years: 2014-_____ Funding: <input checked="" type="checkbox"/> New Reallocation

Project/Program Description

Scoring Summary	Max Points	My Scores
1. Participation in Partners In Care	5	
2. Project Leverage	5	
3. Capacity of Applicant – Consistency with Agency Mission and Purpose	5	
4. Capacity of Applicant – Past Experience	7	
5. Capacity of Applicant – Readiness To Proceed	8	
6. Program Design and Anticipated Outcomes	13	
7. Project Quality – Anticipated Achievement of 2013 HUD CoC Objectives	12	
8. Housing First Bonus – Aligns with City's Housing First Initiative	5	
TOTAL	60	

Exhibit E – New Project Score Sheet

Partners In Care

Preface

Partners in Care (PIC), with the support of the City and County of Honolulu’s Department of Community Services, provides leadership and structure for the annual application for the U.S. Department of Housing and Urban Development’s (HUD) Continuum of Care Competition for Homeless program funding. We are committed to building a system of care to meet the needs of persons experiencing homelessness or threatened with homelessness. Projects emphasizing core values essential to developing a system of care will score more favorably. These include: participation in planning and decision making, collaboration, leveraging and cost-effectiveness, responding to identified needs and the use of practices that have been shown to result in better outcomes than others. Scoring has changed in some areas this year to reflect these values. Others will be rolling out in future years.

PIC is also committed to availing ourselves of wisdom offered by the U.S. Inter-Agency Council on Homelessness (USICH) and the Federal *Opening Doors* Plan to End Homelessness. Funding from HUD’s Homeless Programs is meant to promote projects that lead to or provide permanent housing to homeless persons. Evaluation of projects will also take these elements into consideration.

Notes for the Evaluation Committee

- 1) The evaluation committee is not limited to the point values listed below and may assign points between those values to reflect their ratings.
- 2) In addition to the written material provided, the evaluation committee will have a question and answer session with each applicant on from 9:00am - noon on January 16, 2014. The written material and the responses during the question and answer session will be factored into the final scores.

Criteria	Maximum Points	Points Awarded												
1. Participation in Partners In Care 1a. Partners In Care (PIC) General Meeting Attendance <ul style="list-style-type: none"> • Applicant attended 5 - 9 of the last 9 meetings. (2 Points) • Applicant attended 1 - 4 of the last 9 meetings. (1 Points) • Applicant attended no meetings. (0 Points) 	2	1a. _____												
1b. PIC Subcommittee and PIC Activities Participation a. Agencies will receive the points as noted below for participation in PIC Subcommittees: <ul style="list-style-type: none"> • Applicant chairs and coordinates a subcommittee. (3 Points) • Applicant <u>regularly participates</u> in more than 75% subcommittee meetings. (2 Points) • Applicant <u>frequently participates</u> in between 50% - 75% of subcommittee meetings. (1 Points) • Applicant <u>occasionally participates</u> in less than 50% of subcommittee meetings. (0 Points) 	3	1b. _____												
1c. Participation points as noted in the table below for the following PIC activities are added to the subcommittee participation points above up to a maximum of 3 points. <table border="1" style="width: 100%; margin-top: 5px;"> <thead> <tr> <th></th> <th style="text-align: center;">1 point</th> <th style="text-align: center;">2 points</th> </tr> </thead> <tbody> <tr> <td>2013 Legislative breakfast</td> <td style="text-align: center;">Attended</td> <td style="text-align: center;">Provided a display</td> </tr> <tr> <td>2013 Point In Time</td> <td style="text-align: center;">Attended</td> <td style="text-align: center;">Regional leader</td> </tr> <tr> <td>2012 Hoolaulea</td> <td style="text-align: center;">Attended</td> <td style="text-align: center;">Provided a booth</td> </tr> </tbody> </table>		1 point	2 points	2013 Legislative breakfast	Attended	Provided a display	2013 Point In Time	Attended	Regional leader	2012 Hoolaulea	Attended	Provided a booth		1c. _____
	1 point	2 points												
2013 Legislative breakfast	Attended	Provided a display												
2013 Point In Time	Attended	Regional leader												
2012 Hoolaulea	Attended	Provided a booth												
		Total (1a+1b+1c) _____												

Exhibit E – New Project Score Sheet

Criteria	Maximum Points	Points Awarded
<p>2. Project Leverage</p> <p>This criterion is a mathematical calculation of the ratio of CoC funds requested to the value of other resources devoted to the project by the applicant as described in HUD's application form.</p> <ul style="list-style-type: none"> • Applicant's leveraging ratio is 150% or more. (5 Points) • Applicant's leveraging ratio is between 120% and 139%. (4 Points) • Applicant's leveraging ratio is between 100% and 119%. (3 Points) • Applicant's leveraging ratio is between 80% and 99%. (2 Points) • Applicant's leveraging ratio is between 60% and 79%. (1 Points) • Applicant's leveraging ratio is less than 60%. (0 Points) <p>A. Leverage Provided: \$ B. Total HUD Funding Request: \$ Leverage Ratio (B/A): %</p>	5	
<p>3. Capacity of Applicant – Consistency with Agency Mission and Purpose</p> <ul style="list-style-type: none"> • The proposed project is generally consistent with the stated mission and purpose of the proposing agency as stated in the agency's by-laws and charter. (5 Points) • The proposed project is a related extension of the state mission and purpose of the proposing agency as stated in the agency's by-laws and charter. (3 Points) • The proposed project is inconsistent with the stated mission and purpose of the proposing agency. (0 Points) 	5	
<p>4. Capacity of Applicant – Past Experience</p> <ul style="list-style-type: none"> • The applicant has demonstrated the capacity to implement the proposed project as evidenced by similar past projects and programs which serve the intended client group. The agency has adequate management and professional staff to successfully implement and manage the proposed project. (7 Points) • The applicant's capacity to implement the proposed project is questionable or based on experience with past projects and programs which are related to, but not similar to the proposed project. The agency will need to recruit, retain, and/or train additional management and professional staff prior to the implementation of the proposed project to augment existing staff. (4 Points) • The applicant does not have relevant or related past experience. The agency will need to recruit or train new personnel to manage and operate the proposed project. (0 Points) 	7	

Exhibit E – New Project Score Sheet

Criteria	Maximum Points	Points Awarded
<p>7. Project Quality – Anticipated Achievement of 2013 HUD CoC Objectives</p> <p>HUD CoC Objectives as defined in its application form:</p> <ol style="list-style-type: none"> 1. Create new permanent housing (PH) beds for chronically homeless persons. 2. Increase percentage of homeless persons staying in PH over 6 months to at least 77.80%. 3. Increase percentage of homeless persons moving from transitional housing (TH) to PH to at least 65% 4. Increase percentage of homeless persons employed at exit to at least 20%. 5. Decrease the number of homeless households with children. <p>Proposed project's target population: _____</p> <p>For the anticipated program year:</p> <ul style="list-style-type: none"> • The proposed project intends to <u>meet or exceed three (3) or more</u> HUD objectives. (12 Points) • The proposed project intends to <u>meet two (2)</u> HUD objectives. (9 Points) • The proposed project intends to <u>meet one (1)</u> HUD objective. (6 Points) • The proposed project does not intend to meet a HUD objective. (0 Points) 	12	
<p>8. Housing First Bonus</p> <p>The proposed new project offers all of the elements of Housing First listed below.</p> <p>Housing Stabilization</p> <ul style="list-style-type: none"> • Prioritizes clients that need it most • Immediate placement in long-term housing • Locating housing and short-term rental assistance <p>Crisis Intervention</p> <ul style="list-style-type: none"> • Stabilize participants with case management • Connect to community resources <p>Long-Term Action Plan</p> <ul style="list-style-type: none"> • Improve financial literacy, budgeting, and job skills • Identify underlying causes of hn • Engaged landlords as partners • Will provide the appropriate amount and type of supportive services necessary for client to maintain long term housing 	5	

Exhibit F

1. SEXUAL HARASSMENT POLICY FOR EMPLOYER HAVING A CONTRACT WITH THE CITY.

All City contractors must comply with City Ordinance 93-84 on sexual harassment. All-contractors shall have and enforce a policy prohibiting sexual harassment. The contractor's sexual harassment policy must set forth the same or greater protection than those contained or required by the ordinance. The ordinance is applicable to the employer's business and includes the following:

- a) Prohibitions against an officer's or employee's sexual harassment of the following:
 - (1) Another officer or employee of the employer,
 - (2) An individual under consideration for employment with the employer, or
 - (3) An individual doing business with the employer'
- b) A provision prohibiting a management or supervisory officer or employee from knowingly permitting a subordinate officer or employee to engage in the sexual harassment prohibited under subdivision a;
- c) A prohibition against retaliation towards an officer, employee, or individual who has complained of sexual harassment, conducted an investigation of a complaint, or acted as a witness during an investigation of a complaint
- d) A prohibition against a malicious false complaint of sexual harassment by an officer, employee or individual;
- e) Provisions allowing an officer, employee, or individual to make a sexual harassment complaint to an appropriate management, supervisory, or personnel officer or employee;
- f) Procedures for investigating a sexual harassment complaint in an unbiased, fair, and discreet manner with appropriate safeguards to maintain confidentiality and protection from embarrassment,
- g) A provision requiring the use of the 'reasonable person of the same gender standard,' to determine if sexual harassment has occurred. Under the standard, sexual harassment shall be deemed to have occurred if the alleged offender's conduct would be considered sexual harassment from the perspective of a reasonable person of the same gender as the alleged victim. If the alleged victim is a woman, the 'reasonable person of the same gender standard' shall be equivalent to and may be called the 'reasonable woman standard;'
- h) Disciplinary actions which may be imposed on an officer or employee who committed a prohibitive act; and
- i) For an employer with at least five employees, a provision requiring the annual viewing of a video on the sexual harassment policy by each management or supervisory officer or employee.

The policy required under this section shall be in effect for at least the duration of the employer's contract with the City.

The action of the bidder or proposer in submitting its bid, proposal or signing of the contract shall constitute its pledge and acceptance of the provisions for the sexual harassment policy as required by City Ordinance 93-84.

City Ordinance 93-84 is on file and available for viewing in the Purchasing Division. Bidders or contractors needing a copy must pick up the copy from the Office of the City Clerk, Room 203, City Hall, 530 South King Street, Honolulu, Hawaii.

Instructions:
 Fill in the appropriate yellow cells with info from your most recent APR
 Transfer the green cells to Q7 if your project summary
 The gray cells are formulas

Total leavers		26	
Total stayers		159	
Exited after 6 months		23	
Did not exit after 6 months		143	
Stayer - less than 6 months		16	
6+ months		90%	Project Summary Q7.2 Only Permanent Housing projects must fill this out HUD Goal = 80%
	Steadfast S+C		
Leavers			
30 or less		0	APR Q27 leavers column
31 - 60		0	
61 - 180		3	
181 - 365		2	
366 - 730		9	
731 - 1095		2	
1096 - 1460		3	
1461 - 1825		1	
1825+		6	
Missing		0	
sub		26	
Stayers			
30 or less		4	APR Q27 stayers column
31 - 60		5	
61 - 180		7	
181 - 365		6	
366 - 730		48	
731 - 1095		28	
1096 - 1460		32	
1461 - 1825		6	
1825+		23	
Missing		0	
sub		159	
Total			
30 or less		4	
31 - 60		5	
61 - 180		10	
181 - 365		8	
366 - 730		57	
731 - 1095		30	
1096 - 1460		35	
1461 - 1825		7	
1825+		29	
Missing		0	
sub		185	

Persons exiting from Transitional to Permanent Housing.		
	Salvation Army ATS	
Number of Participants who Moved to PH	10	From APR Q29a1+Q29a2 (subtotals to PH)
Number of Participants Exiting TH	18	From APR Q29a1+Q29a2 (Totals)
Percent of Participants who Move to PH	56%	Project Summary Q7.3 Only Transitional Housing projects must fill this out HUD Goal = 65%

	Salvation Army ATS	
CoC Employment at Exit: GOAL = 20%		
Earned Income	8	Info from APR Q25a1 Total column
Unemployment Insurance	0	
SSI	0	
SSDI	1	
Veteran's Disability	0	
Private Disability	0	
Worker's Compensation	0	
TANF or Equivalent	0	
General Assistance	7	
Retirement (Social Security)	0	
Veteran's Pension	0	
Pension from former job	0	
Child Support	0	
Alimony	0	
Other (Indicate Below)	0	
No Financial Resources	2	APR Q25a2
1+ Sources	16	
Don't Know / Refused	0	
Info Missing	0	
Total	18	
% Employment	44%	Project Summary Q7.4 All projects must fill this out HUD Goal = 20%

**Request for Interest
Continuum of Care Homeless Assistance Programs**

The Department of Community Services, in cooperation with Partners in Care, requests applications from qualified nonprofit agencies providing shelter and supportive services to persons experiencing homelessness. Applications received will be evaluated and prioritized for inclusion into the City's application to the U.S. Department of Housing and Urban Development (HUD) for the Continuum of Care Programs FY2013.

Project applications submitted by qualified organizations will be reviewed based on the experience and capacity of the proposing organization, the degree to which the funding request is consistent with HUD's Continuum of Care (CoC) goals, the degree to which CoC funds will be leveraged with other resources, anticipated accomplishments in relation to CoC priorities, the prospects for the long term operation of the proposed project, the participation of the proposer in the local Continuum of Care process, and the ability of the proposing organization to implement its proposed project in a timely manner.

Interested agencies may download the Request for Interest in electronic format at the City's Purchasing website www.honolulu.gov/pur. If you have any questions regarding this website, please contact the Purchasing Help Desk at 808-768-5535. A printed copy of the Request for Interest will be made available upon request from the Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii, 96813 by calling 768-7749.

The City will conduct an informational meeting from 11:00am – noon on Tuesday December 17, 2013 at Central Union Church, 1660 S Beretania Street, Honolulu.

Applications must be submitted and time-stamped by **noon on Friday, January 3, 2014** to the Department of Community Services at the above address.

Questions regarding the CoC Programs may be directed to Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

KIRK CALDWELL, MAYOR
City and County of Honolulu

Pamela A. Witty-Oakland, Director
Department of Community Services



Request for Interest 2013 Continuum of Care Program

Offered By:

City and County of Honolulu
Department of Community Services
Community-Based Development Division

KIRK CALDWELL, MAYOR
City and County of Honolulu

Pamela A. Witty-Oakland, Director
Department of Community Services

December 2013

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7. Evaluation - 16 -

Exhibit A – Notice of Funding Availability (NOFA) for the CoC Program Competition

Exhibit B – “Summary for Renewal Projects” Form

Exhibit C – “Summary for New Projects” Form

Exhibit D – Renewal Project Score Sheet

Exhibit E – New Project Score Sheet

Exhibit F – City’s Sexual Harassment Policy

Exhibit G – “Summary for Renewal Projects” Calculator

1. Introduction

The City and County of Honolulu, through the Department of Community Services (DCS), is issuing this Request for Interest (RFI) to seek applications from qualified nonprofit agencies providing shelter and supportive services to persons experiencing homelessness. Selected applications will be included in the Honolulu Continuum of Care's (CoC's) federal grant application for funds under the U.S. Department of Housing and Urban Development's (HUD) CoC Program. The CoC Program is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11381-11389) (the "Act"). The FY 2013 funds for the CoC Program were authorized by the Consolidated and Further Continuing Appropriations Act, 2013 (Public Law 113-6, approved March 26, 2013) (the "HUD Appropriations Act"). For FY 2014, the level of funding for the CoC Program is not yet known. The Continuing Appropriations Act, 2014 (Public Law 113-46, approved October 17, 2013) funds HUD operations and programs at FY 2013 levels, but provides such funding only through January 15, 2014. Nevertheless for purposes of expediency and efficiency, the FY 2013 – FY 2014 CoC Program Notice of Funding Availability (NOFA) will award funds made available for the CoC Program under FY 2013 and FY 2014. When the level of funding is known for FY 2014, HUD will announce this amount through separate notice. In this separate notice; HUD will also publish the deadlines for submitting the information required by HUD.

The City submits the application to HUD as a Collaborative Applicant (CA) in partnership with the Honolulu CoC, which is known as Partners In Care (PIC). PIC is a membership organization of homeless service providers, other professionals, units of local and state government, program participants, and other community representatives in the City and County of Honolulu. PIC is a planning, coordinating, and advocacy body that develops recommendations for programs and services to fill gaps in Honolulu's CoC.

The City will conduct an informational meeting from 11:00am – noon on Tuesday December 17, 2013 at Central Union Church, 1660 South Beretania Street, Honolulu.

Notifications of addenda will be issued to all prospective Applicants known to have obtained the RFI from the City.

Application documents must be submitted to the DCS, Community-Based Development Division at 715 South King Street, Suite 311, Honolulu, Hawaii, by **noon on Friday, January 3, 2014**. Please ensure that applications and copies are time stamped at the time of delivery and that the original application is clearly marked. Applications received after the submission deadline will be time stamped and returned unopened to the proposing agency. Questions regarding this Request for Interest may be directed to Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

The 2013 HUD CoC NOFA is included as Exhibit A in this RFI. Every potential applicant should review the NOFA carefully and in its entirety in conjunction with the CoC Program interim rule in order to gain a comprehensive understanding and to comply with CoC Program requirements. The NOFA frequently makes reference to citations from the CoC Program interim rule (24 CFR part 578). Applicants should review the General Section of the NOFA, published on July 23, 2012 and the General Section Technical Correction, published October 13, 2012. Additional 2013 CoC notices, broadcasts, and HUD guidance are available at <https://www.onecpd.info/e-snaps/fy-2013-coc-program-nofa-coc-program-competition/>.

Electronic Submission for Applications

HUD requires the electronic submission of CoC applications through their e-snaps system, which is available at www.hud.gov/esnaps or can be accessed from HUD's OneCPD Resource Exchange at <https://www.onecpd.info/e-snaps/>. **All agencies submitting CoC applications must use e-snaps. In addition, the City requests additional hard copy documents that are detailed in Section 6 of this RFI.**

Project applicants must establish an e-snaps user ID and password before accessing the Project Application.

Project applicants are strongly encouraged to review training materials about e-snaps that are available on HUD's OneCPD site at <https://www.onecpd.info/e-snaps/fy-2013-coc-program-nofa-coc-program-competition/>.

Questions regarding the CoC NOFA and e-snaps can be submitted to HUD's OneCPD Ask A Question (AAQ) at www.onecpd.info/ask-a-question. HUD strongly suggests utilizing the "Export to PDF" function in e-snaps to print a hard copy of all submission documents for your records.

HUD Administered Projects vs. City Administered Projects

Most of the CoC's projects are direct grants between nonprofit agencies and HUD. In these situations the nonprofit agency is considered the applicant to HUD and the recipient of HUD funds. For a few of the CoC's projects, the City is the recipient of grants from HUD and is considered the applicant to HUD. The City administers these grants for nonprofit agencies, which are considered subrecipients, through subrecipient agreements. The current City administered projects include:

Applicant / Recipient	Subrecipient	Program Component
City	Catholic Charities Hawaii	Transitional Housing
City	Gregory House	Permanent Housing
City	Ho'omau Ke Ola	Transitional Housing
City	IHS, The Institute for Human Services, Inc.	Permanent Housing

Applicant / Recipient	Subrecipient	Program Component
City	Kalihi-Palama Health Center	Permanent Housing
City	Steadfast Housing Development Corporation	Permanent Housing

HUD's CoC Program Interim Rule requires that if a new Project Application includes funding for rental assistance, the rental assistance must be administered by a State, unit of general local government, or a public housing agency.

Nonprofit agencies considering rental assistance in their new Project Application must contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715 to consult with the DCS' Community Assistance Division about administering the rental assistance in compliance with HUD's rule. New Project Applications with rental assistance funding must also follow the instructions below:

- Follow HUD's instructions to register and create an e-snaps profile (make sure to add all of your projects when prompted so that you get multiple Project Application documents).
- Complete your Project Application documents through your e-snaps profile.
- If you are a City administered grant, after your Project Application is filled out, **DO NOT** submit your Project Application to e-snaps. Provide Gabe Naeole with your user name and password so that your Project Application documents can be inputted into the City's e-snaps profile. **Please send Gabe your e-snaps information and submit your hard copy documents to the DCS (detailed in Section 6 of this RFI) by the noon, January 3, 2014 deadline.** If you have any questions, please contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

New Project Applications without rental assistance funds will execute contracts for CoC funding directly with HUD. The City will not be a party to new Project Applications without rental assistance funds nor will the City be responsible for the administration and monitoring of new Project Applications without rental assistance funds.

Annual Renewal Demand Amount

Annual Renewal Demand (ARD) (24 CFR 578.17(b)(2)) is the total amount of all the CoC's projects that will be eligible for renewal in the FY2013 CoC Program Competition. It is the sum of the annual renewal amounts of all projects within the CoC's geographic area eligible to apply for renewal in the FY2013 CoC Program competition, before any adjustments to leasing, rental assistance, and operating line items based on FMR changes.

Honolulu's ARD for the FY2013 CoC Program Competition is estimated \$10,042,420. The NOFA (Exhibit A) states that HUD will publish final ARD information and the City will issue an addendum with that information when it is released.

Tier 1 and Tier 2 Funding Levels

Based on the estimated FY 2013 ARD for each CoC that has a HUD-approved Registration, it is anticipated that the national annual renewal demand for FY 2013 funds under the CoC Program Competition will exceed the \$1.7 billion available under the NOFA (Exhibit A). Therefore, HUD anticipates that the available funding will be inadequate to renew all existing projects eligible to renew for FY 2013 funds in the CoC Program Competition. To ensure that CoCs have the ability to indicate to HUD which projects are of the highest priority for FY 2013, HUD is requiring that CoCs rank projects in Tier 1 or Tier 2. The tiers are financial thresholds.

Tier 1 is equal to the CoC's FY 2013 ARD approved in the Registration process, less 5 percent. For Honolulu the ARD amount is estimated at \$10,042,420 and the Tier 1 amount is estimated at \$9,540,299. The NOFA (Exhibit A) states that HUD will publish final ARD and Tier information and the City will issue an addendum with that information when it is released.

Tier 2 is the amount remaining in FY 2013 ARD plus the approved amounts for CoC planning and UFA costs. HUD will publish final FY 2013 ARD and Tier 1 amounts for each CoC no later than 15 days after publication of the NOFA (Exhibit A). Any project that falls only partially in Tier 1 will be considered by HUD as falling entirely in Tier 2.

The CoC must assign a unique rank to each project that it intends to submit to HUD for FY 2013 funding. HUD strongly advises CoCs to rank higher those project applications the CoC determines are high priority, high performing, and meet the needs and gaps as identified by the CoC. HUD will select projects as described in Section VII.B.1.b of the NOFA (Exhibit A).

Honolulu CoC – New Reallocation Project

PIC has decided that it will accept Project Applications for a new reallocation project for an estimated \$501,121. The funding amount is the difference between the CoC's estimated ARD, \$10,042,420, and the CoC's estimated Tier 1 amount, \$9,540,299.

Reallocation is when a CoC shifts funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD. New projects created through reallocation must meet the requirements set forth in Section II.B.1 and the eligibility and project quality thresholds established by HUD in Section V.E.2 of the NOFA (Exhibit A). In this CoC Program Competition reallocation can only be used to create new permanent supportive housing for the chronically

homeless, or rapid re-housing to serve homeless households with children. CoCs that indicate they will be using the reallocation process will be required to identify all projects being reduced or eliminated along with the new projects being created through reallocation.

PIC has decided to limit new reallocation projects to permanent supportive housing for chronically homeless to align with Honolulu's trend to implementing Housing First initiatives for the chronically homeless population.

Nonprofit agencies considering rental assistance in their new Project Application must contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715 to consult with the DCS' Community Assistance Division about administering the rental assistance in compliance with HUD's rule.

Honolulu CoC – Funding Priorities

The City and PIC have established the following priorities ranking and funding projects in the 2013 application.

- First priority will be given to renewal project applications based on their scores on the renewal scoring sheet (included as Exhibit D). The renewal project applications will be ranked by score from highest to lowest and projects will be funded from the highest score downward until the sum of project applications reach the Tier 1 funding line.
- If a project's funding is divided by the Tier 1 funding line, the CA will request an amended Project Application from the affected project applicant to reduce the budget to fit into the Tier 1 funding limit. Example: If the affected project application is for \$100,000, but only \$80,000 is available in the Tier 1 limit, the project applicant will have to submit a revised Project Application for \$80,000.
- The affected project applicant may also elect to forego the grant, which would allow the next ranked Project Application an opportunity to be included in Tier 1. Example: Project C, score of 45 points, budget of \$100,000, available budget below Tier 1 is \$80,000. CA contacts Project C and they elect to forego the \$80,000. Project D, score of 43 points and the next ranked project, budget of \$100,000 would then be contacted by the CA and can choose to amend their Project Application to \$80,000 or forego the funds. This process would continue until all available Tier 1 funding is accounted for.
- After all the Tier 1 projects are ranked, each project will be reduced proportionately to contribute funds to the HMIS and planning renewal projects. The HMIS and planning renewal grants are estimated at \$252,438 and all Tier 1 renewal projects will be reduced by 2.46%.

- Second priority will be given to the highest scoring new reallocation project(s). If the highest scoring new reallocation project does not request all of the Tier 2 funds, the next highest scoring new reallocation projects will be included until the Tier 2 limit is reached. If there are any Tier 2 funds after the new reallocation project(s) are included, renewal projects that did not make it into Tier 1 will be included based on their scores until the Tier 2 limit is reached.

CoC Application Composition

The CoC application is comprised of three parts:

- The CoC Application. The Collaborative Applicant (CA) will work with PIC to provide information about the CoC planning body, governance structure, overall performance, and the strategic planning process. This part of the application is scored and will determine the order in which CoCs are funded.
- The Project Application is completed by the project applicants for new and renewal project requests. Each agency must submit a Project Application for EACH of its projects. Although the entire CoC application score comes from the CoC Application, the CoC evaluation committee reviews all individual applications to determine its ranking in the CoC application.

The project applicant will provide a description of the proposed new or renewal project including the details as to who the project will serve, the type of housing that will be provided and what budget activities are being requested. The project applicant will provide a description of the activities that will be carried out with grant funds.

- The Priority Listings contain four separate forms that list the new, renewal, CoC planning, and UFA projects the CoC included in the CoC Application. The Priority Listings rank the projects in order of priority and also list any projects rejected by the CoC. This part of the CoC Consolidated Application cannot be completed until all Project Applications have been submitted.
- **CoC awardees are expected to actively participate in the PIC planning and coordination processes and activities. Contributing to the Honolulu CoC's development strengthens the CoC which improves the application score and can result in increased funding for the Honolulu CoC.**

2. Program Guidelines

The Continuum of Care program is designed to assist sheltered and unsheltered homeless people by providing the housing and/or services needed to help individuals move into transitional and permanent housing, with the goal of long-term stability.

Specifically, 24 CFR part 578.1 of the CoC Program interim rule states that the primary purpose of the CoC Program is to:

- Promote community-wide commitment to the goal of ending homelessness
- Provide funding for efforts by nonprofit providers, States, and local governments to re-house homeless individuals and families rapidly while minimizing the trauma and dislocation caused to homeless individuals, families, and communities as a consequence of homelessness
- Promote access to and effective use of mainstream programs by homeless individuals and families
- Optimize self-sufficiency among individuals and families experiencing homelessness

To accomplish CoC Program goals, funds may support activities under five primary program components: permanent housing (permanent supportive housing and rapid re-housing), transitional housing, supportive services only, HMIS and, for HUD-designated high-performing communities, homelessness prevention.

- Permanent housing (PH) is defined as community-based housing without a designated length of stay in which formerly homeless individuals and families live as independently as possible. The CoC Program may fund two types of permanent housing: (1) permanent supportive housing (PSH), which is permanent housing with indefinite leasing or rental assistance paired with services to help homeless people with disabilities achieve housing stability; and (b) rapid re-housing (RRH), a model that emphasizes housing search and relocation services and short- and medium-term rental assistance to move homeless people as rapidly as possible into permanent housing.
- The transitional housing (TH) project component may be used to cover the costs of up to 24 months of housing with accompanying support services, providing a period of stability to enable homeless people to transition successfully to and maintain permanent housing within 24 months of program entry. Program participants must have a lease or occupancy agreement in place when residing in transitional housing. The provisions of the CoC Program's TH program component have not changed significantly from the TH provisions under SHP.
- The supportive services only (SSO) program component is limited to recipients and subrecipients providing services to individuals and families not residing in housing operated by the recipient. SSO recipients and subrecipients may use the funds to conduct outreach to sheltered and unsheltered homeless persons, link clients with housing or other necessary services, and provide ongoing support. SSO projects may be offered in a structure or structures at one central site, or in multiple buildings at scattered sites where services are delivered. Projects may

also be operated independent of a building (e.g., street outreach) and in a variety of community-based settings, including in homeless programs operated by other agencies.

- Homeless Management Information System. Funds under this component may be used only by HMIS leads for leasing a structure in which the HMIS operates, for operating the structure in which the HMIS is housed, and/or for covering other costs related to establishing, operating, and customizing a CoC's HMIS. Other recipients and subrecipients may not apply for funds under the HMIS program component, but may include costs associated with contributing data to the CoC's HMIS within their project under another program component (PH, TH, SSO, or HP).
- Homelessness Prevention. Programs within CoCs that have applied for and been designated by HUD as an HPC may use CoC funds to fund homelessness prevention (HP) assistance for individuals and families at risk of homelessness. The services under this component may include housing relocation and stabilization services as well as short- and medium-term rental assistance to prevent an individual or family from becoming homeless. Through this component, recipients and subrecipients may help individuals and families at-risk of homelessness to maintain their existing housing or transition to new permanent housing. Homelessness prevention must be administered in accordance with 24 CFR part 576.

Although HUD allows all of these programs, the City in partnership with PIC, has prioritized and will only consider renewal Project Applications with the following components in this RFI: Permanent Housing, Transitional Housing, Supportive Services Only, HMIS, and Planning. In alignment with HUD's priorities the City in partnership with PIC, has prioritized and will only consider new Project Applications with the following component in this RFI: Permanent Housing - Permanent Supportive Housing for chronically homeless.

3. Eligible Participants

The CoC program is designed to assist sheltered and unsheltered homeless people. The CoC Program interim rule defines homeless as follows (24 CFR 578.3).

"Homeless means:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised 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, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(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:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing."

In addition, some CoC programs are required to serve those who are chronically homeless. The CoC Program interim rule defines chronically homeless as follows (24 CFR 578.3).

"Chronically homeless.

(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; and

(iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) 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."

Applicants must review the CoC NOFA (Exhibit A) and the CoC Interim Rule thoroughly to ensure only eligible participants will be served by CoC funded activities.

4. Request for Interest Schedule

The schedule for the RFI process shall be as follows:

December 10, 2013	Request for Interest Issued
December 17, 2013 11:00 am - noon	Public Informational Meeting Central Union Church 1660 South Beretania Street
December 18, 2013	RFI Addendum: Public Informational Meeting Q & A
December 10 - 20, 2013	Technical Assistance available through email, phone and by appointment
January 3, 2014 Noon	Deadline to Submit Applications Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813
January 3 - 8, 2014	DCS Application Review
January 8 – 16, 2014	Evaluation Committee Reviews and Scores Applications
January 16, 2014 9:00am - noon	Evaluation Committee Q&A with Applicants Department of Community Services, 715 South King Street, 2 nd Floor Conference Room
January 17, 2014	Notification of Awardees via email
January 17, 2014 to January 30, 2014	Finalize HUD Application
January 31, 2014	Submit HUD Application in e-snaps
February 3, 2014	HUD Application Deadline in e-snaps

5. Requirements for Applicants

Statutory and Regulatory Requirements

CoC program participants shall be responsible for compliance with all applicable federal, state, and local laws, ordinances, directives, rules, and regulations, including but not limited the program requirements listed on pages 21-31 of Exhibit A (i.e.

compliance with the Fair Housing Act, Limited English Proficiency, Section 3 of the Housing and Urban Development Act of 1968, etc.)

All prospective applicants must also comply with the following guidelines:

- Be a public agency or a private nonprofit agency organized and certified under Section 501(c) (3) of the Internal Revenue Code of 1986, as amended.
- Comply with federal non-discrimination, equal opportunity, and non-proselytization requirements.
- Comply with the City's sexual harassment ordinance (Exhibit F).

Have an established record of providing assistance to the homeless and managing state, local or federal grant funds.

Match

All eligible funding costs, except leasing, must be matched with no less than a 25 percent cash or in-kind contribution. No match is required for leasing. The match requirements apply to project administration funds, CoC planning costs, and UFA costs, along with the traditional expenses—operations, rental assistance, supportive services, and HMIS. Match must be met on an annual basis.

For an in-kind match, the recipient or subrecipient may use the value of property, equipment, goods, or services contributed to the project, provided that, if the recipient or subrecipient had to pay for such items with grant funds, the costs would have been eligible. If third-party services are to be used as a match, the recipient or subrecipient and the third-party service provider that will deliver the services must enter into a memorandum of understanding (MOU)—before the grant is executed—documenting that the third party will provide such services and value towards the project.

To be eligible for match, the cash or in-kind services must provide services that are eligible under the activities listed in 24 CFR 578 Subpart D.

Leverage

HUD considers any matching funds above and beyond the minimum required amount to be leverage. Leveraging includes all funds, resources, and/or services that the applicant can secure on behalf of the client being served. While leveraging includes all cash matching funds, it is broader in scope, including any other services, supplies, equipment, space, etc. that are provided by sources other than HUD. An example of leveraging would include a project that provides case management through Medicaid or Department of Mental Health funding. The total costs involved in delivering the case management (percentage of salary, fringes, other benefits) can be included in leveraging.

Example: If a project has \$100,000 supportive services budget, and \$100,000 in cash or in-kind services, \$25,000 is considered match, \$75,000 is considered leverage.

Timeliness

Successful applicants are expected to initiate approved projects promptly after execution of the grant agreement. HUD may take action if certain performance standards are not met. In addition, applicants are expected to expend grant funds on a timely basis.

6. Preparation and Submission of Applications

- For HUD administered projects, the following tasks must be done by the **noon, January 3, 2014, application deadline**:
 - Submit the SF-424 and Project Application documents to e-snaps at www.hud.gov/esnaps or www.hudhre.info/esnaps.
 - Submit all hard copy documents described below to the Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813.
- For City administered projects, the following tasks must be done by the **noon, January 3, 2014, application deadline**:
 - E-mail Gabe Naeole at gnaeole@honolulu.gov and provide him with your e-snaps user name and password so that he can input your Project Application documents into the City's e-snaps profile.
 - Submit all hard copy documents described below to the Department of Community Services, 715 South King Street, Suite 311, Honolulu, Hawaii 96813.

For Each RENEWAL Project

Submit **six (6) sets** of the following documents (please use binder clip)

1. Completed Exhibit B - Summary for Renewal Projects which includes:
 - a. A summary cover sheet and leveraging documentation from applicable funding sources or from your agency head
 - b. Relevant sections of the project's 2011 CoC application and most recent Annual Performance Report (APR)
 - c. The most recent HUD and/or City monitoring letter(s) describing the results of the monitoring. If findings and issues were cited, provide the corrective action plan implemented by your agency

2. The project's most recently completed Annual Performance Report (APR)
3. E-snaps webpage providing submission confirmation of the Project Application into e-snaps (not required for City-administered projects)
4. Completed Project Application (e-snaps allows project applicants to export this document into PDF format)
5. The agency's most recent independent financial audit and corrective actions, if applicable
6. Current Board of Directors List
7. If applicable, provide any documents that have been updated since the agency's last CoC application submission (two-sided copies okay; i.e. revised 501(c) (3) certification, Charter of Incorporation, By-Laws, etc.)

For Each NEW Project

Submit **six (6) sets** of the following documents (please use binder clip for each set):

1. Completed Exhibit C - Summary for New Projects which includes:
 - a. A summary cover sheet and leveraging documentation from applicable funding sources or from your agency head
2. E-snaps webpage providing submission confirmation of the Project Application into e-snaps (not required for City-administered projects)
3. Completed Project Application (e-snaps allows project applicants to export this document into PDF format)
4. Provide the following agency documents (2-sided copies are okay):
 - a. 501(c) (3) certification (if applicable, community mental health association documentation)
 - b. Most Recent Independent Financial Audit and Corrective Actions, if applicable
 - c. Current Board of Directors List
 - d. Charter of Incorporation
 - e. By-laws

Nonprofit agencies considering rental assistance in their new Project Application must contact Gabe Naeole at gnaeole@honolulu.gov or 768-7715 to consult with the DCS' Community Assistance Division about administering the rental assistance in compliance with HUD's rule.

Submittals

Application documents must be submitted to the DCS, Community-Based Development Division, 715 South King Street, Suite 311, Honolulu, Hawaii, by **noon, on Friday, January 3, 2014**. Please ensure that applications and copies are time stamped at the time of delivery and that the original application is clearly marked. All applications submitted by the deadline shall be considered for inclusion in the City's CoC application. Applications received after the deadline will be time stamped and returned unopened to the proposing agency. Questions regarding this Request for Interest may be directed to Gabe Naeole at gnaeole@honolulu.gov or 768-7715.

Additional Information

Please read the instructions provided in this RFI and e-snaps before completing application forms.

SF-LLL, Executed Disclosure of Lobbying Activities. The City will complete this document for all City administered projects.

Applicant Code of Conduct. HUD must have the Code of Conduct for every agency submitting a project application. The current list of agencies that have a Code of Conduct filed with HUD is available at <http://www.hud.gov/offices/adm/grants/codeofconduct/cconduct.cfm>. **If your agency is not listed, you must upload your agency's Code of Conduct as an attachment on e-snaps.**

By way of HUD guidance, a Code of Conduct must meet the following minimum requirements:

- Must prohibit the solicitation and acceptance of gifts or gratuities by officers, employees, and agents for their personal benefit in excess of minimal value;
- Outline administrative and disciplinary actions available to remedy violations of such standards;
- Describe the method to be used to ensure that all officers, employees and agents of the organization are aware of the Code of Conduct; and
- Must be written on company letterhead that provides a mailing address, authorized official name, and telephone number.

HUD 40090-4, Applicant Certifications. The City will complete this document for City administered projects.

Project Application. Please note that the HUD-defined name for Honolulu's CoC is **Honolulu CoC**, and Honolulu's CoC number is **HI-501**. Honolulu's Geographic Code is **150144**.

Rental assistance costs in Project Applications may not exceed 100 percent of the Fair Market Rent (FMR) for the Metropolitan Statistical Area (MSA) and unit size in which the unit is located.

FY14 HUD FMR By Unit Bedrooms					
	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
FY14 FMR	\$1,267	\$1,382	\$1,820	\$2,682	\$3,078

7. Evaluation

All new applications will be initially reviewed to determine if the proposed project meets the minimum requirements for participation in the CoC program. Specifically, applications will be initially reviewed to determine that (1) The application is submitted by an agency eligible to receive assistance through the CoC programs; (2) The proposed project will serve eligible CoC beneficiaries; and (3) The activities proposed are eligible for assistance under the CoC programs and appropriate for the population to be served. Applications not meeting any of these minimum requirements will be returned to the proposing agency.

The City will organize an evaluation committee comprised of representatives of the City, and private non-profit and for profit entities to review all projects. Representatives, employees, or officers of agencies submitting a Project Application will be excluded from participation on the evaluation committee. The City reserves the right to request written clarifications or revisions from applicants during the evaluation process. All applications which meet the minimum requirements will be ranked for consideration by HUD for CoC funding.

Project applications submitted by qualified organizations will be reviewed based on the experience and capacity of the proposing organization, the degree to which the funding request is consistent with HUD's Continuum of Care (CoC) goals, the degree to which CoC funds will be leveraged with other resources, anticipated accomplishments in relation to CoC priorities, the prospects for the long term operation of the proposed project, the participation of the proposer in the local Continuum of Care process, and the ability of the proposing organization to implement its proposed project in a timely manner. More details about the evaluation criteria are included in Exhibits B and D for all renewals, and Exhibits C and E for all new applications.

Applicants will also have a Question and Answer (Q&A) session with the evaluation committee on January 16, 2013 from 9:00am – noon at the DCS, Community-Based Development Division at 715 South King Street, 2nd Floor Conference Room, Honolulu, Hawaii. Each agency will be given time to respond to any questions the evaluation committee may have about their Project Application(s). The City will issue via email a schedule of approximate times applicants may meet with the evaluation committee January 8, 2014.

The score sheets that the evaluation committee will use for renewals (Exhibit D) and new projects (Exhibit E) are included in this RFI.

THE CITY AND COUNTY OF HONOLULU RESERVES THE RIGHT, WITHOUT LIABILITY WHATSOEVER, TO REJECT ANY AND ALL APPLICATIONS, IN WHOLE OR IN PART, OR REQUIRE AMENDMENTS TO THE APPLICATIONS IF THE GUIDELINES, REQUIREMENTS, AND/OR ELIGIBILITY CRITERIA SET FORTH IN THIS REQUEST FOR INTEREST ARE NOT MET. THE CITY AND COUNTY OF HONOLULU ALSO RESERVES THE RIGHT TO AMEND OR SUPPLEMENT REQUIREMENTS AND MATERIALS, AND WILL INFORM APPLICANTS OF SUCH CHANGES PRIOR TO THE SUBMITTAL DATE. NEITHER THE CITY NOR THE APPLICANT HAS ANY OBLIGATION UNDER THIS REQUEST.

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
[Docket No. FR-5700-N-31B]

Notice of Funding Availability (NOFA) for the Fiscal Years 2013 and 2014
Continuum of Care Program Competition

OVERVIEW INFORMATION

- A. Federal Agency Name:** U.S. Department of Housing and Urban Development, Office of Community Planning and Development.
- B. Funding Opportunity Title:** Notice of Funding Availability for the Continuum of Care (CoC) Program.
- C. Announcement Type:** Initial Announcement.
- D. Funding Opportunity Number:** The funding opportunity number is **FR-5700-N-31B**.

The OMB Approval number is 2506-0112.

- E. Catalog of Federal Domestic Assistance (CFDA) Number:** 14.267.

- F. Deadline:** The deadline for submitting applications to HUD for the FY 2013 – FY 2014 Continuum of Care Program Competition (CoC Program Competition) will have separate deadlines for FY 2013 and FY 2014 funding requests. For FY 2013 funds, the deadline for submitting applications is 7:59:59 p.m. eastern time, **February 3, 2014**. Applicants will be required to complete and submit their applications in *e-snaps* at www.hud.gov/esnaps. See Section VI of this NOFA for application submission and timely receipt requirements.

The deadline for submitting the documentation required for FY 2014 funds will be announced in a subsequent Notice to be published by HUD, but will be no earlier than 60 days after Congress enacts an appropriation funding the Department for the balance of FY 2014. See Section I.B.2 of this NOFA for information on when and how to apply for FY 2014 funds.

- G. For Further Information:** HUD staff will be available to provide general clarification on the content of this NOFA. HUD staff cannot assist applicants in preparing their applications to submit for funding.
 - 1. Local HUD CPD Field Office.** Questions regarding specific program requirements should be directed to the local HUD CPD Field Office, a directory of which can be found at www.hud.gov/offices/cpd/about/staff/fodirectors/index.cfm.
 - 2. Training and Resources.** CoCs and project applicants that need assistance completing the applications in *e-snaps* or understanding the program requirements under the CoC Program may access the CoC Program interim rule, training materials, and program

resources via the OneCPD Resource Exchange at www.onecpd.info.

3. **The OneCPD Ask A Question (AAQ).** CoCs, Collaborative Applicants, and project applicants that require information and technical support concerning this NOFA and the applications in *e-snaps* may submit an electronic inquiry via the OneCPD AAQ at www.onecpd.info/ask-a-question. The AAQ is accessible 24 hours each day. Starting on the day prior to the application deadline for FY 2013 funds, the AAQ will respond only to emergency technical support questions up to the deadline of 7:59:59 p.m. eastern time.

H. General Section Questions. The Notice of FY 2013 Policy Requirements and General Section to HUD's FY 2013 NOFAs for Discretionary Programs (General Section) is applicable to both FY 2013 funding and FY 2014 funding made available under the CoC Program competition. The General Section can be found at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail. The Notice of FY 2014 Policy Requirements and General Section to HUD's FY 2014 NOFAs for Discretionary Programs will not apply to FY 2014 funding made available under this NOFA.

Questions regarding the General Section should be directed to the Office of Strategic Planning and Management, Grants Management and Oversight Division at (202) 708-0667 (this is not a toll-free number). Persons with hearing or speech impairments may access these numbers via TTY by calling the Federal Information Relay Service at (800) 877-8339.

Additional Overview Information

1. **Available Funds.** For the CoC Program Competition, approximately \$1.7 billion is available for FY 2013 after adjustments were made as a result of sequestration. HUD does not anticipate that this will be adequate to fund all existing projects eligible for renewal with FY2013 funds. HUD may add to this amount any available funds that have been carried over or recaptured from previous fiscal years. All of the requirements for applying for FY 2013 funds, including requirements for the entire CoC Consolidated Application and the total amount of funding available, are contained in this NOFA.

For FY 2014, the level of funding for the CoC Program is not yet known. The Continuing Appropriations Act, 2014 (Public Law 113-46, approved October 17, 2013) funds HUD operations and programs at FY 2013 levels, but provides such funding only through January 15, 2014. Nevertheless for purposes of expediency and efficiency, this FY 2013 – FY 2014 CoC Program NOFA (CoC Program NOFA) will award funds made available for the CoC Program under FY 2013 and FY 2014. When the level of funding is known for FY 2014, HUD will announce this amount through separate notice. In this separate notice, HUD will also publish the deadlines for submitting the information required by HUD. For more information on applying for FY 2014 funds under this NOFA, see Section I.B.2.

2. Eligible Applicants.

- a. *CoC Consolidated Applications.* CoCs were required to designate a Collaborative

Applicant to submit the CoC Consolidated Application on behalf of the CoC as part of the FY 2013 CoC Registration process. Collaborative Applicants will not be able to access the CoC Consolidated Application in *e-snaps* if the CoC does not have an approved Registration. The Collaborative Applicant approved by HUD during the FY 2013 registration process must be the same entity that submits the CoC Consolidated Application – which includes the CoC Application, Priority Listings that list all project applications accepted and ranked or rejected in the CoC local competition, and the Project Application – during the CoC Program Competition. CoCs should not attempt to change Collaborative Applicants during the CoC Program Competition without HUD's prior approval. HUD will approve Collaborative Applicant changes after the FY 2013 CoC Registration process under circumstances that include:

- i. an error made by the Collaborative Applicant when entering the Collaborative Applicant's name in the CoC Applicant Profile,
 - ii. the Collaborative Applicant chosen by the CoC is no longer in business,
 - iii. the Collaborative Applicant withdrew, or
 - iv. the CoC withdrew the Collaborative Applicant.
- b. In cases where the CoC needs to change the Collaborative Applicant approved during Registration, the CoC must notify the local HUD CPD field office in writing stating the reason for the Collaborative Applicant change. The notice to HUD must provide documentation of the CoC's approval of the change (e.g., a copy of the meeting minutes, to include the date and attendees).
- c. *Project Applicants.* Eligible project applicants for the CoC Program are identified in Section V.A.
- d. *Amendments to FY 2013 Registration.* If a geographic area that includes projects eligible to apply for renewal funding during the CoC Program Competition was not claimed by a CoC with an approved FY 2013 CoC Registration, a contiguous CoC or the Balance of State CoC may contact HUD in writing to request that its Registration and FY 2013 Grant Inventory Worksheet (GIW) be amended to include the unclaimed geographic area and the renewal projects. Additionally, if a CoC with an approved FY 2013 CoC Registration failed to include an eligible project on the CoC's FY 2013 GIW during the FY 2013 CoC Registration the CoC will have the opportunity to amend its FY 2013 GIW to make those changes. Projects eligible for renewal in FY 2014 should not be added to this list as there will be a separate, modified CoC Registration process, for FY 2014 funds under the CoC Program Competition (see section I.B.2 of this NOFA for more information). Any changes to the FY 2013 GIW after CoC Registration must be approved by the local HUD CPD field office, in consultation with HUD Headquarters, within 7 days after the publication of this NOFA. The due date of final HUD-approval for FY 2013 GIW changes is **December 4, 2013 by 5:00 pm local time.** Collaborative Applicants will be required to attach the HUD-approved FY 2013 GIW that contains the final FY 2013 Annual Renewal Demand (ARD) to the CoC Application. No changes to the FY 2013 GIW will be considered after the 7-day grace period.

- 3. Additional Information Regarding FY 2013-FY 2014 CoC Program Competition (CoC Program Competition).** All requirements for applying for FY 2013 funds, including requirements for the entire Consolidated Application and the total amount of funding available, are contained in this NOFA. Applicants should read this information carefully and respond to all submission requirements and deadlines as described. The **February 3, 2014** deadline established in this NOFA applies to the following (see Section I.B.2 of this NOFA for more information):
- a. 2013/2014 CoC Application
 - b. FY 2013 Project Applications; and
 - c. FY 2013 Priority Listings.

Because the amount of funding available for FY 2014 is not yet known, HUD will publish at a later date any additional application requirements and the submission deadline for FY 2014 funds. Applicants will not be required to submit a separate CoC Application for FY2014 funds. The score received for the FY 2013/FY 2014 CoC Application submitted by **February 3, 2014** will apply to funding requested for FY 2014 funds as well as FY 2013 funds. However, applicants will be required, at a minimum, to complete the following to apply for FY 2014 funds:

- a. A modified FY 2014 CoC Registration that will establish the CoC's FY 2014 Preliminary Pro Rata Need (PPRN) and FY 2014 ARD amounts, and that will allow Collaborative Applicants to be designated by HUD as Unified Funding Agencies (UFAs). During this modified registration process, changes in claimed geography will not be allowed;
- b. FY 2014 Project Applications. These will be submitted in *e-snaps* and may be for CoC planning costs, UFA costs, renewal projects eligible for FY 2014 funds, and new projects created through reallocation;
- c. FY 2014 Priority Listing that provides HUD with the projects submitted for FY 2014 funding in priority order; and,
- d. A HUD-2991 for all required projects.

The deadline for submission of documentation for FY 2014 funding as described above will be no earlier than 60 days after Congress enacts an appropriation funding the Department for the balance of FY 2014.

4. **Eligible Costs.** 24 CFR 578.37 through 578.63 identify the eligible costs for which funding can be requested for the CoC Program. HUD will reject any requests for ineligible costs.
5. **Match.** 24 CFR 578.73 describes match requirements.
6. **Requirements.** The following requirements apply to funding available under this NOFA:
 - a. *DUNS number and SAM.* Project applicants are required to register with Dun and Bradstreet to obtain a DATA Universal Numbering System (DUNS) number, if they have not already done so, and complete or renew their registration in the Central Contractor Registration (CCR)/System for Award Management (SAM) per the General Section, III.C.2.b. and c. HUD will not enter into a grant agreement with an entity that does not

have a DUNS Number or an active SAM.

- b. *Major natural disaster areas.* HUD will award at least the minimum score, 34.5 out of 69 points for questions associated with Section VII.A.1 of this NOFA in the FY 2013/FY 2014 CoC Application for CoCs with one or more projects directly impacted by a major disaster, as declared by President Obama under Title IV of the Robert T. Stafford Act, in the 12 months prior to the deadline for submitting the application for FY2013 funds.
7. **Local Competition Deadlines.** 24 CFR 578.9 requires CoCs to design, operate, and follow a collaborative process for the development of an application in response to a NOFA issued by HUD. As part of this collaborative process, CoCs should implement internal competition deadlines to ensure transparency and fairness at the local level. The implementation of deadlines that meet the standards outlined below for FY 2013 Project Applications will be considered as part of scoring criteria as detailed in Section VII.A.4.f.
- a. *Project Applications.* All project applications were required to be submitted to the CoC no later than 30 days before the application deadline.
 - b. *CoC Notification to Project Applicants.* The CoC notified all project applicants no later than 15 days before the application deadline regarding whether their project applications would be included as part of the CoC Consolidated Application submission. Any project applicants that submitted projects that were rejected by the CoC must have been notified in writing, outside of *e-snaps*, with an explanation for the decision to reject the project(s).
8. **CoC Transparency.** In order to receive the maximum number of points available in Section VII.A.4.f. the CoC must have in place a process to make all parts of the CoC Consolidated Application available to its community for inspection and to notify community members and key stakeholders that the application is available. If the CoC does not have a website, the CoC should post this information to a partner website within the CoC (e.g., county/city website). The process must be conducted in a manner that is accessible for persons with disabilities and persons with limited English proficiency.

FULL TEXT OF THE ANNOUNCEMENT

I. Funding Opportunity Description.

Program Description: The CoC Program is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house the homeless while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by the homeless; and to optimize self-sufficiency among those experiencing homelessness.

- A. **Authority:** The CoC Program is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act, (42 U.S.C. 11381–11389) (the Act). The FY 2013 funds for the CoC Program were authorized by the Consolidated and Further Continuing Appropriations Act, 2013 (Public Law 113-6, approved March 26, 2013) (the “HUD Appropriations Act”).

FY 2014 funds available, to date, for the CoC Program were authorized by the Continuing Appropriations Act, 2014 (Public Law 113-46, approved October 17, 2013).

B. Summary of the Application Process: The FY 2013- FY 2014 CoC Program Competition (CoC Program Competition) is administered under the CoC Program interim rule.

Applicants should review and follow the steps as outlined below to ensure that applications are complete and submitted on time. Documents referenced in this section can be found on the OneCPD Resource Exchange at www.onecpd.info. While this NOFA applies to both FY2013 and FY2014 funds, the process for submitting required documentation differs according to the funding year as described below.

1. The following requirements apply to the application process for FY 2013 funds:

- a. Collaborative Applicants must have completed the FY 2013 CoC Registration in accordance with the Notice of Fiscal Year (FY) 2013 Opportunity to Register and Other Important Information for Electronic Application Submission for Continuum of Care Program Competition (FY 2013 CoC Registration Notice) published on August 23, 2013.
- b. Project applications submitted to the CoC for inclusion on the FY 2013 Priority Listings as part of the CoC Consolidated Application must be reviewed and either accepted or rejected by the CoC. All projects approved by the CoC must be ranked as Tier 1 or Tier 2 as described in Section II.B.10 of this NOFA. The purpose of this two-tiered approach is for CoCs to clearly indicate to HUD which projects are prioritized for funding in the event that the national total Annual Renewal Demand (ARD) exceeds the \$1.7 billion of FY 2013 funds available through this NOFA. In this case, funding will only be available for projects ranked in Tier 1. CoCs that receive a higher score have a better chance of being awarded projects ranked in Tier 2, depending on the availability of carryover or recaptured funds to be used in FY 2013 under the CoC Program Competition.
- c. The Collaborative Applicant, including any Collaborative Applicant designated by HUD as a Unified Funding Agency (UFA), is responsible for submitting the CoC Consolidated Application in *e-snaps* on behalf of the CoC. The CoC Consolidated Application is made up of the following three parts:
 - (1) The FY 2013/FY 2014 CoC Application. The Collaborative Applicant must provide information about the CoC planning body, governance structure, overall performance, and the strategic planning process. This part of the application is scored and will determine the order in which CoCs are funded. This score will apply to funds requested under FY 2013 and FY 2014. For more information on the FY 2013/FY 2014 CoC Application, see Section VI.B.1.a. of this NOFA.
 - (2) The FY 2013 Project Applications. A project application must be completed by project applicants for CoC planning, UFA costs, new projects created through reallocation, and renewal project requests. New project applicants applying for

funds through reallocation or renewal projects must provide a description of the proposed project including who the project will serve, the type of housing and services that will be provided, and what budget activities are being requested. Project applicants applying for CoC planning or UFA costs must provide a description of the activities that will be carried out with grant funds for CoC planning or UFA costs. For more information on the Project Application, see Section VI.B.1.b of this NOFA.

- (3) The FY 2013 Priority Listings. There are four separate Project Listing forms in *e-snaps* that make up the Priority Listing, which lists the new projects created through reallocation, renewal, CoC planning, and UFA costs project applications that the CoC intends to submit. The Priority Listing ranks the projects in order of priority and identifies any project requests rejected by the CoC. The Collaborative Applicant cannot correctly complete this part of the CoC Consolidated Application until all Project Applications have been submitted to the CoC. Further, the Collaborative Applicant will be required to certify that there is a demonstrated need for all ranked permanent housing renewal projects on the applicable Project Listing. For more information on the Priority Listings, see Section VI.B.1.c.
2. Because the amount of funding available in FY 2014 is not yet known, HUD will publish at a later date any additional application requirements and the deadline for FY 2014 funds. The deadline for the information described below will be no earlier than 60 days after Congress enacts an appropriation funding the Department for the balance of FY 2014. At a minimum, the following requirements apply to the application process for FY 2014 funds under the CoC Program Competition:
 - a. Collaborative Applicants must have completed the FY 2013 CoC Registration as well as complete a modified FY 2014 CoC Registration process. The modified FY 2014 CoC Registration will establish the CoC's FY 2014 Preliminary Pro Rata Need (PPRN) and FY 2014 ARD amounts, and will allow Collaborative Applicants to apply to HUD for UFA designation. During this modified registration process, changes in claimed geography from the FY 2013 CoC Registration will not be allowed.
 - b. The FY 2014 Project Applications. A project application must be completed by project applicants for CoC planning, UFA costs, new projects created through reallocation, and renewal project requests. Project applications submitted to the CoC for inclusion on the FY 2014 Priority Listings must be reviewed and either accepted or rejected by the CoC. All projects approved by the CoC must be ranked as Tier 1 or Tier 2 as will be described when HUD publishes the additional requirements and deadline for FY 2014 funds. The purpose of this two-tiered approach is for CoCs to clearly indicate to HUD which projects are prioritized for funding in the event that the national total FY 2014 ARD exceeds the amount of FY 2014 funds made available. In this case, funding will only be available for projects ranked in Tier 1. CoCs that receive a higher score on the FY 2013/FY 2014 CoC Application have a better chance

of being awarded projects ranked in Tier 2, depending on the availability of carryover or recaptured funds to be used in the CoC Program Competition.

- c. The FY 2014 Priority Listings. There are four separate Project Listing forms in *e-snaps* that make up the Priority Listings, which lists the new projects created through reallocation, renewal, CoC planning, and UFA costs project applications that the CoC intends to submit. The Priority Listing ranks the projects in order of priority and identifies any project requests rejected by the CoC. The Collaborative Applicant will not be able to correctly complete this part of the FY 2014 requirements until all Project Applications have been submitted to the CoC.
 - d. Form HUD-2991: Certification of Consistency with the Consolidated Plan for FY 2014 projects.
3. The following requirements apply to the application process for both FY 2013 and FY 2014 funds
- a. CoCs and applicants should read this NOFA in its entirety in conjunction with the CoC Program interim rule in order to gain a comprehensive understanding and to comply with CoC Program requirements. This NOFA frequently makes reference to citations from the CoC Program interim rule (24 CFR part 578). Applicants should review the General Section of the NOFA, published on July 23, 2012 and the General Section Technical Correction, published October 13, 2012.
 - b. CoCs should consider the policy priorities established in this NOFA in conjunction with local priorities to determine the ranking of new projects created through reallocation, CoC planning, UFA costs, and renewal project requests. See Section II of this NOFA for more information on HUD's homeless policy priorities.
 - c. HUD will conduct a threshold review of ranked projects for all CoCs that submit the CoC Consolidated Application by the application submission deadline.
 - d. HUD intends to announce conditional funding for Tier 1 renewal projects within 45 days of the application submission deadline(s) of the CoC Program Competition.
 - e. HUD will score FY 2013/FY 2014 CoC Applications in accordance with the criteria set forth in Section VII.A of this NOFA. HUD will announce any additional Conditional Awards (new projects created through reallocation, CoC planning funds, UFA costs, if applicable, and Tier 2 renewals) after scoring is complete, depending on availability of funding, and in accordance with the selection criteria outlined in Section VII.B.1.b of this NOFA. CoCs that receive a higher score have a better chance of being awarded projects ranked in Tier 2, depending on the availability of carryover or recaptured funds to be used in the CoC Program Competition.

II. HUD's Homeless Policy and Program Priorities

A. Homeless Policy Priorities. The General Section establishes specific policy priorities, two

of which each program NOFA must include unless an exception is explicitly stated. While HUD will award up to two points for Affirmatively Furthering Fair Housing under this NOFA (per Section VII), HUD will not award points on the General Section policy priorities. Rather, this NOFA focuses on the Administration goals articulated in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. The goals of *Opening Doors* are consistent with the Department's homeless goals as stated in HUD's Strategic Plan.

FY 2013/FY 2014 CoC applications submitted to HUD for the CoC Program Competition will be evaluated in part based on the extent to which the CoC demonstrates efforts in place that further the achievement of HUD's goals through community-level implementation of the homeless policy priorities and activities listed below.

For more information on the CoC Program Competition scoring and selection criteria, see Section VII. Below is a description of HUD's policy priorities for the CoC Program Competition.

1. **Strategic Resource Allocation.** Each CoC must comprehensively review all existing projects within its geographic area, using CoC-approved scoring criteria and selection priorities, to determine the extent to which each project is still necessary and addresses the listed policy priorities above. Funds for projects that are determined to be underperforming, obsolete, or ineffective should be reallocated to new projects that are based on proven or promising models.
2. **Ending chronic homelessness.**
 - a. *Increasing Beds:* In order to increase the number of beds specifically for the chronically homeless and work towards the goal of ending chronic homelessness by 2015, CoCs will be able to apply for new projects created through reallocation for permanent supportive housing (PSH) that propose to exclusively serve the chronically homeless—which includes individuals and households with children—as defined in 24 CFR 578.3, as part of its comprehensive strategy to end chronic homelessness. Chronically homeless and permanent supportive housing are defined in 24 CFR 578.3. Consistent with the interim rule, the chronically homeless includes individuals and families who have a qualifying disabling condition and meet the criteria of chronic homelessness.
 - b. *Targeting:* The chronically homeless should be given priority for PSH beds as vacancies become available through turnover. PSH renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry.
 - c. *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. Research shows that it is effective for the chronically homeless with mental health and substance abuse disorders, resulting in fewer inpatient stays and less expensive interventions than other approaches. PSH projects should use a Housing First approach in the design of the program.

3. Ending family homelessness.

- a. *Rapid Re-Housing* is a model of housing assistance that is designed to assist the homeless, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing. Rapid re-housing assistance is time-limited, individualized, and flexible, and is designed to complement and enhance homeless system performance and the performance of other homeless projects. While it can be used for any homeless person, preliminary evidence indicates that it can be particularly effective for households with children.
- b. CoCs may apply for new projects created through reallocation for rapid re-housing to serve homeless households with children. Rapid re-housing projects must serve households with children living on the streets or in emergency shelter.

4. Removing Barriers to CoC Resources.

CoCs should review system and project level eligibility criteria to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

- a. *Centralized or Coordinated Assessment System*: Centralized or coordinated assessment is a key step in assessing the needs of the homeless requesting assistance and matching the needs of those households to the most appropriate housing and service options. The CoC Program interim rule requires the implementation of a centralized or coordinated assessment system.
- b. *Transitional Housing*: HUD recognizes that transitional housing can be an effective tool in many communities for addressing the needs of specific subpopulations—such as homeless youth, domestic violence survivors, and the homeless with substance abuse issues. However, recent research shows that transitional housing is generally more expensive than other housing models serving similar populations, it is often more service-intensive than most homeless households need, and that the criteria for entry into many transitional housing programs are so rigorous that transitional housing beds are under-utilized because homeless households cannot overcome the barriers to entry. HUD is strongly encouraging CoCs and recipients to carefully review the transitional housing models within the geographic area for cost-effectiveness, performance, and for the number and type of criteria used to determine eligibility for the program and determine if rapid re-housing may be a better model for the CoC's geographic area.

- c. *Prioritizing Households Most in Need:* CoCs should prioritize those who are identified as most in need (e.g., those who have been living on the street the longest, homeless households with children living in unsheltered situations, those that are considered most medically vulnerable) for placement into appropriate housing.

5. Maximizing the use of mainstream resources.

- a. HUD strongly encourages CoCs and project applicants to ensure that they are maximizing the use of all mainstream services available. While the CoC Program interim rule allows for the payment of certain supportive service costs and Supportive Services Only projects, it is more efficient for CoCs to use mainstream resources where possible and use HUD funds for housing-related costs. CoCs should proactively seek and provide information to recipients within the geographic area about mainstream resources and funding opportunities.
- b. CoCs should be actively preparing for implementation of the Affordable Care Act by determining how these funds may be used by recipients to serve the homeless. While this will vary by state, CoCs should also be encouraging project recipients to participate in enrollment and outreach activities to ensure eligible households take advantage of new healthcare options.

6. Building partnerships.

- a. CoCs should proactively seek to engage in partnerships with Public Housing Agencies (PHA) within their geographic area. HUD encourages CoCs to partner with PHAs, for example, to create homeless preferences or adopt strategies to assist current program participants to access PHA housing resources as they become ready to do so. CoCs and PHAs are encouraged to read and use the following HUD Notice (PIH 2013-15) published June 10, 2013: *Guidance on housing individuals and families experiencing homelessness through the Public Housing and Housing Choice Voucher Programs.*
- b. CoCs should assess the extent to which philanthropy plays a role within the community. CoCs and project recipients should consider how to engage with philanthropic organizations in a way to maximize resources and increase progress towards ending homelessness.

- 7. Other Priority Populations:** While new funding opportunities through reallocation will only be available for the chronically homeless and homeless households with children, HUD also expects CoCs to consider the needs of other homeless populations that may be prevalent in the CoC's geographic area, especially the needs of veterans and their families and unaccompanied youth (section VII.A.1.f of this NOFA). The CoC Program Competition will include points on the extent to which the FY 2013/FY 2014 CoC Application demonstrates that these populations are served:

- a. *Veterans*: CoC Program funded projects should, to the extent possible, prioritize veterans who are ineligible for VA services and their families. CoCs should work closely with the local Department of Veterans Affairs (VA), and coordinate CoC resources with VA-funded housing and services (e.g., HUD-VASH, Supportive Services for Veteran Families (SSVF)).
- b. *Homeless Youth*: CoCs should be able to identify and describe the needs of homeless youth within the geographic area and the current programs designed to serve this population, including performance.

B. CoC Program Implementation. The following list highlights important information that applicants should consider as they are preparing the FY 2013/FY 2014 CoC Application and Project Application(s). This is not an exhaustive list of considerations or requirements—all applicants and CoC stakeholders should carefully review the CoC Program interim rule for comprehensive information. Additionally, all applicants and CoC stakeholders should carefully review the notice containing the additional application requirements and deadline for FY 2014 funds under the CoC Program Competition when it is published.

1. Due to funding limitations, HUD will not consider requests for new funding outside of the reallocation process, CoC planning, and UFA costs.
2. In the CoC Program Competition, CoCs may use reallocation to create new PSH projects that serve the chronically homeless; or,
3. Through reallocation, CoCs may create new rapid re-housing projects for homeless households with children.
4. Any changes to the FY 2013 GIW after CoC Registration must be approved by the local HUD CPD field office, in consultation with HUD Headquarters, within 7 days after the publication of the FY 2013 – FY 2014 CoC Program NOFA (CoC Program NOFA). The due date of final HUD-approval for changes to the FY 2013 GIW is **December 4, 2013 by 5:00 pm local time**. Collaborative Applicants will be required to attach the HUD-approved FY 2013 GIW that contains the final HUD-approved FY 2013 ARD to the FY 2013/FY 2014 CoC Application. No changes to the FY 2013 GIW will be considered after the 7-day grace period. It is crucial that CoCs ensure the final FY 2013 GIW is accurate and only those projects that are eligible for renewal in FY 2013 are listed. Projects eligible for renewal in FY 2014 should not be added to this list as there will be a separate, modified CoC Registration process, including a new GIW, for FY 2014 funds under the CoC Program Competition (see section I.B.2 of this NOFA for more information). New projects that were awarded funding in the FY 2012 CoC Program Competition must have an executed grant agreement by December 31, 2013 in order to be eligible for renewal with FY 2013 funds. HUD will remove the annual renewal amount from a CoCs FY 2013 ARD if it determines that any project listed on a CoC's final FY 2013 GIW was a new project awarded in the FY 2012 CoC Program Competition that did not have an executed grant agreement by December 31, 2013. HUD's removal of an ineligible renewal project from the FY 2013 GIW attached to the

FY 2013/FY 2014 CoC Application will affect the CoC's Tier 1 funding line for FY 2013 funds.

5. SHP renewal project applicants that were approved by HUD during the FY 2013 CoC Registration process to change a project budget line item from leasing to rental assistance must provide a commitment letter from an entity eligible to administer rental assistance (a State, unit of general local government, or a public housing agency). Project applicants must have the commitment letter that is dated by the application submission deadline and will be required to provide it to the local HUD CPD field office after announcement of the award and before the grant agreement is signed. If the applicant is unable to provide a commitment letter that is dated before the submission deadline, the applicant must agree to change the project back to leasing and comply with all of the requirements of leasing under the CoC Program or HUD will not renew the grant. Only those Supportive Housing Program projects that are renewing for the first time in FY 2013 under the CoC Program were eligible to request the change from leasing to rental assistance, which must have been approved during the FY2013 CoC Registration process.
6. Eligible renewal projects requesting rental assistance will now be permitted to request a per-unit amount less than the Fair Market Rent (FMR), based on the actual rent costs per unit. This change will help to reduce the number of projects receiving rental assistance that have large balances of unspent funds remaining at the end of the operating year. Project applicants must ensure that the amount requested will be sufficient to cover all eligible costs as HUD cannot provide funds beyond what is awarded through the competition. Project applications for rental assistance cannot request more than 100 percent of the published FMR. New project applications must adhere to 24 CFR 578.51(f) and must request the full FMR amount per unit. See Section III.I.1 for additional information regarding FMR adjustments for projects receiving funds for rental assistance.
7. Under this NOFA, CoCs will be evaluated on the extent to which they are prioritizing the chronically homeless in all CoC Program-funded permanent supportive housing—not just those units that are dedicated to that population. CoCs should prioritize the chronically homeless for placement as units become available through turnover. For more information, see Section VII.A.1.a.3 and 4 of this NOFA.
8. CoCs were required to submit their FY 2013 Housing Inventory Count (HIC) Data and Point-in-Time (PIT) Data directly to the HUD Homelessness Data Exchange (HDX) website by the submission deadline of April 30, 2013. CoCs that did not meet the established deadline for HIC and PIT submission will not be eligible to receive the maximum number of points available as described in Sections VII.A.4.g and VII.A.7.a of this NOFA.
9. In order to receive the maximum number of points available as described in Section VII.A.4.f of this NOFA, CoCs must:
 - a. establish an internal CoC-deadline for project applications to be submitted to the CoC

that is no later than 30 days before the application submission deadline; and

- b. notify, in writing and outside of e-snaps, all project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) will be accepted (and ranked on the Priority Listings) or rejected by the CoC within 15 days of the application deadline. Where a project is being rejected, the CoC must indicate the reasons for the rejection. Per 24 CFR 578.35(b), project applicants that believe they were not allowed to participate in a fair and open process and that were rejected by the CoC may appeal the rejection directly to HUD by submitting as a Solo Application prior to the application deadline.
10. Based on the estimated FY 2013 ARD for each CoC that has a HUD-approved Registration, it is anticipated that the national annual renewal demand for FY 2013 funds under the CoC Program Competition will exceed the \$1.7 billion available under this NOFA. Therefore, HUD anticipates that the available funding will be inadequate to renew all existing projects eligible to renew for FY 2013 funds in the CoC Program Competition. To ensure that CoCs have the ability to indicate to HUD which projects are of the highest priority for FY 2013, HUD is requiring that CoCs rank projects in Tier 1 or Tier 2.

The tiers are financial thresholds. Tier 1 is equal to the CoC's FY 2013 ARD approved in the Registration process, less 5 percent. Tier 2 is the amount remaining in FY 2013 ARD plus the approved amounts for CoC planning and UFA costs. HUD will publish final FY 2013 ARD and Tier 1 amounts for each CoC no later than 15 days after publication of this NOFA. Any project that falls only partially in Tier 1 will be considered by HUD as falling entirely in Tier 2.

The CoC must assign a unique rank to each project that it intends to submit to HUD for FY 2013 funding. HUD strongly advises CoCs to rank higher those project applications the CoC determines are high priority, high performing, and meet the needs and gaps as identified by the CoC. HUD will select projects as described in Section VII.B.1.b. Projects placed fully outside of the CoC's maximum award amount will be reviewed by HUD only in accordance with 24 CFR 578.35 (Appeal).
 11. Only one CoC project application for CoC planning costs may be submitted per CoC per fiscal year appropriation. Only one project application for UFA costs can be submitted for HUD-approved UFAs per funding year. The applications for planning and UFA costs must be submitted by the Collaborative Applicant.
 12. CoCs must consult with Emergency Solutions Grants (ESG) recipients within the geographic area on the plan for allocating ESG funds and reporting on and evaluating the performance of ESG recipients and subrecipients. Each CoC will be required to describe how it is coordinating, or if that is not already occurring, how coordination with ESG recipients will occur and what processes are required to be in place at the CoC level to ensure this requirement is met. See Section VII.A.2.c for more information about scoring criteria related to coordinating with ESG recipients.

13. All CoCs must have an HMIS that has the capacity to collect unduplicated counts of individuals and families experiencing homelessness and provide information to project subrecipients and applicants for needs analysis and funding priorities. Additionally, CoC and ESG recipients must participate in the local HMIS (unless a recipient is a domestic violence provider in which case it must use a comparable database and provide de-identified information). For many communities, the inclusion of ESG recipients and subrecipients in HMIS will mean an increase in users that the HMIS must be able to accommodate. The HMIS Lead should continue to consider any unique needs that the HMIS may be required to address in order to accommodate these emergency shelter, street outreach, and homelessness prevention programs.
14. CoCs may request, in the FY 2013/FY 2014 CoC Application, that up to 10 percent of funding for each fiscal year awarded under this NOFA be approved to serve homeless households with children and youth defined as homeless under other federal statutes (paragraph 3 of the definition of homeless found at 24 CFR 578.3). Approved CoCs are limited to using only up to 10 percent of the total amount awarded for each fiscal year appropriation to the CoC to serve this population, and must determine which projects will be permitted to use some or all of their funding for this purpose. The only project types that can serve this population are transitional housing and supportive services only.

In order to be approved to serve this population, CoCs making this request must be able to demonstrate that serving this population is of equal or greater priority, which means that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth, than serving the homeless as defined under paragraphs (1), (2), and (4) of the definition of homeless in 24 CFR 578:3. CoCs must thoroughly describe how the requirements described in section 427(b)(1)(F) of the Act will be met. CoCs will be required to identify the specific project(s) that will use funding for this purpose (up to 10 percent of CoC total award) by submitting an attachment in *e-snaps* that states the following:

- a. Project name(s); and
- b. Amount of funding in the project or per project that will be used for this purpose.

Where HUD does not approve a CoC's request, any awards for the projects proposed in FY 2013 and FY 2014 to be used for this purpose will be conditioned upon award that no funds may be used to serve this population. See 24 CFR 578.65 and 24 CFR 578.89 for more information about this limitation.

15. HUD continues to encourage CoCs to consider how the outcomes related to performance measures found in Section 427 of the Act will be collected at the local level. HUD strongly encourages communities to consider HMIS capacity in collecting the information necessary to report on the defined selection criteria that will be applied in future competitions. See Section VII.A.1 of this NOFA for details regarding

performance reporting for this competition.

III. Continuum of Care Program Requirements.

The CoC Program interim rule at 24 CFR part 578 details the requirements with which grants awarded under this competition must comply. Regulatory citations are provided below so that applicants can refer to specific areas of the CoC Program interim rule for details.

A. Definitions and Concepts. The definitions and concepts contained in this section include terms that are important for all applicants to understand in order to complete all parts of the CoC Program Consolidated Application.

1. Definitions from 24 CFR 578.3. The following terms are defined in 24 CFR 578.3. Applicants must refer to the CoC Program interim rule for the definitions contained in this section.

- a. *Annual Renewal Amount (ARA)*
- b. *Applicant*
- c. *Centralized or Coordinated Assessment System*
- d. *Chronically Homeless*
- e. *Collaborative Applicant*
- f. *Continuum of Care*
- g. *Consolidated Plan*
- h. *Homeless*
- i. *Permanent Housing*
- j. *Permanent Supportive Housing*
- k. *Private Nonprofit Organization*
- l. *Program Participant*
- m. *Project*
- n. *Subrecipient*
- o. *Transitional Housing*
- p. *Unified Funding Agency*

2. CoC Program NOFA Definitions. The following terms are not found in 24 CFR part 578, but are used in this NOFA to define concepts that pertain specifically to the CoC Program Competition application process.

- a. *Consolidated Plan Certification.* The statutory form in which a state or local official certifies that the proposed activities or projects are consistent with the jurisdiction's Consolidated Plan and, if the applicant is a state or unit of local government, that the jurisdiction is following its Consolidated Plan.
- b. *Housing Inventory Count (HIC).* A complete listing of the community's HUD and non-HUD funded beds dedicated to the homeless.
- c. *Project Applicant.* An applicant designated by the CoC to apply for CoC Program

funds to carry out activities related to a specific project(s) as defined in 24 CFR 578.3. This includes Collaborative Applicants that apply for planning funds.

- d. *Rapid Re-housing*. A type of permanent housing meeting the requirements of 24 CFR 578.37 (a)(1)(ii).
3. **Concepts.** The concepts contained in this section are important for all applicants to understand in order to complete all parts of the CoC Program Consolidated Application. These concepts are used throughout this NOFA:
 - a. *Annual Renewal Demand (ARD) (24 CFR 578.17(b)(2))*. The total amount of all the CoC's projects that will be eligible for renewal in the CoC Program Competition. A separate ARD will be established for each year of funding under this NOFA. It is the sum of the annual renewal amounts of all projects within the CoC's geographic area eligible to apply for renewal in the CoC Program Competition, before any required adjustments to funding for leasing, rental assistance, and operating line items based on FMR changes.
 - b. *Beds Dedicated to the Chronically Homeless*. The total number of beds in the CoC's geographic area that are dedicated specifically for use by the chronically homeless as reported in the CoC's Housing Inventory Count (HIC). For these types of beds, when a participant exits the program, the bed must be filled by another chronically homeless participant unless there are no chronically homeless persons located within the geographic area.
 - c. *Housing First*. 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.
 - d. *Non-Dedicated Permanent Supportive Housing Beds*. Permanent supportive housing beds within a CoC's geographic area that are not currently dedicated specifically for use by the chronically homeless. CoCs and projects are strongly encouraged to prioritize the chronically homeless in non-dedicated permanent supportive housing beds as they become available through turnover. For more information, see Section VII.A.1.a of this NOFA.
 - e. *Preliminary Pro Rata Need (PPRN)*. The amount of funds a CoC could receive based upon the geographic areas HUD approves as included in the CoC. To determine the homeless assistance need of a particular jurisdiction, HUD will use the formula set forth 24 CFR 578.17(a). Each year, HUD publishes the PPRN for each jurisdiction. A CoC's PPRN is determined by adding the published PPRN of each jurisdiction located within the HUD-approved CoC geographic area.
 - f. *Reallocation*. Reallocation is when a CoC shifts funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD. New projects created through reallocation must meet the requirements set

forth in Section II.B.1 and the eligibility and project quality thresholds established by HUD in Section V.E.2 of this NOFA. In the CoC Program Competition reallocation can only be used to create new permanent supportive housing for the chronically homeless, or rapid re-housing to serve homeless households with children.

- B. Establishing and Operating the CoC.** 24 CFR 578.5 and 24 CFR 578.7 detail the requirements for the establishment of a CoC and its operations.
- C. CoC Geographic Area.** 24 CFR 578.5 requires representatives from relevant organizations within a geographic area to establish a CoC to carry out the duties within the geographic area. The boundaries of identified CoC geographic areas may not overlap, and any overlapping geographies are considered Competing CoCs. HUD will follow the process at 24 CFR 578.35(d) to determine which CoC HUD will fund in the case of CoC geographic areas that overlap in whole or in part. See section VII.A.9 for more information about how HUD will award funding to projects in Competing CoCs.
- D. Planning Duties of the CoC.** Planning duties for CoCs are detailed in 24 CFR 578.7.
- E. Centralized or Coordinated Assessment System.** The definition of Centralized or Coordinated Assessment can be found at 24 CFR 578.3. Provisions at 24 CFR 578.7(a)(8) detail responsibilities of the CoC with regard to establishing and operating such a system. CoCs may use planning costs to design and plan for the implementation of a centralized or coordinated assessment system. These systems help communities assess the needs of program participants and effectively match the homeless with the most appropriate resources available to address their particular needs.
- F. CoC Program Components.** Provisions at 24 CFR 578.37 provide that CoC funds may be used for projects under five program components: permanent housing (including rapid re-housing and permanent supportive housing), transitional housing, supportive services only, HMIS, and in some cases, homelessness prevention. Homelessness prevention is a component to be included in future CoC Program Competitions through the implementation of High Performing Communities (HPC), since only designated HPCs may carry out homelessness prevention activities through the CoC program. Therefore, the four components that will be funded in the CoC Program Competition are:
1. Permanent Housing;
 2. Transitional Housing;
 3. Supportive Services Only; and
 4. HMIS.

The components are fully described at 24 CFR 578.37.

- G. High Performing Communities.** While the Act provides that HUD will designate no more than 10 HPCs in each of the first 2 years of the program, and, at 24 CFR 578.65, the rule establishes standards for qualifying as an HPC, the requirement to use HMIS data to qualify as an HPC and the requirements for applying to be an HPC make it impossible for HUD to

designate any HPCs in the CoC Program Competition due to the lack of data responsive to the statutory selection criteria. The Act requires that HUD review at least 2 years of community data for some of the selection criteria to determine whether a CoC may be designated as an HPC. The standards for HPC qualification are clarified in 24 CFR 578.65(c) which was published July 31, 2012, which means CoCs do not have 2 full years of community data available to report to HUD for review. Therefore, HUD will not designate any HPCs in the CoC Program Competition.

- H. Collaborative Applicant.** HUD may only review CoC Consolidated Applications submitted from the Collaborative Applicant that has been designated to submit the CoC Consolidated Application on behalf of the CoC. The Collaborative Applicant will compile all parts of the CoC Consolidated Application, including the FY 2013/FY 2014 CoC Application, the FY 2013 and FY 2014 Priority Listings, and all Project Applications for FY 2013 and FY 2014 funds the CoC has ranked for funding within the geographic area. Additionally, as set forth at 24 CFR 578.3, the Collaborative Applicant is the only entity that may apply for CoC planning costs and UFA costs (if the Collaborative Applicant is designated to apply as an UFA applicant) from HUD on behalf of the CoC that the Collaborative Applicant represents.
- I. CoC Maximum Award.** The process for determining a CoC's maximum award amount is detailed in 24 CFR 578.17(b). HUD is required to adjust awards for leasing, operating, and rental assistance budget line items based on changes to the Fair Market Rents (FMR). All adjustments for each fiscal year appropriation will be made prior to award announcement. HUD will make these adjustments as follows:
1. Funds awarded for rental assistance will be adjusted in one of two ways:
 - a. Funds awarded for rental assistance in all new projects and all renewal projects requesting the FMR will be adjusted by applying the FMR in effect at the time of application submission to HUD, including in the cases where the FMR for a specific area has decreased from the previous year.
 - b. Funds awarded for rental assistance for renewal projects that request less than FMR, i.e., a per-unit amount based on the actual rent costs per unit, will be increased based on the average increase in FMR amounts within the CoC's geographic area, weighted for population density. In the event that the FMR for a specific area decreased from the previous year, project applicants will not receive an award that exceeds the FMR after adjustment. If the FMR for the project applicant's area decreased from the previous year, the project will be awarded the lesser amount of the per-unit amount requested by the project applicant, based on the actual rent costs per unit, or the FMR after adjustment.
 2. Funds awarded for operating and leasing in permanent housing projects will be increased based on the average increase in FMR amounts within the CoC's geographic area, weighted for population density. Because leasing and operating costs do not decrease relative to rent amounts for specific units (e.g., operating costs for 10 units that have rents of \$500 are likely the same as for 10 units that have rents that are \$450) adjustments to

leasing and operating line items will not include decreases if FMRs decrease in the geographic area. The operating and/or leasing budget line items in these projects will remain the same as in the most recent grant agreement or grant agreement amendment.

IV. Award Information

1. *Amount Allocated.* Approximately \$1.7 billion of FY 2013 funds is available for funding after adjustments were made due to sequestration. Carried over or recaptured funds from previous fiscal years, if available, may be added to this amount. For FY 2014, the level of funding for the CoC program is not yet known. When the level of funding is known for FY 2014, HUD will announce this amount through separate notice.
2. *Distribution of Funds.* The distribution of funds will depend largely on HUD selection priorities and CoC locally determined priorities, overall demand, and renewal eligibility.
 - a. *Renewals.* Awards made under the CoC Program, Supportive Housing Program (SHP), and Shelter Plus Care (S+C) are eligible for renewal for FY 2013 funds if they are currently operating and have a signed grant agreement with HUD that will expire during the period beginning January 1, 2014, and ending December 31, 2014. These projects are renewable under the CoC Program Competition as set forth in 24 CFR 578.33 of the interim rule to continue ongoing leasing, operating, supportive services, rental assistance, HMIS, and project administration costs.

Awards made under the CoC Program, Supportive Housing Program (SHP), and Shelter Plus Care (S+C) will be eligible for renewal for FY 2014 funds if they have a signed grant agreement with HUD that will expire during the period beginning January 1, 2015, and ending December 31, 2015. These projects are renewable under the CoC Program Competition as set forth in 24 CFR 578.33 of the interim rule to continue ongoing leasing, operating, supportive services, rental assistance, HMIS, and project administration costs. HUD will publish at a later date any additional application requirements and the deadline for FY 2014 funds determining which awards will be eligible for FY 2014 funds (see section I.B.2 of this NOFA for more information).

Applicants that were eligible under the SHP and S+C programs but are no longer eligible under the CoC Program, will continue to be eligible for renewal of leasing, operating, supportive service, rental assistance, HMIS and project administration costs under 24 CFR 578.33(d)(1), so long as their project continues to serve the same population and the same number of participants or units in the same type of housing as identified in their most recently amended grant agreement signed before August 30, 2012. No new Safe Haven projects will be funded; however, existing Safe Haven projects may be renewed to continue to carry out activities that are eligible costs under Subpart D of the CoC Program interim rule.

- b. *Grant terms.* The initial grant term for new project applications created through

reallocation may be 1-year, 2-years, 3-years, 4-years, 5-years, or 15-years. However, the following exceptions apply:

- (1) Any new project application created through reallocation that includes leasing—either leasing alone or leasing costs plus other costs (e.g. supportive services, HMIS, etc.)—may only request up to a 3-year grant term with funding for 3 years.
- (2) Any of the following new projects created through reallocation may request 1-year, 2-year, 3-year, 4-year, or 5-year grant terms with funding for the same number of years: operating costs, supportive services only, HMIS, and project administration.
- (3) Any new project applications created through reallocation that requests new construction, acquisition, or rehabilitation must request a minimum of a 3-year grant term and may request up to a 5-year grant term.
- (4) Any new projects created through reallocation requesting project-based rental assistance or sponsor-based rental assistance, or operating costs may request up to a 15-year grant term; however, the project applicants may only request up to 5 years of funds. Funding for the remainder of the term is subject to availability and applicants must apply for additional funds at such time and in such manner as HUD may require.
- (5) If an applicant requests funds for new construction, acquisition, or rehabilitation in addition to requesting funds for operating, supportive services, or HMIS, the funding will be for the 3 years requested, and the grant term will be 3 years plus the time necessary to acquire the property, complete construction, and begin operating the project. HUD will require recordation of a HUD-approved use and repayment covenant (a form may be obtained from the HUD CPD field office) for all grants of funds for new constructions, acquisition, and rehabilitation. (24 CFR 578.81)
- (6) All renewal project applications, including rental assistance, and CoC planning costs, are limited to 1-year grant terms and 1-year of funding.
- (7) All new CoC planning or UFA costs applications are limited to 1-year grant terms and 1-year of funding.

V. Eligibility Information

- A. **Eligible Project Applicants.** (24 CFR 578.15) Eligible project applicants for the CoC Program Competition are nonprofit organizations, States, local governments, and instrumentalities of State and local governments, and public housing agencies, as such term is defined in 24 CFR 5.100, without limitation or exclusion. For-profit entities are not eligible to apply for grants or to be subrecipients of grant funds.
- B. **Renewal Projects.** Awards made under the CoC Program, SHP, and S+C programs are eligible for renewal for FY 2013 funds if they are currently in operation and have a signed grant agreement with HUD which will expire during Calendar Year (CY) 2014 (the period from January 1, 2014, through December 31, 2014). HUD will not select renewal projects for an award for FY 2013 funds in the CoC Program Competition unless the grant agreement has been signed by both HUD and the recipient, and the project meets one of the following

additional eligibility requirements:

1. Any CoC Program, SHP, or S+C grants awarded in a preceding competition that expires in Calendar Year (CY) 2014 (the period from January 1, 2014, through December 31, 2014).
2. Any S+C grant awarded prior to FY 2002 for which funding is expected to run out in CY 2014, and which has never applied for renewal funding.
3. Any SHP or S+C grant originally awarded in the FY 2007 Competition and, notwithstanding the expiration date, that has funds expiring in CY 2014 or later and has not been renewed in a previous competition. Funds for these grants will no longer be available after September 30, 2014. The Line of Credit Control System (LOCCS) requires that all draws for the grants awarded in the FY 2007 Competition be made no later than September 22, 2014. Funds from these expiring grants will be recaptured and returned to the U.S. Treasury and will no longer be available for expenditure, even if the end date established in the grant agreement is beyond September 30, 2014. Recipients are prohibited from accelerating their spending rate to spend down funds by September 22, 2014. HUD CPD field offices will monitor draws for affected grants to ensure that funds will be drawn only to reimburse the affected recipients for actual costs incurred in accordance with the project budget on, or before, the LOCCS availability of funds deadline. Grants awarded in the FY 2007 Homeless Assistance Competition are not eligible for renewal in the CoC Program Competition if they expired, or are expiring, in CY 2013 (time period from January 1, 2013, through December 31, 2013), were not renewed in a previous competition, or were not approved for extension into CY 2014. Grants awarded in FY 2007 that have an expiration date beyond CY 2014 **must** apply for renewal in the CoC Program Competition. The only exception is for any grant awarded as Shelter Plus Care that included rehabilitation that has a 10-year grant, which will expire in FY 2016.
4. The total request for each renewing project may not exceed the ARA approved by HUD for that project. Because funds for acquisition, new construction, and rehabilitation may not be renewed, grants being renewed whose original expiring award included those funds may only renew leasing, supportive services, rental assistance, operating, and HMIS, costs and may not exceed 10 percent in administrative costs. For information on Annual Renewal Amount, see Section III.A.3 of this NOFA.
5. HUD will recapture grant funds remaining unspent at the end of the previous grant period when it renews a grant.
6. HUD encourages the consolidation of appropriate renewal grants when the grants are with the same recipient, have the same component and expire in the same year. However, projects that have not yet been consolidated must submit separate project applications for individual renewal grants. Where a recipient intends to consolidate renewal grants, this action can be accomplished by the HUD CPD field office at the point of renewal grant agreement execution. Projects that have outstanding audit findings or

that are poor performers cannot be consolidated. Further, any grant that applied to move from SHP leasing to rental assistance in the CoC Program Competition cannot be consolidated. This paragraph does not apply to CoCs that are designated by HUD as a UFA, since UFAs will enter into a single grant agreement with HUD for the entire geographic area.

7. Shelter Plus Care projects renewing for the first time under this NOFA are allowed to indicate a higher number of units than approved in the original application on the GIW during the CoC Registration process. However, in order for HUD to approve this increase, the applicant must have provided their local HUD CPD field office with copies of all executed leases to support the higher number of units. This must have been completed prior to Registration as the increase in units affected the project's ARA. HUD will consider the number of documented units under lease at the time of GIW submission the maximum number of units eligible for renewal in the FY CoC Program Competition.

C. New Projects.

1. Due to funding limitations, the only new projects that a CoC may apply for are those created through reallocation, CoC planning, and UFA costs (if applicable).
2. In order to expend funds within statutorily required deadlines, applicants funded for sponsor-based and project-based rental assistance must execute the grant award and begin providing rental assistance within 2 years. However, HUD strongly encourages all rental assistance to begin within 12 months of award. Applicants that are unable to begin rental assistance within the 12 month period should consult with the HUD CPD field office.
3. All applicants must meet statutory deadlines regarding the obligation of grant funds as stated in the HUD Appropriations Act. All subrecipients must meet applicant eligibility standards as described in Section V.E.2 of this NOFA. HUD will review project subrecipient eligibility as part of the threshold review process. Project applicants are required to submit documentation of subrecipients' eligibility with the application.

D. Matching. 24 CFR 578.73 provides the information regarding match requirements.

E. Other Project Eligibility Requirements.

1. **Statutory and Regulatory Requirements.** To be eligible for funding under this NOFA, project applicants must meet all statutory and regulatory requirements in the Act and CoC Program interim rule. Project applicants can obtain a copy of the Act and the CoC Program interim rule on the [OneCPD Resource Exchange](#) or by contacting the NOFA Information Center at 1-800-HUD-8929 (1-800-483-8929).
2. **Threshold Requirements:**
 - a. *Ineligible Applicants.* HUD will not consider an application from an ineligible

project applicant, including an application submitted for CoC planning funds or UFA costs from an applicant other than the Collaborative Applicant.

- b. DUNS Number Requirement.* All project applicants seeking funding under this NOFA must have a DUNS number and include the number in the Standard Form 424 (SF-424). The SF-424 must be submitted along with the project application in *e-snaps*. See Section III.C.2.b. of the General Section for additional information
- c. Active Registration in CCR/SAM.* All project applicants seeking funding under this NOFA must have an active CCR/SAM registration. HUD will not issue a grant agreement for awarded funds to a project applicant until an active CCR/SAM registration has been verified. See Section III.C.2.c. of the General Section for additional information.
- d. Project Eligibility Threshold.* HUD will review all projects to determine if they meet the following eligibility threshold requirements on a pass/fail standard. If HUD determines that the applicable standards are not met for a project, the project will be rejected from the competition. Any project requesting renewal funding will be considered as having met these requirements through its previously approved grant application unless information to the contrary is received (i.e., monitoring findings, results from investigations by the Office of Inspector General, etc.). Approval of renewal projects is not a determination by HUD that a recipient is in compliance with applicable fair housing and civil rights requirements.

 - (1) Project applicants and potential subrecipients must meet the eligibility requirements of the CoC Program as described in the CoC program interim rule and provide evidence of eligibility required in the application (e.g., nonprofit documentation).
 - (2) Project applicants and potential subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and to administer federal funds. Demonstrating capacity may include a description of the applicant/subrecipient experience with similar projects and with successful administration of other federal funds.
 - (3) Project applicants must submit the required certifications as specified in this NOFA.
 - (4) The population to be served must meet program eligibility requirements as described in the Act, and the project application must clearly establish eligibility of project applicants. This includes the following additional eligibility criteria for certain types of projects.

 - (a) The only persons who may be served by any permanent supportive housing projects are those who come from the streets, emergency shelters, safe havens, institutions, or transitional housing.

- i. Homeless individuals and homeless households with children coming from transitional housing must have originally come from the streets or emergency shelters.
 - ii. Homeless individuals and homeless households with children with a qualifying disability who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and are living in transitional housing are eligible for permanent supportive housing even if they did not live on the streets, emergency shelters, or safe havens prior to entry in the transitional housing. As participants leave currently operating projects, participants who meet this eligibility standard must replace them.
 - iii. Persons exiting institutions where they resided for 90 days or less and came from the streets, emergency shelter, or safe havens immediately prior to entering the institution are also eligible for PSH.
- (b) Rapid Re-housing projects awarded under the CoC Program must serve individuals and families coming from the streets or emergency shelter.
- (c) Projects originally funded as part of the FY 2008 Rapid Re-Housing for Families Demonstration must continue to adhere to the following requirements:
 - i. Must serve households with dependent children residing on the streets or emergency shelters.
 - ii. No more than 30 percent of the total eligible program activities may be used for supportive services, including case management.
 - iii. Eligible supportive services are limited to housing placement, case management, legal assistance, literacy training, job training, mental health services, childcare services, and substance abuse services.
 - iv. Eligible housing activities include leasing only.
 - v. Continue to participate in and provide requested information to HUD for evaluation.
- (d) Renewal projects originally funded under the Samaritan Housing Initiative must continue to exclusively serve 100 percent chronically homeless, unless there are no chronically homeless within the CoC geographic area. CoCs should not hold units vacant, but instead should prioritize other vulnerable and eligible households.
- (e) Renewal projects originally funded under the Permanent Housing Bonus must continue to serve the homeless population in accordance with the respective NOFA under which it was originally awarded.
- (f) Transitional housing and supportive services only projects may be eligible to use up to 10 percent of the total CoC funds to serve the homeless as

defined by other federal definitions. However, the CoC must be approved by HUD during the competition to serve the homeless as defined by other federal homeless definitions. No project may serve this population unless HUD approves the CoC during the competition. Section II.B.12 of this NOFA describes the process for gaining HUD approval to serve the homeless as defined under other federal definitions.

- (5) The project must be cost-effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.
 - (6) Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA costs, must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient cannot disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that meets the needs of the local HMIS.
 - (7) Whether project applicants administer their programs or activities in the most integrated setting appropriate to the needs of qualified homeless with disabilities. This means that programs or activities must be offered in a setting that enables the homeless with disabilities to interact with others without disabilities to the fullest extent possible.
- e. Project Quality Threshold.* HUD will review new project applications created through reallocation to determine if they meet the following project quality threshold requirements with clear and convincing evidence. Any project requesting renewal funding will be considered as having met these requirements through its previously approved grant application unless information to the contrary is received (i.e., monitoring findings, results from investigations by the Office of Inspector General, etc.). These projects are required to meet the requirements outlined in this section of the NOFA. The housing and services proposed must be appropriate to the needs of the program participants and the community. A determination that a project meets the project quality threshold is not a determination by HUD that a recipient is in compliance with applicable fair housing and civil rights requirements.
- (1) To be considered as meeting project quality threshold, new project applications created through reallocation must receive at least 5 points based on the criteria below. New project applications created through reallocation that do not receive at least 5 points will be rejected.
 - (a) Whether the type, scale, and location of the housing fit the needs of the program participants (1 point);
 - (b) Whether the type, scale, location of the supportive services, and the mode of transportation to those services fit the needs of the program participants (1

- point);
- (c) Whether the specific plan for ensuring program participants will be individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible to apply meets the needs of the program participants (1 point);
 - (d) Whether program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (1 point);
 - (e) Whether program participants are assisted to both increase their incomes and live independently using mainstream housing and service programs in a manner that fits their needs (1 point);
 - (f) Whether at least 75 percent of the proposed program participants come from the street or other locations not meant for human habitation, emergency shelters, or safe havens (1 point); and
 - (g) Whether amenities (e.g., grocery stores, pharmacies, etc.) are accessible in the community (1 point).
- (2) To be considered as meeting project quality threshold, the Collaborative Applicant's application for new CoC planning funds must receive at least 3 points based on the criteria below. Applications that do not receive at least 3 points will be rejected. Applications for UFA costs are not subject to a threshold review, as UFA status was determined as part of Registration.
- (a) The proposed planning activities that will be carried out by the CoC with grant funds are compliant with the provisions of 24 CFR 578.7 (2 points); and
 - (b) The funds requested will improve the CoC's ability to evaluate the outcome of both CoC Program-funded and ESG-funded projects (2 points).
- (3) Additionally, HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness, and performance standards. To be considered as meeting project quality threshold, all new projects must meet all of the following criteria:
- (a) Project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s), as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings;
 - (b) For expansion projects, project applicants must clearly articulate the part of the project that is being expanded. Additionally, the project applicants must clearly demonstrate that they are not replacing other funding sources; and
 - (c) Project applicants must demonstrate they will be able to meet all timeliness standards per 24 CFR 578.85. Project applicants with existing projects must demonstrate that they have met all project renewal threshold requirements of this NOFA. HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that is found to have significant issues related to capacity, performance, or unresolved

audit/monitoring finding related to one or more existing grants. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on the prior grant.

- f. Project Renewal Threshold.* A CoC must consider the need to continue funding for projects expiring in CY 2014 and CY 2015. Renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards identified in this NOFA or they will be rejected from consideration for funding. When considering renewal projects for award, HUD will review information in LOCCS; Annual Performance Reports (APRs); and information provided from the local HUD/CPD Field Office, including monitoring reports and A-133 audit reports as applicable, and performance standards on prior grants, and will assess projects using the following criteria on a pass/fail basis:
- (1) Whether the project applicant's performance met the plans and goals established in the initial application as amended;
 - (2) Whether the project applicant demonstrated all timeliness standards for grants being renewed, including that standards for the expenditure of grant funds have been met;
 - (3) The project applicant's performance in assisting program participants to achieve and maintain independent living and record of success, except HMIS-dedicated projects are not required to meet this standard; and
 - (4) Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site.

HUD reserves the right to reduce or reject a funding request from the project applicant for the following reasons:

- (a) Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
 - (b) Audit finding(s) for which a response is overdue or unsatisfactory;
 - (c) History of inadequate financial management accounting practices;
 - (d) Evidence of untimely expenditures on prior award;
 - (e) History of other major capacity issues that have significantly affected the operation of the project and its performance;
 - (f) History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and
 - (g) History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.
- g. Resolution of Outstanding Civil Rights Matters Threshold.* In order for a project application to be eligible for rating and ranking by HUD, the project applicant and the

proposed subrecipient must meet the civil rights threshold requirements in Section III.C.2.d. of the FY 2013 General Section.

- h. Certification of Consistency with the Consolidated Plan.* For each applicant that is not a State or unit of local government, the applicant must submit a certification by the jurisdiction in which the proposed project will be located that the applicant's application for funding is consistent with the jurisdiction's HUD-approved consolidated plan. The certification must be made in accordance with the provisions of the consolidated plan regulations at 24 CFR part 91, subpart F. Form HUD-2991 must be used and must list all new projects created through reallocation, CoC planning, UFA costs, and renewal projects within the jurisdiction that are consistent with the Consolidated Plan.

For a project applicant that is a State or unit of local government, the jurisdiction must certify that it is following its HUD-approved Consolidated Plan.

- 3. Other HUD Requirements.** The list below highlights requirements contained in the General Section (and in other regulations) that are especially important for CoCs and project applicants to review in detail. This is not an exhaustive list of all HUD requirements. All of the requirements of the General Section apply to the CoC Program, except as otherwise specified in this NOFA.

An applicant may obtain a copy of the General Section of HUD's FY 2013 NOFA and a copy of the General Section Technical Correction on line at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsave/2013gensec. Note that the General Section of HUD's FY 2013 NOFA is critical and must be carefully reviewed to ensure an application can be considered for funding, with the exception of reference to the www.grants.gov application process and other exceptions specifically listed in this NOFA. The CoC Program uses an electronic system outside of www.grants.gov called *e-snaps*. Notification of the availability of the application will be released via HUD's websites located at www.hud.gov and www.onecpd.info. To sign up for HUD's CoC Program email-based listserv, go to www.onecpd.info/maillinglist/.

- a. Fair Housing and Equal Opportunity.* See 24 CFR 578.93 for specific requirements related to Fair Housing and Equal Opportunity.
- b. Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity.* See the *Federal Register* dated February 1, 2012, Docket No. FR 5359-F-02 and Section III.C.3.g. of the General Section.
- c. Debarment and Suspension.* See Section III.C.2.e. of the General Section. Additionally, it is the responsibility of the recipient to ensure that all subrecipients are not debarred or suspended. (24 CFR 578.23((3)(c)(4)(v))
- d. Delinquent Federal Debts.* See Section III.C.2.g. of the General Section.
- e. Compliance with Fair Housing and Civil Rights.* See Section III.C.3.a. of the General Section.
- f. Executive Order 13166, "Improving Access to Services for Persons with Limited*

- English Proficiency (LEP)*. See Section III.C.3.c. of the General Section.
- g. *Economic Opportunities for Low- and Very Low-income Persons (Section 3)*. See Section III.C.3.d. of the General Section.
 - h. *Real Property Acquisition and Relocation*. See Section III.C.3.i. of the General Section.
 - i. *Conducting Business in Accordance with Core Values and Ethical Standards/Code of Conduct*. See Section III.C.3.j. of the General Section.
 - j. *Prohibition Against Lobbying Activities*. See Section III.C.3.k. of the General Section.
 - k. *Participation in HUD-Sponsored Program Evaluation*. See Section III.C.3.m. of the General Section.
 - l. *Environmental Requirements*. Notwithstanding provisions at 24 CFR 578.31 and 24 CFR 578.99(a) of the CoC Program interim rule, and in accordance with Section 100261(3) of MAP-21 (Pub. L. 112-141, 126 Stat.404), activities under this NOFA are subject to environmental review by a responsible entity under HUD regulations at 24 CFR part 58.
 - (1) For activities under a grant to a recipient other than a State or unit of general local government that generally would be subject to review under part 58, HUD may make a finding in accordance with 24 CFR 58.11(d) and may itself perform the environmental review under the provisions of 24 CFR part 50 if the recipient objects in writing to the responsible entity's performing the review under part 24 CFR part 58.
 - (2) Irrespective of whether the responsible entity in accord with 24 CFR part 58 (or HUD in accord with 24 CFR part 50) performs the environmental review, the recipient must supply all available, relevant information necessary for the responsible entity (or HUD, if applicable) to perform for each property any required environmental review. The recipient also must carry out mitigating measures required by the responsible entity (or HUD, if applicable) or select alternative property.
 - (3) The recipient, its project partners, and their contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this NOFA, or commit or expand HUD or local funds for such eligible activities under this NOFA, until the responsible entity (as defined by 24 CFR 58.2(a)(7)) has completed the environmental review procedures required by 24 CFR part 58 and the environmental certification and Request for Release of Funds (RROF) have been approved or HUD has performed an environmental review under 24 CFR part 50 and the recipient has received HUD approval of the property. HUD will not release grant funds if the recipient or any other party commits grant funds (i.e., incurs any costs or expenditures to be paid or reimbursed with such funds) before the recipient submits and HUD approves its RROF (where such submission is required).
 - m. *Drug-Free Workplace*. See Section III.C.3.q. of the General Section.
 - n. *Safeguarding Resident/Client Files*. See Section III.C.3.s. of the General Section.
 - o. *Compliance with the Federal Funding Accountability and Transparency Act of 2006*

(Pub. L. 209-282) (*Transparency Act*), as amended. See Section III.C.3.u. of the General Section.

- p. **Lead-Based Paint Requirements.** For housing constructed before 1978 (with certain statutory and regulatory exceptions), CoC Program recipients must comply with the requirements of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801, *et seq.*), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851, *et seq.*); and implementing regulations of HUD, at 24 CFR part 35; the Environmental Protection Agency (EPA) at 40 CFR part 745, or State/Tribal lead rules implemented under EPA authorization; and the Occupational Safety and Health Administration at 29 CFR 1926.62 and 29 CFR 1910.1025.

VI. Application and Submission Information

- A. **Application Package.** The submission summary in *e-snaps* provides the list of elements required to complete each part of the application. A Collaborative Applicant will not be able to submit an application to HUD until all required parts are completed. Once available, the CoC Consolidated Application, including the CoC Application, Project Application, and Priority Listings may be accessed at www.hud.gov/esnaps.

Content and Form of Application Submission. The CoC Consolidated Application for funds under this NOFA includes a FY 2013/FY 2014 CoC Application, which describes the CoC's plan for ending homelessness, its system-level performance, and addresses the selection criteria specified in Section VII of this NOFA; Project Applications for the project(s) that the CoC listed on its Priority Listings; and the Priority Listings which contain all project applications submitted to the CoC for funding consideration that are either ranked or rejected. As stated in Section I.B of this NOFA, CoCs will be required to submit separate Project Applications and Priority Listings for 2013 and 2014 funds. CoCs will not be required to submit a new CoC Application for 2014 funds. Additional information on the process for FY2014 funds will be published through separate Notice.

1. **CoC Consolidated Application.** An entire CoC Consolidated Application must be submitted by the Collaborative Applicant on behalf of the CoC. The application will include the following parts, all of which will be submitted electronically either through *e-snaps* or as an uploaded attachment (for more information see the Training on *e-snaps* at <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>) to be considered for funding:
- a. The FY 2013/FY 2014 CoC Application, including:
 - (1) The CoC plan with all charts and narratives completed as applicable;
 - (2) All required attachments, including:
 - a. Form HUD-2991, Certification of Consistency with the Consolidated Plan. For each applicant that is not a state or unit of local government, the applicant must submit a certification by the jurisdiction in which the proposed project will be located that the applicant's application for funding is consistent with the jurisdiction's HUD-approved consolidated plan. Form HUD-2991 must be used and must include a list of all projects submitted for funding on the

- CoC's Priority Listings;
 - b. HUD-approved GIW;
 - c. CoC Ranking Process Document, that was made publically available to all project applicants before the application submission deadline;
 - d. CoC Governance Charter for HMIS;
 - e. Copy of Public Solicitation for Project Applications;
 - f. List of Projects to Serve persons defined as homeless under paragraph 3 of the homeless definition (if funding to serve this population is requested); and
 - g. List of Permanent Supportive Housing Projects that have agreed to and will prioritize the chronically homeless, as well as the number/percentage of units for each project made available through turnover.
- b. 2013 Project Application(s), including, for each project application:
- (1) Project application charts, narratives, and attachments;
 - (2) SF-424 Application for Federal Assistance;
 - (3) The SF-424 Supplement, Survey on Ensuring Equal Opportunities for Application is for private nonprofit applicants only and completion/submission of this survey is voluntary;
 - (4) Documentation of Applicant and Subrecipient Eligibility. All project applicants must attach documentation of eligibility. Subrecipient eligibility must also be attached to the project application.
 - (5) Applicant Certifications;
 - (6) Form HUD-2880, Applicant/Recipient Disclosure/Update Report must be attached for each project. Form HUD-2880 must include the correct amount of HUD assistance requested and must be dated no earlier than September 1, 2013;
 - (7) SF-LLL, Disclosure of Lobbying of Activities (if applicable);
 - (8) Applicant Code of Conduct. The Code must be attached in *e-snaps* or on file with HUD at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/conduct; and
 - (9) Form HUD-50070, Certification for a Drug-Free Workplace dated no earlier than September 1, 2013.
- c. The 2013 Priority Listings, including the ranking of all project applications approved by the CoC to be submitted with the CoC Consolidated Application, **with every project assigned a unique rank number.**
2. Solo applicants—eligible project applicants that attempted to participate in the CoC planning process in the geographic area in which they operate, that believe they were denied the right to participate in a reasonable manner—may submit an application to HUD and may be awarded a grant from HUD by following the procedure found in 24 CFR 578.35. Solo applicants must submit their project application to HUD by 7:59:59 p.m. eastern time, **February 3, 2014** or, for FY 2014 project applications, the deadline in the subsequent Notice published by HUD.
3. The General Section of HUD's FY 2013 NOFA contains certifications that the applicant

will comply with fair housing and civil rights requirements, program regulations, and other federal requirements, and (where applicable) that the proposed activities are consistent with the HUD-approved Consolidated Plan of the applicable State or unit of general local government.

B. Submission Dates and Times.

1. Application Deadline Date

- a. Completed applications must be submitted to HUD on or before 7:59:59 p.m. eastern time on **February 3, 2014**. The deadline for submitting the documentation required for FY 2014 funds will be set by notice, but the deadline will be no earlier than 60 days after Congress enacts an appropriation funding the Department for the balance of FY 2014. See Section I.B.2 of this NOFA for information about applying for FY 2014 funds.
- b. Provisions at 24 CFR 578.9 require CoCs to design, operate, and follow a collaborative process for the development of an application in response to a NOFA issued by HUD. As part of this collaborative process, CoCs must implement internal competition deadlines to ensure transparency and fairness at the local level. The implementation of deadlines that meet the standards outlined below for FY2013 Project Applications will be considered as part of scoring criteria as detailed in Section VII.A.4.f.
 - (1) *Project Applicants*. All project applications were required to be submitted to the CoC no later than 30 days before the application deadline.
 - (2) *CoC Notification to Project Applicants*. The CoC notified all project applicants no later than 15 days before the application deadline regarding whether their project applications would be submitted as part of the CoC Consolidated Application. Any project applicants that were rejected by the CoC must be notified in writing, outside of *e-snaps*, with an explanation for the decision to reject the project application. CoCs that fail to provide such notice will not receive the maximum number of points available in Section VII.A.4.f.
- c. All applicants may access the OneCPD Ask A Question (AAQ) any time prior to 7:59:59 p.m. Eastern Time, on the application submission deadline date for FY 2013 funds. Applicants that are experiencing technical difficulty should contact the AAQ immediately for assistance and document their attempts to obtain assistance. HUD strongly encourages CoCs to allow ample time to resolve any technical difficulties that may be encountered during the submission of the application to HUD. Applicants should not wait until the final minutes before the application submission deadline to submit CoC Consolidated Application.
- d. In order for the CoC Consolidated Application to be considered complete and properly submitted for review by HUD in the CoC Program Competition, the Collaborative Applicant must submit the entire CoC Consolidated Application by the

submission deadline which includes: the FY 2013/FY 2014 CoC Application, the CoC Priority Listings, and the project applications on behalf of the CoC. Under this NOFA, the CoC Priority Listings continue to be a separate submission in *e-snaps* in order to improve system performance. Note that the “**Submit**” button will not be available on the Submission Summary of the FY 2013/FY 2014 CoC Application until all required sections of the application have been completed. Collaborative Applicants should review the Submission Summary form carefully to ensure that no sections state “Please Complete.” **The CoC Priority Listings are a separate submission; therefore, CoCs must ensure that the FY 2013/FY 2014 CoC Application and the CoC Priority Listings, along with the applicable Project Applications, are submitted in *e-snaps* prior to the application deadline.**

- e. Collaborative Applicants must print a copy of the Submission Summary form from both the FY 2013/FY2014 CoC Application and the CoC Priority Listings before closing their internet browser after the FY 2013/FY 2014 CoC Application and CoC Priority Listings have been submitted to HUD. This is the Collaborative Applicant’s receipt of submission and proof of compliance with the application deadline. Collaborative Applicants whose applications are determined to be late and that are unable to provide HUD with a record of submission that verifies the FY 2013/FY 2014 CoC Application and CoC Priority Listings were submitted prior to the application deadline date and time will not receive funding consideration.
- f. HUD strongly suggests that applicants utilize the “Export to PDF” functionality of *e-snaps* to print a hard copy of all submission documents for their records. This can be completed prior to or after submission.

C. Intergovernmental Review. Not Applicable.

D. Funding Restrictions. Not Applicable.

E. Other Submission Requirements

1. **Waiver of Electronic Submission Requirements.** The regulatory framework of HUD’s electronic submission requirement is the final rule established in 24 CFR 5.1005. CoCs seeking a waiver of the electronic submission requirement must request a waiver in accordance with 24 CFR 5.1005. HUD regulations allow for a waiver of the electronic submission requirement for good cause. For the Continuum of Care Program Competition, HUD is defining good cause as follows:
 - a. there are no computers that could be used by applicants and/or the Collaborative Applicant that are newer than 5 years old anywhere within the CoC’s geographic area, or
 - b. there are no computers that could be used by applicants and/or the Collaborative Applicant anywhere within the CoC’s geographic area, or
 - c. there is no internet access that could be used by applicants and/or the Collaborative Applicant anywhere within the CoC’s geographic area. HUD will grant waivers only

at the CoC level and not at the individual project applicant level, and only to CoCs that were approved by HUD during the required CoC Registration process.

If the waiver is granted, the Office of Special Needs Assistance Programs' response will include instructions on how many copies of the paper application must be submitted, as well as where to submit them. CoCs that are granted a waiver of the electronic submission requirement will not be afforded additional time to submit their applications. Therefore, Collaborative Applicants seeking a waiver of the electronic submission requirement on behalf of the CoC should submit their waiver request with sufficient time to allow HUD to process and respond to the request. Collaborative Applicants should also allow themselves sufficient time to submit the application on behalf of the CoC so that HUD receives the application by the established deadline date. For this reason, HUD strongly recommends that if a Collaborative Applicant finds it cannot submit its application electronically and must seek a waiver of the electronic grant submission requirement, it should submit the waiver request to the Office of Special Needs Assistance Programs no later than 30 days after the publication date of this NOFA. To expedite the receipt and review of each request, Collaborative Applicants may fax their written requests to Ann Marie Oliva, Director at (202) 401-0053. If HUD does not have sufficient time to process the waiver request, a waiver will not be granted. Paper applications received without a prior approved waiver and/or after the established deadline will not be considered.

VII. Application Review Information

A. Criteria. CoC Consolidated Applications will be assessed based on a **150** point scale, plus a possible 6 bonus points. Per Section I. B. 2 of this NOFA, higher scoring CoCs have a better chance of being awarded projects ranked in Tier 2, depending on the availability of carryover or recaptured funds to be made available under this CoC Program Competition. No Collaborative Applicants have exercised the authority under section 422(j) of the Act. Therefore, no selection criteria based on section 427(b)(1)(A)(viii) is included in this NOFA. Additionally, for purposes of the requirements of section 427(b)(1)(B)(iv)(II) of the Act, HUD considers "all relevant subpopulations" to mean families, youth, veterans, victims of domestic violence, the unsheltered homeless, and the chronically homeless.

- 1. CoC Strategic Planning and Performance:** In this section HUD will award up to 69 points based upon the CoC's plan for and progress to reduce homelessness in its geographic area and decreasing the number of recurrences of homelessness, with a focus on chronic homelessness, particularly those who have had the longest experiences of homelessness.

As found in section 427(b)(1)(A) of the Act, CoCs will be evaluated on performance related to reducing homelessness, including performance for projects funded through the Emergency Solutions Grants program in the geographic area. Section 427(b)(1)(B) of the Act outlines required selection criteria regarding the CoC's plan to meet specific goals. HUD will award a minimum of 34.5 out of the 69 points available in this section (VII.A.1) to CoCs with projects that have been impacted by a major disaster, as declared under Title IV of the Robert T. Stafford Act, in the 12 months prior to the opening of the

CoC Program Competition. Those CoCs in impacted areas must notify HUD in writing prior to the close of this CoC Program Competition. Send written notification to Ann Marie Oliva, Director, Office of Special Needs Assistance Programs, U.S. Department of Housing and Urban Development, 451 Seventh Street, SW Room 7256 Washington, DC, 20410.

- a. **Ending Chronic Homelessness.** Under this NOFA, HUD will award up to 16 points to CoCs based on the extent in which CoCs furthers the achievement of HUD's goals as articulated in HUD's Strategic Plan and *Opening Doors* through planning and performance. The first goal in *Opening Doors* is to end chronic homelessness by 2015. CoCs will be evaluated based on the extent to which they are making progress to achieve this goal within the specified time frame. HUD will award up to:
- (1) 3 points for CoCs that increased the total number of PSH beds dedicated for use by the chronically homeless as reported in the FY 2012 CoC Application.
 - (2) 2 points for CoCs that demonstrate and commit to a continued increase in the total number of PSH beds dedicated for use by the chronically homeless in 2014 and 2015.
 - (3) 2 points for CoCs that demonstrate they are currently prioritizing the chronically homeless in at least 30 percent of the existing PSH units that are not dedicated to serving the chronically homeless in the CoC, and that are made available through turnover. Maximum points will be awarded to CoCs that currently prioritize admission for the chronically homeless in at least 85 percent of the non-dedicated PSH units that are made available through turnover.
 - (4) 5 points for CoCs that commit to increasing the percentage of turnover in non-dedicated PSH units in which the chronically homeless are prioritized or if the commitment rate identified in this CoC Program Competition is currently at 85 percent, the CoC must maintain the 85 percent prioritization rate in 2014 and 2015. The numeric goals indicated here must be achievable as the CoC will be measured against these goals in future CoC Program Competitions through the use of the HIC and PIT data submitted in HDX. CoCs will be required to attach a list of project(s) to the FY 2013/FY 2014 CoC Application, including the name of the project(s) and indicating the number/percentage of units per project, that will commit to prioritizing PSH units specifically for the chronically homeless as PSH units are vacated by the existing participant to meet this CoC-wide goal.
 - (5) 4 points for CoCs that provide a clear description of the CoC's plan between 2014 and 2015 to increase the number of PSH beds available for the chronically homeless, and that outlines specific strategies and actions the CoC will take to achieve the goal of ending chronic homelessness by 2015. Additionally, to receive the full points, CoCs must clearly identify the individual, organization, or committee that will be responsible for implementing this goal.
- b. **Housing Stability.** Achieving housing stability – the ability to obtain and maintain permanent supportive housing or permanent housing – is critical for the homeless. HUD will award up to 10 points to CoCs based on the extent to which they demonstrate successful performance and further planning for this objective. HUD

will award up to:

- (1) 4 points for CoCs that demonstrate for 2013 that at least 80 percent of CoC Program participants either remained in permanent housing, or exited from transitional housing to permanent housing (as reported in APRs submitted to HUD between October 1, 2012, and September 30, 2013).
 - (2) 3 points for CoCs that indicate that they will increase the percentage of CoC Program participants who remained in or exited to permanent housing to at least 80 percent in 2014 and 2015. The numeric goals indicated here must be achievable as the CoC will be measured against these goals in future competitions.
 - (3) 3 points for CoCs that provide a clear description of the CoC's plan between 2014 and 2015 to improve the housing stability of participants in its CoC Program-funded projects, and that address the specific strategies and actions the CoC will take to meet the numeric achievements proposed for 2014 and 2015. Additionally, CoCs must clearly identify the individual, organization, or committee that will be responsible for implementing this goal in order to receive full points.
- c. Jobs and Income Growth.** HUD will award up to 8 points to CoCs based on the extent in which CoC Program-funded projects assist project participants to increase income, which is one way to ensure housing stability and decrease the possibility of returning to homelessness. HUD will award up to:
- (1) 2 points for CoCs that clearly demonstrate that participants in all CoC Program-funded projects obtained employment income during program participation as reported in all APRs submitted to HUD between October 1, 2012, and September 30, 2013. Maximum points will be awarded to CoCs where 20 percent or more of participants in CoC Program-funded projects have employment income.
 - (2) 1 point for CoCs that clearly demonstrate that participants in all CoC Program-funded projects increased their income from sources other than employment (as recorded in all APRs submitted to HUD between October 1, 2012, and September 30, 2013). Maximum points will be awarded to CoCs where 54 percent or more of participants in CoC Program funded projects have income from sources other than employment
 - (3) 1 point for CoCs that indicate they will increase (or maintain) the percentage of participants in CoC Program-funded projects who increase their income through employment in a given operating year to at least 20 percent in 2014 and 2015. The numeric goal indicated here must be achievable as the CoC will be measured against these goals in future competitions.
 - (4) 1 point for CoCs that indicate that they will increase (or maintain) the percentage of participants in CoC Program-funded projects who increase their income from sources other than employment in a given operating year to at least 54 percent in 2014 and 2015. The numeric goal indicated here must be achievable as the CoC will be measured against these goals in future competitions.
 - (5) 3 points for CoCs that provide a clear description of the CoC's plan between

2014 and 2015 to increase the percentage of project participants in all CoC Program-funded projects that increase their incomes from both employment and non-employment sources between. Additionally, CoCs must clearly identify the individual, organization, or committee that will be responsible for implementing this goal in order to receive full points.

- d. **Mainstream Benefits.** HUD will award up to 7 points to CoCs based on the extent in which their CoC Program-funded projects assist project participants to obtain mainstream benefits, which is one way to ensure housing stability and decrease the possibility of returning to homelessness. HUD will award up to:
- (1) 2 points for CoCs that demonstrate that participants in CoC Program funded projects increase their mainstream benefits during program participation (as reported in all APRs submitted to HUD between October 1, 2012, and September 30, 2013). Maximum points will be awarded to CoCs where at least 56 percent of participants obtain mainstream benefits.
 - (2) 2 points for CoCs that indicate that they will increase (or maintain) the percentage of participants in CoC Program funded projects who increase their mainstream benefits in a given operating year in 2014 and 2015. In order to receive the full points, CoCs must either have a rate of at least 56 percent that is maintained, or show a numerical increase from 2013 to 2015. The numeric goal indicated here must be achievable as the CoC will be measured against these goals in future competitions.
 - (3) 3 points for CoCs that provide a clear description of the CoC's plan in 2014 and 2015 to increase the percentage of project participants in all CoC Program funded projects that obtain mainstream. Additionally, CoCs must clearly identify the individual, organization, or committee that will be responsible for implementing this goal in order to receive full points.
- e. **Rapid Re-Housing.** Rapid re-housing allows the homeless to be provided permanent housing quickly without spending long periods in shelter or transitional housing. HUD will award up to 10 points to CoCs based on the extent in which they are implementing a rapid re-housing model to reduce the number of homeless households with children. HUD will award up to:
- (1) 3 points for CoCs that plan to increase in the number of homeless households with children assisted through rapid re-housing programs between 2013 and 2015.
 - (2) 3 points for CoCs that provide a clear description of how the CoC will increase the number of homeless households with children that are assisted with rapid re-housing (through the CoC Program, Emergency Solutions Grants program, or other sources), in 2014 and 2015, including specific strategies and actions the CoC will take to meet the numeric achievements being proposed. Additionally, CoCs must clearly identify the individual, organization, or committee that will be responsible for implementing this goal in order to receive full points.
 - (3) 4 points to CoCs that provide a clear description of the written policies and

procedures for determining and prioritizing which eligible homeless households will receive rapid re-housing assistance, the amount or percentage of rent that each program participant must pay, how often the rapid re-housing projects contact and assess program participants residing in these projects, and whether the rapid re-housing project(s) follow-up with the program participants after assistance ends. CoCs will be assessed on the responses as they pertain to both the CoC Program and the ESG Program.

- f. **Opening Doors.** HUD will award up to 3 points to CoCs that demonstrate how it is including the goals of *Opening Doors* in local plans established to prevent and end homelessness, including what steps the CoC is taking to assess existing barriers to entry and how they plan to remove them.
 - g. **Ending Family Homelessness.** HUD will award up to 4 points to CoCs that demonstrate the efforts to reduce the number of homeless households with children, including an outreach plan to reach this population.
 - h. **Addressing the Needs of Victims of Domestic Violence.** HUD will award up to 2 points to CoCs that demonstrate current efforts to address the needs of victims of domestic violence, including their families which include a clear description of services and safe housing from all funding sources that are available within the CoC to serve this population.
 - i. **Ending Youth Homelessness.** HUD will award up to 2 points to CoCs that demonstrate current efforts to address youth homelessness, including a clear description of services and housing from all funding sources that that are available within the CoC this population, and the extent to which resources are available for all youth or only specific to youth between the ages of 16 to 17 or 18 to 24.
 - j. **Reaching Unsheltered Homeless.** HUD will award up to 3 points to CoCs that demonstrate efforts to identify and engage the homeless who routinely sleep on the streets or in other places not meant for human habitation, including the CoC's outreach plan.
 - k. **Ending Veteran Homelessness.** HUD will award up to 4 points to CoCs that demonstrate the extent to which they are partnering or collaborating with HUD-VASH programs that are operating in the CoC's geographic area. Additionally, CoCs should specifically describe how they are combating homelessness among veterans and their families, particularly those who are not eligible for homeless assistance through the U.S. Department of Veterans Affairs programs. In order to receive maximum points, CoCs must include a complete description of services and housing available for veterans from all funding sources.
2. **CoC Coordination of Housing and Services.** HUD will award up to a total of 28 points based on the extent to which the CoC demonstrates that it coordinates its housing and service resources with other systems of care that serve the homeless, and that housing and

services within the CoC are coordinated.

- a. **Preventing Homelessness:** HUD will award up to 2 points to CoCs that thoroughly describe the CoC's strategy to reduce the number of individuals and families who become homeless and describe the success of the CoC at reducing the number of individuals and families who become homeless. To receive full points, CoCs must provide a brief narrative that specifically describes the current homelessness prevention efforts in place within the CoC's entire geographic area, and how the jurisdictional Consolidated Plan(s) addresses issues and programs that are designed to reduce the number of individuals and families who become homeless. This narrative should include a discussion of any barriers to fair housing choice identified in the jurisdictions' Analyses of Impediments that related to homeless populations. As part of the narrative, CoCs must describe how they coordinated with the Emergency Solutions Grants projects within their geography.
- b. **Discharge Planning.** HUD will award up to 4 points to CoCs that clearly demonstrate how they coordinate with and/or assist in State or local discharge planning efforts to ensure that those discharged are not released directly to the streets, emergency shelters, or other McKinney-Vento Homeless assistance programs. CoCs must clearly indicate if there is a discharge policy in place mandated by the State or adopted by the CoC, specifically describe the efforts taken by the CoC against the routine discharge into homelessness and specifically identify the stakeholders and/or collaborating organizations that are responsible for ensuring there is a comprehensive discharge policy in place and followed for the following:
 - (1) 1 point for foster care;
 - (2) 1 point for health care;
 - (3) 1 point for mental health; and
 - (4) 1 point for corrections.
- c. **Consolidated Plan.** HUD will award up to 2 points to CoCs where the Consolidated Plan for the jurisdiction(s) within the CoC includes the CoC's strategic plan goals for addressing and reducing homelessness. To receive maximum points, CoCs must specifically list the goals that pertain to addressing and reducing homelessness.
- d. **Emergency Solutions Grants.** HUD will award up to 3 points to CoCs that demonstrate how the CoC consults with ESG jurisdiction(s) within the CoC geographic area to determine how ESG funds are allocated, coordination with ESG recipients and how ESG-funded projects are evaluated.
- e. **Coordination with Other Funding Sources.** Coordination with other programs that provide housing and services to the homeless is critical to reducing homelessness in the CoC's geographic area. HUD will award up to 1 point to CoCs that clearly demonstrate coordination with other Federal, State, local, private, and other entities serving the homeless and those at risk of homelessness in the planning and operation of projects. The CoC must clearly and specifically describe how it participates in and/or coordinates with other funding and service opportunities that include, but are

not limited to Housing Opportunities for Persons with AIDS, Temporary Assistance for Needy Families (TANF), Runaway and Homeless Youth, Head Start programs, philanthropic organizations and foundations, and other housing and service programs funded through Federal, State, or local government resources.

- f. Public Housing Agencies.** Coordinating and engaging with Public Housing Agencies (PHAs) in a meaningful way is strongly encouraged. HUD will award up to 2 points to CoCs that can clearly demonstrate how they are currently engaged with or are attempting to engage with local PHA(s). Maximum points will be awarded to CoCs that can demonstrate ways in which they are partnering with one or more PHA in efforts to prevent and end homelessness.
- g. Housing First Approach.** HUD will award up to 3 points to CoCs based on the extent to which the CoC uses a Housing First approach. To receive maximum points, at least 75 percent of the CoC's permanent supportive housing project applications submitted for FY2013 funds must report that they follow a Housing First approach, and the CoC must describe specific steps it has taken to implement this approach in permanent supportive housing CoC-wide.
- h. Centralized or Coordinated Assessment System.** CoCs should have a centralized or coordinated assessment system covering the CoC's geographic area. HUD will award up to 2 points to CoCs that can demonstrate the existence of a centralized or coordinated assessment system and describe how the system is used to ensure that the homeless are placed in the appropriate housing and service types based on their level of need.
- i. Affirmatively Furthering Fair Housing.** HUD will award up to 2 points to CoCs that demonstrate recipients have implemented specific strategies that affirmatively further fair housing as detailed in 24 CFR 578.93(c).
- j. Educational Assurances.** HUD will award up to 2 points to CoCs that specifically describe how the CoC collaborates with local education authorities to assist in the identification of individuals and families who become or remain homeless and are informed of the eligibility for services under subtitle B of title VII of the Act (42 U.S.C. 11432 et. seq.). This includes demonstrating that the CoC has established policies that require homeless assistance providers to ensure all children are enrolled in early childhood programs or in school and connected to appropriate services in the community. HUD will award maximum points to CoCs that demonstrate that the CoC actively collaborates with local school districts and early childhood education providers to identify homeless households with children to ensure they understand their eligibility for educational services. CoCs must also demonstrate that ESG recipients are involved in this effort.
- k. Preventing Involuntary Family Separation.** Maintaining family unity is important when homeless households with children under the age of 18 enter homeless shelters or housing. HUD will award CoCs up to 2 points that demonstrate that the CoC is

narrative must indicate how data from CoC and ESG funded projects are considered as well as how non-HUD funded projects are included.

- e. **Outreach.** HUD will award up to 1 point to CoCs that demonstrate a thorough plan for reaching homeless individuals and families. To receive the full point, the CoC must provide information that demonstrates that 100 percent of the geographic area is considered, and that describes the specific outreach procedures in place that are used by the homeless service agencies to identify and engage homeless individuals and families, including their efforts to provide meaningful outreach to persons with disabilities and persons with limited English proficiency. Applicants must describe the procedures they will use to market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach.
 - f. **Tracking and Reducing Returns to Homelessness.** HUD will award up to 2 points to CoCs that provide information to HUD on the extent to which individuals and families leaving homelessness experience additional spells of homelessness and specifically describe how the number of individuals and families who return to homelessness will be reduced in the community. In order to receive full points, the CoC must demonstrate the use of HMIS, or a comparable database, within the CoC to monitor and record returns to homelessness by participants who exit rapid rehousing, transitional housing, and permanent supportive housing. Additionally, the CoC will be assessed on the processes that have been implemented by CoCs to reduce the number of additional returns to homelessness once the homeless have exited the homeless system.
4. **CoC Housing, Services, and Structure.** HUD will award up to 13 points to CoCs based on the extent to which a CoC demonstrates the existence of a coordinated, inclusive, and outcome-oriented community process, including an organizational structure(s) and decision making process for developing and implementing a CoC strategy that is inclusive of representatives from both the private and public sectors; has a fair and impartial project review and selection process; and has created, maintained and built upon a community-wide inventory of housing for the homeless.
- a. **CoC Meetings.** HUD will award up to 2 points to CoCs that can clearly demonstrate that they conduct regular meetings that are open to the public and inclusive of the homeless and/or formerly homeless.
 - b. **Complaints.** CoC will receive up to 2 points if they did not receive any written complaints from recipients, subrecipients, applicants, or other members of the CoC as they relate to 24 CFR 578.7 and 578.9 within the 12 months before the CoC Program Application submission deadline. In the event the CoC did receive complaints, the Collaborative Applicant must address whether the complaints were resolved in a manner that was satisfactory and without retaliation to the entity who lodged the complaint. If the CoC indicates that no complaints were received as described above, but the local HUD CPD field office or HUD Headquarters is aware of complaints, the

CoC will not receive points for this section.

- c. Inclusive Structure.** CoCs must demonstrate an inclusive structure and application process. Each CoC will be scored on the extent to which it:
- i. considers the full range of opinions from individuals or entities with knowledge of homelessness in the geographic area or an interest in preventing or ending homelessness in the geographic area when establishing CoC-wide committees, subcommittees, and workgroups. HUD will award up to 1 point to CoCs that demonstrate the most active CoC-wide committees, subcommittees, and workgroups established within the CoC that are directly involved in addressing homelessness prevention, as well as the goals for ending homelessness.
 - ii. is open to proposals from entities that have not previously received funds in prior Homeless Assistance Grants competitions. HUD will award up to 1 point to CoCs that clearly and specifically describe how the CoC works with homeless services providers that have expressed an interest in applying for HUD funds and what steps it takes to discuss and review proposals as well as provide valuable feedback and guidance.
- d. Project Application Performance Metrics.** Each CoC will be scored based on the extent to which it reviews and ranks projects using periodically collected data on the projects within the CoC in order to conduct analysis on the effectiveness of each project and to determine the extent to which each project has resulted in rapid return to permanent housing for those served by the project, taking into account the severity of barriers faced by the project participants. CoCs that provide a brief narrative that specifically describes the current or proposed efforts in place by the CoC to collect information and analyze the results will receive maximum points. HUD will award up to 2 points to CoCs that are able to provide a clear description of the current processes in place or how they propose to collect and analyze the information.
- e. Accuracy of GIW.** Accurate GIWs are necessary for HUD to determine the final ARD amount for each CoC and, therefore, to determine the total national annual renewal demand for the CoC Program. To that end, HUD will award 1 point to CoCs that attach the final GIW that was approved by HUD either during CoC Registration or, if applicable, during the 7-day grace period following the publication of the CoC Program NOFA without changes. No points will be awarded to CoCs that attach a GIW that is not consistent with the final HUD-approved GIW.
- f. Ranking and Selection Process.** HUD will award up to 3 points to CoCs that demonstrate the use of a ranking and selection process for project applications that is based on objective criteria and that have been publicly announced by the CoC, including published written policies and procedures that include dated meeting minutes. The CoC will be required to submit written documentation of a rating and ranking/review process for all projects (new and renewal). This may be published

written policies and procedures for this CoC Program Competition in the CoC governance charter or a standalone document. Evidence of the rating and ranking/review process decision must be presented via dated meeting minutes and evidence that the meeting minutes were made available to the CoC's full membership. Additionally, the CoC must post on its website all parts of the CoC Consolidated Application, including the Priority Listings, before the submission deadline and notify community members and key stakeholders that the application is available. CoCs that do not have a website, must post this information to a partner website within the CoC (e.g., county/city website). In the event that HUD is notified and confirms that a CoC did not notify project applicants who submitted their project applications to the CoC by the required deadline whether their project application(s) were accepted or rejected—in writing, outside of *e-snaps* and including the reasons for the rejection—no later than 15 days before the application deadline, the CoC will automatically receive 0 points for this selection criteria. If a project applicant appeals the decision by the CoC to reject of its project application, HUD will follow the process outlined in 24 CFR 578.35(b). This could result in HUD electing to fund the appealed project by de-funding or cutting other project(s), including renewal projects, within the CoC.

- g. **Housing Inventory Count Submission.** HUD will award 1 point to CoCs that submitted the 2013 Housing Inventory Count (HIC) data in the HDX by the April 30, 2013, submission deadline. If a CoC did not submit the 2013 HIC by April 30, 2013, the CoC will receive 0 points.
5. **Leveraging.** HUD will award up to 5 points to CoCs that demonstrate the extent to which the amount of assistance to be provided to the CoC will be supplemented with resources from other public and private sources, including mainstream programs. CoCs that have 100 percent participation in leveraging from all project applications (including only those projects that have commitment letter(s) on file that are dated within 60 days of the CoC application deadline) and that have at a minimum 150 percent leveraging will receive the maximum points.
 6. **Homeless Management Information System.** HUD will award up to 11 points to CoCs that clearly demonstrate the existence of a functioning HMIS that facilitates the collection of information on the homeless using residential and other homeless services and stores that data in an electronic format.
 - a. **HMIS Governance.** HUD will award up to 2 points to CoCs that have in place a HMIS governance charter. To receive maximum points, the CoC must attach a copy of the HMIS governance charter.
 - b. **HMIS Plans.** Each HMIS Lead should have the following plans in place: Privacy Plan, Security Plan, and Data Quality Plan. HUD will award up to 1 point to CoCs that describe how these plans are reviewed by the CoC and ensures that the HMIS Lead reviews and revises these plans on a regular basis.

- c. **HMIS Funding.** As other HUD-funded programs, other federal agencies, State and local governments require the use of HMIS, the HMIS Lead should access funding provided for these additional requirements to ensure accuracy of the system information. HUD will award up to 2 points to CoCs that demonstrate that the HMIS is supported by non-HUD sources. CoCs will be assessed on the total funding generated for the HMIS from all sources—HUD, other federal sources, State and local, private, etc.—that includes the amounts for all matching sources, both cash and in-kind. To receive maximum points, the CoC must demonstrate that at least 25% of the HMIS budget (not including required match) is supported through non-CoC Program cash or in-kind sources.
 - d. **Bed Coverage.** The CoC will be assessed on the bed coverage rate for each housing type within the CoC that includes: emergency shelter, Safe Haven, transitional housing, rapid re-housing, and PSH. HUD will award up to 2 points to CoCs that record 86 percent or higher for the bed coverage rate. The bed coverage rate is the number of HMIS participating beds divided by the total number of year-round beds dedicated to the homeless in the geographic area covered by the CoC. Beds funded by victim service providers must not be included in this calculation. Further, if the bed coverage rate is 0 – 64 percent, the CoC must provide clear steps on how it intends to increase this percentage over the next 12 months to receive partial credit. Additionally, if the bed coverage rate was 0-64 percent in FY 2012, the CoC must provide the specific steps it has taken to increase the percentage.
 - e. **Data Quality.** The CoC must report the number of unduplicated client records with null or missing values for the Universal Data Elements on a single day, as selected by the CoC, within the last 10 days of January 2013. HUD will award up to 2 points to CoCs that have below 10 percent null or missing values and 10 percent of refused or unknown records as recorded in the HMIS will receive maximum points.
 - f. **Entry and Exit Dates.** The CoC will be assessed on the existing HMIS policies and procedures used to ensure that valid program entry and exit dates are recorded in the HMIS. HUD will award up to 1 point to CoCs that demonstrate the procedures in place to ensure program entry and exit dates are recorded in HMIS. Additionally, the CoC will be required to attach the HMIS policies and procedures where HUD will review to ensure there is a section that clearly describes the procedure of how entry and exit dates are recorded in HMIS.
 - g. **Required Reports.** HUD will award up to 1 point to CoCs that demonstrate that they are able to generate HUD required reports (e.g., APR, CAPER, etc.) from the HMIS system.
7. **Point-in-Time Count.** HUD will award up to 9 points to CoCs related to the collection, use and submission of the 2013 PIT count data.
- a. **PIT Count and Data Submission.** HUD will award up to 3 points to CoCs that conducted a PIT count and reported the data in HDX. Maximum points will be

awarded to CoCs that:

- (1) conducted a sheltered and unsheltered PIT count during the last 10 days of January 2013,
 - (2) submitted the PIT data for 2013 in HDX by April 30, 2013, and
 - (3) provided the percentage of homeless service providers that supplied information on population and subpopulation data.
- b. Change in PIT Since 2012.** HUD will award up to 2 points to CoCs that demonstrate an overall reduction in the number of individuals and families who have become homeless since the number reported in the FY 2012 CoC Program Competition. To receive full points, CoCs must demonstrate a decrease in the number of sheltered and unsheltered homeless individual individuals and families from the previous PIT count and compare it to the number of homeless individuals and families from the most recent PIT as reported in the Homelessness Data Exchange (HDX).
- c. Subpopulation Data.** HUD will award up to 2 points to CoCs based on the CoC's ability to collect and report accurate and quality subpopulation data for the sheltered homeless during the 2013 PIT count.
- d. Methodology for Unsheltered Count.** HUD will award up to 2 points to CoCs based on the CoCs ability to collect and report accurate and quality data on the unsheltered homeless by using methods to reduce the occurrence of counting the unsheltered homeless more than once during the 2013 PIT count.
- 8. Bonus Points.** HUD will award up to 6 bonus points to CoCs as follows:
- a. Administration.** HUD will award up to 2 point to CoCs where 100 percent of the project applications request 7 percent or less in project administration costs.
 - b. SSO Projects.** HUD will award up to 2 bonus points to CoCs where no SSO projects (excluding those that were awarded in the FY 2012 CoC Program Competition for coordinated assessment) are prioritized in Tier 1.
 - c. Accuracy of Submission.** HUD will award up to 2 bonus points to CoCs that accurately and completely include all submitted project applications on the Form HUD-2991.
- 9. CoCs That Have Claimed the Same Geographic Area (Competing CoCs).** (24 CFR 578.35(d)). Subject to the appeal process in 24 CFR 578.35(d), if one or more CoC claims the same geographic area, HUD will award funds to the Collaborative Applicant whose application has the highest overall score. Projects from the lower rated CoC will not be awarded funds.

B. CoC and Project Review and Selection Process

1. **Review, Rating, and Ranking.** Two types of reviews will be conducted—selection criteria rating for the overall FY 2013/FY 2014 CoC Application, and threshold review for project applicants and project applications. For new projects created through reallocation, the review process will consider applicant and sponsor eligibility and capacity, project eligibility, and project quality as part of the threshold review. The renewal project threshold review will consider applicant and sponsor capacity and eligibility. The renewal project threshold reviews are explained in Section V.E.2 of this NOFA, which covers eligible applicants and projects.

HUD may employ rating panels to review and rate all or part of FY 2013/FY 2014 CoC Applications according to the rating criteria in Section VII.A. See the General Section of HUD's FY 2013 NOFA for more information on rating panels.

- a. *Threshold Review: Applicant and subrecipient eligibility, capacity, and quality.* HUD will review project applications to determine whether applicants and subrecipients meet the eligibility and capacity thresholds, and whether the projects meet the eligibility and project quality thresholds detailed in Section V.E.2. If HUD determines these standards are not met, the project will be rejected from the competition. If a new project receives sufficient points to pass the project quality threshold review described in Sections V.E.2.e.(1),(2), or (3), as applicable, but does not meet one or more of the criteria within the rating factors, then HUD will place conditions on the grant award and the applicant must demonstrate that the criteria will be met before HUD will sign a grant agreement with the applicant for the project. If an applicant is unable to demonstrate that the project quality threshold criteria are met within the time frame specified by HUD, then HUD reserves the right not to award funds to the applicant and add those funds to the funds available for the next competition.
- b. *Conditional Selection and Adjustments to Funding.* Once projects are determined to have passed threshold review, HUD will use the following order of selection priorities to select eligible projects for funding in the CoC Program Competition. CoCs that receive a higher score have a better chance of being awarded projects ranked in Tier 2, depending on the availability of carryover or recaptured funds to be used in the CoC Program Competition. Using the selection priorities, HUD will select projects from the CoC's Priority Listings until no additional funds are available. HUD will select lower ranked projects from the CoC Priority Listings above higher ranked projects, consistent with these selection priorities.

Within the rank order established by the CoC on the Priority Listings, HUD will first select projects from Tier 1 in the following order by CoC score:

- (1) renewal permanent housing projects, RRH and PSH;
- (2) new PSH projects created through reallocation for 100 percent chronically homeless;
- (3) new rapid re-housing projects created through reallocation for homeless

- households with children;
- (4) renewal transitional housing;
- (5) CoC planning costs;
- (6) UFA costs;
- (7) SSO projects for centralized or coordinated assessment system;
- (8) renewal HMIS;
- (9) all other renewal supportive services only projects, and
- (10) any project application submitted by the CoC that was not included in the HUD-approved GIW.

Within the rank order established by the CoC on the Priority Listings, HUD will then select projects from Tier 2 with any remaining available funds in the following order by CoC score:

- (1) renewal permanent housing projects, RRH and PSH;
- (2) new PSH projects created through reallocation for 100 percent chronically homeless;
- (3) new rapid re-housing projects created through reallocation for homeless households with children;
- (4) renewal transitional housing;
- (5) CoC planning costs;
- (6) UFA costs;
- (7) supportive services only projects for centralized or coordinated assessment;
- (8) renewal HMIS; and
- (9) all other renewal supportive services only projects, and
- (10) any project application submitted by the CoC that was not included in the HUD-approved GIW.

HUD will select projects in order of the selection priorities, and within each selection priority by CoC score, and for each CoC in order of the Priority Listings, until there are no more available funds. For each selection priority, HUD will select all of the projects for a higher scoring CoC, in order of the CoC's Priority Listings, before selecting projects from the next highest scoring CoC, in order of that CoC's Priority Listings; HUD will move down through the CoCs by CoC score before continuing to the next selection priority, or until there are no more available funds.

2. Adjustments to Funding. HUD may adjust the selection of competitive projects as follows:

- a. The FMRs used in calculating award amounts will be those in effect at the time the of application submission deadline.
- b. *Geographic Diversity.* HUD has determined that geographic diversity is an appropriate consideration in selecting homeless assistance projects in the competition. HUD believes that geographic diversity can be achieved best by awarding grants to as many CoCs as possible. To this end, in instances where any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, the Northern Mariana Islands, the Virgin

Islands, and American Samoa do not have at least one funded CoC, HUD reserves the right to fund eligible project(s) with the highest total score in the CoC.

- c. *Funding Diversity.* HUD reserves the right to reduce the amount of a grant, if necessary, to ensure that no more than 10 percent of assistance made available under this NOFA will be awarded for projects located within any one unit of general local government or within the geographic area covered by any one CoC.
 - d. If HUD exercises a right it has reserved under this NOFA, that right will be exercised uniformly across all applications received in response to this NOFA.
 - e. *Tie-breaking Rules.* HUD will break ties among CoCs with the same total score by comparing scores received by the CoCs for each of the following scoring factors, in the order shown: Overall CoC score; CoC Strategic Planning and Performance; CoC Coordination of Housing and Services; CoC Housing, Services, and Structure; Recipient Performance; HMIS; PIT count; and Leveraging. The final tie-breaking factor is the priority number of the competing projects on the applicable CoC Priority Lists.
3. **Corrections to Deficient Applications.** HUD will exercise the authority for curing deficiencies as stated in the General Section of HUD's FY 2013 NOFA, if needed, on a consistent and uniform basis for all CoCs and applicants. Additionally, HUD reserves the right to respond to unanticipated system defects, ambiguities, and technical difficulties in application submissions in *e-snaps* through a flexible implementation of its authority to cure application deficiencies through written inquires seeking clarification and additional information (also known as callbacks). Upon proper publication in the *Federal Register*, HUD reserves the right to extend the competition deadline for good cause.

VIII. Award Administration Information

A. Award Notices

- 1. **Action on Conditionally Selected Applications.** HUD will notify conditionally selected applicants in writing. HUD may subsequently request conditionally selected applicants to submit additional project information—which may include documentation to show the project is financially feasible; documentation of firm commitments for match; documentation showing site control; information necessary for HUD to perform an environmental review, where HUD determines to do so in accordance with 24 CFR 58.11(d); a copy of the organization's Code of Conduct; and such other documentation as specified by HUD in writing—to the application, that confirms or clarifies information provided in the application. HUD will notify applicants of the deadline for submission of such information. If an applicant is unable to meet any conditions for fund award within the specified time frame, HUD reserves the right not to award funds to the applicant and add them to funds available for the next competition.
- 2. **Applicant Debriefing.** See the General Section of HUD's FY 2013 NOFA for applicant debriefing procedures.

3. **Appeals Process.** Applicants may appeal the results only as provided in 24 CFR 578.35.

B. Administrative and National Policy Requirements

1. Administrative and Other Program Requirements

a. Federal agencies are required to measure the performance of their programs. HUD captures this information not only from monitoring visits and APRs, but also on the data gathered in annual competitions. HUD's homeless assistance programs are being measured in FY 2013 and FY 2014 by the objective to "end chronic homelessness and to move the homeless to permanent housing." HUD has chosen six indicators which directly relate to the CoC Program. These six indicators, as described below, will be collected in the FY 2013/FY2014 CoC Application:

- (1) The creation of new PSH beds for the chronically homeless.
- (2) The decrease in the number of the chronically homeless in the CoC's geography.
- (3) The increase of employment of the homeless residing in or exiting HUD homeless assistance projects.
- (4) The increase of the use of mainstream resources for the homeless residing or exiting from HUD homeless assistance projects.
- (5) The percentage of turnover in CoC Program-funded PSH not dedicated to the chronically homeless that will be prioritized to serve the chronically homeless.
- (6) The percentage of households with children that are served in rapid re-housing that came from unsheltered locations.

b. *Procurement of Recovered Materials.* See Section III C.4.1 of the General Section of HUD's FY 2013 NOFA and the interim rule at 24 CFR 578.99(b) for further information.

c. Reference the General Section of HUD's FY 2013 NOFA for other administrative requirements.

2. **Timeliness Standards.** The FY 2013 HUD Appropriations Act requires HUD to obligate FY 2013 CoC Program funds by September 30, 2015. Obligated funds remain available for expenditure until September 30, 2020. However, HUD reserves the right to require an earlier expenditure deadline under a grant agreement. After Congress enacts an appropriation funding the Department for the balance of FY 2014, HUD will provide information about the obligation requirements for FY 2014 funds. The applicant is expected to initiate the approved projects promptly in accordance with the requirements of this section of this NOFA. Grant terms, and associated grant operations, may not extend beyond the availability of funds. Applicants must plan accordingly and only submit applications that can start operations in a timely manner with enough time to complete within the awarded grant term. In addition, HUD will take action if the grantee fails to satisfy the following timeliness standards found in 24 CFR 578.85.

3. Reporting

- a. In accordance with program regulations at 24 CFR 578.103, applicants must maintain records and within the timeframe required, make any reports, including those pertaining to race, ethnicity, gender, and disability status that HUD may require. CoC applicants may report this data as part of their APR submission to HUD. Also, recipients who expend \$500,000 or more in a year in federal awards are reminded they must have a single or program-specific audit for that year in accordance with the provisions of OMB Circular No. A-133.
- b. *Section 3 Reporting Regulations.* Pursuant to 24 CFR 135.3(a)(2), the Section 3 requirements apply to housing and community development assistance that is used for housing rehabilitation, housing construction and other public constructions. Recipients performing any of these activities are subject to Section 3 and must submit Form HUD-60002 to the Office of Fair Housing and Equal Opportunity (FHEO) at the time they submit their APR to the Office of Special Needs Assistance Programs. This form may be completed electronically at www.hud.gov/section3. For more information on Section 3, see Section III.C.3.d. of the FY 2013 General Section Technical Correction.
- c. Award notices may also include requirements for sub-award reporting in compliance with the requirements of the Federal Financial Assistance Accountability and Transparency Act of 2006 (Pub. L. 109-282) (Transparency Act) and Section 872 of the Duncan Hunter National Defense Authorization Act for Fiscal Year 2009 (Pub. L. 110-417), referred to as "Section 872." See the General Section for further information.

IX. Agency Contacts

- A. **For Further Information.** Individuals who are hearing or speech-impaired should use the Information Relay Services at 1-800-877-8339 (these are toll-free numbers). Recipients and individuals can use the locator at www.onecpd.info to find contact information for the Collaborative Applicant and for the HUD CPD Field Office serving the CoC's territory.
- B. **For Technical Assistance.** HUD will make appropriate resources available for technical assistance related to *e-snaps*. Specifically, HUD will make available *e-snaps* AAQ at www.onecpd.info/ask-a-question. To address technical or other questions, HUD CPD Field Office staff will also be available to help citizens identify organizations in the community that are involved in developing the CoC system. HUD staff and HUD contractors are prohibited from providing CoCs and project applicants with guidance that will result in a competitive advantage for any CoC or project applicant.

Following conditional selection of applications, HUD staff will be available to assist selected applicants in clarifying or confirming information that is a prerequisite to the offer of a grant agreement by HUD. However, between the application deadline and the announcement of conditional selections, HUD is prohibited from and will not accept any information that

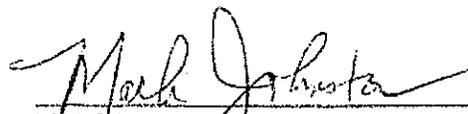
would improve the substantive quality of a CoC's application pertinent to HUD's funding decision.

- C. Satellite Broadcast.** HUD will hold one or more informative broadcast(s) via satellite for potential applicants to provide guidance on the program and preparation of the application. HUD strongly recommends that applicants view these broadcasts, which will provide critical information on the application process. For more information about the date and time of the broadcast, individuals should consult the HUD website at www.hud.gov/offices/adm/grants/fundsavail.cfm.

X. Other Information

- A. Paperwork Reduction Act.** The information collection requirements contained in this document have been submitted for approval by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and the OMB approval number is 2506-0112. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. Public reporting burden for the collection of information and grant administration is estimated to average 250 hours per annum per respondent for the application and grant administration. This includes the time for collecting, reviewing, and reporting the data for the application, semi-annual reports and final report. The information will be used for grantee selection and monitoring the administration of funds.
- B. Environmental Impact.** A Finding of No Significant Impact with respect to the environment has been made for this notice, in accordance with HUD regulations at 24 CFR part 50 that implement section 102(2)(C) of the National Environmental Policy Act of 1969 (42 U.S.C. 4332(2)(C)). The Finding of No Significant Impact is made available with the posting of this NOFA on HUD's "Funds Available" page at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail under the FY 2013 program link.

Dated: November 21, 2013



Mark Johnston
Deputy Assistant Secretary
for Special Needs

[FR-5700-N-31B]

Exhibit B – Project Summary for Renewal Projects

Complete one form per project. Please reply to all of the questions. Put 'N/A' if not applicable. Keep responses short and succinct.

Project Information

Surecipient (Agency Name): _____
 Project Applicant (Agency Name, City): _____
 Project/Program Name: _____

Program Type (Check One)

- Transitional Housing
- Permanent Housing
- Supportive Services Only

1. Participation in Partners In Care (will be verified with PIC)

Partners in Care (PIC) General Meeting Attendance – Enter the total number of PIC general monthly meetings attended from April 2013 to December 2013: _____ (Note: the Homeless Awareness Conference counts as a General Meeting)

Subcommittee Participation – Check off all that apply and indicate the number of monthly meetings attended from January 2013 to December 2013:

- Executive - Chair or Member Number of meetings attended: _____
- Awareness - Chair or Member Number of meetings attended: _____
- Advocacy - Chair or Member Number of meetings attended: _____
- Planning - Chair or Member Number of meetings attended: _____
- Data - Chair or Member Number of meetings attended: _____

PIC Activities Participation

Please circle how your agency participated in the following PIC activities:

	1 point	2 points
2013 Legislative breakfast	Attended	Provided a display
2012 Hoolaulea	Attended	Provided a booth
2013 Point In Time	Attended	Regional leader

2. Project Leverage

This criterion is a mathematical calculation of ratio of HUDfunds requested to the value of other resources contributed / secured for the project / program by the applicant.

For your proposed CoC project proposal:

A. Leverage Provided: \$ _____

B. HUD Funding Request: \$ _____

Leverage Ratio (B/A): _____%

Please use the Project Leverage Cover Sheet at the back of this document.

3. Project Quality – Meeting Original Goals and Intent of Program

Client Group

Client group proposed in ORIGINAL application: _____

Client group currently serving is the same as originally proposed? Yes No

Exhibit B – Project Summary for Renewal Projects

If you wish, please provide a brief explanation: _____

Services

Services proposed in ORIGINAL application: _____

Services currently providing are the same as originally proposed? Yes No

If you wish, please provide a brief explanation: _____

4. Project Quality – Accomplishing Program Goals

For the APR submitted to HUD between October 1, 2012, and September 30, 2013:

Number of HUD required performance measures accomplished in your Annual Performance Report (APR): _____

Please attach the related pages of your APR (PH: Q36a, TH: Q36b) to the back of this document (see samples attached).

If you wish, provide brief comments on your performance: _____

5. Project Quality – Accomplishing Program Goals

For the APR submitted to HUD between October 1, 2012, and September 30, 2013:

Number anticipated to be served during the grant term from 5A and 5B of your 2011 application:

a. Individuals: _____ b. Families (households): _____

Actual number served during the grant term from your APR:

c. Individuals: _____ d. Families (households): _____

Percentage accomplished (Actual divided by anticipated):

e. Individuals: _____ f. Families (households): _____

Please attach the related pages (5A and 5B) of your 2011 application and APR (Q8) to the back of this document (see samples attached). An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.

If you wish, provide brief comments on your performance: _____

6. Project Quality – Accomplishing Program Goals

For the APR submitted to HUD between October 1, 2012, and September 30, 2013:

Total Grant Award from the 2011 renewal list: \$ _____

Amount of Grant Award Expended at Grant Expiration from your APR: \$ _____

Percentage Expended at Grant Expiration (Expended divided by Total Grant Award): _____%

Total Duration (Years) of Grant Award: _____

Please attach a copy of the 2011 renewal list with your budget amount circled to the back of this document and the related pages of your APR (PH: Q31, TH: Q30a4). See samples attached.

If you wish, provide brief comments on your performance: _____

7. Project Quality – Accomplishing 2012 HUD CoC Program Objectives

Describe how your CoC project has achieved the following 2012 HUD CoC Objectives.

1. Create new permanent housing (PH) beds for chronically homeless persons.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects achievements related to this outcome: _____

Exhibit B – Project Summary for Renewal Projects

2. Increase percentage of homeless persons staying in PH over 6 months to at least 80%. An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.

Check off if this was an objective of the project's most recently completed grant term: Explain your projects achievements related to this outcome (provide data and percentages from your most recently completed APR):

3. Increase percentage of homeless persons moving from transitional housing (TH) to PH to at least 65%. An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.

Check off if this was an objective of the project's most recently completed grant term: Explain your projects achievements related to this outcome (provide data and percentages from your most recently completed APR):

4. Increase percentage of homeless persons employed at exit to at least 20%. An excel worksheet (Exhibit G) was also included in the RFI to help you calculate these numbers.

Check off if this was an objective of the project's most recently completed grant term: Explain your projects achievements related to this outcome (provide data and percentages from your most recently completed APR):

5. Decrease the number of homeless households with children.

Check off if this was an objective of the project's most recently completed grant term: Explain your projects achievements related to this outcome:

8. Project Quality – Unresolved Issues

Please circle any of the applicable issues your program may be experiencing. The City will verify any issues with the HUD field office.

(a) Outstanding obligation to HUD;

(b) Audit finding(s);

(c) History of inadequate financial management accounting practices;

(d) Evidence of untimely expenditures on prior award;

(e) History of other major capacity issues;

(f) History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

Explain any items circled above:

Exhibit B – Project Summary for Renewal Projects

Please attach the most recent HUD and/or City monitoring letter(s) describing the results of the monitoring. If findings and issues were cited, provide the corrective action plan implemented by your agency.

Additional Questions

9. Project Implementation of the Affordable Care Act

Describe how the project is preparing for implementation of the Affordable Care Act (ACA). Response should address the extent in which project recipients and subrecipients will participate in enrollment and outreach activities to ensure eligible households are able to take advantage of new healthcare options. _____

4) PH APR sample

Q36a. Performance Measures - Permanent Housing Programs

Instructions

Projects funded in the 2010 competition or a subsequent competition: This question relies on performance measurement information you established in the Performance Measures section of the Exhibit 2 application for this project and your project's actual results.

1. The Target # and % of persons who were expected to accomplish this measure have been pre-populated from the response you provided to the Standard Performance Measures question in your Exhibit 2 application. For Measure 1, the pre-populated figure is the sum of the targets provided for questions 1a and 1b.

2. Complete the actual number of persons served by the program for whom the measure is applicable, and the actual number of persons who accomplished the measure. Click 'Save' to automatically calculate the 'Actual % of persons who accomplished this measure' and the '% Difference between your Exhibit 2 Targets and Actual Performance' columns.

3. In the comment box, describe the project's performance relative to the target you set and provide an explanation for any discrepancies. HUD recognizes that the performance measurement question on the APR is not structured in exactly the same way as the Exhibit 2 question, and that this may be part of your explanation.

Projects funded prior to the 2010 competition: Grantees who did not submit their project in the 2010 competition will not have pre-populated targets for each measure, but should still complete step 3 as described above. In the comment box, grantees should reflect on their program performance and the extent to which it was consistent with local expectations.

Permanent Housing Program Performance Measures Key

Key	Domain	Performance measure
Measure 1	Housing Stability	The % of persons who remained in the permanent housing program as of the end of the operating year or exited to permanent housing (subsidized or unsubsidized) during the operating year.
Measure 2a	Increase Total Income	The % of persons age 18 and older who maintained or increased their total income (from all sources) as of the end of the operating year or program exit.
Measure 2b	Increase Earned Income	The % of persons age 18 through 61 who maintained or increased their earned income (i.e., employment income) as of the end of the operating year or program exit.

Performance Measure	Exhibit 2 Target # of persons who were expected to accomplish this measure	Exhibit 2 Target % of persons who were expected to accomplish this measure	Actual # of persons served by the program, as applicable to this measure	Actual # of persons who accomplished this measure	Actual % of persons who accomplished this measure	% Difference between Exhibit 2 Target and Actual Performance
1 - Housing Stability Measure	81	80%	182	182	89%	9%
2a - Total Income Measure	101	100%	182	160	88%	-12%
2b - Earned Income Measure	0	0%	182	141	77%	-77%

Describe how your project performed relative to your expectations for its performance. For projects funded in the 2010 competition or a subsequent competition, describe the project's performance relative to the target you set and provide an explanation for any discrepancies.

Maximum Characters: 2000

With cost savings we were able to place additional participants. 6 participants exited the program because they received Section 8 housing assistance.

4) TH APR sample

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2010

075575

Q36b. Performance Measures - Transitional Housing Programs

Instructions

Projects funded in the 2010 competition or a subsequent competition: This question relies on performance measurement information you established in the Performance Measures section of the Exhibit 2 application for this project and your project's actual results.

1. The Target # and % of persons who were expected to accomplish this measure have been pre-populated from the response you provided to Standard Performance Measures question 1b in the Exhibit 2 application. HUD will not review data that SHP-TH project applicants submitted in Standard Performance Measures question 1a because applicants should have entered zeroes for that question.

2. Complete the actual number of persons served by the program for whom the measure is applicable, and the actual number of persons who accomplished the measure. Click 'Save' to automatically calculate the 'Actual % of persons who accomplished this measure' and the '% Difference between your Exhibit 2 Targets and Actual Performance' columns.

3. In the comment box, describe the project's performance relative to the target you set and provide an explanation for any discrepancies. HUD recognizes that the performance measurement question on the APR is not structured in exactly the same way as the Exhibit 2 question, and that this may be part of your explanation.

Projects funded prior to the 2010 competition: Grantees who did not submit their project in the 2010 competition will not have pre-populated targets for each measure, but should still complete step 3 as described above. In the comment box, grantees should reflect on their program performance and the extent to which it was consistent with local expectations.

Transitional Housing Program Performance Measures Key

Key	Domain	Performance Measure
Measure 1	Housing Stability	The % of persons who exited to permanent housing (subsidized or unsubsidized) during the operating year.
Measure 2a	Increase Total Income	The % of persons age 18 or older who increased their total income (from all sources) as of the end of the operating year or program exit.
Measure 2b	Increase Earned Income	The % of persons age 18 through 61 who increased their earned income (i.e., employment income) as of the end of the operating year or program exit.

Performance Measure	Exhibit 2 Target # of persons who were expected to accomplish this measure	Exhibit 2 Target % of persons who were expected to accomplish this measure	Actual # of persons served by the program, as applicable to this measure	Actual # of persons who accomplished this measure	Actual % of persons who accomplished this measure	% Difference between Exhibit 2 Target and Actual Performance
---------------------	--	--	--	---	---	--

1-Housing Stability Measure	10	87%	18	10	55%	11%
2a-Total Income Measure	9	60%	8	8	100%	40%
2b-Earned Income Measure	0	0%	0	0	0%	0%

Describe how your project performed relative to your expectations for its performance. For projects funded in the 2010 competition or a subsequent competition, describe the project's performance relative to the target you set and provide an explanation for any discrepancies.

Maximum Characters: 2000

Housing Stability-While the # of clients projected in 2010 to exit to PH equaled the actual # of clients exiting to PH in 2012, the actual % in FY11-12 was lower than the % projected in 2010. This is due to clients relapsing back to alcohol and chemical substance abuse and returning to the streets, unable to secure PH.

Total Income-The # of clients who increased their income in FY11-12 equaled the % of clients who increased their income in FY11-12. Income goals are set for clients to attain employment or cash income sources within 45 days of admission.

S) PHTH application sample

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2011

042323

5A. Project Participants - Households with Dependent Children

Instructions:

Identify the demographics of each household with children served (or proposed to be served), at a particular point in time (when the project is at full capacity). The numbers entered here must reflect only those households and persons served using the funds requested in this application.

1. Total number of households: (required) - enter the total number of households served (or proposed to be served).
2. Disabled adults: (in this row) - enter the un-duplicated total number of adult persons with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).
3. Non-disabled adults: (in this row) - enter the un-duplicated total number of adult persons without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).
4. Disabled children: (in this row) - enter the un-duplicated total number of children with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).
5. Non-disabled children: (in this row) - enter the un-duplicated total number of children without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).
6. Total persons: (calculated row) - the total number of persons within each subpopulation is automatically calculated.
7. Total number of adults: (calculated row) - the total number of adults served (or proposed to be served) is automatically calculated.
8. Total number of children: (calculated row) - the total number of children served (or proposed to be served) is automatically calculated.

Additional Resources:

Point in time - PIT (definition) - a snap shot of the number of homeless persons that can be served, on any given night or day, when the project is at full capacity. For a new project, this count is based on the applicant's best guess at the time of application. For a renewal project, the PIT is based on the applicant's assessment of the number of participants residing in a facility or served by the program on a particular night or day when the project is at full capacity.

Application Detailed Instructions (on left menu)

<http://esnaps.hudhre.info>

<http://esnaps.hudhre.info/training>

1. Total Number of Households	0						
	Total Persons (unduplicated)	Chronically Homeless	Severely Mentally Ill	Chronic Substance Abuse	Veterans	Persons with HIV/AIDS	Victims of Domestic Violence
2. Disabled Adults	0						
3. Non-Disabled Adults	0						
4. Disabled Children	0						

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2011

042323

5. Non-Disabled Children	0						
6. Total Persons (click on "Save" to auto-calculate)	0	0	0	0	0	0	0
7. Total Number of Adults (click on "Save" to auto-calculate)	0						
8. Total Number of Children (click on "Save" to auto-calculate)	0						

5B. Project Participants - Households without Dependent Children

Instructions:

Identify the demographics of each household without children served (or proposed to be served), at a particular point in time (when the project is at full capacity). The numbers entered here must reflect only those households and persons served using the funds requested in this application.

1. Total number of households: (required) - enter the total number of households without children served (or proposed to be served).

2. Disabled adults: (In this row) - enter the un-duplicated total number of adult persons with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

3. Non-disabled adults: (In this row) - enter the un-duplicated total number of adult persons without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

4. Disabled unaccompanied youth: (in this row) - enter the un-duplicated total number of unaccompanied youth with a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

5. Non-disabled unaccompanied youth: (In this row) - enter the un-duplicated total number of unaccompanied youth without a disability, under Total Persons. Then, indicate how many fall into each subpopulation (chronically homeless, severely mentally ill, chronic substance abuse, veterans, persons with HIV/AIDS, and DV victims).

6. Total persons: (calculated row) - the total number of persons within each subpopulation is automatically calculated.

7. Total number of adults: (calculated row) - the total number of adults served (or proposed to be served) is automatically calculated.

8. Total number of unaccompanied youth: (calculated row) - the total number of unaccompanied youth served (or proposed to be served) is automatically calculated.

Additional Resources:

Point in time - PIT (definition) - a snap shot of the number of homeless persons that can be served, on any given night or day, when the project is at full capacity. For a new project, this count is based on the applicant's best guess at the time of application. For a renewal project, the PIT is based on the applicant's assessment of the number of participants residing in a facility or served by the program on a particular night or day when the project is at full capacity.

Application Detailed Instructions (on left menu)

<http://esnaps.hudhre.info>

<http://www.hudhre.info/index.cfm?do=viewHomelessAndHousingProgramInfo>

1. Total Number of Households	8						
	Total Persons (unduplicated)	Chronically Homeless	Severely Mentally Ill	Chronic Substance Abuse	Veterans	Persons with HIV/AIDS	Victims of Domestic Violence
2. Disabled Adults	8	5		8			
3. Non-Disabled Adults	0						

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2011

042323

4. Disabled Unaccompanied Youth (under 18)	0						
5. Non-Disabled Unaccompanied Youth (under 18)	0	0	0	0	0	0	
6. Total Persons (click on "Save" to auto-calculate)	8	8	0	8	0	0	0
7. Total Number of Adults (click on "Save" to auto-calculate)	8						
8. Total Number of Unaccompanied Youth (click on "Save" to auto-calculate)	0						

5) PH/TH APR
Sample

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2010

075575

Q8. Persons Served

Instructions:

Q8 reports on the full universe of non-victim service provider clients served and all future questions will refer back to the answers here. Report the unduplicated count of all people served during the operating year. Each person should be counted in the household type associated with his or her last stay of the operating year.

The household types include:

- a) Households without Children - include single adult persons, or adults with adult companions that have never had a child in their household.
- b) Households with Children and Adults - include any household with at least one adult and one child present regardless of whether the child(ren) is present for the full program stay. (Rule - If ever a child in the household, always a household with children).
- c) Households with only Children - include any household where all persons are younger than age 18. (Age is determined based on: entry date closest to the end of the operating year or if they were in the program during the previous operating year then age is based on the first day of the operating year.)
- d) Unknown Household Type - includes households that cannot be classified in cases when one or more persons are missing dates of birth. Note that in instances when the household already contains at least one known adult and one known child, the household type can be determined and categorized as a Household with Children and Adults.

Number of Persons in Households Served During the Operating Year

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Adults	26	26	0	0	0
Children	0	0	0	0	0
Don't Know/Refused	0	0	0	0	0
Information Missing	0	0	0	0	0
Total	26	26	0	0	0

Average Number of Persons Served Each Night

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Average Number of Persons	9	9	0	0	0

Point-in-Time Count of Persons Served on the Last Wednesday in

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	10	10	0	0	0
April	10	10	0	0	0
July	5	5	0	0	0

Applicant: The Salvation Army ATS

021754601

Project: ATS Homeless Offenders Treatment and Supportive Living Services 2010

075575

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
October	9	9	0	0	0

Q9. Households Served

Instructions:

Report the unduplicated number of households served by household type. The type of household is determined based on the type of persons in the household, considering all program stays within the operating year.

- a) Households without Children - include single adult persons, or adults with adult companions that have never had a child in their household.
- b) Households with Children and Adults - include a person in any household with at least one adult and one child present regardless of whether the child(ren) is present for the full program stay. (Rule - If ever a child in the household, always a household with children).
- c) Households with only Children - include a person in any household where all persons are younger than age 18. (Age is determined based on: entry date closest to the end of the operating year or if they were in the program during the previous operating year then age is based on the first day of the operating year.)
- d) Unknown Household Type - include households that cannot be classified in cases when one or more persons are missing dates of birth. Note that in instances when the household already contains at least one known adult and one known child, the household type can be determined and categorized as a Household with Children and Adults.

Number of Households Served During the Operating Year

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Households	26	26	0	0	0

Point-in-Time Count of Households Served on the Last Wednesday in

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	10	10	0	0	0
April	10	10	0	0	0
July	5	5	0	0	0
October	9	9	0	0	0

(6) PH/TH Sample
2011 Renewal List

**Fiscal Year 2011
Continuum of Care Competition
Homeless Assistance Award Report**

State

CoC Name

Project Name

Program

Awarded Amount

HI

HI-500

Kauai Shelter Plus Care Program	S+CR	\$74,304
Transitions Project	SHPR	\$77,536
Puamouli Group Home 2011	SHPR	\$33,384
Kulalani Group Home 2011	SHPR	\$36,384
Eha Shelter Plus Care Program	S+CR	\$605,124
Kaulana Group Home 2011	SHPR	\$32,924
Kaahale Group Home 2011	SHPR	\$31,598
Ka Hale A Ke Ola Family Outpatient Program	SHPR	\$46,245
Ka Hale A Ke Ola Chemical Dependency Program	SHPR	\$91,717
HMIS Analysis and Dissemination Project	SHPR	\$41,160
Hawaii State Homeless Management Information System	SHPR	\$31,131
Eono Shelter Plus Care Program	S+CR	\$140,388
Ehiku Shelter Plus Care Program	S+CR	\$61,440
Kukul Program	S+CR	\$489,048
HI-500 Total:		\$1,792,383

HI-501

Continuum of Care - Domestic Abuse Shelters and Transitional Apartments 2011	SHPR	\$84,488
Ahukini Group Home 2011	SHPR	\$27,874
<u>ATS Homeless Offenders Treatment and Supportive Living Services 2011</u>	SHPR	<u>\$289,302</u>
Barbers Point Veterans-In-Progress	SHPR	\$341,263
Kalaheo Permanent Housing for Homeless Veterans with Disabilities	SHPR	\$142,282
Transitional Living Program Housing and Support for Homeless Young Adults	SHPR	\$136,000
Shelter Plus Care Program	S+CR	\$498,404
<u>SHDC S+C 2011</u>	S+CR	<u>\$1,648,868</u>
Safe Haven	SHPR	\$876,273
PACT	SHPR	\$29,015
Ohana Ola O Kahumana	SHPR	\$147,175
New Beginnings	S+CR	\$2,055,900
CCH Maui Land PEP 2011	SHPR	\$133,807
Kaukama Group Home 2011	SHPR	\$29,653
Community Residential Program	SHPR	\$363,080
Ka 'Oahu Hou O Manoa	SHPR	\$183,498

State

CoC Name

<u>Project Name</u>	<u>Program</u>	<u>Awarded Amount</u>
HUD Homeless Holistic Civil Legal Services Program	SHPR	\$64,669
Home At Last 2011	S+CR	\$1,306,512
HMIS Dedicated Project 2011 A	SHPR	\$68,000
HKO Supportive Housing Program 2011	SHPR	\$185,147
Headway House 2011	SHPR	\$207,198
Vancouver House	SHPR	\$55,132
Komo Mai Group Home 2011	SHPR	\$36,960
HI-501 Total:		\$8,905,300
HI Total:		\$10,698,683

6) PH APR Sample

Applicant: Honolulu CoC - Applicant
 Project: SHDC S+C 2011

HI-501_CoC_Applicant
 081787

Q31. S+C Expenditures and Value of Services

Instructions:

Indicate if this Shelter Plus Care (S+C) grant is completing its initial term and save the screen. If it is completing its initial term then, in addition to reporting on the other match requirements on this screen, the grantee must identify at the bottom of the screen the cumulative match amount for the grant.

Report all S+C funds expended on rental assistance during the operating year. (This should include all funds expended out of the rental assistance line item that went towards--rental assistance; deposits, damage expenses, etc.)

Report all of the S+C funds expended during the operating year on administration.

Report the value of all documented services match received by S+C clients during the operating year. Record the values separately, for each service type.

Is this grant completing its initial grant term? No
 Click save to update form.

S+C and Documented Services Match During the Operating Year

	Expenditure Amount
Rental Assistance	\$1,199,489.84
Administration	\$40,298.77
Total S+C Expenditures	\$1,239,788.61

Value of Supportive Services Received by S+C Clients During the Operating Year

Documented Services Match	Value (\$)
Outreach	\$0.00
Case management	\$328,812.90
Life skills (outside of case management)	\$151,758.80
Alcohol and drug abuse services	\$0.00
Mental health services	\$733,505.70
AIDS-related services	\$0.00
Other health care services	\$0.00
Education	\$0.00
Housing placement	\$50,588.60
Employment assistance	\$0.00
Child care	\$0.00
Transportation	\$0.00
Legal	\$0.00
Other	\$59,684.66
Total documented services match	\$1,324,349.66

CoC TIT APR sample

Applicant: The Salvation Army ATS
 Project: ATS Homeless Offenders Treatment and Supportive Living Services 2010

021754601
 075575

Q30a4. SHP Expenditures - Leasing, Operating, and Administration

Instructions:

Leasing, Operating, & Admin Chart:
 Report all SHP and cash match expended during this operating year on leasing, operating, and administration costs. Please note that grantees are not required to have matching funds for leasing or administration costs but may enter such cash match if they in fact acquired cash match for those expenses.

In the SHP Funds column, list all SHP funds expended during the operating year on each line item.

In the cash match column, list all matching funds expended during the operating year on operating costs.

Totals Chart:

The totals chart is pre-populated with the subtotals amounts from Q30a1, Q30a2, Q30a3, and Q30a4. Please note that the leasing and administration costs are not included in the cash match calculation in the totals chart because they are not statutorily required. The only way to correct a mistake identified when reviewing this table is to review and correct the source data for in Q30a1, Q30a2, Q30a3, and Q30a4.

SHP and Cash Match Expenditures During the Operating Year - Leasing, Operating, & Admin

Expenditure Type	SHP Funds	Cash Match	Match %	Total Expenditures
Real Property Leasing	\$32,227.00	\$0.00	0%	\$32,227.00
Operating Costs	\$80,907.00	\$32,750.00	35%	\$93,657.00
Administration	\$13,695.00	\$0.00	0%	\$13,695.00
Leasing, Operating, Admin - Subtotal	\$106,829.00	\$32,750.00		\$139,579.00

SHP and Cash Match Expenditures During the Operating Year - Totals

Total SHP Expenses	SHP Funds	Cash Match	Match %	Total Expenditures
Development	\$0.00	\$0.00	0%	\$0.00
Supportive Services	\$179,717.00	\$120,874.00	40%	\$300,591.00
Real Property Leasing	\$32,227.00	\$0.00	0%	\$32,227.00
Operating Expenses	\$80,907.00	\$32,750.00	35%	\$93,657.00
HMIS	\$0.00	\$0.00	0%	\$0.00
SHP Expenses - Subtotal	\$272,851.00	\$153,624.00		\$426,475.00
Administration	\$13,695.00	\$0.00	0%	\$13,695.00
Total Expenses	\$286,546.00	\$153,624.00		\$440,170.00

(e) For program use

Fiscal Year 2011
Continuum of Care Competition
Homeless Assistance Award Report

State

CoC Name

Project Name

Program

Awarded Amount

HI

HI-500

Kauai Shelter Plus Care Program	S+CR	\$74,304
Transitions Project	SHPR	\$77,536
Puamela Group Home 2011	SHPR	\$33,364
Kulalani Group Home 2011	SHPR	\$36,384
Eha Shelter Plus Care Program	S+CR	\$605,124
Kaulana Group Home 2011	SHPR	\$32,924
Kaahela Group Home 2011	SHPR	\$31,598
Ka Hale A Ke Ola Family Outpatient Program	SHPR	\$46,245
Ka Hale A Ke Ola Chemical Dependency Program	SHPR	\$91,717
HMIS Analysis and Dissemination Project	SHPR	\$41,160
Hawaii State Homeless Management Information System	SHPR	\$31,131
Eono Shelter Plus Care Program	S+CR	\$140,388
Ehiku Shelter Plus Care Program	S+CR	\$61,440
Kukul Program	S+CR	\$489,048
HI-500 Total:		\$1,782,363

HI-501

Continuum of Care - Domestic Abuse Shelters and Transitional Apartments 2011	SHPR	\$84,488
Ahukini Group Home 2011	SHPR	\$27,874
ATS Homeless Offenders Treatment and Supportive Living Services 2011	SHPR	\$289,302
Barbers Point Veterans-In-Progress	SHPR	\$341,263
Kalaheo Permanent Housing for Homeless Veterans with Disabilities	SHPR	\$142,282
Transitional Living Program Housing and Support for Homeless Young Adults	SHPR	\$136,000
Shelter Plus Care Program	S+CR	\$496,404
SHDC S+C 2011	S+CR	\$1,646,868
Safe Haven	SHPR	\$876,273
PACT	SHPR	\$29,015
Ohana Ola O Kahumana	SHPR	\$147,175
New Beginnings	S+CR	\$2,055,900
CCH Mailli Land PEP 2011	SHPR	\$133,607
Kaukama Group Home 2011	SHPR	\$29,653
Community Residential Program	SHPR	\$363,080
Ka 'Ohu Hou O Manoa	SHPR	\$183,498

State

CoC Name

<u>Project Name</u>	<u>Program</u>	<u>Awarded Amount</u>
HUD Homeless Holistic Civil Legal Services Program	SHPR	\$64,669
Home At Last 2011	S+CR	\$1,306,512
HMIS Dedicated Project 2011 A	SHPR	\$68,000
HKO Supportive Housing Program 2011	SHPR	\$185,147
Headway House 2011	SHPR	\$207,198
Vancouver House	SHPR	\$55,132
Komo Mal Group Home 2011	SHPR	\$36,960
HI-501 Total:		\$8,906,300
HI Total:		\$10,698,683

Exhibit C – Project Summary for NEW Projects

Complete one form per project. Please reply to all of the questions. Put 'N/A' if not applicable. Keep responses short and succinct.

Project Information

Subrecipient (Agency Name): _____
 Project Applicant (Agency Name, City): _____
 Project/Program Name: _____

Program Type must be:

Permanent Housing

Number of years requesting funds: _____

Anticipated grant years: 2014 - _____

Funding:

New Reallocation

1. Participation in Partners In Care (will be verified with PIC)

Partners in Care (PIC) General Meeting Attendance – Enter the total number of PIC general monthly meetings attended from April 2013 to December 2013: _____ (Note: the Homeless Awareness Conference counts as a General Meeting)

Subcommittee Participation – Check off all that apply and indicate the number of monthly meetings attended from January 2013 to December 2013:

<input type="checkbox"/> Executive -	<input type="checkbox"/> Chair or	<input type="checkbox"/> Member	Number of meetings attended: _____
<input type="checkbox"/> Awareness -	<input type="checkbox"/> Chair or	<input type="checkbox"/> Member	Number of meetings attended: _____
<input type="checkbox"/> Advocacy -	<input type="checkbox"/> Chair or	<input type="checkbox"/> Member	Number of meetings attended: _____
<input type="checkbox"/> Planning -	<input type="checkbox"/> Chair or	<input type="checkbox"/> Member	Number of meetings attended: _____
<input type="checkbox"/> Data -	<input type="checkbox"/> Chair or	<input type="checkbox"/> Member	Number of meetings attended: _____

PIC Activities Participation

Please circle how your agency participated in the following PIC activities:

	1 point	2 points
2013 Legislative breakfast	Attended	Provided a display
2013 Point In Time	Attended	Regional leader
2012 Hoolaulea	Attended	Provided a booth

2. Project Leverage

This criterion is a mathematical calculation of ratio of HUD funds requested to the value of other resources contributed / secured for the project / program by the applicant.

For your proposed project:

A) Leverage Provided: \$ _____
 B) Total HUD Funding Request: \$ _____
 Leverage Ratio (B/A): _____ %

Please use the Project Leverage Cover Sheet at the back of this document.

Exhibit C – Project Summary for NEW Projects

3. Capacity of Applicant – Consistency with Agency Mission and Purpose

State your agency's mission and purpose as stated in the by-laws and charter: _____

Briefly explain how your proposed CoC project is in line with your agency's mission and purpose: _____

4. Capacity of Applicant – Past Experience

Provide a brief overview of your agency's previous experience with CoC grants and/or with similar projects/programs that serve the same client group as your current CoC proposal:

Briefly explain how your agency has the adequate management, direct, and/or financial staff to implement the proposed CoC project: _____

5. Capacity of Applicant – Readiness To Proceed

Check off if your agency has secured a site for the proposed CoC project

Provide a brief overview/explanation: _____

Check off if all resources necessary to implement the proposed CoC project have been secured or will be secured with the receipt of the requested funding.

Provide a brief overview/explanation: _____

Check off if program guidelines have been established for the proposed CoC project

Provide a brief overview/explanation: _____

Check off if key staff members have been identified to manage and implement the proposed CoC project

Provide a brief overview/explanation: _____

6. Program Design and Anticipated Outcomes

Briefly describe the need and the population to be addressed by this project: _____

Briefly describe how the program design will address the identified the need: _____

Briefly describe how the program design will address the identified population: _____

Briefly describe how the program design will provide appropriate services for the identified population: _____

Briefly describe how the program design will lead to outcomes that will meet or exceed project goals: _____

Non scoring question: What is HUD's cost of services per person?

a) Proposed HUD Budget:

b) Proposed People served:

a / b = _____ dollars per person

Exhibit C – Project Summary for NEW Projects

7. Project Quality – Anticipated Achievement of 2013 HUD CoC Objectives

Describe how your proposed project will achieve the following 2013 HUD CoC Objectives.

1. Create new permanent housing (PH) beds for chronically homeless persons.

Check off if this is an objective of your proposed CoC project:

Explain your projects proposed achievements related to this outcome:

2. Increase percentage of homeless persons staying in PH over 6 months to at least 80%.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects proposed achievements related to this outcome (provide your proposed %, numbers, etc.):

3. Increase percentage of homeless persons moving from transitional housing (TH) to PH to at least 80%.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects proposed achievements related to this outcome (provide your proposed %, numbers, etc.):

4. Increase percentage of homeless persons employed at exit to at least 20%.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects proposed achievements related to this outcome (provide your proposed %, numbers, etc.):

5. Decrease the number of homeless households with children.

Check off if this was an objective of the project's most recently completed grant term:

Explain your projects proposed achievements related to this outcome:

8. Housing First Bonus

Describe how the project will meet the following criteria:

Housing Stabilization _____

Crisis Intervention _____

Long Term Action Plan _____

Additional Questions

9. Project implementation of the Affordable Care Act

Describe how the project is preparing for implementation of the Affordable Care Act (ACA). Response should address the extent in which project recipients and subrecipients will participate in enrollment and outreach activities to ensure eligible households are able to take advantage of new healthcare options. _____

10. Economic opportunities for persons with low or very low income

Describe activities the project will undertake to ensure employment and other economic opportunities are directed to persons with low or very low income. _____

Exhibit D – Renewal Project Score Sheet

Project Information	Continuum of Care Program
Subrecipient:	<input type="checkbox"/> Transitional Housing <input type="checkbox"/> Permanent Housing <input type="checkbox"/> Supportive Services Only
Project Applicant:	
Project/Program Name:	Number of years requesting funds: 1
	Anticipated grant year: 2014-2015

Project/Program Description

Scoring Summary

RENEWAL PROJECTS Criteria		Max Points	My Scores
1.	Participation in Partners in Care	5	
2.	Project Leverage	10	
3.	Project Quality - Meeting Goals and Intent of Program	5	
4.	Project Quality - Accomplishing Program Goals (APR)	15	
5.	Project Quality - Accomplishing Program Goals (number served)	5	
6.	Project Quality - Accomplishing Program Goals (Expend funds)	5	
7.	Project Quality --Achievement of 2012 HUD CoC Objectives	10	
8.	Unresolved Issues	-8	
TOTAL		60	

Partners In Care

Preface

Partners in Care (PIC), with the support of the City and County of Honolulu's Department of Community Services, provides leadership and structure for the annual application for the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care Competition for Homeless program funding. We are committed to building a system of care to meet the needs of persons experiencing homelessness or threatened with homelessness. Projects emphasizing core values essential to developing a system of care will score more favorably. These include: participation in planning and decision making, collaboration, leveraging and cost-effectiveness, responding to identified needs and the use of practices that have been shown to result in better outcomes than others. Scoring has changed in some areas this year to reflect these values. Others will be rolling out in future years.

PIC is also committed to availing ourselves of wisdom offered by the U.S. Inter-Agency Council on Homelessness (USICH) and the *Federal Opening Doors Plan to End Homelessness*. Funding from HUD's Homeless Programs is meant to promote projects that lead to or provide permanent housing to homeless persons. Evaluation of projects will also take these elements into consideration.

Notes for the Evaluation Committee

- 1) The evaluation committee is not limited to the point values listed below and may assign points between those values to reflect their ratings.
- 2) In addition to the written material provided, the evaluation committee will have a question and answer session with each applicant on from 9:00am - noon on January 16, 2014. The written material and the responses during the question and answer session should be factored into the final scores.

Criteria	Maximum Points	Points Awarded												
<p>1. Participation in Partners in Care</p> <p>1a. Partners In Care (PIC) General Meeting Attendance</p> <ul style="list-style-type: none"> • Applicant attended 7 - 9 of the last 9 meetings. (5 Points) • Applicant attended 4 - 6 of the last 9 meetings. (3 Points) • Applicant attended 1 - 3 of the last 9 meetings. (1 Points) • Applicant attended no meetings. (0 Points) <p>1b. PIC Subcommittee and PIC Activities Participation</p> <p>a. Agencies will receive the points as noted below for participation in PIC Subcommittees:</p> <ul style="list-style-type: none"> • Applicant chairs and coordinates a subcommittee. (3 Points) • Applicant <u>regularly participates</u> in more than 75% subcommittee meetings. (2 Points) • Applicant <u>frequently participates</u> in between 50% - 75% of subcommittee meetings. (1 Points) • Applicant <u>occasionally participates</u> in less than 50% of subcommittee meetings. (0 Points) <p>1c. Participation points as noted in the table below for the following PIC activities are added to the subcommittee participation points above up to a maximum of 3 points.</p> <table border="1" data-bbox="204 989 943 1178"> <thead> <tr> <th></th> <th>1 point</th> <th>2 points</th> </tr> </thead> <tbody> <tr> <td>2013 Legislative breakfast</td> <td>Attended</td> <td>Provided a display</td> </tr> <tr> <td>2012 Hoolaulea</td> <td>Attended</td> <td>Provided a booth</td> </tr> <tr> <td>2013 Point In Time</td> <td>Attended</td> <td>Regional leader</td> </tr> </tbody> </table>		1 point	2 points	2013 Legislative breakfast	Attended	Provided a display	2012 Hoolaulea	Attended	Provided a booth	2013 Point In Time	Attended	Regional leader	<p>2</p> <p>3</p>	<p>1a. _____</p> <p>1b. _____</p> <p>1c. _____</p> <p>Total (1a+1b+1c)</p> <p>_____</p>
	1 point	2 points												
2013 Legislative breakfast	Attended	Provided a display												
2012 Hoolaulea	Attended	Provided a booth												
2013 Point In Time	Attended	Regional leader												
<p>2. Project Leverage</p> <p>This criterion is a mathematical calculation of the ratio of CoC funds requested to the value of other resources contributed/secured to the project/program by the applicant.</p> <ul style="list-style-type: none"> • Applicant's leveraging ratio is 150% or more. (10 Points) • Applicant's leveraging ratio between 120% and 139%. (8 Points) • Applicant's leveraging ratio between 100% and 119%. (6 Points) • Applicant's leveraging ratio between 80% and 99%. (4 Points) • Applicant's leveraging ratio between 60% and 79%. (2 Points) • Applicant's leveraging ratio less than 60%. (0 Points) <p>A. Leverage Provided: \$</p> <p>B. HUD Funding Request: \$</p> <p>Leverage Ratio (B/A): %</p>	<p>10</p>													

<p>3. Project Quality - Meeting Original Goals and Intent of Program or as Amended</p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project has been successful in serving the intended client group, providing the intended services, and meeting the intended overall goals of the program. (5 Points) <input type="checkbox"/> The proposed project has, for the most part, been serving the intended client group, providing the intended services, and meeting the intended overall goals of the program, although some variations may have been made. (3 Points) <input type="checkbox"/> The proposed project has not been serving the intended client group, providing the intended services, and meeting the intended overall goals of the program. (0 Points) 	5	
<p>4. Project Quality - Accomplishing Program Goals <u>Annual Progress Report (APR) Goals</u> <i>For the APR submitted to HUD between October 1, 2012, and September 30, 2013:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project achieved all of the HUD required program goals. (15 Points) <input type="checkbox"/> The proposed project achieved one of the HUD required program goals (8 Points) <input type="checkbox"/> The proposed project achieved none of the HUD required program goals (0 Points) 	15	
<p>5. Project Quality - Accomplishing Program Goals <u>Projected Number of Consumers to be Served</u> From 5A and 5B of the 2011 application: Number anticipated to be served during the grant term from 5A and 5B of your 2011 application: a. Individuals: b. Families (households): Actual number served during the grant term from your APR: c. Individuals: d. Families (households): Percentage accomplished (Actual divided by anticipated): e. Individuals: f. Families (households):</p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project served 100% or more of the anticipated number of individuals and/or families. (5 Points) <input type="checkbox"/> The proposed project served 90 - 99% of the anticipated number of individuals and/or families. (4 Points) <input type="checkbox"/> The proposed project served 80 - 89% of the anticipated number of individuals and/or families. (3 Points) <input type="checkbox"/> The proposed project served 70 - 79% of the anticipated number of individuals and/or families. (2 Points) <input type="checkbox"/> The proposed project served 60 - 69% of the anticipated number of individuals and/or families. (1 Point) <input type="checkbox"/> The proposed project served less than 60% of the anticipated number of individuals and/or families. (0 Points) 	5	

<p>6. Project Quality - Accomplishing Program Goals Grant Award Expenditure For the most recently completed grant year: Total Grant Award from the 2011 renewal list: \$ _____ Amount of Grant Award Expended at Grant Expiration from your APR: \$ _____ Percentage Expended at Grant Expiration (Expended divided by Total Grant Award): _____ % Total Duration (Years) of Grant Award: _____</p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project expended 100% of its grant award. (5 Points) <input type="checkbox"/> The proposed project expended 90 - 99% of its grant award. (4 Points) <input type="checkbox"/> The proposed project expended 80 - 89% of its grant award. (3 Points) <input type="checkbox"/> The proposed project expended 70 - 79% of its grant award. (2 Points) <input type="checkbox"/> The proposed project expended 60 - 69% of its grant award. (1 Point) <input type="checkbox"/> The proposed project expended less than 60% of its grant award. (0 Points) 	5	
<p>7. Project Quality - Accomplishing 2012 HUD CoC Objectives HUD CoC Objectives:</p> <ol style="list-style-type: none"> 1. Create new permanent housing (PH) beds for chronically homeless persons. 2. Increase percentage of homeless persons staying in PH over 6 months to at least 80%. 3. Increase percentage of homeless persons moving from transitional housing (TH) to PH to at least 65% 4. Increase percentage of homeless persons employed at exit to at least 20%. 5. Decrease the number of homeless households with children. <p>For the most recently completed grant year:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The proposed project met or exceeded three (3) or more HUD objectives. (15 Points) <input type="checkbox"/> The proposed project met two (2) HUD objectives. (10 Points) <input type="checkbox"/> The proposed project met one (1) HUD objective. (5 Points) <input type="checkbox"/> The proposed project met none of the HUD objectives. (0 Points) 	15	
<p>8. Project Quality - Unresolved Issues (a) Outstanding obligation to HUD; (b) Audit finding(s); (c) History of inadequate financial management accounting practices; (d) Evidence of untimely expenditures on prior award; (e) History of other major capacity issues; (f) History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes. Evaluation committee will subtract 1 point for each of factors a - f above</p>	-6	

Exhibit E – New Project Score Sheet

Project Information	Continuum of Care Program Component
Subrecipient:	<input checked="" type="checkbox"/> Permanent Housing
Project Applicant:	Number of years requesting funds:
Project/Program Name:	Anticipated grant years: 2014-_____
	Funding: <input checked="" type="checkbox"/> New Reallocation

Project/Program Description

Scoring Summary	Max Points	My Scores
1. Participation in Partners In Care	5	
2. Project Leverage	5	
3. Capacity of Applicant – Consistency with Agency Mission and Purpose	5	
4. Capacity of Applicant – Past Experience	7	
5. Capacity of Applicant – Readiness To Proceed	8	
6. Program Design and Anticipated Outcomes	13	
7. Project Quality – Anticipated Achievement of 2013 HUD CoC Objectives	12	
8. Housing First Bonus – Aligns with City's Housing First Initiative	5	
TOTAL	60	

Exhibit E -- New Project Score Sheet

Partners In Care
Preface

Partners in Care (PIC), with the support of the City and County of Honolulu's Department of Community Services, provides leadership and structure for the annual application for the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care Competition for Homeless program funding. We are committed to building a system of care to meet the needs of persons experiencing homelessness or threatened with homelessness. Projects emphasizing core values essential to developing a system of care will score more favorably. These include: participation in planning and decision making, collaboration, leveraging and cost-effectiveness, responding to identified needs and the use of practices that have been shown to result in better outcomes than others. Scoring has changed in some areas this year to reflect these values. Others will be rolling out in future years.

PIC is also committed to availing ourselves of wisdom offered by the U.S. Inter-Agency Council on Homelessness (USICH) and the Federal *Opening Doors* Plan to End Homelessness. Funding from HUD's Homeless Programs is meant to promote projects that lead to or provide permanent housing to homeless persons. Evaluation of projects will also take these elements into consideration.

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Criteria	Maximum Points	Points Awarded												
1. Participation in Partners In Care 1a. Partners In Care (PIC) General Meeting Attendance <ul style="list-style-type: none"> • Applicant attended 5 - 9 of the last 9 meetings. (2 Points) • Applicant attended 1 - 4 of the last 9 meetings. (1 Points) • Applicant attended no meetings. (0 Points) 	2	1a. _____												
1b. PIC Subcommittee and PIC Activities Participation a. Agencies will receive the points as noted below for participation in PIC Subcommittees: <ul style="list-style-type: none"> • Applicant chairs and coordinates a subcommittee. (3 Points) • Applicant <u>regularly participates</u> in more than 75% subcommittee meetings. (2 Points) • Applicant <u>frequently participates</u> in between 50% - 75% of subcommittee meetings. (1 Points) • Applicant <u>occasionally participates</u> in less than 50% of subcommittee meetings. (0 Points) 	3	1b. _____												
1c. Participation points as noted in the table below for the following PIC activities are added to the subcommittee participation points above up to a maximum of 3 points. <table border="1" style="width: 100%; margin-top: 5px;"> <thead> <tr> <th></th> <th style="text-align: center;">1 point</th> <th style="text-align: center;">2 points</th> </tr> </thead> <tbody> <tr> <td>2013 Legislative breakfast</td> <td style="text-align: center;">Attended</td> <td style="text-align: center;">Provided a display</td> </tr> <tr> <td>2013 Point In Time</td> <td style="text-align: center;">Attended</td> <td style="text-align: center;">Regional leader</td> </tr> <tr> <td>2012 Hoolaulea</td> <td style="text-align: center;">Attended</td> <td style="text-align: center;">Provided a booth</td> </tr> </tbody> </table>		1 point	2 points	2013 Legislative breakfast	Attended	Provided a display	2013 Point In Time	Attended	Regional leader	2012 Hoolaulea	Attended	Provided a booth		1c. _____
	1 point	2 points												
2013 Legislative breakfast	Attended	Provided a display												
2013 Point In Time	Attended	Regional leader												
2012 Hoolaulea	Attended	Provided a booth												
		Total (1a+1b+1c)												

Exhibit E – New Project Score Sheet

Criteria	Maximum Points	Points Awarded
<p>2. Project Leverage</p> <p>This criterion is a mathematical calculation of the ratio of CoC funds requested to the value of other resources devoted to the project by the applicant as described in HUD's application form.</p> <ul style="list-style-type: none"> • Applicant's leveraging ratio is 150% or more. (5 Points) • Applicant's leveraging ratio is between 120% and 139%. (4 Points) • Applicant's leveraging ratio is between 100% and 119%. (3 Points) • Applicant's leveraging ratio is between 80% and 99%. (2 Points) • Applicant's leveraging ratio is between 60% and 79%. (1 Points) • Applicant's leveraging ratio is less than 60%. (0 Points) <p>A. Leverage Provided: \$ B. Total HUD Funding Request: \$ Leverage Ratio (B/A): %</p>	5	
<p>3. Capacity of Applicant – Consistency with Agency Mission and Purpose</p> <ul style="list-style-type: none"> • The proposed project is generally consistent with the stated mission and purpose of the proposing agency as stated in the agency's by-laws and charter. (5 Points) • The proposed project is a related extension of the state mission and purpose of the proposing agency as stated in the agency's by-laws and charter. (3 Points) • The proposed project is inconsistent with the stated mission and purpose of the proposing agency. (0 Points) 	5	
<p>4. Capacity of Applicant – Past Experience</p> <ul style="list-style-type: none"> • The applicant has demonstrated the capacity to implement the proposed project as evidenced by similar past projects and programs which serve the intended client group. The agency has adequate management and professional staff to successfully implement and manage the proposed project. (7 Points) • The applicant's capacity to implement the proposed project is questionable or based on experience with past projects and programs which are related to, but not similar to the proposed project. The agency will need to recruit, retain, and/or train additional management and professional staff prior to the implementation of the proposed project to augment existing staff. (4 Points) • The applicant does not have relevant or related past experience. The agency will need to recruit or train new personnel to manage and operate the proposed project. (0 Points) 	7	

Exhibit E – New Project Score Sheet

Criteria	Maximum Points	Points Awarded
<p>7. Project Quality – Anticipated Achievement of 2013 HUD CoC Objectives</p> <p>HUD CoC Objectives as defined in its application form:</p> <ol style="list-style-type: none"> 1. Create new permanent housing (PH) beds for chronically homeless persons. 2. Increase percentage of homeless persons staying in PH over 6 months to at least 77.80%. 3. Increase percentage of homeless persons moving from transitional housing (TH) to PH to at least 65% 4. Increase percentage of homeless persons employed at exit to at least 20%. 5. Decrease the number of homeless households with children. <p>Proposed project's target population: _____</p> <p>For the anticipated program year:</p> <ul style="list-style-type: none"> • The proposed project intends to <u>meet or exceed three (3) or more</u> HUD objectives. (12 Points) • The proposed project intends to <u>meet two (2)</u> HUD objectives. (9 Points) • The proposed project intends to <u>meet one (1)</u> HUD objective. (6 Points) • The proposed project does not intend to meet a HUD objective. (0 Points) 	12	
<p>8. Housing First Bonus</p> <p>The proposed new project offers all of the elements of Housing First listed below.</p> <p>Housing Stabilization</p> <ul style="list-style-type: none"> • Prioritizes clients that need it most • Immediate placement in long-term housing • Locating housing and short-term rental assistance <p>Crisis Intervention</p> <ul style="list-style-type: none"> • Stabilize participants with case management • Connect to community resources <p>Long-Term Action Plan</p> <ul style="list-style-type: none"> • Improve financial literacy, budgeting, and job skills • Identify underlying causes of hn • Engaged landlords as partners • Will provide the appropriate amount and type of supportive services necessary for client to maintain long term housing 	5	

Exhibit F

1. SEXUAL HARASSMENT POLICY FOR EMPLOYER HAVING A CONTRACT WITH THE CITY.

All City contractors must comply with City Ordinance 93-84 on sexual harassment. All contractors shall have and enforce a policy prohibiting sexual harassment. The contractor's sexual harassment policy must set forth the same or greater protection than those contained or required by the ordinance. The ordinance is applicable to the employer's business and includes the following:

- a) Prohibitions against an officer's or employee's sexual harassment of the following:
 - (1) Another officer or employee of the employer,
 - (2) An individual under consideration for employment with the employer, or
 - (3) An individual doing business with the employer'
- b) A provision prohibiting a management or supervisory officer or employee from knowingly permitting a subordinate officer or employee to engage in the sexual harassment prohibited under subdivision a;
- c) A prohibition against retaliation towards an officer, employee, or individual who has complained of sexual harassment, conducted an investigation of a complaint, or acted as a witness during an investigation of a complaint
- d) A prohibition against a malicious false complaint of sexual harassment by an officer, employee or individual;
- e) Provisions allowing an officer, employee, or individual to make a sexual harassment complaint to an appropriate management, supervisory, or personnel officer or employee;
- f) Procedures for investigating a sexual harassment complaint in an unbiased, fair, and discreet manner with appropriate safeguards to maintain confidentiality and protection from embarrassment,
- g) A provision requiring the use of the 'reasonable person of the same gender standard,' to determine if sexual harassment has occurred. Under the standard, sexual harassment shall be deemed to have occurred if the alleged offender's conduct would be considered sexual harassment from the perspective of a reasonable person of the same gender as the alleged victim. If the alleged victim is a woman, the 'reasonable person of the same gender standard' shall be equivalent to and may be called the 'reasonable woman standard;'
- h) Disciplinary actions which may be imposed on an officer or employee who committed a prohibitive act; and
- i) For an employer with at least five employees, a provision requiring the annual viewing of a video on the sexual harassment policy by each management or supervisory officer or employee.

The policy required under this section shall be in effect for at least the duration of the employer's contract with the City.

The action of the bidder or proposer in submitting its bid, proposal or signing of the contract shall constitute its pledge and acceptance of the provisions for the sexual harassment policy as required by City Ordinance 93-84.

City Ordinance 93-84 is on file and available for viewing in the Purchasing Division. Bidders or contractors needing a copy must pick up the copy from the Office of the City Clerk, Room 203, City Hall, 530 South King Street, Honolulu, Hawaii.

2011 Application 5A and 5B Summary				For Q5 of Project Summary	
	5A	Households with Children		Number anticipated to be served during the grant term:	
Households	0			a. Individuals	8
Adults	0			b. Households	8
Children	0			Actual number served during the grant term:	
Individuals	0			c. Individuals	28
				d. Households	28
	5B	Households w/out Children		Percentage accomplished (Actual divided by anticipated):	
Households	8			e. Individuals	350%
Adults	8			f. Households	350%
Children	0				
Individuals	8				
	Total				
Households	8			APR Summary	
Adults	8			Households	28
Children	0			Adults	28
Individuals	8			Children	0
				Individuals	28
					From APR Q 9
					From APR Q 8
					From APR Q 8

Instructions:
 Fill in the yellow cells with info from your 2011 application and your most recent APR
 Transfer the green cells to Q5 if your project summary
 The gray cells are formulas

Exhibit G

Instructions:

Fill in the appropriate yellow cells with info from your most recent APR

Transfer the green cells to Q7 if your project summary

The gray cells are formulas

Total leavers		26	
Total stayers		159	
Exited after 6 months		23	
Did not exit after 6 months		13	
Stayer - less than 6 months		16	
6+ months		90%	
			Project Summary Q7.2
			Only Permanent Housing projects must fill this out
			HUD Goal = 80%
	Steadfast S+C		
Leavers			
30 or less		0	APR Q27 leavers column
31 - 60		0	
61 - 180		3	
181 - 365		2	
366 - 730		9	
731 - 1095		2	
1096 - 1460		3	
1461 - 1825		1	
1825+		6	
Missing		0	
sub		26	
Stayers			
30 or less		4	APR Q27 stayers column
31 - 60		5	
61 - 180		7	
181 - 365		6	
366 - 730		48	
731 - 1095		28	
1096 - 1460		32	
1461 - 1825		6	
1825+		23	
Missing		0	
sub		159	
Total			
30 or less		4	
31 - 60		5	
61 - 180		10	
181 - 365		8	
366 - 730		57	
731 - 1095		30	
1096 - 1460		35	
1461 - 1825		7	
1825+		29	
Missing		0	
sub		185	

Persons exiting from Transitional to Permanent Housing.		
	Salvation Army ATS	
Number of Participants who Moved to PH	10	From APR Q29a1+Q29a2 (subtotals to PH)
Number of Participants Exiting TH	18	From APR Q29a1+Q29a2 (Totals)
Percent of Participants who Move to PH	56%	Project Summary Q7.3 Only Transitional Housing projects must fill this out HUD Goal = 65%

	Salvation Army ATS	
CoC Employment at Exit: GOAL = 20%		
Earned Income	8	Info from APR Q25a1 Total column
Unemployment Insurance	0	
SSI	0	
SSDI	1	
Veteran's Disability	0	
Private Disability	0	
Worker's Compensation	0	
TANF or Equivalent	0	
General Assistance	7	
Retirement (Social Security)	0	
Veteran's Pension	0	
Pension from former job	0	
Child Support	0	
Alimony	0	
Other (Indicate Below)	0	APR Q25a2
No Financial Resources	2	
1+ Sources	16	
Don't Know / Refused	0	
Info Missing	0	
Total	18	
% Employment	44%	Project Summary Q7.4 All projects must fill this out HUD Goal = 20%

1A. Continuum of Care (CoC) Identification

Instructions:

The fields on this screen are read only and reference the information entered during the CoC Registration process. Updates cannot be made at this time. If the information on this screen is not correct, contact the One CPD Resource Exchange Ask A Question at <https://www.onecpd.info/ask-a-question/>.

Collaborative Applicant Name: City and County of Honolulu

Continuum of Care (CoC) New Project Listing

Instructions:

Prior to starting the CoC New Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Instructions" and the "CoC Project Listing" training module, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>

To upload all new project applications that were created through reallocation and have been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes based upon the number of new projects created through reallocation that need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review a project on the New Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Rank	Comp Type
IHS New Permanent...	2014-02-02 01:31:...	1 Year	Honolulu CoC - Ap...	\$485,489	R23	PH

Continuum of Care (CoC) Renewal Project Listing

Instructions:

Prior to starting the CoC Renewal Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Instructions" and the "CoC Project Listing" training module, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>

To upload all renewal project applications that have been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes based upon the number of renewal projects that need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review a project on the Renewal Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

The Collaborative Applicant certifies that there is a demonstrated need for all renewal permanent supportive housing and rapid re-housing projects listed on the Renewal Project Listing.

The Collaborative Applicant does not have any renewal permanent supportive housing or rapid re-housing renewal projects.

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Rank	Comp Type ▲
2013 HMIS 28840	2014-02-03 13:44:...	1 Year	Honolulu CoC -Ap...	\$23,072	W19	HMIS
2013 HMIS 82026	2014-02-03 13:45:...	1 Year	Honolulu CoC -Ap...	\$65,621	W20	HMIS
Headway House 2013	2014-01-17 22:45:...	1 Year	Steadfast Housing...	\$203,242	W5	PH
Kalealoa Permanen...	2014-01-24 20:43:...	1 Year	United States Vet...	\$135,782	T14	PH
Kaukama Group Hom...	2014-01-17 22:57:...	1 Year	Steadfast Housing...	\$29,605	W1	PH
Komo Mai Group Ho...	2014-01-17 22:50:...	1 Year	Steadfast Housing...	\$36,900	W2	PH
Permanent Support...	2014-01-24 20:48:...	1 Year	United States Vet...	\$249,703	T10	PH

GHP Permanent Hou...	2014-01-30 21:14:...	1 Year	Honolulu CoC - Ap...	\$505,106	W6	PH
IHS NPLH 2013	2014-01-30 21:29:...	1 Year	Honolulu CoC - Ap...	\$286,780	T8	PH
Consolidated PH 2013	2014-01-31 19:53:...	1 Year	Honolulu CoC - Ap...	\$5,048,976	W16	PH
Hearth Safe Haven...	2014-01-31 13:47:...	1 Year	Mental Health Kokua	\$826,467	W11	SH
Homeless Holistic...	2014-01-21 16:53:...	1 Year	Legal Aid Society...	\$62,155	W15	SSO
Transitional Livl...	2014-01-24 13:26:...	1 Year	Hale Kipa, Inc.	\$130,715	W17	TH
Barbers Point Vet...	2014-01-24 20:24:...	1 Year	United States Vet...	\$327,998	T3	TH
Community Residen...	2014-01-24 14:18:...	1 Year	Gregory House Pro...	\$342,346	W18	TH
Ahukini Group Hom...	2014-01-17 22:39:...	1 Year	Steadfast Housing...	\$26,791	W12	TH
Vancouver House	2014-01-30 16:23:...	1 Year	Housing Solutions...	\$51,998	W13	TH
Ohana Ola O Kahum...	2014-01-30 20:11:...	1 Year	Alternative Struc...	\$142,024	X	TH
Ka Ohu Hou O Manoa	2014-01-30 22:23:...	1 Year	The Salvation Arm...	\$173,068	W9	TH
ATS Homeless Offe...	2014-01-31 00:36:...	1 Year	The Salvation Arm...	\$193,670	W22	TH
Continuum of Care...	2014-01-31 21:42:...	1 Year	Child and Family ...	\$81,204	T4	TH
Consolidated TH 2013	2014-02-03 12:58:...	1 Year	Honolulu CoC - Ap...	\$303,039	W7	TH

Continuum of Care (CoC) Planning Project Listing

Instructions:

Prior to starting the CoC Planning Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Instructions" and the "CoC Project Listing" training module, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>

To upload the CoC planning project application that has been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes as the project will need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review the CoC Planning Project Listing, click on the magnifying glass next to view the project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

If more than one CoC planning project was submitted, the Collaborative Applicant can only approve one CoC planning project (which must be submitted by the Collaborative Applicant) and reject all other CoC planning projects.

Project Name	Date Submitted	Project Type	Applicant Name	Budget Amount	Grant Term	Rank	Comp.Type
CoC Planning Proj...	2014-02-03 13:04:...	--	Honolulu CoC - Ap...	\$120,046	1 Year	C21	CoC Planning Proj...

Funding Summary

Instructions

For additional information, carefully review the "CoC Priority Listing Instructions" and the "CoC Priority Listing" training guide, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>.

This page contains the total budget summaries for each of the project listings for which the Collaborative Applicant approved and ranked or rejected project applications. The Collaborative Applicant must review this page to ensure the totals for each of the categories is accurate. The "Total CoC Request" indicates the total funding request amount the Collaborative Applicant will submit to HUD for funding consideration. As stated previously, 1 UFA Cost project and only 1 CoC Planning project can be submitted and only the Collaborative Applicant is eligible to request these funds.

Title	Total Amount
Renewal Amount	\$9,104,238
New Amount	\$485,489
Reallocated Amount	\$0
CoC Planning Amount	\$120,046
UFA Costs	
Rejected Amount	\$142,024
TOTAL CoC REQUEST	\$9,709,773

Maximum CoC project planning amount: \$125,530

Submission Summary

Page	Last Updated
Before Starting	No Input Required
1A. Identification	01/02/2014
2A. CoC New Project Listing	02/02/2014
2B. CoC Renewal Project Listing	02/03/2014
4A. CoC Planning Project Listing	02/03/2014
Submission Summary	No Input Required

State of Hawaii

HMIS Data Quality Plan

Hawaii Balance of State (HI-500) CoC

Honolulu (HI-501) CoC

August 4, 2013.

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I. Overview and Purpose

This document defines the Data Quality Plan (DQP) for the State of Hawaii Homeless Management Information System (HMIS). The HMIS covers both the Hawaii Balance of State Continuum of Care (CoC) (HI-500) and the Honolulu CoC (HI-501).

Data Quality refers primarily to the reliability and validity of client-level data collected by the numerous service provider staff that input these data into HMIS for storage, tabulation and analysis. **Reliability** refers to the degree to which the data are complete (e.g. all questions answered with valid and useable responses) and consistent (results can be duplicated within and across different sites collecting data using the same instruments). **Validity** measures the degree to which data are accurate and represent, to the best extent possible, the true measure of the concept.

Benefits of reliable and valid (accurate) client data include:

- 1) Increase understanding of characteristics of persons experiencing homelessness and how characteristics may change over time and geography.
- 2) Provide accurate information about persons who utilize the homeless services system.
- 3) Generate accurate measures of program performance serving homeless populations.
- 4) Provide empirical information that can be the basis of new program interventions.

This DQP reflects a statewide effort to document and define procedures and benchmarks that will enhance the ability of both CoC to achieve statistically reliable, accurate and complete data. The DQP sets expectations, methods, and execution standards (benchmarks) that will be implemented by the Honolulu and Hawaii Balance of State CoC in an effort to improve data quality for the purposes of analysis, reporting, and planning.

The DQP includes protocols for on-going data quality monitoring that meet or exceed requirements set forth by the United States Department of Housing and Urban Development (HUD). It has been developed by the City & County of Honolulu, the Hawaii Balance of State CoC, the Honolulu CoC Data Committee, and local HMIS participating service providers. Additional technical consultants experienced in HMIS implementation have also contributed to this plan.

The plan is intended to be updated annually, taking into account changes to HUD's HMIS Data and Technical Standards, data entry procedures set forth via the Honolulu and Hawaii Balance of State CoC, needs of varying stakeholders, and enhancements to CoC performance plans.

HMIS Data and Technical Standards

Hawaii's HMIS is a web-based system that stores longitudinal client-level information about persons utilizing homeless assistance services, whose data is entered by over 40 agencies operating over 100 programs that fall under the homeless services network. The HMIS also has the capacity to integrate data from the database systems of other contributory organizations.

Aggregate HMIS data can be used to understand key characteristics of the homeless population and to generate statistical reports used by stakeholders in making policy and funding decisions.

HUD's HMIS Data and Technical Standards provide a framework for an HMIS implementation. HUD's March 2010 Notice revised the HMIS Data and Technical Standards Final Notice (69 FR 146, July 30, 2004) and acts as the most recently revised data standards. The final March 2010 data standards can be downloaded from: <https://www.onecpd.info/resource/1220/final-hmis-data-standards/>

The Notice outlines three sets of HMIS data elements, which include:

- 1) Program Descriptor Data Elements (PDDE)
- 2) Universal Data Elements (UDE)
- 3) Program Specific Data Elements (PSDE)

Program Descriptor Data Elements (PDDE) ensure that standardized information about each CoC program is available to 1) generate Annual Performance Reports (APR), Quarterly Performance Reports (QPR) for HPRP, the Annual Homeless Assessment Report (AHAR), and the Housing Inventory Count (HIC), 2) track bed utilization rates, 3) calculate HMIS participation rates among categories of programs (e.g. ES, TH, PH, Outreach, etc.), and 4) monitor data quality. These fields are populated via the HMIS, and updated by agency users and the local HMIS Administrator. A full listing and description for each element are available on pages 17-39 of the HUD HMIS Data and Technical Standards.

Universal Data Elements (UDE) establishes baseline data collection requirements for all programs utilizing the HMIS. These data elements provide a basis for producing unduplicated estimates of the number of homeless persons accessing services from homeless assistance providers. They assist in gathering key demographic information and help to identify frequency and duration of homelessness. All UDE are collected in the HMIS and are the primary set of variables used to produce the AHAR report each year. Data quality for these elements largely determines whether HMIS data will be useable in the national AHAR. Useable AHAR data also garners points in the annual CoC competition, and could mean the difference in funding allocation. A full listing and description for each element are available on pages 40-63 of the HUD HMIS Data and Technical Standards.

Program Specific Data Elements (PSDE) provide information about the health and medical status of participants, and also enable the calculation of financial outcomes of clients when documented correctly at program entry and exit. These elements can also help to identify persons that are chronically homeless and help with service planning. PSDE are outlined on pages 64-105 of the HUD HMIS Data and Technical Standards.

Summary exhibits outlining program applicability, who data collection applies to, and when data should be collected are available on pages 12-16 of the HUD HMIS Data and Technical Standards. The data standards serve as a great resource, and should be referenced if questions arise concerning definitions or instructions for individual data elements.

II. Improving HMIS Data Quality

The sections that follow outline protocols and procedures that work to enhance overall data quality in five key areas: 1) Fidelity to data entry collection procedures and protocols, 2) Increasing data entry timeliness, 3) Reducing HMIS record duplication, 4) Improving and measuring data completeness, and 5) Data accuracy and consistency. The DQP also summarizes procedures for program entry and exit data, how to add assessments in the HMIS, and how to generate data quality and outcomes reports using the HMIS. Using the below methods should help to evaluate current data entry processes and enhance the integrity of your agency's data.

Area I: Fidelity to Data Entry Collection Procedures and Protocols

Maintaining rigorous data entry collection procedures ensures that the HMIS can provide the most up-to-date and accurate information for service providers and policy-makers with respect to programming decisions.

An important area identified through analysis of HMIS data are the protocols and procedures related to the collection of accurate discharge data and medical/income assessments. Since a formal client discharge interview is not always possible, it is important that key information such as income and disability status are continuously updated in both the HMIS and client case files.

Table 1: Benchmarks for Entry/Exit Collection Protocols and Medical/Income Assessments

SUPERIOR:

- 1) Direct entry of client-level data during program entry and exit interviews into the HMIS. This works to minimize the time between client entry/exit and HMIS data entry.
- 2) Medical/income assessments entered within one year of the intake date for eligible clients remaining in the program and annually thereafter.
- 3) Review and compare discharge data with intake data in the areas of disability, income, and non-cash benefits to ensure that original intake data is as accurate as possible given the additional information gathered during the client's program stay.

ACCEPTABLE:

- 1) Collecting intake/discharge data using the most updated paper forms provided by the HMIS administrator.
- 2) Intake data is collected through an in-person interview, face-to-face with client.
- 3) Discharge data is collected through a combination of in-person interview and/or case file records.

LACKING:

- 1) Collection of intake and discharge data using old versions of the paper forms or not using any CoC produced forms to collect the data.
- 2) Completing intake and discharge data using second hand data recalled from case manager or other staff/volunteers working at the agency.
- 3) No use of client case records for data validation.
- 4) No medical/income assessments are entered for eligible clients.

AREA II: Increasing Data Entry Timeliness:

Entering data into the HMIS during program entry or soon after the intake has been completed has several benefits.

- 1) Ensures that program utilization reporting is accurate and reflects actual occupancy relative to program capacity.
- 2) Increases data quality by reducing recollection errors (which increase as time between collection and data entry lapses) and by addressing data errors more quickly after collection has occurred.
- 3) Provides more complete, up-to-date, real-time reports on service utilization at the client and program level. This information is critical in CoC planning activities and for directing solutions for addressing homelessness, since participating homeless service agencies will benefit from shared utilization data that will be reviewed during program entry.

Rating program performance in relation to data entry uses the three tier scheme of Superior, Acceptable, and Lacking. Table 2 outlines timelines for intake, exit, encounter, and service data entry by CoC program type.

Table 2: Program Entry, Exit, Encounter and Service Data Timeliness Benchmarks:

Type of Program	Superior	Acceptable	Lacking
1. Emergency Shelter Programs	24 hours from program entry or exit	96 hours from program entry or exit	More than 96 hours from program entry or exit
2. Transitional Housing Programs and Safe Havens	24 hours from program entry or exit	96 hours from program entry or exit	More than 96 hours from program entry or exit
3. Permanent Housing Programs	24 hours from program entry or exit	96 hours from program entry or exit	More than 96 hours from program entry or exit
4. Homeless Street Outreach Programs	24 hours from encounter, 72 hours from program entry or exit	7 days from program entry or exit	More than 7 days from program entry or exit
5. Homeless Prevention and Rapid Re-Housing Programs	72 hours from program entry, exit, or service data	7 days from program entry, exit or service data	More than 7 days from program entry, exit or service data
6. Support Service Only Programs (excluding Outreach):	24 hours from encounter, 72 hours from program entry or exit	7 days from program entry, exit or encounter	More than 7 days from program entry, exit or encounter

Emergency/Transitional/Safe Haven/Permanent Housing: These four primary categories of supportive housing fall under the most stringent standards for HMIS data entry. For all programs, the superior standard is 24 hours from time of program entry or exit. The minimum acceptable standard is 96 hours (4 days) which allows for leniency during weekend or holidays time periods and acknowledge staff capacity issues.

Homeless Street Outreach Programs: If clients who were formerly homeless transition successfully to housing or shelter services, the client's discharge form should contain appropriate exit destination information. It is also recommended that outreach programs that provide outreach and supportive services to clients after they have been sheltered/housed should setup a separate sheltered outreach program in the HMIS and enter data into this new program. A new program can be set-up by contacting the HMIS administrator so that data is not comingled and reported with unsheltered and homeless client data. The HMIS is also designed so that clients without an encounter in the last six months will automatically be exited with an exit date equal to the current date.

Homeless Prevention & Rapid Re-housing Programs: HMIS data entry standards for Homeless Prevention and Rapid Re-Housing programs are less stringent as to allow these programs to complete HMIS data entry. This standard will be reviewed during the initial year of implementation of the DQS to determine if more stringent standards are needed. Service notes for Housing Relocation and Stabilization Services or Financial Assistance are to be entered within one week of the provision of services and will also be reviewed after the initial DQS implementation.

Support Service Only Programs (excluding Outreach): Program entries and exits are to be entered within one week of program entry and exit date to achieve basic compliance. Superior efforts are defined as entering encounters within 24 hours and program entries and exits within 72 hours. This will be monitored and adjusted once a better baseline is set.

AREA III: Reducing HMIS Record Duplication

Preventing Client Duplication at Program Entry

Using the search criteria effectively in the HMIS before adding client-level data is the most important method for reducing duplication in the HMIS. Before adding a new client it is important that users search for the client to determine if he or she has been entered into the HMIS at some point in the past. During a major clean-up effort of the HMIS in 2012-13, nearly 10% of the client records (sheltered programs varied from 3% to 5%; outreach programs varied from 10% to 12%) were found to be duplicate clients created over the past ten years.

Limiting the search to just the last name field is the most effective way to search for clients in the database. Searching for a client using more than one field and a client's full information increases the likelihood of error and the potential that a new client is created that already exists. If you suspect that a client has already been entered into the HMIS at some point and the client has a difficult last name, you may want to search using wildcard characters (*).

As an example, Hakeem Olajuwon could be searched for by using the following method:

- 1) If you are certain that the first three letters of the last name are correct, you could type "Ola*" in the last name field.
- 2) This will bring up all clients in the database with last name starting with Ola.
- 3) If you wanted to narrow the search results you could type Ha* in the first name field and Ola* in the last name field.

Generally, easy last/first names will bring up the desired client with no problem. However, it is still recommended to use the above approach.

It is recommended that the social security number (SSN) or alias fields be used with great care. Searching by just the SSN increases the likelihood of error due to transposition errors. The HMIS contains a large amount of client records and every search for a client should be conducted as if the client records already exist. If you have exhausted all recommended search strategies, then and only then should a new client record be created.

Table 3: Benchmarks for Client Duplication

SUPERIOR: Use three or more (3+) search methods independently, including last name only, first three letters of last name, and first two letters of first or last name. SSN used WITH crosschecking Date of Birth (DOB) and First and Last Name for any client with identical SSN.

ACCEPTABLE: Use at least two (2) search methods including last name only and first three letters of last name.

LACKING: Use only full last name for searching records without varying spelling or using only first 3 letters only. Use both full first name and last name during search. Use Social Security WITHOUT crosschecking DOB and First and Last Name with any client with identical SSN.

Merging of Client Records

A merge function is accessible to all users as a tool in the HMIS software and can be found under the Client menu function. Client records created by different agencies are unable to be merged by agency users. Merges can be searched by first name, last name, and social security number. It is recommended that merge search use last name only or social security only, but not both. This will maximize the number of client records found that may be in need of merging.

When two or more client records are identified as needing to be merged, it is necessary to select which client record will be the primary record (where the data will be active). The newly merged record will take the demographic characteristics corresponding to the primary record. Secondary client visits will be stored under the merged client; however, the secondary client's demographic info will be removed from the database.

When duplicate records of a client exist across agencies, the agency will not be able to merge the duplicate client records of other agencies. In these cases, users should proceed as follows:

- 1) Merge the duplicate client records that are located within your agency's records.
- 2) Contact the HMIS administrator with the names and dates of birth of the clients that cannot be merged. **Do not email any SSN information.**
- 3) The HMIS administrator will then merge the duplicate client records across agencies.

Elimination of Duplicate Intakes

HMIS users must ensure that duplicate entries are not created that represent the same program entry information. When duplicate program entries are found in the HMIS, the user can delete one of the program entries after ensuring that the most accurate program was selected for retention.

AREA IV: Improving and Measuring Data Completeness

Data entered into the HMIS must be as complete as possible. Partially complete or missing data can increase duplication and affect the provision of services to clients. All programs receiving local, state, or federal funding must enter data on 100% of the clients they serve.

The goal of the CoC is to collect 100% of all data elements for each client. Often, however, this is not possible or realistic. The CoC has established acceptable thresholds for unknown, refused and missing values rates, which are dependent on data element and program type. The table below establishes these thresholds. **Missing value rates for all program types should not be higher than 0%; if data is not available it should be marked as unknown or refused.**

Table 4: Data Quality Completeness Thresholds

Program Type	ES, TH, SH PSH, SSO,	Outreach	HPRP, RRH
	% Unk/Ref.	% Unk/Ref.	% Unk/Ref.
First Name	0%	1%	0%
Last Name	0%	1%	0%
SSN	1%	10%	3%
DOB	1%	4%	1%
Race	1%	2%	1%
Ethnicity	1%	10%	4%
Gender	0%	2%	0%
Vet Status	1%	10%	3%
Disabling Condition	10%	25%	6%
Residence Prior to Entry	5%	10%	2%
Zip of Last Perm. Address	10%	25%	5%
Housing Status (Entry)	1%	10%	2%
Income (Entry)	2%	15%	1%
Income (Exit)	2%	25%	15%

Non-Cash Benefits (Entry)	2%	15%	1%
Non-Cash Benefits (Exit)	2%	25%	15%
Physical Disability (Entry)	5%	15%	N/A
Developmental Disability (Entry)	5%	15%	N/A
Chronic Health Cond. (Entry)	5%	20%	N/A
HIV/AIDS (Entry)	5%	15%	N/A
Mental Health (Entry)	5%	15%	N/A
Substance Abuse (Entry)	5%	15%	N/A
Domestic Violence (Entry)	5%	15%	N/A
Destination at Exit	2%	25%	3%

Generating the above Data Quality Report in the HMIS is relatively straightforward. After logging in, click on the Reports tab, then identify the Data Quality Report section. Select the Data Quality Report radio button and program(s) you want included in the report. Be sure to edit the Date Criteria at the bottom before running the report – it is automatically set to the current fiscal year.

The report shows percentages of values that have been set to unknown, refused, or are missing. It also displays links that allows users to fix intake/exit data that is unknown, missing, or refused. As a reminder, programs should not enter 0 in the SSN field and mark partial SSN reported.

Area V: Data Accuracy and Consistency

Information entered into the HMIS needs to accurately reflect actual information for the people being served by any of the homeless service programs contributing data to the HMIS. False or inaccurate information is worse than incomplete information. It must be emphasized to clients and staff that it is better to enter “unknown or refused” than to enter inaccurate information.

All data entered into the CoC’s HMIS shall be a reflection of information provided by the client and documented by the intake worker, or otherwise updated by case management staff and entered into the HMIS, or relayed to appropriate HMIS administrative staff. Recording inaccurate information in the HMIS is strictly prohibited.

Analogously, all data must be collected and entered in a consistent manner, paying close attention to timeliness and completeness benchmarks. Separate data quality reports will be available in the coming months that will allow stakeholders and agencies the ability to monitor timeliness thresholds set forth in Table 2 above. All data entry staff must have separate passwords and complete an initial training with experienced HMIS staff before entering or updating client data. Additionally, it is mandatory that the HMIS administrator be notified immediately as HMIS staff resign or are terminated. This is an extremely important part of data security.

Aliases and Record Building Techniques in the HMIS:

Aliases are allowable only when a client refuses to provide their accurate personal identification information. Agencies are required to keep track of the alias/pseudonym given and must not

create a new alias record if one already exists, as this will increase duplication. Aliases, however, may adversely affect overall accuracy and completeness.

Record building in the HMIS for outreach programs is an important part of the data quality process and is strongly encouraged.

1. Clients initially declining HMIS consent are permitted to be entered into the HMIS under an alias that does not contain personally identifying information such as DOB, SSN.
2. As client information is accumulated, the original alias record should be expanded until it represents a very accurate depiction of the client receiving services.
3. A goal of outreach staff should be to garner trust with clients and obtain consent for those clients that have initially declined consent and been given an alias.
4. The alias given is required to be amended with actual personally identifiable information if consent is ultimately obtained. This stipulation is also established in the consent form.

File Sampling:

Sampling during site monitoring will be performed during periodic monitoring by the HMIS lead agency or Homeless Programs Office to measure data integrity. Staff designated by the lead agency or HPO will request a sample of client program entry and exit forms and compare these hardcopy files to information entered into the HMIS. If HMIS records differ significantly from hardcopy files, corrective action will be needed to improve the data quality.

Data Consistency Checks will be used to monitor data accuracy and consistency. Examples of inaccuracies include:

- Program entry and exit dates that overlap
- A client that is missing program exit data from one shelter program when that same client has an active program entry in another shelter program.
- Duplicate open client records in an agency program.

Often, running an unduplicated or duplicated report by client last name in the HMIS can identify inconsistencies in program data. These reports can identify duplicate clients or inaccuracies with data entry. If identified, duplicates should be voided by agency staff or merged by contacting the HMIS administrator.

III. Updating Data During the Program Stay

While the bulk of client information entered into the HMIS is collected during the program entry and exit interviews, the HMIS system has expanded greatly over the past five years to allow and encourage entry of data during the client program stay. Data on disability, income and other medical related domains are both difficult to collect in the program entry interview and also may change over the course of time. These functions are covered below.

Adding Assessments and Updating Intake/Exit Data

Often at program entry many data elements are simply not collected. During the course of working with clients, case management staff may discover the actual data and are expected to

update client records in the HMIS accordingly. It is important that data entry and case management staff update client records to reduce invalid data response rates.

Client records can be updated by clicking on the Edit Client Activity and Demographics link under the Client tab of the HMIS, searching for the client, then clicking on the Edit Intake/Exit button. Records can also be updated directly by clicking on the links in the data quality report as mentioned above.

Medical/Income assessments are required to be completed exactly one-year after intake for clients remaining in the program and at the end of the operating year for programs required to produce CoC program APRs. Programs should also update client data at the end of the AHAR cycle (Oct – Sep) for federal reporting purposes. The APR generation tool uses assessment data in the calculation of salient performance measures and is described below.

Medical/Income assessments can be added to intake records by clicking on the Edit Client Activity and Demographics link under the Client tab of the HMIS, searching for the client, then clicking on the Medical/Income Assessments button. It should be noted that assessments can be added at any time, and are encouraged to be added as frequently as medical/income information changes.

Producing Reports with the APR Generation Tool

The APR Generation Tool can be used as a universal assessment tool for all participating HMIS programs. The tool can be downloaded from the following link:
<https://www.onecpd.info/resource/1853/apr-generation-tool/>

Instructions for downloading the HMIS CSV (Comma Separated Values) files, importing the data into the tool, and running the report are below:

- 1) After logging in click on the Reports section tab.
- 2) Scroll down and identify the Export Data for the APR (beta) report. Click the radio button and select the program(s) you want in the report.
- 3) Fill in the date criteria at the bottom of the Reports page then submit.
- 4) Click on the HUD formatted Data (zip format). Open the file.
- 5) Extract all files to a new folder that you create.
- 6) Open the APR Generation Tool. Be sure to enable macros. Browse for the new folder that you created and then fill in all the blue fields below.
- 7) Click on the Import the Data button, then when finished click on the Run the Report button.
- 8) You can either export as PDF or review the tabs on the bottom of the excel workbook.

Exporting the report to PDF allows you to save and print the report. The report has a number of useful evaluation sub-reports that can be used to evaluate program performance. The Medical/Income Assessments defined in the prior section are important for the performance measures involving “Stayers”. Exit data is also extremely important for outcome reporting.

IV. Data Monitoring

Responsibilities and Compliance

It is the responsibility of the CoC, HMIS lead agency, executive directors, and all front-line support staff to conduct monitoring and provide notification to the CoC of the progress of participating programs regarding the CoC Data Quality Plan. Though each has a different role, they are all extremely important.

It is the responsibility of HMIS participating programs to comply with the HMIS Data Quality Plan and to collaborate with the HMIS Lead and support staff to quickly and accurately correct data that does not meet the compliance thresholds. It is the responsibility of the CoC to implement effective improvement and enforcement policies and procedures to support the monitoring and improvement process.

The HMIS Lead and support staff will run custom reports outlining timeliness issues and procedures to reconcile the information by the second week of the following month. Random census listings will be requested to determine if all clients have been entered within the standards set forth in Section II above. Agencies not meeting standards will be asked to provide an explanation and resolve any findings. This information will be shared with the CoC, which may aid in program funding determinations.

The HMIS lead and support staff will measure completeness by running an APR, custom, or data quality report and comparing to the data quality thresholds identified in section II above. Projects deficient in the above reporting will be identified randomly for review. Although deficient programs will be strictly targeted, every agency will be monitored at least once in a 2-year cycle. Summary reports and any findings will be sent to appropriate data entry and supervisory staff during the first week of the following month. The agency will be required to improve their data completeness or provide an explanation by the end of the month. Failure to correct findings may result in decreased program funding.

The HMIS Lead and HPO will review source documentation from sample records and compare to HMIS data entry. Comparisons will include universal as well as program-specific data elements. HMIS staff will not send sample listings beforehand. All program types will be subject to review.

Data Quality Monitoring Instruments:

Formal written instruments are currently being developed as tools to measure fidelity to data quality standards. Six areas that will be reviewed on a periodic basis as defined below.

1. Data Entry Collection Protocols

Monitoring Frequency: Yearly
Measure: On-site review of program entry and exit records.

Method: Observation, review of records, staff and client interviews
Standard: See Table 1 for standards
Sample: Randomly selected clients enrolled in prior six month period

2. Data Entry Timeliness

Monitoring Frequency: Biyearly
Measure: Length (days) between program entry and HMIS data entry
Method: Statistical analysis of HMIS program entry data
Standard: See Table 2 for standards
Sample: All clients enrolled in prior six month period

3. Reduction of Client Duplication

Monitoring Frequency: Yearly
Measure: Number of duplicate client records created/unmerged. Number of duplicated active intakes.
Method: Run duplicated and unduplicated client reports for monitoring period. Compare for discrepancies in number of clients. Sort and compare unduplicated client intakes for multiple active intakes.
Standard: Zero duplicate client records and duplicate intake records
Sample: All clients enrolled in prior six month period

4. Data Completeness

Monitoring Frequency: Quarterly
Measure: Review of 20 key data elements
Method: Run HMIS data quality report
Standard: Equal to or less than data benchmarks (See Table 4)
Sample: All clients enrolled in prior quarterly period

5. Data Accuracy

Key areas of database verification:

- 1) DOB substitution for date of entry (DOE)
- 2) Discrepancies between program entry and exit income
- 3) Incongruent disability information

STANDARD: The HMIS Administrative team and Partners in Care (PIC) Data Committee will work to complete a succinct set of benchmarks for key areas of data accuracy. Initial monitoring and other exploratory analysis during the upcoming year will provide a better baseline upon which to set standards and revise procedures.

General Procedures and Funding Impacts

HMIS staff will send data quality monitoring reports to the contact person at the agency responsible for HMIS data entry. Reports will include any findings and recommended corrective actions. If the agency fails to make corrections, or if there are repeated data quality errors, the HMIS staff may notify the agency's funders or community partners about non-compliance with the HMIS Data Quality Standards.

Future funding may be contingent on the ability to adhere to data quality thresholds and performance standards as defined in this document.

V. Relating HMIS Data Quality to the AHAR and HIC

The Annual Homeless Assessment Report (AHAR) is a report to the U.S. Congress on the extent and nature of homelessness in America. The report is prepared by the Department of Housing and Urban Development (HUD) and provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The report is based primarily on Homeless Management Information Systems (HMIS) data about sheltered persons who experience homelessness during a 12-month period.

The AHAR uses Universal and Program Specific Data Elements from the HMIS to amass reports that are deemed useable/unusable based on the extent of missing/unknown data rates and bed utilization rates for emergency, transitional, and permanent supportive housing programs. The submission of usable data in the AHAR gains points for the CoC in the annual CoC competitive grant program.

The most influential statistic in determining the usability of AHAR data is the HMIS bed/unit utilization rate. This rate for all programs will be calculated and monitored at four times during the year. These four dates are the last Wednesday in January, April, July, and October. The bed/unit utilization rate is defined to be the actual unduplicated occupancy in the HMIS on any date divided by the stated capacity in the most recently submitted Housing Inventory Count (HIC).

Bed/Unit Utilization Rate = (Actual HMIS Occupancy) / (Stated HIC Capacity)

The HIC and AHAR break out bed capacity into two categories: 1) beds for households with children, and 2) beds for households without children. The actual occupancy for these categories is easily obtained by running an unduplicated report in the HMIS for a one-day period and using the summary statistics generated at the bottom of the report. These numbers (used as the numerator) are then divided by the actual capacities as stated in the HIC to produce the bed/unit utilization rates.

Acceptable bed/unit utilization ranges for established projects within both CoCs are:

75% to 105% - Emergency Shelter Programs

85% to 105% - Transitional Housing Programs
90% to 105% - Permanent Supportive Housing Programs

In some cases HIC inventories will need to be expanded or contracted annually to accommodate changes in program capacity. The CoC is aware that new projects may need extra time to meet the above thresholds and will not expect them to meet the above in the first operating year.

The bed utilization rate is a good measure to monitor intake/exit data entry. Programs can receive a copy of the most recently submitted HIC and AHAR by contacting the City & County of Honolulu, the Homeless Programs Office, or the local HMIS administrator. It is also online at HUD's HDX reports site.

The below bullets define some key problem areas that are often overlooked and explain why they are relevant to the AHAR and CoC data quality in general.

- **Low Utilization Rates (Below 65%)** – May indicate that clients are not being entered into the database. May also reflect program inability to outreach participants or effectively transition clients into the program.
- **High Utilization Rates (Above 105%)** – May indicate that clients are not being exited on a consistent basis. Data entry timeliness procedures should be referenced above regarding client exits.
- **Length of Stay (LOS)** – Length of stay statistics are generally much longer in transitional and permanent supportive housing projects when compared to emergency shelter programs. It is not unusual to see length of stay statistics for these programs greater than six months or several years. Length of stay numbers longer than 90 days for an isolated ES visit may indicate lack of program exit or inability to transition clients effectively. These cases should be monitored to determine status of clients with length of stay longer than 90 days. Length of stay per visit is calculated as the difference between the date of entry and the date of exit (or a specified date if no exit date is available).

Length of Stay (in days) = Date of Exit (or specified date) – Date of Entry

Average LOS by program can also be calculated by summing the above for each client and dividing by the total number of clients. Normally, exited clients are separated from clients still in the program for this calculation. LOS statistics coupled with exit destination data gives several good program performance outcomes.

- **Veteran Status for PSH Programs** - Unknown/missing data rate for this category must be 0%. One of HUD's priorities is on homeless veterans; information on this variable should be able to be captured for each client in PSH. Accurate veteran status reporting enables the CoC to effectively monitor performance for this subpopulation and also helps to ensure that AHAR data is usable.
- **LOS in Prior Living Arrangement** – Aggregate unknown/missing data rates are high for this category for all contributing HMIS programs. Data for this field should be available at intake or may need to be updated in the HMIS after working with the client after initial intake.

- ***Zip Code of Last Permanent Address*** - Aggregate unknown/missing data rates are high for this category for all contributing HMIS programs. If data is unknown at intake it is helpful to obtain a location which can ultimately be mapped to a zip code. Zip code tables are available online and can be updated via the HMIS after initial data entry. Acceptable rates for this variable and others are defined in the data quality report section below.
- ***Destination at PSH Program Exit*** – High missing/unknown values for PSH program exits are unacceptable. Unknown/Missing values for this measure should be less than 5%. Programs should be credited with positive program exits and the CoCs can benefit from successful transitions via outcome performance reporting. Case managers should be communicating with administrative staff to limit unknown/missing values.

VI. Present Challenges and Future Directions

This revised HMIS DQP seeks to greatly improve the quality of the data collected by over 40 agencies serving over 10,000 persons throughout the State of Hawaii. High-quality HMIS data is extremely important in monitoring the success of programs and establishing successful policy and funding decisions.

The trend in data quality monitoring will continue on the general path of increased rigor in the collection and entry of data into the HMIS. Standards will continue to edge higher and tolerance for programs not implementing high quality data procedures will begin to impact funding decisions. New tools such as sharing client utilization data and increased report functionality in the HMIS can take full advantage of real time access to high quality data to inform daily decisions.

As the Hawaii CoC implement additional protocols related to coordinated intakes and more formalized discharge review, data quality standards will continue to rise to meet these challenges.

1A. Continuum of Care (CoC) Identification

Instructions:

The fields on this screen are read only and reference the information entered during the CoC Registration process. Updates cannot be made at this time. If the information on this screen is not correct, contact the One CPD Resource Exchange Ask A Question at <https://www.onecpd.info/ask-a-question/>.

Collaborative Applicant Name: City and County of Honolulu

Continuum of Care (CoC) New Project Listing

Instructions:

Prior to starting the CoC New Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Instructions" and the "CoC Project Listing" training module, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>

To upload all new project applications that were created through reallocation and have been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes based upon the number of new projects created through reallocation that need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review a project on the New Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Rank	Comp Type
IHS New Permanent...	2014-02-02 01:31:...	1 Year	Honolulu CoC - Ap...	\$485,489	R23	PH

Continuum of Care (CoC) Renewal Project Listing

Instructions:

Prior to starting the CoC Renewal Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Instructions" and the "CoC Project Listing" training module, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>

To upload all renewal project applications that have been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes based upon the number of renewal projects that need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review a project on the Renewal Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

The Collaborative Applicant certifies that there is a demonstrated need for all renewal permanent supportive housing and rapid re-housing projects listed on the Renewal Project Listing.

The Collaborative Applicant does not have any renewal permanent supportive housing or rapid re-housing renewal projects.

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Rank	Comp Type ▲
2013 HMIS 28840	2014-02-03 13:44:...	1 Year	Honolulu CoC - Ap...	\$23,072	W19	HMIS
2013 HMIS 82026	2014-02-03 13:45:...	1 Year	Honolulu CoC - Ap...	\$65,621	W20	HMIS
Headway House 2013	2014-01-17 22:45:...	1 Year	Steadfast Housing...	\$203,242	W5	PH
Kalealoa Permanen...	2014-01-24 20:43:...	1 Year	United States Vet...	\$135,782	T14	PH
Kaukama Group Hom...	2014-01-17 22:57:...	1 Year	Steadfast Housing...	\$29,605	W1	PH
Komo Mai Group Ho...	2014-01-17 22:50:...	1 Year	Steadfast Housing...	\$36,900	W2	PH
Permanent Support...	2014-01-24 20:48:...	1 Year	United States Vet...	\$249,703	T10	PH

GHP Permanent Hou...	2014-01-30 21:14:...	1 Year	Honolulu CoC - Ap...	\$505,106	W6	PH
IHS NPLH 2013	2014-01-30 21:29:...	1 Year	Honolulu CoC - Ap...	\$286,780	T8	PH
Consolidated PH 2013	2014-01-31 19:53:...	1 Year	Honolulu CoC - Ap...	\$5,048,976	W16	PH
Hearth Safe Haven...	2014-01-31 13:47:...	1 Year	Mental Health Kokua	\$826,467	W11	SH
Homeless Holistic...	2014-01-21 16:53:...	1 Year	Legal Aid Society...	\$62,155	W15	SSO
Transitional Livi...	2014-01-24 13:26:...	1 Year	Hale Kipa, Inc.	\$130,715	W17	TH
Barbers Point Vet...	2014-01-24 20:24:...	1 Year	United States Vet...	\$327,998	T3	TH.
Community Residen...	2014-01-24 14:18:...	1 Year	Gregory House Pro...	\$342,346	W18	TH
Ahukini Group Hom...	2014-01-17 22:39:...	1 Year	Steadfast Housing...	\$26,791	W12	TH
Vancouver House	2014-01-30 16:23:...	1 Year	Housing Solutions...	\$51,998	W13	TH
Ohana Ola O Kahum...	2014-01-30 20:11:...	1 Year	Alternative Struc...	\$142,024	X	TH
Ka Ohu Hou O Manoa	2014-01-30 22:23:...	1 Year	The Salvation Arm...	\$173,068	W9	TH
ATS Homeless Offe...	2014-01-31 00:36:...	1 Year	The Salvation Arm...	\$193,670	W22	TH
Continuum of Care...	2014-01-31 21:42:...	1 Year	Child and Family ...	\$81,204	T4	TH
Consolidated TH 2013	2014-02-03 12:58:...	1 Year	Honolulu CoC - Ap...	\$303,039	W7	TH

Continuum of Care (CoC) Planning Project Listing

Instructions:

Prior to starting the CoC Planning Project Listing, Collaborative Applicants should carefully review the "CoC Priority Listing Instructions" and the "CoC Project Listing" training module, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>

To upload the CoC planning project application that has been submitted to this CoC Project Listing, click on the "Update List" button. This process may take a few minutes as the project will need to be located in the e-snaps system. The Collaborative Applicant may update each of the Project Listings simultaneously. The Collaborative Applicant can wait for the Project Listings to be updated or can log out of e-snaps and come back later to view the updated list(s). To review the CoC Planning Project Listing, click on the magnifying glass next to view the project details. To view the actual project application, click on the orange folder. If there are errors identified by the Collaborative Applicant, the project can be amended back to the project applicant to make the necessary changes by clicking on the amend icon.

If more than one CoC planning project was submitted, the Collaborative Applicant can only approve one CoC planning project (which must be submitted by the Collaborative Applicant) and reject all other CoC planning projects.

Project Name	Date Submitted	Project Type	Applicant Name	Budget Amount	Grant Term	Rank	Comp Type
CoC Planning Proj...	2014-02-03 13:04:...	--	Honolulu CoC - Ap...	\$120,046	1 Year	C21	CoC Planning Proj...

Funding Summary

Instructions

For additional information, carefully review the "CoC Priority Listing Instructions" and the "CoC Priority Listing" training guide, both of which are available at: <https://www.onecpd.info/e-snaps/guides/coc-program-competition-resources/>.

This page contains the total budget summaries for each of the project listings for which the Collaborative Applicant approved and ranked or rejected project applications. The Collaborative Applicant must review this page to ensure the totals for each of the categories is accurate. The "Total CoC Request" indicates the total funding request amount the Collaborative Applicant will submit to HUD for funding consideration. As stated previously, 1 UFA Cost project and only 1 CoC Planning project can be submitted and only the Collaborative Applicant is eligible to request these funds.

Title	Total Amount
Renewal Amount	\$9,104,238
New Amount	\$485,489
Reallocated Amount	\$0
CoC Planning Amount	\$120,046
UFA Costs	
Rejected Amount	\$142,024
TOTAL CoG REQUEST	\$9,709,773

Maximum CoC project planning amount: \$125,530

Submission Summary

Page	Last Updated
Before Starting	No Input Required
1A. Identification	01/02/2014
2A. CoC New Project Listing	02/02/2014
2B. CoC Renewal Project Listing	02/03/2014
4A. CoC Planning Project Listing	02/03/2014
Submission Summary	No Input Required

RESOLUTION AUTHORIZING THE DIRECTOR OF COMMUNITY SERVICES OR THE DIRECTOR'S DESIGNEE TO APPLY FOR GRANT FUNDS UNDER THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT'S 2013 CONTINUUM OF CARE HOMELESS ASSISTANCE PROGRAMS.

EXHIBIT B



U.S. Department of Housing and Urban Development
Office of Community Planning and Development
1132 Bishop Street
Suite 1400
Honolulu, HI 96813

Tax ID Number: 99-6001257
Project Location: 150144 Honolulu, Hawaii
Grant Number: HI0029L9C011306
DUNS Number: 111763285
Effective Date: 5/14/2014
Operating Start Date: 5/1/2014

EXHIBIT 2
SCOPE OF WORK for FY2013 COMPETITION

1. This Agreement is governed by the Continuum of Care program Interim Rule attached hereto and made a part hereof as Exhibit 1a. Upon publication for effect of a Final Rule for the Continuum of Care program, the Final Rule will govern this Agreement instead of the Interim Rule. The project listed on this Exhibit at 3., below, is also subject to the terms of the FY2013 Notice of Funds Availability.
2. The Continuum that designated Recipient to apply for grant funds is not a high-performing community.
3. Recipient is not a Unified Funding Agency and was not the only Applicant the Continuum of Care designated to apply for and receive grant funds and is not the only Recipient for the Continuum of Care that designated it. HUD's total funding obligation for this grant is \$5032152 for project number HI0029L9C011306. In accordance with 24 CFR 578.105(b), Recipient is prohibited from moving more than 10% from one budget line item in a project's approved budget to another without a written amendment to this Agreement. The obligation for this project shall be allocated as follows:

a. CoC Planning cost	\$ 0
b. Acquisition	\$ 0
c. New construction	\$ 0
d. Rehabilitation	\$ 0
e. Leasing	\$ 0
f. Rental assistance	\$ 4,845,768
i. Tenant-based rental assistance	\$
ii. Project-based rental assistance	\$
iii. Sponsor-based rental assistance	\$
g. Supportive services	\$ 0
h. Operating costs	\$ 0
i. HMIS	\$ 0
j. Administration	\$ 186,384

4. No funds for new projects may be drawn down by Recipient until HUD has approved site control pursuant to §578.21 and §578.25 and no funds for renewal projects may be drawn down by Recipient before the end date of the project's final operating year under the grant that has been renewed.
5. Nothing in this grant agreement shall be construed as creating or justifying any claim against the federal government or the grantee by any third party.

This agreement is hereby executed on behalf of the parties as follows:

**UNITED STATES OF AMERICA,
Secretary of Housing and Urban Development**

By:



(Signature)

Mark Chandler, Director

(Typed Name and Title)

May 14, 2014

(Date)

RECIPIENT

City and County of Honolulu

(Name of Organization)

By:

(Signature of Authorized Official)

Pamela Witty-Oakland, Director, Dept of Community Services

(Typed Name and Title of Authorized Official)

(Date)

EXHIBIT 1a
Continuum of Care Program Interim Rule



FEDERAL REGISTER

Vol. 77 Tuesday,
No. 147 July 31, 2012

Part II

Department of Housing and Urban
Development

24 CFR Part 578
Homeless Emergency Assistance and Rapid Transition to Housing:
Continuum of Care Program; Interim Final Rule

**DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT**

24 CFR Part 578

[Docket No. FR-5476-I-01]

RIN 2506-AC29

**Homeless Emergency Assistance and
Rapid Transition to Housing:
Continuum of Care Program**

AGENCY: Office of the Assistant Secretary for Community Planning and Development, HUD.

ACTION: Interim rule.

SUMMARY: The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, and revises the Emergency Shelter Grants program and renames it the Emergency Solutions Grants program. The HEARTH Act also codifies in law the Continuum of Care planning process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs. The HEARTH Act also directs HUD to promulgate regulations for these new programs and processes.

This interim rule focuses on regulatory implementation of the Continuum of Care program, including the Continuum of Care planning process. The existing homeless assistance programs that comprise the Continuum of Care program are the following: the Supportive Housing program, the Shelter Plus Care program, and the Moderate Rehabilitation/Single Room Occupancy (SRO) program. This rule establishes the regulations for the Continuum of Care program, and, through the establishment of such regulations, the funding made available for the Continuum of Care program in the statute appropriating Fiscal Year (FY) 2012 funding for HUD can more quickly be disbursed, consistent with the HEARTH Act requirements, and avoid any disruption in current Continuum of Care activities.

DATES: *Effective Date:* August 30, 2012.

Comment Due Date: October 1, 2012.

ADDRESSES: Interested persons are invited to submit comments regarding this rule to the Regulations Division, Office of General Counsel, 451 7th Street SW., Room 10276, Department of Housing and Urban Development, Washington, DC 20410-0500. Communications must refer to the above

docket number and title. There are two methods for submitting public comments. All submissions must refer to the above docket number and title.

1. Submission of Comments by Mail.

Comments may be submitted by mail to the Regulations Division, Office of General Counsel, Department of Housing and Urban Development, 451 7th Street SW., Room 10276, Washington, DC 20410-0500.

2. Electronic Submission of

Comments. Interested persons may submit comments electronically through the Federal eRulemaking Portal at www.regulations.gov. HUD strongly encourages commenters to submit comments electronically. Electronic submission of comments allows the commenter maximum time to prepare and submit a comment, ensures timely receipt by HUD, and enables HUD to make them immediately available to the public. Comments submitted electronically through the www.regulations.gov Web site can be viewed by other commenters and interested members of the public. Commenters should follow the instructions provided on that site to submit comments electronically.

Note: To receive consideration as public comments, comments must be submitted through one of the two methods specified above. Again, all submissions must refer to the docket number and title of the rule.

No Facsimile Comments. Facsimile (FAX) comments are not acceptable.

Public Inspection of Public Comments. All properly submitted comments and communications submitted to HUD will be available for public inspection and copying between 8 a.m. and 5 p.m. weekdays at the above address. Due to security measures at the HUD Headquarters building, an advance appointment to review the public comments must be scheduled by calling the Regulations Division at 202-708-3055 (this is not a toll-free number). Individuals with speech or hearing impairments may access this number through TTY by calling the Federal Relay Service at 800-877-8339. Copies of all comments submitted are available for inspection and downloading at www.regulations.gov.

FOR FURTHER INFORMATION CONTACT: Ann Marie Oliva, Director, Office of Special Needs Assistance Programs, Office of Community Planning and Development, Department of Housing and Urban Development, 451 7th Street SW., Washington, DC 20410-7000; telephone number 202-708-4300 (this is not a toll-free number). Hearing- and speech-impaired persons may access this number through TTY by calling the

Federal Relay Service at 800-877-8339 (this is a toll-free number).

SUPPLEMENTARY INFORMATION:

Executive Summary

Purpose of and Legal Authority for This Interim Rule

This interim rule implements the Continuum of Care program authorized by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). Section 1504 of the HEARTH Act directs HUD to establish regulations for this program. (See 42 U.S.C. 11301.) The purpose of the Continuum of Care program is 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 effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

The HEARTH Act streamlines HUD's homeless grant programs by consolidating the Supportive Housing, Shelter Plus Care, and Single Room Occupancy grant programs into one grant program: The Continuum of Care program. Local continuums of care, which are community-based homeless assistance program planning networks, will apply for Continuum of Care grants. By consolidating homeless assistance grant programs and creating the Continuum of Care planning process, the HEARTH Act intended to increase the efficiency and effectiveness of coordinated, community-based systems that provide housing and services to the homeless. Through this interim final rule, HUD will implement the Continuum of Care program by establishing the framework for establishing a local continuum of care and the process for applying for Continuum of Care grants.

Summary of Major Provisions

The major provisions of this rulemaking relate to how to establish and operate a Continuum of Care, how to apply for funds under the program, and how to use the funds for projects approved by HUD. These provisions are summarized below.

1. General Provisions (Subpart A):

The Continuum of Care program includes transitional housing, permanent supportive housing for

disabled persons, permanent housing, supportive services, and Homeless Management Information Systems (HMIS). To implement the program, HUD had to define several key terms. In particular, HUD distinguishes between "Continuum of Care," "applicant," and "collaborative applicant." A

"Continuum of Care" is a geographically based group of representatives that carries out the planning responsibilities of the Continuum of Care program, as set out in this regulation. These representatives come from organizations that provide services to the homeless, or represent the interests of the homeless or formerly homeless. A Continuum of Care then designates certain "applicants" as the entities responsible for carrying out the projects that the Continuum has identified through its planning responsibilities. A "Continuum of Care" also designates one particular applicant to be a "collaborative applicant." The collaborative applicant is the only entity that can apply for a grant from HUD on behalf of the Continuum that the collaborative applicant represents.

2. Establishing and Operating a Continuum of Care (Subpart B): In order to be eligible for funds under the Continuum of Care program, representatives from relevant organizations within a geographic area must establish a Continuum of Care. The three major duties of a Continuum of Care are to: (1) Operate the Continuum of Care, (2) designate an HMIS for the Continuum of Care, and (3) plan for the Continuum of Care. HUD has delineated certain operational requirements of each Continuum to help measure a Continuum's overall performance at reducing homelessness, in addition to tracking of performance on a project-by-project basis. In addition, each Continuum is responsible for establishing and operating a centralized or coordinated assessment system that will provide a comprehensive assessment of the needs of individuals and families for housing and services. HUD has also defined the minimum planning requirements for a Continuum so that it coordinates and implements a system that meets the needs of the homeless population within its geographic area. Continuums are also responsible for preparing and overseeing an application for funds. Continuums will have to establish the funding priorities for its geographic area when submitting an application.

3. Application and Grant Award Process (Subpart C): The Continuum of Care grant award process begins with a determination of a Continuum's maximum award amount. As directed

by statute, HUD has developed a formula for determining award amounts that includes the following factors: A Continuum's Preliminary Pro Rata Need (PPRN) amount; renewal demand; any additional increases in amounts for leasing, rental assistance, and operating costs based on Fair Market Rents, planning and Unified Funding Agency cost funds, and amounts available for bonus dollars. HUD has established selection criteria for determining which applications will receive funding under the Continuum of Care program. Recipients awarded Continuum of Care funds must satisfy several conditions prior to executing their grant agreements. All grants submitted for renewal must also submit an annual performance report. For those applicants not awarded funding, the process also provides an appeals process.

4. Program Components and Eligible Costs (Subpart D): Continuum of Care funds may be used for projects under five program components: Permanent housing, transitional housing, supportive services only, HMIS, and, in some limited cases, homelessness prevention. The rule further clarifies how the following activities are considered eligible costs under the Continuum of Care program: Continuum of Care planning activities, Unified Funding Agency costs, acquisition, rehabilitation, new construction, leasing, rental assistance, supportive services, operating costs, HMIS, project administrative costs, relocation costs, and indirect costs.

5. High-Performing Communities (Subpart E): HUD will annually, subject to the availability of appropriate data, select those Continuums of Care that best meet application requirements to be designated a high-performing community (HPC). An HPC may use grant funds to provide housing relocation and stabilization services, and short- and/or medium-term rental assistance to individuals and families at risk of homelessness. This is the only time that Continuum of Care funds may be used to serve individuals and families at risk of homelessness.

6. Program Requirements (Subpart F): All recipients of Continuum of Care funding must comply with the program regulations and the requirements of the Notice of Funding Availability that HUD will issue each year. Notably, the HEARTH Act requires that all eligible funding costs, except leasing, must be matched with no less than 25 percent cash or in-kind match by the Continuum. Other program requirements of recipients include: Abiding by housing quality standards

and suitable dwelling size, assessing supportive services on an ongoing basis, initiating and completing approved activities and projects within certain timelines, and providing a formal process for termination of assistance to participants who violate program requirements or conditions of occupancy.

7. Grant Administration (Subpart G): To effectively administer the grants, HUD will provide technical assistance to those who apply for Continuum of Care funds, as well as those who are selected for Continuum of Care funds. After having been selected for funding, grant recipients must satisfy certain recordkeeping requirements so that HUD can assess compliance with the program requirements. For any amendments to grants after the funds have been awarded, HUD has established a separate amendment procedure. As appropriate, HUD has also established sanctions to strengthen its enforcement procedures.

Benefits and Costs

This interim rule is intended to help respond to and work toward the goal of eliminating homelessness. This interim rule provides greater clarity and guidance about planning and performance review to the more than 430 existing Continuums of Care that span all 50 states and 6 United States territories. As reported in HUD's Annual Homelessness Assessment Report to Congress, there were approximately 1.59 million homeless persons who entered emergency shelters or transitional housing in FY 2010. HUD serves roughly half that many persons, nearly 800,000 annually, through its three programs that will be consolidated into the Continuum of Care program under the McKinney-Vento Act as amended by the HEARTH Act (i.e., Shelter Plus Care, Supportive Housing Program, Single Room Occupancy). The changes initiated by this interim rule will encourage Continuums of Care to establish formal policies and review procedures, including evaluation of the effectiveness of their projects, by emphasizing performance measurement and developing performance targets for homeless populations. HUD is confident that this systematic review by Continuums of Care will lead to better use of limited resources and more efficient service models, with the end result of preventing and ending homelessness.

The Consolidated and Further Continuing Appropriations Act, 2012 (Pub. L. 112-55) appropriated \$1,593,000,000 for the Continuum of Care and Rural Housing Stability

Assistance programs. Upon publication of this rule, those FY 2012 funds will be available for distribution, as governed by these Continuum of Care regulations.

I. Background—HEARTH Act

On May 20, 2009, the President signed into law “An Act to Prevent Mortgage Foreclosures and Enhance Mortgage Credit Availability,” which became Public Law 111–22. This law implements a variety of measures directed toward keeping individuals and families from losing their homes. Division B of this law is the HEARTH Act, which consolidates and amends three separate homeless assistance programs carried out under title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 *et seq.*) (McKinney-Vento Act) into a single grant program that is designed to improve administrative efficiency and enhance response coordination and effectiveness in addressing the needs of homeless persons. The HEARTH Act codifies in law and enhances the Continuum of Care planning process, the coordinated response to addressing the needs of the homeless, which was established administratively by HUD in 1995. The single Continuum of Care program established by the HEARTH Act consolidates the following programs: The Supportive Housing program, the Shelter Plus Care program, and the Moderate Rehabilitation/Single Room Occupancy program. The Emergency Shelter Grants program is renamed the Emergency Solutions Grants program and is revised to broaden existing emergency shelter and homelessness prevention activities and to add short- and medium-term rental assistance and services to rapidly rehouse homeless people. The HEARTH Act also creates the Rural Housing Stability program to replace the Rural Homelessness Grant program.

HUD commenced the process to implement the HEARTH Act with rulemaking that focused on the definition of “homeless.” HUD published a proposed rule, entitled “Defining Homeless” on April 20, 2010 (75 FR 20541), which was followed by a final rule that was published on December 5, 2011 (76 FR 75994). The Defining Homeless rule clarified and elaborated upon the new McKinney-Vento Act definitions for “homeless” and “homeless individual with a disability.” In addition, the Defining Homeless rule included recordkeeping requirements related to the “homeless” definition. On December 5, 2011, HUD also published an interim rule for the Emergency Solutions Grants program (76 FR 75954). This interim rule

established the program requirements for the Emergency Solutions Grants program and contained corresponding amendments to the Consolidated Plan regulations. On December 9, 2011, HUD continued the process to implement the HEARTH Act, with the publication of the proposed rule titled “Homeless Management Information Systems Requirements” (76 FR 76917), which provides for uniform technical requirements for Homeless Management Information Systems (HMIS), for proper data collection and maintenance of the database, and ensures the confidentiality of the information in the database. Today’s publication of the interim rule for the Continuum of Care program continues HUD’s implementation of the HEARTH Act.

This rule establishes the regulatory framework for the Continuum of Care program and the Continuum of Care planning process, including requirements applicable to the establishment of a Continuum of Care. Prior to the amendment of the McKinney-Vento Act by the HEARTH Act, HUD’s competitively awarded homeless assistance grant funds were awarded to organizations that participate in local homeless assistance program planning networks referred to as a Continuum of Care, a system administratively established by HUD in 1995. A Continuum of Care is designed to address the critical problem of homelessness through a coordinated community-based process of identifying needs and building a system of housing and services to address those needs. The approach is predicated on the understanding that homelessness is not caused merely by a lack of shelter, but involves a variety of underlying, unmet needs—physical, economic, and social.

The HEARTH Act not only codified in law the planning system known as Continuum of Care, but consolidated the three existing competitive homeless assistance grant programs (Supportive Housing, Shelter Plus Care, and Single Room Occupancy) into the single grant program known as the Continuum of Care program. The consolidation of the three existing homeless assistance programs into the Continuum of Care grant program and the codification in law of the Continuum of Care planning process are intended to increase the efficiency and effectiveness of the coordination of the provision of housing and services to address the needs of the homeless. The regulations established by this rule are directed to carrying out this congressional intent.

II. Overview of Interim Rule

As amended by the HEARTH Act, Subpart C of the McKinney-Vento Homeless Assistance Act establishes the Continuum of Care program. The purpose of the program is 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 effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

This interim rule establishes the Continuum of Care as the planning body responsible for meeting the goals of the Continuum of Care program. Additionally, in order to meet the purpose of the HEARTH Act, established in section 1002(b), and the goals of “Opening Doors: Federal Strategic Plan to Prevent and End Homelessness,” the Continuum of Care must be involved in the coordination of other funding streams and resources—federal, local, or private—of targeted homeless programs and other mainstream resources. In many communities, the Continuum of Care is the coordinating body, while in other communities it is a local Interagency Council on Homelessness (both would be acceptable forms of coordination under this interim rule). As noted earlier, HUD published on December 9, 2011, a proposed rule to establish HMIS regulations in accordance with the HEARTH Act. However, while the HEARTH Act directed that regulations be established for HMIS, HMIS is not new to many HUD grantees. Until regulations for HMIS are promulgated in final, grantees should continue to follow HUD’s existing HMIS instructions and guidance.

The following provides an overview of the proposed rule.

General Provisions (Subpart A)

Purpose and scope. The Continuum of Care program is designed to promote community-wide goals to end homelessness; provide funding to quickly rehouse homeless individuals (including unaccompanied youth) and families while minimizing trauma and dislocation to those persons; promote access to, and effective utilization of, mainstream programs; and optimize self-sufficiency among individuals and

families experiencing homelessness. The program is composed of transitional housing, permanent supportive housing for disabled persons, permanent housing, supportive services, and HMIS.

Definitions. The interim rule adopts the definitions of "developmental disability," "homeless," "homeless individual," and "homeless person" established by the December 5, 2011 Defining Homeless final rule. Public comments have already been solicited and additional public comment is not solicited through this rule. The December 5, 2011, final rule was preceded by an April 20, 2010, proposed rule, which sought public comment on these definitions. The final definitions of these terms took into consideration the public comments received on the proposed definitions as set out in the April 20, 2010, proposed rule. This interim rule adopts the definition of "at risk of homelessness" established by the December 5, 2011, the Emergency Solutions Grants program interim rule. The interim rule sought public comment on this definition, and additional public comment is not being sought through this rule.

HUD received valuable public comment on the definition of "chronically homeless," through the public comment process on the Emergency Solutions Grants program interim rule. Based on public comment, this rule for the Continuum of Care program is not adopting the full definition of "chronically homeless" that was included in the conforming amendments to the Consolidated Plan that were published as a part of the Emergency Solutions Grants program rule. Commenters raised concerns with the meaning of the phrase "where each homeless occasion was at least 15 days." The concerns raised about this phrase, used for the first time in a definition of "chronically homeless," has caused HUD to reconsider proceeding to apply a definition that includes this phrase, without further consideration and opportunity for comment. In this rule, HUD therefore amends the definition of "chronically homeless" in the Consolidated Plan regulations to strike this phrase. The removal of this phrase returns the definition to one with which service providers are familiar. The following highlights key definitions used in the Continuum of Care program regulations, and HUD solicits comment on these definitions.

Applicant is defined to mean an entity that has been designated by the Continuum of Care as eligible to apply for assistance on behalf of that

Continuum. HUD highlights that the Act does not contain different definitions for "applicant" and "collaborative applicant." HUD distinguishes between the applicant(s) designated to apply for and carry out projects (the "applicant") and the collaborative applicant designated to apply for a grant on behalf of the Continuum of Care (the "collaborative applicant"). Please see below for more information on the definition of a collaborative applicant, which is the only entity that may apply for and receive Continuum of Care planning funds.

Centralized or coordinated assessment system is defined to mean a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool. This definition establishes basic minimum requirements for the Continuum's centralized or coordinated assessment system.

Collaborative applicant is defined to mean an eligible applicant that has been designated by the Continuum of Care to apply for a grant for Continuum of Care planning funds on behalf of the Continuum. As discussed above, the "applicant" is the entity(ies) designated to apply for and carry out projects on behalf of the Continuum. In contrast to the definition of "applicant" above, the collaborative applicant applies for a grant to carry out the planning activities on behalf of the Continuum of Care. The interim rule simplifies the statutory language in order to make the Continuum of Care planning process clear.

HUD highlights that its definition of collaborative applicant does not track the statutory definition, which is found in section 401 of the McKinney-Vento Act. As will be discussed in further detail later in this preamble, the concept of collaborative applicant, its duties and functions, as provided in the statute, is provided for in this rule. However, HUD uses the term Continuum of Care to refer to the organizations that carry out the duties and responsibilities assigned to the collaborative applicant, with the exception of applying to HUD for grant funds. The clarification is necessary in this rule because Continuums of Care are not required to be legal entities, but HUD can enter into contractual agreements with legal entities only.

Continuum of Care and Continuum are defined to mean the group that is

organized to carry out the responsibilities required under this part and that is composed of representatives of organizations including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons. These organizations consist of the relevant parties in the geographic area. Continuums are expected to include representation to the extent that the type of organization exists within the geographic area that the Continuum represents and is available to participate in the Continuum. For example, if a Continuum of Care did not have a university within its geographic boundaries, then HUD would not expect the Continuum to have representation from a university within the Continuum.

These organizations carry out the responsibilities and duties established under Subpart B of this interim rule. The Continuum of Care, as noted above, carries out the statutory duties and responsibilities of a collaborative applicant. HUD established the Continuum of Care in 1995. Local grantees and stakeholders are familiar with the Continuum of Care as the coordinating body for homeless services and homelessness prevention activities across the geographic area. Consequently, HUD is maintaining the Continuum of Care terminology, and the rule provides for the duties and responsibilities of a collaborative applicant to be carried out under the name Continuum of Care.

High-performing community is defined to mean the geographic area under the jurisdiction of a Continuum of Care that has been designated as a high-performing community by HUD. Section 424 of the McKinney-Vento Act provides that HUD shall designate, on an annual basis, which collaborative applicants represent high-performing communities. Consistent with HUD's substitution of the term "Continuum of Care" for "collaborative applicant," the definition of "high-performing community" in this interim rule provides for designation of Continuums of Care that represent geographic areas designated as high-performing communities. The standards for becoming a high-performing community can be found in § 578.65 of this interim

rule and will be discussed later in this preamble.

Private nonprofit organization is based on the statutory definition for "private nonprofit organization." The term "private nonprofit organization" is defined in section 424 of the McKinney-Vento Act as follows: "The term 'private nonprofit organization' means an organization: (A) No part of the net earnings of which inures to the benefit of any member, founder, contributor, or individual; (B) that has a voluntary board; (C) that has an accounting system, or has designated a fiscal agent in accordance with requirements established by the Secretary; and (D) that practices nondiscrimination in the provision of assistance." In HUD's regulatory definition of "private nonprofit organization," HUD clarifies that the organization's accounting system must be functioning and operated in accordance with generally accepted accounting principles. HUD has included this language to make certain that accounting systems are workable and abide by definite, accurate standards. As reflected in the statutory definition of "private nonprofit organization," HUD may establish requirements for the designation of a fiscal agent. HUD has determined that the fiscal agent, such as a Unified Funding Agency, a term that is also defined in section 424 of the McKinney-Vento Act, must maintain a functioning accounting system for the organization in accordance with generally accepted accounting principles.

Permanent housing is consistent with the statutory definition of "permanent housing" in section 401 of the McKinney-Vento Act, but does not track the statutory language. HUD's regulatory definition of "permanent housing" states: "The term 'permanent housing' means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid re-housing." Additionally, in the regulatory definition of "permanent housing," HUD clarifies that to be permanent housing, "the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary. These requirements are consistent with Section 8 requirements.

Specific request for comment. HUD specifically requests comment on requiring a lease for a term of at least one year to be considered permanent housing.

Project is consistent with the statutory definition of "project" in section 401 of the McKinney-Vento Act, but does not track the statutory language. Section 401 defines "project" as, with respect to activities carried out under subtitle C, eligible activities described in section 423(a), undertaken pursuant to a specific endeavor, such as serving a particular population or providing a particular resource. In HUD's definition of "project" in this interim rule, the eligible activities described in section 423(a) of the McKinney-Vento Act have been identified. In the regulatory text, HUD has clarified that it is a group of one or more of these eligible costs that are identified as a project in an application to HUD for Continuum of Care funds.

Recipient is defined to mean an applicant that signs a grant agreement with HUD. HUD's definition of "recipient" is consistent with the statutory definition of "recipient," but does not track the statutory language. Section 424 of the McKinney-Vento Act defines "recipient" as "an eligible entity who—(A) submits an application for a grant under section 422 that is approved by the Secretary; (B) receives the grant directly from the Secretary to support approved projects described in the application; and (C)(i) serves as a project sponsor for the projects; or (ii) awards the funds to project sponsors to carry out the projects." All of the activities specified by the statutory definition are in the rule: (A) and (B) are contained in the definition and (C) is covered in the sections of the rule dealing with what a recipient can do with grant funds.

Safe haven is based on the definition of safe haven in the McKinney-Vento Act prior to amendment by the HEARTH Act. Although no longer used in statute, HUD's position is that the term remains relevant for implementation of the Continuum of Care program and, therefore, HUD proposes to include the term in the Continuum of Care program regulations. The term "safe haven" is used for purposes of determining whether a person is chronically homeless. The housing must serve hard-to-reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services. In addition, the housing must provide 24-hour residence for eligible persons for an unspecified period, have an overnight capacity limited to 25 or

fewer persons, and provide low-demand services and referrals for the residents.

Subrecipient is defined to mean a private nonprofit organization, State or local government, or instrumentality of a State or local government that receives a subgrant from the recipient to operate a project. The definition of "subrecipient" is consistent with the definition of "project sponsor" found in section 401 of the McKinney-Vento Act, but does not track the statutory language. To be consistent with the Emergency Solutions Grants program regulation, and also to ensure that the relationship between the recipient and subrecipient is clear, HUD is using the term subrecipient, instead of project sponsor, throughout this regulation.

Transitional housing is based on the definition of "transitional housing" in section 401 of the McKinney-Vento Act, as follows: "The term 'transitional housing' means housing, the purpose of which is to facilitate the movement of individuals and families experiencing homelessness to permanent housing within 24 months or such longer period as the Secretary determines necessary." The definition has been expanded to distinguish this type of housing from emergency shelter. This distinction is necessitated by the McKinney-Vento Act's explicit distinction between what activities can or cannot be funded under the Continuum of Care program. The regulatory definition clarifies that, to be transitional housing, program participants must have signed a lease or occupancy agreement that is for a term of at least one month and that ends in 24 months and cannot be extended.

Unified Funding Agency (UFA) means an eligible applicant selected by the Continuum of Care to apply for a grant for the entire Continuum, which has the capacity to carry out the duties delegated to a UFA in this rule, which is approved by HUD and to which HUD awards a grant. HUD's regulatory definition of UFA departs slightly from the statutory definition. The statutory definition refers to the collaborative applicant. The differences between the statutory definition and HUD's regulatory definition reflect HUD's substitution of Continuum of Care for collaborative applicant.

Establishing and Operating the Continuum of Care (Subpart B)

In general. The statutory authority for the Continuum of Care program is section 422 of the McKinney-Vento Act. As stated under section 1002 of the HEARTH Act, one of the main purposes of the HEARTH Act is to codify the Continuum of Care planning process. Consequently, under this interim rule,

HUD focuses on the rules and responsibilities of those involved in the Continuum of Care planning process and describes how applications and grant funds will be processed.

As discussed earlier in the preamble, HUD's interim rule provides for the duties and functions of the collaborative applicant found in section 401 of the McKinney-Vento Act to be designated to the Continuum of Care, with the exception of applying to HUD for grant funds. HUD chose this approach because the Continuum might not be a legal entity, and therefore cannot enter into enforceable contractual agreements, but is the appropriate body for establishing and implementing decisions that affect the entire geographic area covered by the Continuum, including decisions related to funding. This approach allows the Continuum to retain its duties related to planning and prioritizing need (otherwise designated by statute to the collaborative applicant), while the authority to sign a grant agreement with HUD is designated to an eligible applicant that can enter into a contractual agreement. All of the duties assigned to the Continuum are based on the comparable duties of section 402(f) of the McKinney-Vento Act.

Subpart B of the interim rule identifies how Continuums of Care are established, as well as the required duties and functions of the Continuum of Care.

Establishing the Continuum of Care. In order to be eligible for funds under the Continuum of Care program, representatives from relevant organizations within a geographic area must establish a Continuum of Care. As discussed earlier in this preamble, this body is responsible for carrying out the duties identified in this interim regulation. Representatives from relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals. Where these organizations are located within the geographic area served by the Continuum of Care, HUD expects a representative of the organization to be a part of the Continuum of Care.

Specific request for comment. HUD specifically requests comments on requiring Continuums of Care to have a board that makes the decisions for the

Continuum. HUD requires two characteristics for all board compositions. These characteristics are that the Board must be representative of the subpopulations of homeless persons that exist within the geographic area, and include a homeless or formerly homeless person. Continuums will have 2 years from the effective date of the interim rule to establish a board that meets the criteria established in this section. No board member may participate or influence discussions or decisions concerning the award of a grant or other financial benefits for an organization that the member represents.

HUD is considering four additional characteristics for all board compositions for incorporation in the final rule. HUD did not implement them at this stage in order to seek public comment prior to implementing them as requirements. HUD proposes that all boards must have a chair or co-chairs; be composed of an uneven number, serving staggered terms; include members from the public and private sectors; and include a member from at least one Emergency Solutions Grants program (ESG) recipient's agency located within the Continuum's geographic area. HUD is requesting comment on all of these proposed requirements; however, HUD specifically requests comments from Continuums of Care and ESG recipients on the requirement that the Board include an ESG recipient as part of its membership. HUD invites ESG recipients and Continuums to share challenges that will be encountered when implementing this requirement. Ensuring that ESG recipients are represented on the Board is important to HUD; therefore, in communities where ESG recipients and/or Continuums do not feel this requirement is feasible, HUD asks commenters to provide suggestions for how ESG recipients can be involved in the Continuum at one of the core decision-making levels.

Responsibilities of the Continuum of Care. The interim rule establishes three major duties for which the Continuum of Care is responsible: To operate the Continuum of Care, to designate an HMIS for the Continuum of Care, and to plan for the Continuum of Care.

This section of the interim rule establishes requirements within these three major duties.

Operating the Continuum of Care. The interim rule provides that the Continuum of Care must abide by certain operational requirements. These requirements will ensure the effective management of the Continuum of Care process and ensure that the process is

inclusive and fair. HUD has established eight duties required of the Continuum necessary to effectively operate the Continuum of Care. HUD has established the specific minimum standards for operating and managing a Continuum of Care for two main reasons. First, the selection criteria established under section 427 of the McKinney-Vento Act require HUD to measure the Continuum of Care's performance in reducing homelessness by looking at the overall performance of the Continuum, as opposed to measuring performance project-by-project as was done prior to the enactment of the HEARTH Act. This Continuum of Care performance approach results in cooperation and coordination among providers. Second, because Continuums of Care will have grants of up to 3 percent of Final Pro Rata Need (FPRN) to be used for eligible Continuum of Care planning costs, HUD is requiring more formal decision-making and operating standards for the Continuum of Care. This requirement ensures that the Continuums have appropriate funding to support planning costs.

One of the duties established in this interim rule is the requirement that the Continuum establish and operate a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. As detailed in the Emergency Solutions Grants program interim rule published on December 5, 2011, through the administration of the Rapid Re-Housing for Families Demonstration program and the Homelessness Prevention and Rapid Re-Housing program, as well as best practices identified in communities, HUD has learned that centralized or coordinated assessment systems are important in ensuring the success of homeless assistance and homeless prevention programs in communities. In particular, such assessment systems help communities systematically assess the needs of program participants and effectively match each individual or family with the most appropriate resources available to address that individual or family's particular needs.

Therefore, HUD has required, through this interim rule, each Continuum of Care to develop and implement a centralized or coordinated assessment system for its geographic area. Such a system must be designed locally in response to local needs and conditions. For example, rural areas will have significantly different systems than urban ones. While the common thread between typical models is the use of a

common assessment tool, the form, detail, and use of that tool will vary from one community to the next. Some examples of centralized or coordinated assessment systems include: A central location or locations within a geographic area where individuals and families must be present to receive homeless services; a 211 or other hotline system that screens and directly connects callers to appropriate homeless housing/service providers in the area; a "no wrong door" approach in which a homeless family or individual can show up at any homeless service provider in the geographic area but is assessed using the same tool and methodology so that referrals are consistently completed across the Continuum of Care; a specialized team of case workers that provides assessment services to providers within the Continuum of Care; or in larger geographic areas, a regional approach in which "hubs" are created within smaller geographic areas. HUD intends to develop technical assistance materials on a range of centralized and coordinated assessment types, including those most appropriate for rural areas.

HUD recognizes that imposing a requirement for a centralized or coordinated assessment system may have certain costs and risks. Among the risks that HUD wishes specifically to address are the risks facing individuals and families fleeing domestic violence, dating violence, sexual assault, and stalking. In developing the baseline requirements for a centralized or coordinated intake system, HUD is considering whether victim service providers should be exempt from participating in a local centralized or coordinated assessment process, or whether victim service providers should have the option to participate or not.

Specific request for comment. HUD specifically seeks comment from Continuum of Care-funded victim service providers on this question. As set forth in this interim rule, each Continuum of Care is to develop a specific policy on how its particular system will address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers. These policies could include reserving private areas at an assessment location for evaluations of individuals or families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking; a separate "track" within the assessment framework that is specifically designed for domestic

violence victims; or the location of victim service providers with centralized assessment teams.

HUD invites suggestions for ensuring that the requirements it imposes regarding centralized or coordinated assessment systems will best help communities use their resources effectively and best meet the needs of all families and individuals who need assistance. Questions that HUD asks commenters to specifically address are: What barriers to accessing housing/services might a centralized or coordinated intake system pose to victims of domestic violence? How can those barriers be eliminated? What specific measures should be implemented to ensure safety and confidentiality for individuals and families who are fleeing or attempting to flee domestic violence situations? How should those additional standards be implemented to ensure that victims of domestic violence have immediate access to housing and services without increasing the burden on those victims? For communities that already have centralized or coordinated assessment systems in place, are victims of domestic violence and/or domestic violence service providers integrated into that system? Under either scenario (they are integrated into an assessment process or they are not integrated into it), how does your community ensure the safety and confidentiality of this population, as well as access to homeless housing and services? What HUD-sponsored training would be helpful to assist communities in completing the initial assessment of victims of domestic violence in a safe and confidential manner?

In addition to comments addressing the needs of victims of domestic violence, dating violence, sexual assault, and stalking, HUD invites general comments on the use of a centralized or coordinated assessment system, particularly from those in communities that have already implemented one of these systems who can share both what has worked well and how these systems could be improved. HUD specifically seeks comment on any additional risks that a centralized or coordinated assessment system may create for victims of domestic violence, dating violence, sexual assault, or stalking who are seeking emergency shelter services due to immediate danger, regardless of whether they are seeking services through a victim service provider or nonvictim service provider.

Another duty set forth in this part, is the requirement to establish and consistently follow written standards

when administering assistance under this part. These requirements, established in consultation with recipients of Emergency Solutions Grants program funds within the geographic area, are intended to coordinate service delivery across the geographic area and assist Continuums of Care and their recipients in evaluating the eligibility of individuals and families consistently and administering assistance fairly and methodically. The written standards can be found in § 578.7(a)(9) of this interim rule.

Designating and operating an HMIS. The Continuum of Care is responsible for designating an HMIS and an eligible applicant to manage the HMIS, consistent with the requirements, which will be codified in 24 CFR part 580. This duty is listed under section 402(f)(2) of the McKinney-Vento Act. In addition, the Continuum is responsible for reviewing, revising, and approving a privacy plan, security plan, and data quality plan for the HMIS and ensuring consistent participation of recipients and subrecipients in the HMIS.

Continuum of Care planning. The Continuum is responsible for coordinating and implementing a system for its geographic area to meet the needs of the homeless population and subpopulations within the geographic area. The interim rule defines the minimum requirements for this systematic approach under § 578.7(c)(1), such as emergency shelters, rapid rehousing, transitional housing, permanent supportive housing, and prevention strategies. Because there are not sufficient resources available through the Continuum of Care program to prevent and end homelessness, coordination and integration of other funding streams, including the Emergency Solutions Grants program and mainstream resources, is integral to carrying out the Continuum of Care System.

HUD has determined that since the Continuum of Care will be the larger planning organization, the Continuum of Care must develop and follow a Continuum of Care plan that adheres, not only to the requirements being established by this interim rule, but to the requirements and directions of the most recently issued notice of funding availability (NOFA).

While these planning duties are not explicitly provided in section 402(f) of the Act, HUD has included them to facilitate and clarify the Continuum of Care planning process. Consistent with the goals of the HEARTH Act, HUD strives, through this interim rule, to provide a comprehensive, well-

coordinated and clear planning process, which involves the creation of the Continuum of Care and the duties the Continuum of Care will have to fulfill.

Other planning duties for Continuums established in this section of the interim rule are planning for and conducting at least a biennial-point-in-time count of homeless persons within the geographic area, conducting an annual gaps analysis of the homeless needs and services available within the geographic area, providing information necessary to complete the Consolidated Plan(s) within the geographic area, and consulting with State and local government Emergency Solutions Grants program recipients within the Continuum of Care on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of Emergency Solutions Grants program recipients and subrecipients.

Preparing an application for funds. A major function of the Continuum of Care is preparing and overseeing an application for funds under this part. This section of the interim rule establishes the duties of the Continuum of Care related to the preparation of the application. This section of the interim rule establishes that the Continuum is responsible for designing, operating, and following a collaborative process for the development of applications, as well as approving the submission of applications, in response to a NOFA published by HUD.

The Continuum must also establish priorities for funding projects within the geographic area and determine the number of applications being submitted for funding. As previously noted in this preamble, since the Continuum of Care might not be a legal entity, and therefore may not be able to enter into a contractual agreement with HUD, the Continuum must select one or more eligible applicants to submit an application for funding to HUD on its behalf. If the Continuum of Care is an eligible applicant, the Continuum of Care may submit an application. If the Continuum selects more than one application, the Continuum must select one eligible applicant to be the collaborative applicant. That applicant will collect and combine the required application information from all of the other eligible applicants and for all projects within the geographic area that the Continuum has designated. If only one application is submitted by the collaborative applicant, the collaborative applicant will collect and combine the required application information from all projects within the geographic area that the Continuum has

designated for funding. The collaborative applicant will always be the only applicant that can apply for Continuum of Care planning costs. In the case that there is one application for projects, the recipient of the funds is required to have signed agreements with its subrecipients as set forth in § 578.23(c), and is required to monitor and sanction subrecipients in compliance with § 578.107.

Whether the Continuum of Care submits the application or designates an eligible applicant to submit the application for funding, the Continuum of Care retains all of its duties.

Unified Funding Agencies. To be designated as the Unified Funding Agency (UFA) for the Continuum of Care, the Continuum must select the collaborative applicant to apply to HUD to be designated as the UFA for the Continuum. The interim rule establishes the criteria HUD will use when determining whether to designate the collaborative applicant as a UFA. These standards were developed to ensure that collaborative applicants have the capacity to manage the grant and carry out the duties in 578.11(b), and are described below.

The duties of the UFA established in § 578.11 are consistent with the duties set forth in section 402(g) of the Act. Even if the Continuum designates a UFA to submit the application for funding, the Continuum of Care retains all of its duties.

Remedial actions. Section 402(c) of the McKinney-Vento Act gives HUD the authority to ensure the fair distribution of grant amounts for this program, such as designating another body as a collaborative applicant, replacing the Continuum of Care for the geographic area, or permitting other eligible entities to apply directly for grants. Section 578.13 of this interim rule addresses the remedial actions that may be taken.

Overview of the Application and Grant Award Process (Subpart C)

Eligible applicants. Under this interim rule, eligible applicants consist of nonprofit organizations, State and local governments, and instrumentalities of local governments. An eligible applicant must have been designated by the Continuum of Care to submit an application for grant funds under this part. The Continuum's designation must state whether the Continuum is designating more than one applicant to apply for funds, and if it is, which applicant is being designated the collaborative applicant. A Continuum of Care that is designating only one applicant for funds must designate that applicant to be the collaborative

applicant. For-profit entities are not eligible to apply for grants or to be subrecipients of grant funds.

Section 401(10) of the McKinney-Vento Act identifies that collaborative applicants may be legal entities, and a legal entity may include a consortium of instrumentalities of a State or local government that has constituted itself as an entity. HUD has not included a consortium in the list of eligible applicants. As noted earlier in this preamble, a Continuum of Care is defined to mean a group that is composed of representatives of organizations across the entire geographic area claimed by the Continuum of Care. A Continuum is able to combine more than one metropolitan city or county into the geographic area that the Continuum represents. In essence, the Continuum of Care acts as a consortium, and it is therefore HUD's position that the inclusion of consortiums in the interim rule would be redundant.

Determining the Continuum's maximum award amount. The total amount for which a Continuum of Care is eligible to apply and be awarded is determined through a four-step process, including the following factors: A Continuum's PPRN amount; renewal demand; any additional increases in amounts for leasing, rental assistance, and operating costs based on Fair Market Rents (FMRs); planning and UFA cost funds; and the amounts available for bonus dollars.

Using the formula that will be discussed below, HUD will first determine a Continuum of Care's PPRN amount, as authorized under section 427(b)(2)(B) of the McKinney-Vento Act. This amount is the sum of the PPRN amounts for each metropolitan city, urban county, non-urban county, and insular area claimed by the Continuum of Care as part of its geographic area, excluding any counties applying for, or receiving funds under the Rural Housing Stability Assistance program, the regulations for which will be established in 24 CFR part 579. The PPRN for each of these areas is based upon the "need formula" under § 579.17(a)(2) and (3). Under the McKinney-Vento Act, HUD is required to publish, by regulation, the formula used to establish grant amounts. The need formula under § 579.17(a)(2) and (3) satisfies this requirement, and HUD specifically seeks comment on this formula. HUD will announce the PPRN amounts prior to the publication of the NOFA on its Web site.

To establish the amount on which the need formula is run, HUD will deduct an amount, which will be published in

the NOFA, to be set aside to provide a bonus, and the amount necessary to fund Continuum of Care planning activities and UFA costs from the total funds made available for the program each fiscal year. On this amount, HUD will use the following process to establish an area's PPRN. First, 2 percent of the total funds available shall be allocated among the four insular areas (American Samoa, Guam, the Commonwealth of the Northern Marianas, and the Virgin Islands) based upon the percentage each area received in the previous fiscal year under section 106 of the Housing and Community Development Act of 1974. Second, 75 percent of the remaining funds made available shall be allocated to metropolitan cities and urban counties that have been funded under the Emergency Solutions Grants program (formerly known as the Emergency Shelter Grants program) every year since 2004. Third, the remaining funds made available shall be allocated to Community Development Block Grant (CDBG) metropolitan cities and urban counties that have not been funded under the Emergency Solutions Grants program every year since 2004 and all other counties in the United States and Puerto Rico.

Recognizing that in some federal fiscal years, the amount available for the formula may be less than the amount required to renew all existing projects eligible for renewal in that year for at least one year, HUD has included a method for distributing the reduction of funds proportionally across all Continuums of Care in § 578.17(a)(4) of this interim rule. HUD will publish the total dollar amount that each Continuum will be required to deduct from renewal projects Continuum-wide, and Continuums will have the authority to determine how to administer the cuts to projects across the Continuum.

Specific request for comment. HUD specifically requests comment on the method established in § 578.17(a)(4) to reduce the total amount required to renew all projects eligible for renewal in that one year, for at least one year, for each Continuum of Care when funding is not sufficient to renew all projects nationwide for at least one year.

The second step in determining a Continuum's maximum award amount is establishing a Continuum of Care's "renewal demand." The Continuum's renewal demand is the sum of the annual renewal amounts of all projects eligible within the Continuum of Care's geographic area to apply for renewal in that federal fiscal year's competition before any adjustments to rental assistance, leasing, and operating line

items based on changes to the FMRs in the geographic area.

Third, HUD will determine the Continuum of Care's Final Pro Rata Need (FPRN), which is the higher of: (1) PPRN, or (2) renewal demand for the Continuum of Care. The FPRN establishes the base for the maximum award amount for the Continuum of Care.

Fourth, HUD will determine the maximum award amount. The maximum award amount for the Continuum of Care is the FPRN amount plus any additional eligible amounts for Continuum planning; establishing fiscal controls for the Continuum; updates to leasing, operating, and rental assistance line items based on changes to FMR; and the availability of any bonus funding during the competition.

Application process. Each fiscal year, HUD will issue a NOFA. All applications, including applications for grant funds, and requests for designation as a UFA or HPC, must be submitted to HUD in accordance with the requirements of the NOFA and contain such information as the NOFA specifies. Applications may request up to the maximum award amount for Continuums of Care.

An applicant that is a State or a unit of general local government must have a HUD-approved, consolidated plan in accordance with HUD's Consolidated Plan regulations in 24 CFR part 91. The applicant must submit a certification that the application for funding is consistent with the HUD-approved consolidated plan(s) in the project's jurisdiction(s). Applicants that are not States or units of general local government must submit a certification that the application for funding is consistent with the jurisdiction's HUD-approved consolidated plan. The certification must be made by the unit of general local government or the State, in accordance with HUD's regulations in 24 CFR part 91, subpart F. The required certification must be submitted by the funding application submission deadline announced in the NOFA.

An applicant may provide assistance under this program only in accordance with HUD subsidy layering requirements in section 102 of the Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545). In this interim rule, HUD clarifies that the applicant must submit information in its application on other sources of funding the applicant has received, or reasonably expects to receive, for a proposed project or activities.

Awarding funds. HUD will review applications in accordance with the guidelines and procedures specified in

the NOFA and award funds to recipients through a national competition based on selection criteria as defined in section 427 of the McKinney-Vento Act. HUD will announce the awards and notify selected applicants of any conditions imposed on the awards.

Grant agreements. A recipient of a conditionally awarded grant must satisfy all requirements for obligation of funds; otherwise, HUD will withdraw its offer of the award. These conditions include establishing site control, providing proof of match, complying with environmental review under § 578.31, and documenting financial feasibility within the deadlines under § 578.21(a)(3). HUD has included in the interim rule the deadlines for conditions that may be extended and the reasons for which HUD will consider an extension.

The interim rule requires that site control be established by each recipient receiving funds for acquisition, rehabilitation funding, new construction, or operating costs, or for providing supportive services. HUD has determined that the time to establish site control is 12 months for projects not receiving new construction, acquisition, or rehabilitation funding, as stated under section 426(a) of the McKinney-Vento Act, not 9 months as stated under section 422(d) of the McKinney-Vento Act, for projects receiving operating and supportive service funds. HUD's determination on the time needed to establish site control is based on previous program policy, and the longer time frame takes into consideration the reality of the housing market. Projects receiving acquisition, rehabilitation, or new construction funding must provide evidence of site control no later than 24 months after the announcement of grant awards, as provided under section 422(d) of the McKinney-Vento Act.

The interim rule requires that HUD perform an environmental review for each property as required under HUD's environmental regulations in 24 CFR part 50. All recipients of Continuum of Care program funding under this part must supply all available, relevant information necessary to HUD, and carry out mitigating measures required by HUD. The recipient, its project partners, and its project partner's contractors may not perform any eligible activity for a project under this part, or commit or expend HUD or local funds for such activities until HUD has performed an environmental review and the recipient has received HUD approval of the property agreements.

Executing grant agreements. If a Continuum designates more than one applicant for the geographic area, HUD

will enter into a grant agreement with each designated recipient for which an award is announced. If a Continuum designates only one recipient for the geographic area, HUD may enter into one grant agreement with that recipient for new awards, if any; and one grant agreement for renewals and Continuum of Care planning costs and UFA costs, if any. These two grant agreements will cover the entire geographic area, and a default by the recipient under one of these agreements will also constitute a default under the other. If the Continuum is a UFA, HUD will enter into one grant agreement with the UFA for new awards, if any; and one for renewal and Continuum of Care planning costs and UFA costs, if any. Similarly, these two grant agreements will cover the entire geographic area and a default by the recipient under one of those agreements will also constitute a default under the other.

HUD requires the recipient to enter into the agreement described in § 578.23(c). Under this agreement, the grant recipient must agree to ensure that the operation of the project will be in accordance with the McKinney-Veto Act and the requirements under this part. In addition, the recipient must monitor and report the progress of the projects to the Continuum of Care and to HUD. The recipient must ensure that individuals and families experiencing homelessness are involved in the operation of the project, maintain confidentiality of program participants, and monitor and report matching funds to HUD, among other requirements. The recipient must also agree to use the centralized or coordinated assessment system established by the Continuum of Care, unless the recipient or subrecipient is a victim service provider. Victim service providers may choose not to use the centralized or coordinated assessment system provided that all victim service providers in the area use a centralized or coordinated assessment system that meets HUD's minimum requirements. HUD has provided this optional exception because it understands the unique role that victim service providers have within the Continuum of Care.

Renewals. The interim rule provides that HUD may fund, through the Continuum of Care program, all projects that were previously eligible under the McKinney-Vento Act prior to the enactment of the HEARTH Act. These projects may be renewed to continue ongoing leasing, operations, supportive services, rental assistance, HMIS, and administration beyond the initial funding period even if those projects

would not be eligible under the Continuum of Care program. For projects that would no longer be eligible under the Continuum of Care program (e.g., safe havens), but which are serving homeless persons; HUD wants to ensure that housing is maintained and that persons do not become homeless because funding is withdrawn.

HUD may renew projects that were submitted on time and in such manner as required by HUD, but did not have a total score that would allow the project to be competitively funded. HUD may choose to exercise this option to ensure that homeless or formerly homeless persons do not lose their housing. The interim rule provides, based on the language in section 421(e) of the McKinney-Vento Act, that HUD may renew the project, upon a finding that the project meets the purposes of the Continuum of Care program, for up to one year and under such conditions as HUD deems appropriate.

Annual Performance Report. The interim rule also provides that HUD may terminate the renewal of any grant and require the recipient to repay the renewal grant if the recipient fails to submit a HUD Annual Performance Report (APR) within 90 days of the end of the program year or if the recipient submits an APR that HUD deems unacceptable or shows noncompliance with the requirements of the grant and this part. Section 578.103(e) of the Continuum of Care program regulations further clarifies that recipients receiving grant funds for acquisition, rehabilitation, or new construction are expected to submit APRs for 15 years from the date of initial occupancy or the date of initial service provision, unless HUD provides an exception. The recipient's submission of the APR helps HUD review whether the recipient is carrying out the project in the manner proposed in the application. Recipients agree to submit an APR as a condition of their grant agreement. This requirement allows HUD to ensure that recipients submit APRs on grant agreements that have expired as a condition of receiving approval for a new grant agreement for the renewal project.

Appeals. The interim rule provides certain appeal options for applicants that were not awarded funding.

Under section 422(g) of the McKinney-Vento Act, if more than one collaborative applicant submits an application covering the same geographic area, HUD must award funds to the application that scores the highest score based on the selection criteria set forth in section 427 of the Act. Consistent with HUD's use of the term

Continuum of Care in the interim rule where the statute uses collaborative applicant, as explained earlier in the preamble, the interim rule stipulates that if more than one Continuum of Care claims the same geographic area, then HUD will award funds to the Continuum applicant(s) whose application(s) has the highest total score and that no projects from the lower scoring Continuum of Care will be funded (and that any projects submitted with both applications will not be funded). To appeal HUD's decision to fund the competing Continuum of Care, the applicant(s) from the lower-scoring Continuum of Care must file the written appeal in such form and manner as HUD may require within 45 days of the date of HUD's announcement of award.

If an applicant has had a certification of consistency with a consolidated plan withheld, that applicant may appeal such a decision to HUD. HUD has established a procedure to process the appeals and no later than 45 days after the date of receipt of an appeal, HUD will make a decision.

Section 422(h) of the McKinney-Vento Act provides the authority for a solo applicant to submit an application to HUD and be awarded a grant by HUD if it meets the criteria under section 427 of the McKinney-Vento Act. The interim rule clarifies that a solo applicant must submit its application to HUD by the deadline established in the NOFA to be considered for funding. The statute also requires that HUD establish an appeal process for organizations that attempted to participate in the Continuum of Care's process and believe they were denied the right to reasonable participation, as reviewed in the context of the local Continuum's process. An organization may submit a solo application to HUD and appeal the Continuum's decision not to include it in the Continuum's application. If HUD finds that the solo applicant was not permitted to participate in the Continuum of Care process in a reasonable manner, then HUD may award the grant to that solo applicant and may direct the Continuum to take remedial steps to ensure reasonable participation in the future. HUD may also reduce the award to the Continuum's applicant(s).

Section 422(h)(1) of the McKinney-Vento Act requires that "HUD establish a timely appeal procedure for grant amounts awarded or denied under this subtitle to a collaborative application." The interim rule sets an appeal process for denied or decreased funding under § 578.35(c). Applicants that are denied funds by HUD, or that requested more funds than HUD awarded, may appeal

by filing a written appeal within 45 days of the date of HUD's announcement of the award. HUD will notify applicant of its decision on the appeal within 60 days of the date of HUD's receipt of the written appeal.

Program Components and Eligible Costs (Subpart D)

Program components. The interim rule provides that Continuum of Care funds may be used for projects under five program components: Permanent housing, transitional housing, supportive services only, HMIS, and, in some cases, homelessness prevention. Administrative costs are eligible under all components. Where possible, the components set forth in the Continuum of Care program are consistent with the components set forth under the Emergency Solutions Grants program. This will ease the administrative burden on recipients of both programs and will ensure that reporting requirements and data quality benchmarks are consistently established and applied to like projects. One significant distinction between the Emergency Solutions Grants program and this part can be found in the eligible activities and administration requirements for assistance provided under the rapid rehousing component in this interim rule. The significant differences between this component in the Emergency Solutions Grants program and this part are discussed below.

The interim rule sets forth the costs eligible for each program component in § 578.37(a). The eligible costs for contributing data to the HMIS designated by the Continuum of Care are also eligible under all components.

Consistent with the definition of permanent housing in section 401 of the McKinney-Vento Act and § 578.3 of this interim rule, the permanent housing component is community-based housing without a designated length of stay that permits formerly homeless individuals and families to live as independently as possible. The interim rule clarifies that Continuum of Care funds may be spent on two types of permanent housing: Permanent supportive housing for persons with disabilities (PSH) and rapid rehousing that provides temporary assistance (i.e., rental assistance and/or supportive services) to program participants in a unit that the program participant retains after the assistance ends.

Although the McKinney-Vento Act authorizes permanent housing without supportive services, the interim rule does not. Based on its experience with the Supportive Housing and Shelter Plus Care programs, HUD has

determined that programs should require at least case management for some initial period after exiting homelessness. HUD has imposed the requirement that rapid rehousing include, at a minimum, monthly case management meetings with program participants (except where prohibited by the Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA)) and allows for a full range of supportive services to be provided for up to 6 months after the rental assistance stops. Many other HUD programs, such as Section 8 and HOME, provide housing without supportive services to low-income individuals and families.

With respect to rapid rehousing, the interim rule provides that funds under this part may be used to provide supportive services and short-term and/or medium-term rental assistance. While the time frames under which a program participant may receive short-term or medium-term rental assistance set forth in this part match the time frames set forth in the Emergency Solutions Grants program, the supportive services available to program participants receiving rapid rehousing assistance under the Continuum of Care program are not limited to housing relocation and stabilization services as they are in the Emergency Solutions Grants program. Program participants receiving rapid rehousing under this part may receive any of the supportive services set forth in § 578.53 during their participation in the program. The Continuum of Care, however, does have the discretion to develop written policies and procedures that limit the services available to program participants that better align the services available to program participants with those set forth in the Emergency Solutions Grants program.

Specific request for comment. While HUD's experience with the Supportive Housing and Shelter Plus Care programs is the basis for HUD's determination to require case management for some initial period after exiting homelessness, HUD specifically welcomes comment on other experiences with monthly case management.

The interim rule provides that the HMIS component is for funds that are used by HMIS Leads only. Eligible costs include leasing a structure in which the HMIS is operated, operating funds to operate a structure in which the HMIS is operated, and HMIS costs related to establishing, operating, and customizing a Continuum of Care's HMIS.

As set forth in Section 424(c) of the McKinney-Vento Act, Continuum of Care funds may be used only for the

homelessness prevention component by recipients in Continuums of Care that have been designated HPCs by HUD. Eligible activities are housing relocation and stabilization services, and short- and/or medium-term rental assistance, as set forth in 24 CFR 576.103, necessary to prevent an individual or family from becoming homeless.

Planning activities. Under this interim rule, HUD lists eligible planning costs for the Continuum of Care under § 578.39(b) and (c). HUD will allow no more than 3 percent of the FPRN, or a maximum amount to be established by the NOFA, to be used for certain costs. These costs must be related to designing a collaborative process for an application to HUD, evaluating the outcomes of funded projects under the Continuum of Care and Emergency Solutions Grants programs, and participating in the consolidated plan(s) for the geographic area(s). Under section 423 of the McKinney-Vento Act, a collaborative applicant may use no more than 3 percent of total funds made available to pay for administrative costs related to Continuum of Care planning.

HUD is defining "of the total funds made available" to mean FPRN, the higher of PPRN or renewal demand, in the interim rule. HUD has determined that FPRN strikes the correct balance, as it is the higher of PPRN or renewal demand. This will help Continuums of Care (CoC) balance: (1) Having sufficient planning dollars to be successful in its duties and compete for new money (which would be the PPRN), and (2) being able to monitor and evaluate actual projects in operation (and plan for renewal demand). The administrative funds related to CoC planning made available will be added to a CoC's FPRN to establish the CoCs maximum award amount.

Unified Funding Agency Costs. Under this interim rule, HUD lists eligible UFA costs in § 578.41(b) and (c). Similar to the cap on planning costs for CoC, HUD will allow no more than 3 percent of the FPRN, or a maximum amount to be established by the NOFA, whichever is less, to be used for UFA costs. This amount is in addition to the amount made available for CoC planning costs. UFA costs include costs associated with ensuring that all financial transactions carried out under the Continuum of Care program are conducted and records maintained in accordance with generally accepted accounting principles, including arranging for an annual survey, audit, or evaluation of the financial records of each project carried out by a subrecipient funded by a grant received through the Continuum of Care program. The funds made

available to UFAs related to establishing fiscal controls will be added to a CoC's FPRN to establish the CoC maximum award amount.

Leasing. Under this interim rule, grant funds may be used to pay the costs of leasing a structure or structures, or portions of structures, to provide housing or supportive services. The interim rule further clarifies that leasing means that the lease is between the recipient of funds and the landlord. HUD recognizes that some grantees receiving funds through the Supportive Housing Program may have been using their leasing funds in a manner consistent with the rental assistance requirements established in § 578.51; therefore, since the Continuum of Care program authorizes both leasing and rental assistance, the rule provides for an allowance for projects originally approved to carry out leasing to renew and request funds for rental assistance, so long as the rental assistance meets the requirements in § 578.51. The rule provides that a recipient of a grant awarded under the McKinney-Vento Act, prior to enactment of the HEARTH Act, must apply for leasing if the lease is between the recipient and the landlord, notwithstanding that the grant was awarded prior to the HEARTH Act amendments to the McKinney-Vento Act.

The interim rule provides that leasing funds may not be used to lease units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure, unless HUD authorizes an exception for good cause. The interim rule establishes minimum requirements that a request for an exception must include. These exceptions are based on HUD's experience in administering the Homelessness Prevention and Rapid Re-Housing Program (HPRP).

The interim rule establishes that projects for leasing may require that program participants pay an occupancy charge (or in the case of a sublease, rent) of no more than 30 percent of their income. Income must be calculated in accordance with HUD's regulations in 24 CFR 5.609 and 24 CFR 5.611(a). However, the interim rule clarifies that projects may not charge program fees.

Rental assistance. Under this interim rule, rental assistance is an eligible cost for permanent and transitional housing, and this rule clarifies that the rental assistance may be short-term, up to 3 months of rent; medium-term, for 3 to 24 months of rent; and long-term, for longer than 24 months of rent. This

section provides that rental assistance may include tenant-based, project-based, or sponsor-based rental assistance. This section also provides that project-based rental assistance may include rental assistance to preserve existing permanent supportive housing for homeless individuals and families. Given that the availability of affordable rental housing has been shown to be a key factor in reducing homelessness, the availability of funding for short-term, medium-term, and long-term rental assistance under both the Emergency Solutions Grants program and the Continuum of Care program is not inefficient use of program funds, but rather effective use of funding for an activity that lowers the number of homeless persons.

As noted in the above discussion of rental housing available for funding under the Continuum of Care program, one eligible form of rental assistance is tenant-based, which allows the program participant to retain rental assistance for another unit. The interim rule limits this retention to within the Continuum of Care boundaries. HUD has determined that Continuum of Care program funds must be used within the Continuum's geographic boundaries. If program participants move outside of the Continuum, the Continuum may pay moving costs, security deposits, and the first month of rent for another unit; however, the Continuum would have to organize assistance with the relevant Continuum of Care for the program participant if rental assistance is to continue. The program participant may be transferred to a rental assistance program in a different Continuum without having to become homeless again. The recipient may also limit the movement of the assistance to a smaller area if this is necessary to coordinate service delivery.

Under this interim rule, the only exception to the limitation for retention of tenant-based rental assistance is for program participants who are victims of domestic violence, dating violence, sexual assault, or stalking. Under the definition of "tenant-based" in the McKinney-Vento Act (section 401(28) of the McKinney-Vento Act), these participants must have complied with all other obligations of the program and reasonably believe that he or she is imminently threatened by harm from further violence if he or she remains in the assisted dwelling unit.

In the interim rule, HUD has clarified that the imminent threat of harm must be from further domestic violence, dating violence, sexual assault, or stalking, which would include threats from a third party, such as a friend or

family member of the perpetrator of the violence. HUD requires that the program participant provide appropriate documentation of the original incident of domestic violence, dating violence, sexual assault, or stalking, and any evidence of the current imminent threat of harm. Examples of appropriate documentation of the original incident of domestic violence, dating violence, sexual assault, or stalking include written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; or medical or dental, court, or law enforcement records.

Documentation of reasonable belief of further domestic violence, dating violence, sexual assault, or stalking includes written observation by the housing or service provider; a letter or other written documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has requested assistance; a current restraining order, recent court order, or other court records; or law enforcement reports or records. The housing or service provider may also consider other documentation such as emails, voicemails, text messages, social media posts, and other communication. Because of the particular safety concerns surrounding victims of domestic violence, the interim rule provides that acceptable evidence for both the original violence and the reasonable belief include an oral statement. This oral statement does not need to be verified, but it must be documented by a written certification by the individual or head of household.

This provision is specific to victims of domestic violence, dating violence, sexual assault, and stalking who are receiving tenant-based rental assistance in permanent housing. This interim rule contains other policies for moving program participants receiving any type of assistance under this interim rule, including tenant-based rental assistance, within the Continuum of Care geographic area, or smaller geographic area required by the provider to coordinate service delivery. Moving program participants outside of the geographic area where providers can coordinate service-delivery is administratively difficult for providers and makes it difficult to monitor that program participants have access to, and are receiving, appropriate supportive

services; therefore, moves outside of the geographic area where the provider can effectively deliver and monitor service coordination are allowed only under exceptional circumstances. HUD has established these provisions to provide an exception and to address the challenges that are associated with such a move.

Based on HUD's experience in administering the Shelter Plus Care program, the interim rule includes provisions to clarify when rental payments may continue to be made to a landlord when the program participant no longer resides in the unit. For vacated units, the interim rule provides that assistance may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless the unit is occupied by another eligible person. A person staying in an institution for less than 90 days is not considered as having vacated the unit. Finally, the recipient may use grant funds, in an amount not to exceed one month's rent, to pay for any damage to housing due to the action of the program participant, one-time, per program participant, per unit. This assistance can be provided only at the time the program participant exits the housing unit.

Supportive services. Grant funds may be used to pay eligible costs of supportive services for the special needs of program participants. All eligible costs are eligible to the same extent for program participants who are unaccompanied homeless youth; persons living with Human Immunodeficiency Virus (HIV)/ Acquired Immune Deficiency Syndrome (AIDS) (HIV/AIDS); and victims of domestic violence, dating violence, sexual assault, or stalking. Any cost that is not described as an eligible cost under this interim rule is not an eligible cost of providing supportive services. Eligible costs consist of assistance with moving costs, case management, child care, education services, employment assistance and job training, housing search and counseling services, legal services, life skills training, mental health services, outpatient health services, outreach services, substance abuse treatment services, transportation, and utility deposits.

The definition of "supportive services" in section 401(27) of the McKinney-Vento Act includes the provision of mental health services, trauma counseling, and victim services. HUD has determined that victim services are eligible as supportive services, and are included as eligible program costs in this interim rule. Providers are allowed to provide

services specifically to victims of domestic violence, dating violence, sexual assault, and stalking. The eligible costs for providing victim services are listed as eligible costs in the supportive services funding category. Rather than create a new eligible line item in the project budget, HUD has determined that these costs can be included in the funding categories already established.

Indirect costs. Indirect costs are allowed as part of eligible program costs. Programs using indirect cost allocations must be consistent with Office of Management and Budget (OMB) Circulars A-87 and A-122, as applicable. OMB Circular A-87 and the regulations at 2 CFR part 225 pertain to "Cost Principles for State, Local, and Indian Tribal Governments." OMB Circular A-122 and the regulations codified at 24 CFR part 230 pertain to "Cost Principles for Non-Profit Organizations."

Other costs. In addition to the eligible costs described in this preamble, the regulation addresses the following other eligible costs: acquisition, rehabilitation, new construction, operating costs, HMIS, project administrative costs, and relocation costs.

High-Performing Communities (Subpart E)

Section 424 of the McKinney-Vento Act establishes the authority for the establishment of and requirements for HPCs. Applications must be submitted by the collaborative applicant at such time and in such manner as HUD may require and contain such information as HUD determines necessary under § 578.17(b). Applications will be posted on the HUD Web site (www.hud.gov) for public comments. In addition to HUD's review of the applications, interested members of the public will be able to provide comment to HUD regarding the applications.

Requirements. The Continuum of Care must use HMIS data (HUD will publish data standards and measurement protocols) to determine that the standards for qualifying as a HPC are met. An applicant must submit a report showing how the Continuum of Care program funds were expended in the prior year, and provide information that the Continuum meets the standards for HPCs.

Standards. In order to qualify as an HPC, a Continuum of Care must demonstrate through reliable data that it meets all of the required standards. The interim rule clarifies which standards will be measured with reliable data from a Continuum's HMIS and which standards will be measured through reliable data from other sources and

presented in a narrative form or other format prescribed by HUD.

Continuums must use the HMIS to demonstrate the following measures: (1) That the mean length of homelessness must be less than 20 days for the Continuum's geographic area, or the Continuum's mean length of episodes for individuals and families in similar circumstances was reduced by at least 10 percent from the preceding year; (2) that less than 5 percent of individuals and families that leave homelessness become homeless again any time within the next 2 years, or the percentage of individuals and families in similar circumstances who became homeless again within 2 years after leaving homelessness was decreased by at least 20 percent from the preceding year; and (3) for Continuums of Care that served homeless families with youth defined as homeless under other federal statutes, that 95 percent of those families did not become homeless again within a 2-year period following termination of assistance and that 85 percent of those families achieved independent living in permanent housing for at least 2 years following the termination of assistance.

The McKinney-Vento Act requires that HUD set forth standards for preventing homelessness among the subset of those at the highest risk of becoming homeless among those homeless families and youth defined as homeless under other federal statutes, the third measure above, one of which includes achieving independent living in permanent housing among this population. HUD has set forth the standards of 95 percent and 85 percent. HUD recognizes that these standards are high, but standards are comparable to the other standards in the Act, which are high. It is HUD's position that HPCs should be addressing the needs of those homeless individuals within their communities prior to receiving designation of a HPC and being allowed to spend funds in accordance with § 578.71.

The final standard that the Continuum must use its HMIS data to demonstrate is provided under section 424(d)(4) of the Act. The statute requires each homeless individual or family who sought homeless assistance to be included in the data system used by that community. HUD has defined this as bed-coverage and service-volume coverage rates of at least 80 percent. The documentation that each homeless individual or family who sought homeless assistance be included in the HMIS is not measurable by HUD. This type of standard would be entirely reliant upon self-reporting. Additionally, individuals and families

have the right to decline having their data entered into the HMIS. HUD uses bed-coverage rates and service-volume coverage rates as a proxy for measuring the rate of inclusion of persons who are present for services or housing in the HMIS. This is a measurable standard, and HUD defines the calculation in the HMIS rule; therefore, the measurement will be consistent between Continuums.

Continuums must use reliable data from other sources and presented in a narrative form or other format prescribed by HUD to measure two standards: Community action and renewing HPC status. Section 424(d)(4) of the McKinney-Vento Act establishes another standard for HPCs, which is "community action." This statutory section provides that communities that compose the geographic area must have actively encouraged homeless individuals and families to participate in housing and services available in the geographic area and included each homeless individual or family who sought homeless assistance services in the data system used by that community for determining compliance. HUD has defined "communities that compose the geographic area" to mean the entire geographic area of the Continuum. This definition will also provide consistency of measurement since most of HUD's measurements are across the entire Continuum of Care geographic area. HUD has further defined "actively encourage" within this standard as a comprehensive outreach plan, including specific steps for identifying homeless persons and referring them to appropriate housing and services in that geographic area. The measurement of the last part of this standard, "each homeless individual or family who sought homeless assistance services in the data system used by that community," will be measured using reliable data from an HMIS and has been discussed earlier in this preamble. HUD has determined this will provide clarity and ensure consistent measurement across Continuums.

The interim rule provides that a Continuum of Care that was an HPC in the prior year and used Continuum funds for activities described under § 578.71 must demonstrate that these activities were effective at reducing the number of persons who became homeless in that community, to be renewed as a HPC.

Selection. HUD will select up to 10 Continuums of Care each year that best meet the application requirements and the standards set forth in § 578.65. Consistent with section 424 of the McKinney-Vento Act, the interim rule provides a HPC designation for the

grants awarded in the same competition in which the designation is applied for and made. The designation will be for a period of one year.

Eligible activities. Recipients and subrecipients in Continuums that have been designated an HPC may use grant funds to provide housing relocation and stabilization services and short- and/or medium-term rental assistance to individuals and families at risk of homelessness as set for in the Emergency Solutions Grants program. All eligible activities discussed in this section must be effective at stabilizing individuals and families in their current housing, or quickly moving such individuals and families to other permanent housing. This is the only time that Continuum of Care funds may be used to serve nonhomeless individuals and families. Recipients and subrecipients using grant funds on these eligible activities must follow the written standards established by the Continuum of Care in § 578.7(a)(9)(v), and the recordkeeping requirements set for the Emergency Solutions Grants program rule.

Program Requirements (Subpart F)

All recipients of Continuum of Care funding must comply with the program regulations and the requirements of the NOFA issued annually by HUD.

Matching. The HEARTH Act allows for a new, simplified match requirement. All eligible funding costs except leasing must be matched with no less than a 25 percent cash or in-kind match. The interim rule clarifies that the match must be provided for the entire grant, except that recipients that are UFAs or are the sole recipient for the Continuum may provide the match on a Continuum-wide basis.

For in-kind match, the governmentwide grant requirements of HUD's regulations in 24 CFR 84.23 (for private nonprofit organizations) and 85.24 (for governments) apply. The regulations in 24 CFR parts 84 and 85 establish uniform administrative requirements for HUD grants. The requirements of 24 CFR part 84 apply to subrecipients that are private nonprofit organizations. The requirements of 24 CFR part 85 apply to the recipient and subrecipients that are units of general purpose local government. The match requirement in 24 CFR 84.23 and in 24 CFR 85.24 applies to administration funds, as well as Continuum of Care planning costs and UFA's financial management costs. All match must be spent on eligible activities as required under subpart D of this interim rule, except that recipients and subrecipients

in HPCs may use match on eligible activities described under § 578.71.

General operations. Recipients of grant funds must provide housing or services that comply with all applicable State and local housing codes, licensing requirements, and any other requirements in the project's jurisdiction. In addition, this interim rule clarifies that recipients must abide by housing quality standards and suitable dwelling size. Recipients must also assess supportive services on an ongoing basis, have residential supervision, and provide for participation of homeless individuals as required under section 426(g) of the McKinney-Vento Act.

Specific request for comment. With respect to housing quality standards, HUD includes in this rule the longstanding requirement from the Shelter Plus Care program that recipients or subrecipients, prior to providing assistance on behalf of a program participant, must physically inspect each unit to assure that the unit meets housing quality standards. This requirement is designed to ensure that program participants are placed in housing that is suitable for living. Additionally, these requirements are consistent with HUD's physical inspection requirements in its other mainstream rental assistance programs. Notwithstanding that this is a longstanding requirement, HUD welcomes comment on alternatives to inspection of each unit that may be less burdensome but ensure that the housing provided to a program participant is decent, safe, and sanitary.

Under Section 578.75, General Operations, subsection (h), entitled "Supportive Service Agreements," states that recipients and subrecipients may require program participants to take part in supportive services so long as they are not disability-related services, provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability.

This provision further states that if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program. For example, if a Continuum of Care recipient operates a transitional housing program with substance abuse treatment

services, the recipient may require program participants to participate in those services. By contrast, in a program that offers services but whose purpose is not substance abuse treatment, a recipient may not require a person who is an alcoholic, for example, to sign a supportive service agreement at initial occupancy stating that he or she will participate in substance abuse treatment services as a condition of occupancy. All program participants must, however, meet all terms and conditions of tenancy, including lease requirements. If, as a result of a person's behavior stemming from substance use, a person violates the terms of the lease, a recipient may consider requiring participation in services or any other action necessary in order for such a person to successfully meet the requirements of tenancy.

Finally, the interim rule clarifies that in units where the qualifying member of the household has died, or has been incarcerated or institutionalized for more than 90 days, assistance may continue until the expiration of the lease in effect at the time of the qualifying member's death, incarceration, or institutionalization.

Displacement, relocation, and acquisition. All recipients must ensure that they have taken all reasonable steps to minimize the displacement of persons as a result of projects assisted under this part. This section of the interim rule is substantially revised from the previous programs to increase clarity and comprehension of the directions to recipients' and subrecipients in the use of grant funds.

Timeliness standards. Recipients must initiate approved activities and projects promptly. Recipients of funds for rehabilitation and new construction must begin construction activities within 9 months of the signing of the grant, and such activities must be completed within 24 months. HUD is providing these requirements to assist communities in meeting the obligation and expenditure deadline historically imposed by the annual HUD appropriations act. HUD may reduce a grant term to a term of one year if implementation delays reduce the amount of funds that can be used during the original grant term.

Limitation on use of funds. Recipients of funds provided under this part must abide by any limitations that apply to the use of such funds, such as use of funds for explicitly religious activities.

The limitation on use of funds also addresses limitation on uses where religious activities may be concerned. It is HUD's position that faith-based organizations are able to compete for

HUD funds and participate in HUD programs on an equal footing with other organizations; that no group of applicants competing for HUD funds should be subject, as a matter of discretion, to greater or fewer requirements than other organizations solely because of their religious character or affiliation, or, alternatively, the absence of religious character or affiliation. HUD's general principles regarding the equal participation of such organizations in its programs are codified at 24 CFR 5.109. Program-specific requirements governing faith-based activities are codified in the regulations for the individual HUD programs. (See, for example, 24 CFR 574.300(c), 24 CFR 582.115(c), and 24 CFR 583.150(b).)

HUD's equal participation regulations were prompted by Executive Order 13279, Equal Protection of the Laws for Faith-Based and Community Organizations, issued by President Bush on December 12, 2002, and published in the *Federal Register* on December 16, 2002 (67 FR 77141). Executive Order 13279 set forth principles and policymaking criteria to guide federal agencies in ensuring the equal protection of the laws for faith-based and community organizations. Executive Order 13279 was amended by Executive Order 13559 (Fundamental Principles and Policymaking Criteria for Partnerships With Faith-Based and Other Neighborhood Organizations), issued by President Obama on November 17, 2010, and published in the *Federal Register* on November 22, 2010 (75 FR 71319).

Executive Order 13559 expands on the equal participation principles provided in Executive Order 13279 to strengthen the capacity of faith-based and other neighborhood organizations to deliver services effectively and ensure the equal treatment of program beneficiaries. Executive Order 13559 reiterates a key principle underlying participation of faith-based organizations in federally funded activities and that is that faith-based organizations be eligible to compete for federal financial assistance used to support social service programs and to participate fully in social service programs supported with federal financial assistance without impairing their independence, autonomy, expression outside the programs in question, or religious character.

With respect to program beneficiaries, the Executive Order states that organizations, in providing services supported in whole or in part with federal financial assistance, and in their outreach activities related to such

services, should not be allowed to discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice. The Executive Order directs that organizations that engage in explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization) must perform such activities and offer such services outside of programs that are supported with direct federal financial assistance (including through prime awards or subawards), separately in time or location from any such programs or services supported with direct federal financial assistance, and participation in any such explicitly religious activities must be voluntary for the beneficiaries of the social service program supported with such federal financial assistance. For purposes of greater clarity and comprehensibility, the Executive Order uses the term "explicitly religious" in lieu of "inherently religious." The Executive Order further directs that if a beneficiary or prospective beneficiary of a social service program supported by federal financial assistance objects to the religious character of an organization that provides services under the program, that organization shall, within a reasonable time after the date of the objection, refer the beneficiary to an alternative provider.

Executive Order 13559 provides for the establishment of an Interagency Working Group on Faith-Based and Other Neighborhood Partnerships (Working Group) to review and evaluate existing regulations, guidance documents, and policies, and directs the OMB to issue guidance to agencies on uniform implementation following receipt of the Working Group's report. On April 27, 2012, the Working Group issued its report, recommending a model set of regulations and guidance for agencies to adopt.¹

HUD intends to wait for OMB guidance before initiating any rulemaking directed to broader changes to HUD's existing faith-based regulations, to ensure consistency with faith-based regulations of other federal agencies. However, HUD has revised its regulatory provisions governing faith-based activities to incorporate the principles of Executive Order 13559 pertaining to equal treatment of program beneficiaries and to adopt terminology, such as "explicitly religious" and "overt

¹ The report is available at: <http://www.whitehouse.gov/sites/default/files/uploads/finalfaithbasedworkinggroupreport.pdf>.

religious content," that offers greater clarity to the limitations placed on faith-based organizations when using federal funds for their supportive services. Additionally, HUD is putting in place through this rulemaking the provision of Executive Order 13559 that directs the referral to alternative providers. Executive Order 13559 provides that if a beneficiary or prospective beneficiary of a social service program supported by federal financial assistance objects to the religious character of an organization that provides services under the program, that organization shall, within a reasonable time frame after the date of the objection, refer the beneficiary to an alternative provider. While HUD will benefit from OMB guidance on other provisions of the Executive Order, specifically those which the Working Group is charged to provide recommendations, the "referral" provision of the Executive Order is one that HUD believes it can immediately put in place. HUD may, following receipt of public comment and further consideration of this issue, revise how recipients and subrecipients document the referral to other providers when beneficiaries may assert objections to the original provider. For now, HUD is requiring that any objections and any referrals be documented in accordance with the recordkeeping provisions of § 578.013.

This section of the interim rule also contains limitations on the types of eligible assistance that may not be combined in a single structure or housing unit. As the Continuum of Care substantially increases the types of assistance that may be combined in a project from previous programs, HUD has established standards in this section to provide recipients with clarity about the types of activities that may not be carried out in a single structure or housing unit.

Termination of assistance. The interim rule provides that a recipient may terminate assistance to a participant who violates program requirements or conditions of occupancy. The recipient must provide a formal process that recognizes the due process of law. Recipients may resume assistance to a participant whose assistance has been terminated.

Recipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate. Under this interim rule, HUD has determined that a participant's assistance should be terminated only in the most severe cases. HUD is carrying

over this requirement from the Shelter Plus Care program.

Fair Housing and Equal Opportunity requirements. The Continuum of Care, as well as its members and subrecipients, are required to comply with applicable civil rights laws. Section 578.93, addressing nondiscrimination and equal opportunity requirements, is provided to offer greater direction to recipients and subrecipients on the use of grant funds. Section 578.93(a) states that the nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) apply. This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 (Section 504), and title II of the Americans with Disabilities Act.

Section 578.93(b) explains when recipients and subrecipients may exclusively serve a particular subpopulation in transitional or permanent housing. As part of these requirements, recipients must also administer programs and activities receiving federal financial assistance in the most integrated setting appropriate to the needs of qualified individuals with disabilities. This "integration mandate" requires that HUD-funded programs or activities enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible. In reviewing requests for funding through the Continuum of Care NOFA, HUD will be considering each recipient's proposals to provide integrated housing to individuals with disabilities.

There are certain situations in which a recipient or subrecipient may limit housing to a specific subpopulation, so long as admission does not discriminate against any protected class, as well as instances where recipients or subrecipients may limit admission or provide a preference to certain subpopulations of homeless persons and families who need the specialized services provided in the housing. For example, § 578.93(b)(2) states that the housing may be limited to homeless veterans, so long as admission is not denied based on any membership in a protected class; e.g., homeless veterans with families must be admitted. Similarly, housing may be limited to domestic violence victims and their families or persons who are at risk of institutionalization, so long as admission is not denied based on any membership in a protected class.

Section 578.93(b)(3) states that housing may be limited to families with children.

Section 578.93(b)(1) states that, in consideration of personal privacy, housing may only be limited to a single sex when such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex.

Further, §§ 578.93(b)(4) and (5) clearly outline instances when sex offenders or violent offenders may be excluded from housing, and when projects providing sober housing may exclude persons.

HUD's Section 504 regulations permit housing funded under a particular program to be reserved for persons with a specific disability when a federal statute or executive order specifically authorizes such a limitation. Section 578.93(b)(6) states that if the housing is assisted with funds under a federal program that is limited by federal statute or executive order to a specific subpopulation, the housing may be limited to that subpopulation.

Section 578.93(b)(7) provides clarification to recipients of funds under this part as to when a project can limit admission to a specific subpopulation of homeless individuals and families based on the service package offered in the project. To help recipients better understand these requirements, the following paragraphs provide a detailed explanation of the regulatory provision, along with a few examples.

Section 578.93(b)(7) states that recipients may limit admission to or provide a preference for the housing to subpopulations of homeless persons and families who need the specialized supportive services that are provided in the housing. The regulation contains the following examples: Substance abuse addiction treatment, domestic violence services, or a high-intensity package designed to meet the needs of hard-to-reach homeless persons. However, § 578.93(b)(7) further states that while the housing may offer services for a particular type of disability, no otherwise eligible individual with a disability, or family that includes an individual with a disability, who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability. Below are general examples to offer guidance on this subsection. Please note that these examples are nonexhaustive, but emphasize that the proper focus is on the services available as part of the Continuum of Care project as opposed to a person's category or subcategory of disability. While these general principles are offered to help clarify this

section, a change in the factual scenario may change the analysis.

One clarifying example is as follows. A private, nonprofit organization or a local government applies for and receives a new grant under this part to provide project-based rental assistance and services, including case management, intensive therapy provided by a psychiatrist, and medication management. The recipient or subrecipient may establish a preference for individuals who are chronically homeless. When filling an opening in the housing, the recipient or subrecipient may target chronically homeless individuals or families, but if there are no such individuals or families either on a waiting list or applying for entrance to the program, the recipient or subrecipient cannot deny occupancy to individuals or families who apply for entrance into the program and who may benefit from the services provided. When filling a vacancy in the housing, the recipient or subrecipient, if presented with two otherwise eligible persons, one who is chronically homeless and one who is not, may give a preference to the chronically homeless individual.

By comparison, § 578.93(b)(6) addresses situations where Continuum of Care funds are combined with HUD funding for housing that may be restricted to a specific disability. For example, if Continuum of Care funds for a specific project are combined with construction or rehabilitation funding for housing from the Housing Opportunities for People With AIDS program, the program may limit eligibility for the project to persons with HIV/AIDS and their families. An individual or a family that includes an individual with a disability may be denied occupancy if the individual or at least one member of the family does not have HIV/AIDS.

In another example, a private, nonprofit organization applies for and receives Continuum of Care funds from a local governmental entity to rehabilitate a five-unit building, and provides services including assistance with daily living and mental health services. While the nonprofit organization intends to target and advertise the project as offering services for persons with developmental disabilities, an individual with a severe psychiatric disability who does not have a developmental disability but who can benefit from these services cannot be denied.

Section 578.93(e) incorporates the "preventing involuntary family separation" requirement set forth in Section 404 of the McKinney-Veto Act

into this interim rule. This provision clarifies, especially for projects where the current policy is to deny the admittance of a boy under the age of 18, that denying admittance to a project based on age and gender is no longer permissible. HUD encourages Continuums of Care to use their centralized or coordinated assessment systems to find appropriate shelter or housing for families with male children under the age of 18.

Specific request for comment. HUD specifically seeks comments from Continuum of Care-funded recipients on this requirement. HUD invites comments about the difficulty that recipients are going to experience, if any, in implementing this requirement. In addition to comments about the difficulties, HUD invites communities that have already implemented this requirement locally to describe their methods for use in HUD's technical assistance materials and for posting on the HUD Homeless Resource Exchange.

Other standards. In addition to the program requirements described in this preamble, the interim rule sets forth other program requirements by which all recipients of grant funds must abide. These include a limitation on the use of grant funds to serve persons defined as homeless under other federal laws, conflicts of interest standards, and standards for identifying uses of program income.

Additionally, recipients are required to follow other federal requirements contained in this interim rule under § 578.99. These include compliance with such federal requirements as the Coastal Barriers Resources Act, OMB Circulars, HUD's Lead-Based Paint regulations, and audit requirements. The wording of these requirements has been substantially revised from previous programs, with the objective being to increase clarity and comprehension of the directions to recipients and subrecipients in the use of grant funds.

Administration (Subpart G)

Technical assistance. The purpose of technical assistance under the Continuum of Care program is to increase the effectiveness with which Continuums of Care, eligible applicants, recipients, subrecipients, and UFAs implement and administer their Continuum of Care planning process. Technical assistance will also improve the capacity to prepare applications, and prevent the separation of families in projects funded under the Emergency Solutions Grants, Continuum of Care, and Rural Housing Stability Assistance programs. Under this interim rule, technical assistance means the transfer

of skills and knowledge to entities that may need, but do not possess, such skills and knowledge. The assistance may include written information, such as papers, manuals, guides, and brochures; person-to-person exchanges; and training and related costs.

Therefore, as needed, HUD may advertise and competitively select providers to deliver technical assistance. HUD may enter into contracts, grants, or cooperative agreements to implement the technical assistance. HUD may also enter into agreements with other federal agencies when awarding technical assistance funds.

Recordkeeping requirements. Grant recipients under the Supportive Housing Program and the Shelter Plus Care program have always been required to show compliance with regulations through appropriate records. However, the existing regulations are not specific about the records to be maintained. The interim rule for the Continuum of Care program elaborates upon the recordkeeping requirements to provide sufficient notice and clarify the documentation that HUD requires for assessing compliance with the program requirements. The recordkeeping requirements for documenting homeless status were published in the December 5, 2011, Defining Homeless final rule. Because these recordkeeping requirements already went through a 60-day comment period, HUD is not seeking further comment on these requirements. Additionally, recordkeeping requirements with similar levels of specificity apply to documentation of "at risk of homelessness" and these requirements can be found in § 576.500(c) of the Emergency Solutions Grants program interim rule published on December 5, 2011. Because the documentation requirements pertaining to "at risk of homelessness" were already subject to a 60-day public comment period, HUD is not seeking additional comment on these requirements. Further requirements are modeled after the recordkeeping requirements for the HOME Investment Partnerships Program (24 CFR 92.508) and other HUD regulations.

Included along with these changes are new or expanded requirements regarding confidentiality, rights of access to records, record retention periods, and reporting requirements. Most significantly, to protect the safety and privacy of all program participants, the Continuum of Care rule broadens the program's confidentiality requirements. The McKinney-Vento Act requires only procedures to ensure the

confidentiality of records pertaining to any individual provided family violence prevention or treatment services under this program. The interim rule requires written procedures to ensure the security and confidentiality of all records containing personally identifying information of any individual or family who applies for and/or receives Continuum of Care assistance.

Grant and project changes. The interim rule provides that recipients of grants may not make any significant changes to use of grant funds without prior HUD approval, evidenced by a grant amendment signed by HUD and the recipient. The interim rule provides separate standards for determining when a grant amendment is required for Continuums having only one recipient, including UFAs, and Continuums having more than one recipient. Additionally, the interim rule provides contingencies that must be met before HUD will approve the grant amendment. These contingencies are necessary to ensure that recipients meet the capacity requirements established in the NOFA and to ensure that eligible persons within the geographic area are better served and, since the Continuum of Care program is a competitive program, that the priorities established under the NOFA continue to be met. Any changes to an approved grant or project that do not require a grant amendment, as set forth in this section, must be fully documented in the recipient's or subrecipient's records.

Sanctions. The interim rule establishes sanctions based on existing regulations and strengthens the enforcement procedures and array of remedial actions and sanctions for recipients and subrecipients of Continuum of Care funds. These revisions draw from the requirements at 24 CFR 85.43 and other HUD program regulations.

Close-out. The interim rule provides that grants must be closed out at the end of their grant term if recipients are not seeking renewal. Section 578.109 of this interim rule specifies the actions that must be taken after the closeout, including grantee submission of financial, final performance, or other reports required by HUD within 90 days of the end of the grant term. Any unused funds must be deobligated and returned to HUD.

The interim rule stipulates, for grants seeking renewal, that failure to submit final performance reports, or other reports required by HUD within 90 days, may cause renewal funds to be withdrawn and grant funds expended on the renewal grant to be repaid.

III. Regulations for HUD Homeless Assistance Programs Existing Prior to Enactment of HEARTH Act

Because grants are still being administered under the Shelter Plus Care program and the Supportive Housing program, the regulations for these programs in 24 CFR parts 582, and 583, respectively, will remain in the Code of Federal Regulations for the time being. When no more, or very few, grants remain under these programs, HUD will remove the regulations in these parts by a separate rule (if no grants exist) or will replace them with a savings clause, which will continue to govern grant agreements executed prior to the effective date of the HEARTH Act regulations.

IV. Conforming Regulations

In addition to establishing the new regulations for the Continuum of Care program, HUD is amending the following regulations, which reference the Shelter Plus Care Program and the Supportive Housing Program, to include reference to the Continuum of Care program. These regulations are the regulations pertaining to: (1) Family Income and Family Payment; Occupancy Requirements for Section 8 and Public Housing, Other HUD-Assisted Housing Serving Persons with Disabilities, and Section 8 Project-Based Assistance, the regulations for which are in 24 CFR part 5, subpart F, specifically, § 5.601 (Purpose and Applicability), paragraphs (d) and (e) of this section; § 5.603 (Definitions), specifically the definition of "Responsible Entity;" § 5.617 (Self-Sufficiency Incentives for Persons with Disabilities—Disallowance of Increase in Annual Income), paragraph (a) of this section; (2) Environmental Review Responsibilities for Entities Assuming HUD Environmental Responsibilities, the regulations for which are in 24 CFR part 58, specifically § 58.1 (Purpose and Applicability), paragraph (b)(3) of this section; and (3) the Consolidated Submissions for Community Planning and Development Programs, the regulations for which are in 24 CFR part 91, specifically, § 91.2 (Applicability), paragraph (b) of this section.

V. Justification for Interim Rulemaking

In accordance with its regulations on rulemaking at 24 CFR part 10, HUD generally publishes its rules for advance public comment.² Notice and public

² The Administrative Procedure Act (5 U.S.C. Subchapter II) (APA), which governs federal rulemaking, provides in section 553(a) that matters involving a military or foreign affairs function of the United States or a matter relating to federal agency

procedures may be omitted, however, if HUD determines that, in a particular case or class of cases, notice and public comment procedure are "impracticable, unnecessary, or contrary to the public interest." (See 24 CFR 10.1.)

In this case, HUD has determined that it would be contrary to the public interest to delay promulgation of the regulations for the Continuum of Care program.³ Congress has provided funding for this new program in the Consolidated and Further Continuing Appropriations Act, 2012 (Pub. L. 112-55, approved November 18, 2011) (FY 2012 Appropriations Act). The FY 2012 Appropriations Act, under the account for Homeless Assistance Grants, appropriates not less than \$1.593 billion for the Continuum of Care and Rural Housing Stability programs. While many federal programs, including HUD programs, received a reduction in funding in the FY 2012 Appropriations Act, Congress increased funding for HUD's homeless assistance grants, including the Continuum of Care program. Additionally, the Conference Report accompanying the FY 2012 Appropriations Act (House Report 112-284) states in relevant part, as follows: "The conferees express concern that HUD continued to implement pre-HEARTH grant programs in FY 2011, due to a lack of regulations. The conferees direct HUD to publish at least interim guidelines for the Emergency Solutions Grants and Continuum of Care programs this fiscal year and to implement the new grant programs as soon as possible so that the updated policies and practices in HEARTH can begin to govern the delivery of homeless assistance funding." (See Conf. Rpt. at page 319. Emphasis added.) Given this congressional direction, HUD is issuing this rule providing for regulations for the Continuum of Care program as an interim rule. Having interim regulations in place will allow HUD to move forward in making FY 2012 funds available to grantees, and avoid a significant delay that would result from issuance, first, of a proposed rule. As

management or personnel or to public property, loans, grants, benefits, or contracts are exempt from the advance notice and public comment requirement of sections 553(b) and (c) of the APA. In its regulations in 24 CFR 10.1, HUD has waived the exemption for advance notice and public comment for matters that relate to public property, loans, grants, benefits, or contracts, and has committed to undertake notice and comment rulemaking for these matters.

³ Although HUD's regulation in 24 CFR 10.1 provide that HUD will involve public participation in its rulemaking, this regulation also provides that notice and public procedure will be omitted if HUD determines in a particular case or class of cases that notice and public procedure are impracticable, unnecessary, or contrary to the public interest.

has been discussed in this preamble, the foundation for the Continuum of Care regulations is the criteria and requirements provided in NOFAs for the Continuum of Care Homeless Assistance Grants Competition program, which HUD has funded for more than 10 years. Through the Continuum of Care Homeless Assistance Grants Competition program, HUD provided funding for the Supportive Housing program, the Shelter Plus Care program, and the Section 8 Moderate Rehabilitation Single Room Occupancy program. The HEARTH Act consolidated these three competitive programs into the statutorily established Continuum of Care program, which was established as a single grant program. Interim regulations will provide certainty with respect to funding requirements and eligible expenditures for FY 2012, and the public comment solicited through this interim rule will help inform the public procedures that HUD is contemplating in its regulations in 24 CFR part 10, and this public comment, in turn, will inform the final rule that will follow this interim rule and govern the funding years following FY 2012.

For the reasons stated above, HUD is issuing this rule to take immediate effect, but welcomes all comments on this interim rule and all comments will be taken into consideration in the development of the final rule.

VI. Findings and Certifications

Regulatory Review—Executive Orders 12866 and 13563

Under Executive Order 12866 (Regulatory Planning and Review), a determination must be made whether a regulatory action is significant and, therefore, subject to review by the Office of Management and Budget (OMB) in accordance with the requirements of the order. Executive Order 13563 (Improving Regulations and Regulatory Review) directs executive agencies to analyze regulations that are “outmoded, ineffective, insufficient, or excessively burdensome, and to modify, streamline, expand, or repeal them in accordance with what has been learned.” Executive Order 13563 also directs that, where relevant, feasible, and consistent with regulatory objectives, and to the extent permitted by law, agencies are to identify and consider regulatory approaches that reduce burdens and maintain flexibility and freedom of choice for the public. This rule was determined to be a “significant regulatory action,” as defined in section 3(f) of Executive Order 12866 (although not an economically significant

regulatory action, as provided under section 3(f)(1) of the Executive Order).

As has been discussed in this preamble, this interim rule establishes the regulations for the Continuum of Care program, which is the HEARTH Act’s codification of HUD’s long-standing Continuum of Care planning process. The HEARTH Act not only codified in law the planning system known as Continuum of Care, but consolidated the three existing competitive homeless assistance grant programs (Supportive Housing, Shelter Plus Care, and Single Room Occupancy) into the single grant program known as the Continuum of Care program. As discussed in the preceding section of the preamble, HUD funded these three programs for more than 10 years through a NOFA, which was titled the Continuum of Care Homeless Assistance Grants Competition Program. However, the funding of the three competitive grant programs, although done through a single NOFA, delineated the different statutes and regulations that governed each of the three programs (see, for example, HUD’s 2008 Continuum of Care NOFA at 73 FR 398450, specifically page 39845). In consolidating these three competitive programs into a single grant program, the HEARTH Act achieves the administrative efficiency that HUD strived to achieve to the extent possible, through its administrative establishment of the Continuum of Care planning process. To the extent permitted by the HEARTH Act and where feasible, the regulations build-in flexibility for grantees, based on experience in administering the Continuum of Care program to date. Given the transition from administrative operation of the Continuum of Care program to statutory operation of the Continuum of Care program, this interim rule would also have no discernible impact upon the economy.

The docket file is available for public inspection in the Regulations Division, Office of the General Counsel, Room 10276, 451 7th Street SW., Washington, DC 20410-0500. Due to security measures at the HUD Headquarters building, please schedule an appointment to review the docket file by calling the Regulations Division at 202-708-3055 (this is not a toll-free number). Individuals with speech or hearing impairments may access this number via TTY by calling the Federal Relay Service at 800-877-8339.

Environmental Impact

A Finding of No Significant Impact (FONSI) with respect to the environment has been made in

accordance with HUD regulations at 24 CFR part 50, which implement section 102(2)(C) of the National Environmental Policy Act of 1969 (42 U.S.C. 4332(2)(C)). The Finding of No Significant Impact is available for public inspection between the hours of 8 a.m. and 5 p.m. weekdays in the Regulations Division, Office of General Counsel, Department of Housing and Urban Development, 451 7th Street SW., Room 10276, Washington, DC 20410-0500. Due to security measures at the HUD Headquarters building, please schedule an appointment to review the FONSI by calling the Regulations Division at 202-708-3055 (this is not a toll-free number). Individuals with speech or hearing impairments may access this number via TTY by calling the Federal Relay Service at 800-877-8339.

Unfunded Mandates Reform Act

The Unfunded Mandates Reform Act of 1995 (2 U.S.C. 1531-1538) (UMRA) establishes requirements for federal agencies to assess the effects of their regulatory actions on State, local, and tribal governments and on the private sector. This interim rule does not impose a federal mandate on any State, local, or tribal government, or on the private sector, within the meaning of UMRA.

Regulatory Flexibility Act

The Regulatory Flexibility Act (5 U.S.C. 601 *et seq.*) generally requires an agency to conduct a regulatory flexibility analysis of any rule subject to notice and comment rulemaking requirements, unless the agency certifies that the rule will not have a significant economic impact on a substantial number of small entities. This rule solely addresses the allocation and use of grant funds under the new McKinney-Vento Act homeless assistance programs, as consolidated and amended by the HEARTH Act. As discussed in the preamble, the majority of the regulatory provisions proposed by this rule track the regulatory provisions of the Continuum of Care program, with which prospective recipients of the Supportive Housing program and the Shelter Plus Care program are familiar. Accordingly, the program requirements should raise minimal issues because applicants and grantees are familiar with these requirements, and in response to HUD’s solicitations to them on the burden of the requirements for the Supportive Housing program and the Shelter Plus Care program, grantees have not advised that such requirements are burdensome. Therefore, HUD has determined that this rule would not

have a significant economic impact on a substantial number of small entities.

Notwithstanding HUD's determination that this rule will not have a significant effect on a substantial number of small entities, HUD specifically invites comments regarding any less burdensome alternatives to this rule that will meet HUD's objectives as described in this preamble.

Executive Order 13132, Federalism

Executive Order 13132 (entitled "Federalism") prohibits an agency from publishing any rule that has federalism implications if the rule either imposes

substantial direct compliance costs on State and local governments and is not required by statute, or the rule preempts State law, unless the agency meets the consultation and funding requirements of section 6 of the Executive Order. This final rule does not have federalism implications and does not impose substantial direct compliance costs on State and local governments nor preempts State law within the meaning of the Executive Order.

Paperwork Reduction Act

The information collection requirements contained in this interim

rule have been submitted to the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). In accordance with the Paperwork Reduction Act, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information, unless the collection displays a currently valid OMB control number.

The burden of the information collections in this interim rule is estimated as follows:

REPORTING AND RECORDKEEPING BURDEN

Information collection	Number of respondents	Response frequency (average)	Total annual responses	Burden hours per response	Total annual hours
§ 578.5(a) Establishing the CoC	450	1	450	8.0	3,600
§ 578.5(b) Establishing the Board	450	1	450	5.0	2,250
§ 578.7(a)(1) Hold CoC Meetings	450	2	900	4.0	3,600
§ 578.7(a)(2) Invitation for New Members	450	1	450	1.0	450
§ 578.7(a)(4) Appoint committees	450	2	900	0.5	450
§ 578.7(a)(5) Governance charter	450	1	450	7.0	3,150
§ 578.7(a)(6) and (7) Monitor performance and evaluation	450	4	450	9.0	4,050
§ 578.7(a)(8) Centralized or coordinated assessment system	450	1	450	8.0	3,600
§ 578.7(a)(9) Written standards	450	1	450	5.0	2,250
§ 578.7(b) Designate HMIS	450	1	450	10.0	4,500
§ 578.9 Application for funds	450	1	450	180.0	81,000
§ 578.11(c) Develop CoC plan	450	1	450	9.0	4,050
§ 578.21(c) Satisfying conditions	8,000	1	8,000	4.0	32,000
§ 578.23 Executing grant agreements	8,000	1	8,000	1.0	8,000
§ 578.35(b) Appeal—solo	10	1	10	4.0	40
§ 578.35(c) Appeal—denied or decreased funding	15	1	15	1.0	15
§ 578.35(d) Appeal—competing CoC	10	1	10	5.0	50
§ 578.35(e) Appeal—Consolidated Plan certification	5	1	5	2.0	10
§ 578.49(a)—Leasing exceptions	5	1	5	1.5	7.5
§ 578.65 HPC Standards	20	1	20	10.0	200
§ 578.75(a)(1) State and local requirements—appropriate service provision	7,000	1	7,000	0.5	3,500
§ 578.75(a)(1) State and local requirements—housing codes	20	1	20	3.0	60
§ 578.75(b) Housing quality standards	72,800	2	145,600	1.0	145,600
§ 578.75(b) Suitable dwelling size	72,800	2	145,600	0.08	11,648
§ 578.75(c) Meals	70,720	1	70,720	0.5	35,360
§ 578.75(e) Ongoing assessment of supportive services	8,000	1	8,000	1.5	12,000
§ 578.75(f) Residential supervision	6,600	3	19,800	0.75	14,850
§ 578.75(g) Participation of homeless individuals	11,500	1	11,500	1.0	11,500
§ 578.75(h) Supportive service agreements	3,000	100	30,000	0.5	15,000
§ 578.77(a) Signed leases/occupancy agreements	104,000	2	208,000	1.0	208,000
§ 578.77(b) Calculating occupancy charges	1,840	200	368,000	0.75	276,000
§ 578.77(c) Calculating rent	2,000	200	400,000	0.75	300,000
§ 578.81(a) Use restriction	20	1	20	0.5	10
§ 578.91(a) Termination of assistance	400	1	400	4.00	1,600
§ 578.91(b) Due process for termination of assistance	4,500	1	4,500	3.0	13,500
§ 578.95(d)—Conflict-of-Interest exceptions	10	1	10	3.0	30
§ 578.103(a)(3) Documenting homelessness	300,000	1	300,000	0.25	75,000
§ 578.103(a)(4) Documenting at risk of homelessness	10,000	1	10,000	0.25	2,500
§ 578.103(a)(5) Documenting imminent threat of harm	200	1	200	0.5	100
§ 578.103(a)(7) Documenting program participant records	350,000	6	2,100,000	0.25	525,000
§ 578.103(a)(7) Documenting case management	8,000	12	96,000	1.0	96,000
§ 578.103(a)(13) Documenting faith-based activities	8,000	1	8,000	1.0	8,000
§ 578.103(b) Confidentiality procedures	11,500	1	11,500	1.0	11,500
§ 578.105(a) Grant/project changes—UFAs	20	2	40	2.0	80
§ 578.105(b) Grant/project changes—multiple project applicants	800	1	800	2.0	1,600
Total					1,921,710.5

In accordance with 5 CFR 1320.8(d)(1), HUD is soliciting comments from members of the public and affected agencies concerning this collection of information to:

(1) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions HUD, including whether the information will have practical utility;

(2) Evaluate the accuracy of HUD's estimate of the burden of the proposed collection of information;

(3) Enhance the quality, utility, and clarity of the information to be collected; and

(4) Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated collection techniques or other forms of information technology; e.g., permitting electronic submission of responses.

Interested persons are invited to submit comments regarding the information collection requirements in this rule. Comments must refer to the proposal by name and docket number (FR-5476-I-01) and be sent to: HUD Desk Officer, Office of Management and Budget, New Executive Office Building, Washington, DC 20503, Fax: (202) 395-6947, and Reports Liaison Officer, Office of the Assistant Secretary for Community Planning and Development, Department of Housing and Urban Development, 451 Seventh Street SW., Room 7233, Washington, DC 20410-7000.

Interested persons may submit comments regarding the information collection requirements electronically through the Federal eRulemaking Portal at <http://www.regulations.gov>. HUD strongly encourages commenters to submit comments electronically. Electronic submission of comments allows the commenter maximum time to prepare and submit a comment, ensures timely receipt by HUD, and enables HUD to make them immediately available to the public. Comments submitted electronically through the <http://www.regulations.gov> Web site can be viewed by other commenters and interested members of the public. Commenters should follow the instructions provided on that site to submit comments electronically.

List of Subjects in 24 CFR Part 578

Community facilities, Continuum of Care, Emergency solutions grants, Grant programs—housing and community development, Grant program—social programs, Homeless, Rural housing, Reporting and recordkeeping requirements, Supportive housing

programs—housing and community development, Supportive services.

Accordingly, for the reasons described in the preamble, HUD adds part 578 to subchapter C of chapter V of subtitle B of 24 CFR to read as follows:

PART 578—CONTINUUM OF CARE PROGRAM

Subpart A—General Provisions

Sec.

- 578.1 Purpose and scope.
578.3 Definitions.

Subpart B—Establishing and Operating a Continuum of Care

- 578.5 Establishing the Continuum of Care.
578.7 Responsibilities of the Continuum of Care.
578.9 Preparing an application for funds.
578.11 Unified Funding Agency.
578.13 Remedial action.

Subpart C—Application and Grant Award Process

- 578.15 Eligible applicants.
578.17 Overview of application and grant award process.
578.19 Application process.
578.21 Awarding funds.
578.23 Executing grant agreements.
578.25 Site control.
578.27 Consolidated plan.
578.29 Subsidy layering.
578.31 Environmental review.
578.33 Renewals.
578.35 Appeal.

Subpart D—Program Components and Eligible Costs

- 578.37 Program components and uses of assistance.
578.39 Continuum of Care planning activities.
578.41 Unified Funding Agency costs.
578.43 Acquisition.
578.45 Rehabilitation.
578.47 New construction.
578.49 Leasing.
578.51 Rental assistance.
578.53 Supportive services.
578.55 Operating costs.
578.57 Homeless Management Information System.
578.59 Project administrative costs.
578.61 Relocation costs.
578.63 Indirect costs.

Subpart E—High-Performing Communities

- 578.65 Standards.
578.67 Publication of application.
578.69 Cooperation among entities.
578.71 HPC-eligible activities.

Subpart F—Program Requirements

- 578.73 Matching requirements.
578.75 General operations.
578.77 Calculating occupancy charges and rent.
578.79 Limitation on transitional housing.
578.81 Term of commitment, repayment of grants, and prevention of undue benefits.
578.83 Displacement, relocation, and acquisition.
578.85 Timeliness standards.

578.87 Limitation on use of funds.

578.89 Limitation on use of grant funds to serve persons defined as homeless under other federal laws.

578.91 Termination of assistance to program participants.

578.93 Fair Housing and Equal Opportunity.

578.95 Conflicts of interest.

578.97 Program income.

578.99 Applicability of other federal requirements.

Subpart G—Grant Administration

- 578.101 Technical assistance.
578.103 Recordkeeping requirements.
578.105 Grant and project changes.
578.107 Sanctions.
578.109 Closeout.

Authority: 42 U.S.C. 11371 *et seq.*, 42 U.S.C. 3535(d).

Subpart A—General Provisions

§ 578.1 Purpose and scope.

(a) The Continuum of Care program is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381–11389).

(b) The program is designed to:

(1) Promote communitywide commitment to the goal of ending homelessness;

(2) Provide funding for efforts by nonprofit providers, States, and local governments to quickly rehouse homeless individuals (including unaccompanied youth) and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;

(3) Promote access to and effective utilization of mainstream programs by homeless individuals and families; and

(4) Optimize self-sufficiency among individuals and families experiencing homelessness.

§ 578.3 Definitions.

As used in this part:

Act means the McKinney-Vento Homeless Assistance Act as amended (42 U.S.C. 11371 *et seq.*).

Annual renewal amount means the amount that a grant can be awarded on an annual basis when renewed. It includes funds only for those eligible activities (operating, supportive services, leasing, rental assistance, HMIS, and administration) that were funded in the original grant (or the original grant as amended), less the unrenovable activities (acquisition, new construction, rehabilitation, and any administrative costs related to these activities).

Applicant means an eligible applicant that has been designated by the Continuum of Care to apply for assistance under this part on behalf of that Continuum.

At risk of homelessness. (1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "Homeless" definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as "homeless" under this

section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Centralized or coordinated assessment system means a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.

Chronically homeless. (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; and

(iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) 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.

Collaborative applicant means the eligible applicant that has been designated by the Continuum of Care to apply for a grant for Continuum of Care planning funds under this part on behalf of the Continuum.

Consolidated plan means the HUD-approved plan developed in accordance with 24 CFR 91.

Continuum of Care and Continuum means the group organized to carry out the responsibilities required under this

part and that is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.

Developmental disability means, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002):

(1) A severe, chronic disability of an individual that—

(i) Is attributable to a mental or physical impairment or combination of mental and physical impairments;

(ii) Is manifested before the individual attains age 22;

(iii) Is likely to continue indefinitely;

(iv) Results in substantial functional limitations in three or more of the following areas of major life activity:

(A) Self-care;

(B) Receptive and expressive language;

(C) Learning;

(D) Mobility;

(E) Self-direction;

(F) Capacity for independent living;

(G) Economic self-sufficiency.

(v) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are lifelong or extended duration and are individually planned and coordinated.

(2) An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of the definition of "developmental disability" in this section if the individual, without services and supports, has a high probability of meeting these criteria later in life.

Eligible applicant means a private nonprofit organization, State, local government, or instrumentality of State and local government.

Emergency shelter is defined in 24 CFR part 576.

Emergency Solutions Grants (ESG) means the grants provided under 24 CFR part 576.

Fair Market Rent (FMR) means the Fair Market Rents published in the **Federal Register** annually by HUD.

High-performing community (HPC) means a Continuum of Care that meets the standards in subpart E of this part and has been designated as a high-performing community by HUD.

Homeless means:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised 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, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(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:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

Homeless Management Information System (HMIS) means the information system designated by the Continuum of Care to comply with the HMIS requirements prescribed by HUD.

HMIS Lead means the entity designated by the Continuum of Care in accordance with this part to operate the Continuum's HMIS on its behalf.

Permanent housing means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid rehousing. 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.

Permanent supportive housing means permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Point-in-time count means a count of sheltered and unsheltered homeless persons carried out on one night in the last 10 calendar days of January or at such other time as required by HUD.

Private nonprofit organization means an organization:

(1) No part of the net earnings of which inure to the benefit of any member, founder, contributor, or individual;

(2) That has a voluntary board;

(3) That has a functioning accounting system that is operated in accordance with generally accepted accounting principles, or has designated a fiscal agent that will maintain a functioning accounting system for the organization in accordance with generally accepted accounting principles; and

(4) That practices nondiscrimination in the provision of assistance.

A private nonprofit organization does not include governmental organizations, such as public housing agencies.

Program participant means an individual (including an unaccompanied youth) or family who is assisted with Continuum of Care program funds.

Project means a group of eligible activities, such as HMIS costs, identified as a project in an application to HUD for Continuum of Care funds and includes a structure (or structures) that is (are) acquired, rehabilitated, constructed, or leased with assistance provided under this part or with respect to which HUD provides rental assistance or annual payments for operating costs, or supportive services under this subtitle.

Recipient means an applicant that signs a grant agreement with HUD.

Safe haven means, for the purpose of defining chronically homeless, supportive housing that meets the following:

(1) Serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services;

(2) Provides 24-hour residence for eligible persons for an unspecified period;

(3) Has an overnight capacity limited to 25 or fewer persons; and

(4) Provides low-demand services and referrals for the residents.

State means each of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, American Samoa, Guam, the Commonwealth of the Northern Marianas, and the Virgin Islands.

Subrecipient means a private nonprofit organization, State, local government, or instrumentality of State or local government that receives a

subgrant from the recipient to carry out a project.

Transitional housing means housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary. The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended.

Unified Funding Agency (UFA) means an eligible applicant selected by the Continuum of Care to apply for a grant for the entire Continuum, which has the capacity to carry out the duties in § 578.11(b), which is approved by HUD and to which HUD awards a grant.

Victim service provider means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

Subpart B—Establishing and Operating a Continuum of Care

§ 578.5 Establishing the Continuum of Care.

(a) *The Continuum of Care.* Representatives from relevant organizations within a geographic area shall establish a Continuum of Care for the geographic area to carry out the duties of this part. Relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals.

(b) *The board.* The Continuum of Care must establish a board to act on behalf of the Continuum using the process established as a requirement by § 578.7(a)(3) and must comply with the conflict-of-interest requirements at § 578.95(b). The board must:

- (1) Be representative of the relevant organizations and of projects serving homeless subpopulations; and
- (2) Include at least one homeless or formerly homeless individual.

(c) *Transition.* Continuums of Care shall have 2 years after August 30, 2012

to comply with the requirements of paragraph (b) of this section.

§ 578.7 Responsibilities of the Continuum of Care.

(a) *Operate the Continuum of Care.* The Continuum of Care must:

- (1) Hold meetings of the full membership, with published agendas, at least semi-annually;
- (2) Make an invitation for new members to join publicly available within the geographic area at least annually;
- (3) Adopt and follow a written process to select a board to act on behalf of the Continuum of Care. The process must be reviewed, updated, and approved by the Continuum at least once every 5 years;
- (4) Appoint additional committees, subcommittees, or workgroups;
- (5) In consultation with the collaborative applicant and the HMIS Lead, develop, follow, and update annually a governance charter, which will include all procedures and policies needed to comply with subpart B of this part and with HMIS requirements as prescribed by HUD; and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board;
- (6) Consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers;
- (7) Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report to HUD;
- (8) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and operate either a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. The Continuum must develop a specific policy to guide the operation of the centralized or coordinated assessment system on how its system will address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from nonvictim service providers. This system must comply with any requirements established by HUD by Notice.
- (9) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing

Continuum of Care assistance. At a minimum, these written standards must include:

- (i) Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
- (ii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
- (iii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
- (iv) Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
- (v) Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and
- (vi) Where the Continuum is designated a high-performing community, as described in subpart G of this part, policies and procedures set forth in 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and (e)(3)(ix).

(b) *Designating and operating an HMIS.* The Continuum of Care must:

- (1) Designate a single Homeless Management Information System (HMIS) for the geographic area;
- (2) Designate an eligible applicant to manage the Continuum's HMIS, which will be known as the HMIS Lead;
- (3) Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS.
- (4) Ensure consistent participation of recipients and subrecipients in the HMIS; and
- (5) Ensure the HMIS is administered in compliance with requirements prescribed by HUD.

(c) *Continuum of Care planning.* The Continuum must develop a plan that includes:

- (1) Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system encompasses the following:
 - (i) Outreach, engagement, and assessment;
 - (ii) Shelter, housing, and supportive services;
 - (iii) Prevention strategies.
- (2) Planning for and conducting, at least biennially, a point-in-time count of homeless persons within the geographic area that meets the following requirements:
 - (i) Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for

humans must be counted as unsheltered homeless persons.

(ii) Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons.

(iii) Other requirements established by HUD by Notice.

(3) Conducting an annual gaps analysis of the homeless needs and services available within the geographic area;

(4) Providing information required to complete the Consolidated Plan(s) within the Continuum's geographic area;

(5) Consulting with State and local government Emergency Solutions Grants program recipients within the Continuum's geographic area on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of Emergency Solutions Grants program recipients and subrecipients.

§ 578.9 Preparing an application for funds.

(a) The Continuum must:

(1) Design, operate, and follow a collaborative process for the development of applications and approve the submission of applications in response to a NOFA published by HUD under § 578.19 of this subpart;

(2) Establish priorities for funding projects in the geographic area;

(3) Determine if one application for funding will be submitted for all projects within the geographic area or if more than one application will be submitted for the projects within the geographic area;

(i) If more than one application will be submitted, designate an eligible applicant to be the collaborative applicant that will collect and combine the required application information from all applicants and for all projects within the geographic area that the Continuum has selected funding. The collaborative applicant will also apply for Continuum of Care planning activities. If the Continuum is an eligible applicant, it may designate itself;

(ii) If only one application will be submitted, that applicant will be the collaborative applicant and will collect and combine the required application information from all projects within the geographic area that the Continuum has selected for funding and apply for Continuum of Care planning activities;

(b) The Continuum retains all of its responsibilities, even if it designates one or more eligible applicants other than itself to apply for funds on behalf of the Continuum. This includes approving the Continuum of Care application.

§ 578.11 Unified Funding Agency.

(a) *Becoming a Unified Funding Agency.* To become designated as the Unified Funding Agency (UFA) for a Continuum, a collaborative applicant must be selected by the Continuum to apply to HUD to be designated as the UFA for the Continuum.

(b) *Criteria for designating a UFA.* HUD will consider these criteria when deciding whether to designate a collaborative applicant a UFA:

(1) The Continuum of Care it represents meets the requirements in § 578.7;

(2) The collaborative applicant has financial management systems that meet the standards set forth in 24 CFR 84.21 (for nonprofit organizations) and 24 CFR 85.20 (for States);

(3) The collaborative applicant demonstrates the ability to monitor subrecipients; and

(4) Such other criteria as HUD may establish by NOFA.

(c) *Requirements.* HUD-designated UFAs shall:

(1) Apply to HUD for funding for all of the projects within the geographic area and enter into a grant agreement with HUD for the entire geographic area.

(2) Enter into legally binding agreements with subrecipients, and receive and distribute funds to subrecipients for all projects within the geographic area.

(3) Require subrecipients to establish fiscal control and accounting procedures as necessary to assure the proper disbursement of and accounting for federal funds in accordance with the requirements of 24 CFR parts 84 and 85 and corresponding OMB circulars.

(4) Obtain approval of any proposed grant agreement amendments by the Continuum of Care before submitting a request for an amendment to HUD.

§ 578.13 Remedial action.

(a) If HUD finds that the Continuum of Care for a geographic area does not meet the requirements of the Act or its implementing regulations, or that there is no Continuum for a geographic area, HUD may take remedial action to ensure fair distribution of grant funds within the geographic area. Such measures may include:

(1) Designating a replacement Continuum of Care for the geographic area;

(2) Designating a replacement collaborative applicant for the Continuum's geographic area; and

(3) Accepting applications from other eligible applicants within the Continuum's geographic area.

(b) HUD must provide a 30-day prior written notice to the Continuum and its

collaborative applicant and give them an opportunity to respond.

Subpart C—Application and Grant Award Process

§ 578.15 Eligible applicants.

(a) *Who may apply.* Nonprofit organizations, States, local governments, and instrumentalities of State or local governments are eligible to apply for grants.

(b) *Designation by the Continuum of Care.* Eligible applicant(s) must have been designated by the Continuum of Care to submit an application for grant funds under this part. The designation must state whether the Continuum is designating more than one applicant to apply for funds and, if it is, which applicant is being designated as the collaborative applicant. If the Continuum is designating only one applicant to apply for funds, the Continuum must designate that applicant to be the collaborative applicant.

(c) *Exclusion.* For-profit entities are not eligible to apply for grants or to be subrecipients of grant funds.

§ 578.17 Overview of application and grant award process.

(a) *Formula.* (1) After enactment of the annual appropriations act for each fiscal year, and issuance of the NOFA, HUD will publish, on its Web site, the Preliminary Pro Rata Need (PPRN) assigned to metropolitan cities, urban counties, and all other counties.

(2) HUD will apply the formula used to determine PPRN established in paragraph (a)(3) of this section, to the amount of funds being made available under the NOFA. That amount is calculated by:

(i) Determining the total amount for the Continuum of Care competition in accordance with section 413 of the Act or as otherwise directed by the annual appropriations act;

(ii) From the amount in paragraph (a)(2)(i) of this section, deducting the amount published in the NOFA as being set aside to provide a bonus to geographic areas for activities that have proven to be effective in reducing homelessness generally or for specific subpopulations listed in the NOFA or achieving homeless prevention and independent living goals established in the NOFA and to meet policy priorities set in the NOFA; and

(iii) Deducting the amount of funding necessary for Continuum of Care planning activities and UFA costs.

(3) PPRN is calculated on the amount determined under paragraph (a)(2) of this section by using the following formula:

(i) Two percent will be allocated among the four insular areas (American Samoa, Guam, the Commonwealth of the Northern Marianas, and the Virgin Islands) on the basis of the ratio of the population of each insular area to the population of all insular areas.

(ii) Seventy-five percent of the remaining amount will be allocated, using the Community Development Block Grant (CDBG) formula, to metropolitan cities and urban counties that have been funded under either the Emergency Shelter Grants or Emergency Solutions Grants programs in any one year since 2004.

(iii) The amount remaining after the allocation under paragraphs (a)(1) and (2) of this section will be allocated, using the CDBG formula, to metropolitan cities and urban counties that have not been funded under the Emergency Solutions Grants program in any year since 2004 and all other counties in the United States and Puerto Rico.

(4) If the calculation in paragraph (a)(2) of this section results in an amount less than the amount required to renew all projects eligible for renewal in that year for at least one year, after making adjustments proportional to increases in fair market rents for the geographic area for leasing, operating, and rental assistance for permanent housing, HUD will reduce, proportionately, the total amount required to renew all projects eligible for renewal in that year for at least one year, for each Continuum of Care. HUD will publish, via the NOFA, the total dollar amount that every Continuum will be required to deduct from renewal projects Continuum-wide.

(b) *Calculating a Continuum of Care's maximum award amount.* (1) *Establish the PPRN amount.* First, HUD will total the PPRN amounts for each metropolitan city, urban county, other county, and insular area claimed by the Continuum as part of its geographic area, excluding any counties applying for or receiving funding from the Rural Housing Stability Assistance program under 24 CFR part 579.

(2) *Establishing renewal demand.* Next, HUD will determine the renewal demand within the Continuum's geographic area. Renewal demand is the sum of the annual renewal amounts of all projects within the Continuum eligible to apply for renewal in that fiscal year's competition, before any adjustments to rental assistance, leasing, and operating line items based on FMR changes.

(3) *Establishing FPRN.* The higher of PPRN or renewal demand for the Continuum of Care is the FPRN, which

is the base for the maximum award amount for the Continuum.

(4) *Establishing the maximum award amount.* The maximum award amount for the Continuum is the FPRN amount plus any additional eligible amounts for Continuum planning; UFA costs; adjustments to leasing, operating and rental assistance line items based on changes to FMR; and available bonuses.

§ 578.19 Application process.

(a) *Notice of Funding Availability.* After enactment of the annual appropriations act for the fiscal year, HUD will issue a NOFA in accordance with the requirements of 24 CFR part 4.

(b) *Applications.* All applications to HUD, including applications for grant funds and requests for designation as a UFA or HPC, must be submitted at such time and in such manner as HUD may require, and contain such information as HUD determines necessary. At a minimum, an application for grant funds must contain a list of the projects for which it is applying for funds; a description of the projects; a list of the projects that will be carried out by subrecipients and the names of the subrecipients; a description of the subpopulations of homeless or at risk of homelessness to be served by projects; the number of units to be provided and/or the number of persons to be served by each project; a budget request by project; and reasonable assurances that the applicant, or the subrecipient, will own or have control of a site for the proposed project not later than the expiration of the 12-month period beginning upon notification of an award for grant assistance.

§ 578.21 Awarding funds.

(a) *Selection.* HUD will review applications in accordance with the guidelines and procedures provided in the NOFA and will award funds to recipients through a national competition based on selection criteria as defined in section 427 of the Act.

(b) *Announcement of awards.* HUD will announce awards and notify selected applicants of any conditions imposed on awards. Conditions must be satisfied before HUD will execute a grant agreement with the applicant.

(c) *Satisfying conditions.* HUD will withdraw an award if the applicant does not satisfy all conditions imposed on it. Correcting all issues and conditions attached to an award must be completed within the time frame established in the NOFA. Proof of site control, match, environmental review, and the documentation of financial feasibility must be completed within 12 months of the announcement of the award, or 24

months in the case of funds for acquisition, rehabilitation, or new construction. The 12-month deadline may be extended by HUD for up to 12 additional months upon a showing of compelling reasons for delay due to factors beyond the control of the recipient or subrecipient.

§ 578.23 Executing grant agreements.

(a) *Deadline.* No later than 45 days from the date when all conditions are satisfied, the recipient and HUD must execute the grant agreement.

(b) *Grant agreements.* (1) *Multiple applicants for one Continuum.* If a Continuum designates more than one applicant for the geographic area, HUD will enter into a grant agreement with each designated applicant for which an award is announced.

(2) *One applicant for a Continuum.* If a Continuum designates only one applicant for the geographic area, after awarding funds, HUD may enter into a grant agreement with that applicant for new awards, if any, and one grant agreement for renewals, Continuum of Care planning, and UFA costs, if any. These two grants will cover the entire geographic area. A default by the recipient under one of those grant agreements will also be a default under the other.

(3) *Unified Funding Agencies.* If a Continuum is a UFA that HUD has approved, then HUD will enter into one grant agreement with the UFA for new awards, if any, and one grant agreement for renewals, Continuum of Care planning and UFA costs, if any. These two grants will cover the entire geographic area. A default by the UFA under one of those grant agreements will also be a default under the other.

(c) *Required agreements.* Recipients will be required to sign a grant agreement in which the recipient agrees:

(1) To ensure the operation of the project(s) in accordance with the provisions of the McKinney-Veto Act and all requirements under 24 CFR part 578;

(2) To monitor and report the progress of the project(s) to the Continuum of Care and HUD;

(3) To ensure, to the maximum extent practicable, that individuals and families experiencing homelessness are involved, through employment, provision of volunteer services, or otherwise, in constructing, rehabilitating, maintaining, and operating facilities for the project and in providing supportive services for the project;

(4) To require certification from all subrecipients that:

(i) Subrecipients will maintain the confidentiality of records pertaining to any individual or family that was provided family violence prevention or treatment services through the project;

(ii) The address or location of any family violence project assisted under this part will not be made public, except with written authorization of the person responsible for the operation of such project;

(iii) Subrecipients will establish policies and practices that are consistent with, and do not restrict, the exercise of rights provided by subtitle B of title VII of the Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness;

(iv) In the case of projects that provide housing or services to families, that subrecipients will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act;

(v) The subrecipient, its officers, and employees are not debarred or suspended from doing business with the Federal Government; and

(vi) Subrecipients will provide information, such as data and reports, as required by HUD; and

(5) To establish such fiscal control and accounting procedures as may be necessary to assure the proper disbursement of, and accounting for grant funds in order to ensure that all financial transactions are conducted, and records maintained in accordance with generally accepted accounting principles, if the recipient is a UFA;

(6) To monitor subrecipient match and report on match to HUD;

(7) To take the educational needs of children into account when families are placed in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education;

(8) To monitor subrecipients at least annually;

(9) To use the centralized or coordinated assessment system established by the Continuum of Care as set forth in § 578.7(a)(8). A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system, provided that victim service providers in the area use a centralized or coordinated assessment system that

meets HUD's minimum requirements and the victim service provider uses that system instead;

(10) To follow the written standards for providing Continuum of Care assistance developed by the Continuum of Care, including the minimum requirements set forth in § 578.7(a)(9);

(11) Enter into subrecipient agreements requiring subrecipients to operate the project(s) in accordance with the provisions of this Act and all requirements under 24 CFR part 578; and

(12) To comply with such other terms and conditions as HUD may establish by NOFA.

§ 578.25 Site control.

(a) *In general.* When grant funds will be used for acquisition, rehabilitation, new construction, operating costs, or to provide supportive services, the recipient or subrecipient must demonstrate that it has site control within the time frame established in section § 578.21 before HUD will execute a grant agreement. This requirement does not apply to funds used for housing that will eventually be owned or controlled by the individuals or families served or for supportive services provided at sites not operated by the recipient or subrecipient.

(b) *Evidence.* Acceptable evidence of site control is a deed or lease. If grant funds will be used for acquisition, acceptable evidence of site control will be a purchase agreement. The owner, lessee, and purchaser shown on these documents must be the selected applicant or intended subrecipient identified in the application for assistance.

(c) *Tax credit projects.* (1) Applicants that plan to use the low-income housing tax credit authorized under 26 U.S.C. 42 to finance a project must prove to HUD's satisfaction that the applicant or subrecipient identified in the application is in control of the limited partnership or limited liability corporation that has a deed or lease for the project site.

(i) To have control of the limited partnership, the applicant or subrecipient must be the general partner of the limited partnership or have a 51 percent controlling interest in that general partner.

(ii) To have control of the limited liability company, the applicant or subrecipient must be the sole managing member.

(2) If grant funds are to be used for acquisition, rehabilitation, or new construction, the recipient or subrecipient must maintain control of the partnership or corporation and must

ensure that the project is operated in compliance with law and regulation for 15 years from the date of initial occupancy or initial service provision. The partnership or corporation must own the project site throughout the 15-year period. If grant funds were not used for acquisition, rehabilitation, or new construction, then the recipient or subrecipient must maintain control for the term of the grant agreement and any renewals thereof.

§ 578.27 Consolidated plan.

(a) *States or units of general local government.* An applicant that is a State or a unit of general local government must have a HUD-approved, complete or abbreviated, consolidated plan in accordance with 24 CFR part 91. The applicant must submit a certification that the application for funding is consistent with the HUD-approved consolidated plan(s) for the jurisdiction(s) in which the proposed project will be located. Funded applicants must certify in a grant agreement that they are following the HUD-approved consolidated plan.

(b) *Other applicants.* Applicants that are not States or units of general local government must submit a certification by the jurisdiction(s) in which the proposed project will be located that the applicant's application for funding is consistent with the jurisdiction's HUD-approved consolidated plan. The certification must be made by the unit of general local government or the State, in accordance with the consistency certification provisions under 24 CFR part 91, subpart F. If the jurisdiction refuses to provide a certification of consistency, the applicant may appeal to HUD under § 578.35.

(c) *Timing of consolidated plan certification submissions.* The required certification that the application for funding is consistent with the HUD-approved consolidated plan must be submitted by the funding application submission deadline announced in the NOFA.

§ 578.29 Subsidy layering.

HUD may provide assistance under this program only in accordance with HUD subsidy layering requirements in section 102 of the Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545) and 24 CFR part 4, subpart A. An applicant must submit information in its application on other sources of governmental assistance that the applicant has received, or reasonably expects to receive, for a proposed project or activities. HUD's review of this information is intended to prevent excessive public assistance for

proposed project or activities by combining (layering) assistance under this program with other governmental housing assistance from federal, State, or local agencies, including assistance such as tax concessions or tax credits.

§ 578.31 Environmental review.

(a) Activities under this part are subject to environmental review by HUD under 24 CFR part 50. The recipient or subrecipient shall supply all available, relevant information necessary for HUD to perform, for each property, any environmental review required by 24 CFR part 50. The recipient or subrecipient must carry out mitigating measures required by HUD or select an alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement.

(b) The recipient or subrecipient, its project partners, and their contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this part, or commit or expend HUD or local funds for such eligible activities under this part, until HUD has performed an environmental review under 24 CFR part 50 and the recipient or subrecipient has received HUD approval of the property.

§ 578.33 Renewals.

(a) *In general.* Awards made under this part and title IV of the Act, as in effect before August 30, 2012 (the Supportive Housing Program and the Shelter Plus Care program), may be renewed to continue ongoing leasing, operations, supportive services, rental assistance, HMIS, and administration beyond the initial funding period. To be considered for funding, recipients must submit a request in a form specified by HUD, must meet the requirements of this part, and must submit the request within the time frame established by HUD.

(b) *Length of renewal.* HUD may award up to 3 years of funds for supportive services, leasing, HMIS, and operating costs. Renewals of tenant-based and sponsor-based rental assistance may be for up to one year of rental assistance. Renewals of project-based rental assistance may be for up to 15 years of rental assistance, subject to availability of annual appropriations.

(c) *Assistance available.* (1) Assistance during each year of a renewal period may be for:

(i) Up to 100 percent of the amount for supportive services and HMIS costs in the final year of the prior funding period;

(ii) Up to 100 percent of the amount for leasing and operating in the final year of the prior funding period adjusted in proportion to changes in the FMR for the geographic area; and

(iii) For rental assistance, up to 100 percent of the result of multiplying the number and unit size(s) in the grant agreement by the number of months in the renewal grant term and the applicable FMR.

(d) *Review criteria.* (1) Awards made under title IV of the Act, as in effect before August 30, 2012 are eligible for renewal in the Continuum of Care program even if the awardees would not be eligible for a new grant under the program, so long as they continue to serve the same population and the same number of persons or units in the same type of housing as identified in their most recently amended grant agreement signed before August 30, 2012. Grants will be renewed if HUD receives a certification from the Continuum that there is a demonstrated need for the project, and HUD finds that the project complied with program requirements applicable before August 30, 2012. For purposes of meeting the requirements of this part, a project will continue to be administered in accordance with 24 CFR 582.330, if the project received funding under the Shelter Plus Care program, or 24 CFR 583.325, if the project received funding under the Supportive Housing Program.

(2) *Renewal of awards made after August 30, 2012.* Review criteria for competitively awarded renewals made after August 30, 2012 will be described in the NOFA.

(e) *Unsuccessful projects.* HUD may renew a project that was eligible for renewal in the competition and was part of an application that was not funded despite having been submitted on time, in the manner required by HUD, and containing the information required by HUD, upon a finding that the project meets the purposes of the Continuum of Care program. The renewal will not exceed more than one year and will be under such conditions as HUD deems appropriate.

(f) *Annual Performance Report condition.* HUD may terminate the renewal of any grant and require the recipient to repay the renewal grant if:

(1) The recipient fails to timely submit a HUD Annual Performance Report (APR) for the grant year immediately prior to renewal; or

(2) The recipient submits an APR that HUD deems unacceptable or shows noncompliance with the requirements of the grant and this part.

§ 578.35 Appeal.

(a) *In general.* Failure to follow the procedures or meet the deadlines established in this section will result in denial of the appeal.

(b) *Solo applicants.* (1) *Who may appeal.* Nonprofits, States, and local governments, and instrumentalities of State or local governments that attempted to participate in the Continuum of Care planning process in the geographic area in which they operate, that believe they were denied the right to participate in a reasonable manner, and that submitted a solo application for funding by the application deadline established in the NOFA, may appeal the decision of the Continuum to HUD.

(2) *Notice of intent to appeal.* The solo applicant must submit a written notice of intent to appeal, with a copy to the Continuum, with their funding application.

(3) *Deadline for submitting proof.* No later than 30 days after the date that HUD announces the awards, the solo applicant shall submit in writing, with a copy to the Continuum, all relevant evidence supporting its claim, in such manner as HUD may require by Notice.

(4) *Response from the Continuum of Care.* The Continuum shall have 30 days from the date of its receipt of the solo applicant's evidence to respond to HUD in writing and in such manner as HUD may require, with a copy to the solo applicant.

(5) *Decision.* HUD will notify the solo applicant and the Continuum of its decision within 60 days of receipt of the Continuum's response.

(6) *Funding.* If HUD finds that the solo applicant was not permitted to participate in the Continuum of Care planning process in a reasonable manner, then HUD may award a grant to the solo applicant when funds next become available and may direct the Continuum of Care to take remedial steps to ensure reasonable participation in the future. HUD may also reduce the award to the Continuum's applicant(s).

(c) *Denied or decreased funding.* (1) *Who may appeal.* Eligible applicants that are denied funds by HUD, or that requested more funds than HUD awarded to them, may appeal the award by filing a written appeal, in such form and manner as HUD may require by Notice, within 45 days of the date of HUD's announcement of the award.

(2) *Decision.* HUD will notify the applicant of its decision on the appeal within 60 days of HUD's receipt of the written appeal. HUD will reverse a decision only when the applicant can show that HUD error caused the denial or decrease.

(3) *Funding.* Awards and increases to awards made upon appeal will be made from next available funds.

(d) *Competing Continuums of Care.*

(1) *In general.* If more than one Continuum of Care claims the same geographic area, HUD will award funds to the Continuum applicant(s) whose application(s) has the highest total score. No projects will be funded from the lower scoring Continuum. No projects that are submitted in two or more competing Continuum of Care applications will be funded.

(2) *Who may appeal.* The designated applicant(s) for the lower scoring Continuum may appeal HUD's decision to fund the application(s) from the competing Continuum by filing a written appeal, in such form and manner as HUD may require by Notice, within 45 days of the date of HUD's announcement of the award.

(3) *Decision.* HUD will notify the applicant(s) of its decision on the appeal within 60 days of the date of HUD's receipt of the written appeal. HUD will reverse a decision only upon a showing by the applicant that HUD error caused the denial.

(e) *Consolidated plan certification.* (1) *In general.* An applicant may appeal to HUD a jurisdiction's refusal to provide a certification of consistency with the Consolidated Plan.

(2) *Procedure.* The applicant must submit a written appeal with its application to HUD and send a copy of the appeal to the jurisdiction that denied the certification of consistency. The appeal must include, at a minimum:

(i) A copy of the applicant's request to the jurisdiction for the certification of consistency with the Consolidated Plan;

(ii) A copy of the jurisdiction's response stating the reasons for denial, including the reasons the proposed project is not consistent with the jurisdiction's Consolidated Plan in accordance with 24 CFR 91.500(c); and

(iii) A statement of the reasons why the applicant believes its project is consistent with the jurisdiction's Consolidated Plan.

(3) *Jurisdiction response.* The jurisdiction that refused to provide the certification of consistency with the jurisdiction's Consolidated Plan shall have 10 days after receipt of a copy of the appeal to submit a written explanation of the reasons originally given for refusing to provide the certification and a written rebuttal to any claims made by the applicant in the appeal.

(4) *HUD review.* (i) HUD will issue its decision within 45 days of the date of HUD's receipt of the jurisdiction's

response. As part of its review, HUD will consider:

(A) Whether the applicant submitted the request to the appropriate political jurisdiction; and

(B) The reasonableness of the jurisdiction's refusal to provide the certificate.

(ii) If the jurisdiction did not provide written reasons for refusal, including the reasons why the project is not consistent with the jurisdiction's Consolidated Plan in its initial response to the applicant's request for a certification, HUD will find for the applicant without further inquiry or response from the political jurisdiction.

Subpart D—Program Components and Eligible Costs

§ 578.37 Program components and uses of assistance.

(a) Continuum of Care funds may be used to pay for the eligible costs listed in § 578.39 through § 578.63 when used to establish and operate projects under five program components: permanent housing; transitional housing; supportive services only; HMIS; and, in some cases, homelessness prevention. Although grant funds may be used by recipients and subrecipients in all components for the eligible costs of contributing data to the HMIS designated by the Continuum of Care, only HMIS Leads may use grant funds for an HMIS component. Administrative costs are eligible for all components. All components are subject to the restrictions on combining funds for certain eligible activities in a single project found in § 578.87(c). The eligible program components are:

(1) *Permanent housing (PH).* Permanent housing is community-based housing, the purpose of which is to provide housing without a designated length of stay. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services. PH includes:

(i) *Permanent supportive housing for persons with disabilities (PSH).* PSH can only provide assistance to individuals with disabilities and families in which one adult or child has a disability. Supportive services designed to meet the needs of the program participants must be made available to the program participants.

(ii) *Rapid rehousing.* Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help

a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing. When providing short-term and/or medium-term rental assistance to program participants, the rental assistance is subject to § 578.51(a)(1), but not § 578.51(a)(1)(i) and (ii); (a)(2); (c) and (f) through (i); and (l)(1). These projects:

(A) Must follow the written policies and procedures established by the Continuum of Care for determining and prioritizing which eligible families and individuals will receive rapid rehousing assistance, as well as the amount or percentage of rent that each program participant must pay.

(B) May set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, and/or a maximum number of times that a program participant may receive rental assistance. The recipient or subrecipient may also require program participants to share in the costs of rent. For the purposes of calculating rent for rapid rehousing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

(C) Limit rental assistance to no more than 24 months to a household.

(D) May provide supportive services for no longer than 6 months after rental assistance stops.

(E) Must re-evaluate, not less than once annually, that the program participant lacks sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing. The recipient or subrecipient may require each program participant receiving assistance to notify the recipient or subrecipient of changes in the program participant's income or other circumstances (e.g., changes in household composition) that affect the program participant's need for assistance. When notified of a relevant change, the recipient or subrecipient must reevaluate the program participant's eligibility and the amount and types of assistance that the program participant needs.

(F) Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt

from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) prohibits the recipient carrying out the project from making its housing conditional on the participant's acceptance of services.

(2) *Transitional Housing (TH).*

Transitional housing facilitates the movement of homeless individuals and families to PH within 24 months of entering TH. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services.

(3) *Supportive Service Only (SSO).*

Funds may be used for acquisition, rehabilitation, relocation costs, or leasing of a facility from which supportive services will be provided, and supportive services in order to provide supportive services to unsheltered and sheltered homeless persons for whom the recipient or subrecipient is not providing housing or housing assistance. SSO includes street outreach.

(4) *HMIS.* Funds may be used by HMIS Leads to lease a structure in which the HMIS is operated or as operating funds to operate a structure in which the HMIS is operated, and for other costs eligible in § 578.57.

(5) *Homelessness prevention.* Funds may be used by recipients in Continuums of Care-designated high-performing communities for housing relocation and stabilization services, and short- and/or medium-term rental assistance, as described in 24 CFR 576.105 and 24 CFR 576.106, that are necessary to prevent an individual or family from becoming homeless.

(b) *Uses of assistance.* Funds are available to pay for the eligible costs listed in § 578.39 through § 578.63 when used to:

- (1) Establish new housing or new facilities to provide supportive services;
- (2) Expand existing housing and facilities in order to increase the number of homeless persons served;
- (3) Bring existing housing and facilities into compliance with State and local government health and safety standards, as described in § 578.87;
- (4) Preserve existing permanent housing and facilities that provide supportive services;

(5) Provide supportive services for residents of supportive housing or for homeless persons not residing in supportive housing;

(6) Continue funding permanent housing when the recipient has received funding under this part for leasing, supportive services, operating costs, or rental assistance;

(7) Establish and operate an HMIS or comparable database; and

(8) Establish and carry out a Continuum of Care planning process and operate a Continuum of Care.

(c) *Multiple purposes.* Structures used to provide housing, supportive housing, supportive services, or as a facility for HMIS activities may also be used for other purposes. However, assistance under this part will be available only in proportion to the use of the structure for supportive housing or supportive services. If eligible and ineligible activities are carried out in separate portions of the same structure or in separate structures, grant funds may not be used to pay for more than the actual cost of acquisition, construction, or rehabilitation of the portion of the structure or structures used for eligible activities. If eligible and ineligible activities are carried out in the same structure, the costs will be prorated based on the amount of time that the space is used for eligible versus ineligible activities.

§ 578.39 Continuum of Care planning activities.

(a) *In general.* Collaborative applicants may use up to 3 percent of their FPRN, or a maximum amount to be established by the NOFA, for costs of:

- (1) Designing and carrying out a collaborative process for the development of an application to HUD;
- (2) Evaluating the outcomes of projects for which funds are awarded in the geographic area under the Continuum of Care and the Emergency Solutions Grants programs; and
- (3) Participating in the consolidated plan(s) for the geographic area(s).

(b) *Continuum of Care planning activities.* Eligible planning costs include the costs of:

- (1) Developing a communitywide or regionwide process involving the coordination of nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve veterans, and homeless and formerly homeless individuals;

(2) Determining the geographic area that the Continuum of Care will serve;

(3) Developing a Continuum of Care system;

(4) Evaluating the outcomes of projects for which funds are awarded in the geographic area, including the Emergency Solutions Grants program;

(5) Participating in the consolidated plan(s) of the jurisdiction(s) in the geographic area; and

(6) Preparing and submitting an application to HUD on behalf of the entire Continuum of Care membership, including conducting a sheltered and unsheltered point-in-time count and other data collection as required by HUD.

(c) *Monitoring costs.* The costs of monitoring recipients and subrecipients and enforcing compliance with program requirements are eligible.

§ 578.41 Unified Funding Agency costs.

(a) *In general.* UFAs may use up to 3 percent of their FPRN, or a maximum amount to be established by the NOFA, whichever is less, for fiscal control and accounting costs necessary to assure the proper disbursement of, and accounting for, federal funds awarded to subrecipients under the Continuum of Care program.

(b) *UFA costs.* UFA costs include costs of ensuring that all financial transactions carried out under the Continuum of Care program are conducted and records are maintained in accordance with generally accepted accounting principles, including arranging for an annual survey, audit, or evaluation of the financial records of each project carried out by a subrecipient funded by a grant received through the Continuum of Care program.

(c) *Monitoring costs.* The costs of monitoring subrecipients and enforcing compliance with program requirements are eligible for costs.

§ 578.43 Acquisition.

Grant funds may be used to pay up to 100 percent of the cost of acquisition of real property selected by the recipient or subrecipient for use in the provision of housing or supportive services for homeless persons.

§ 578.45 Rehabilitation.

(a) *Use.* Grant funds may be used to pay up to 100 percent of the cost of rehabilitation of structures to provide housing or supportive services to homeless persons.

(b) *Eligible costs.* Eligible rehabilitation costs include installing cost-effective energy measures, and bringing an existing structure to State and local government health and safety standards.

(c) *Ineligible costs.* Grant funds may not be used for rehabilitation of leased property.

§ 578.47 New construction.

(a) *Use.* Grant funds may be used to:

- (1) Pay up to 100 percent of the cost of new construction, including the

building of a new structure or building an addition to an existing structure that increases the floor area by 100 percent or more, and the cost of land associated with that construction, for use as housing.

(2) If grant funds are used for new construction, the applicant must demonstrate that the costs of new construction are substantially less than the costs of rehabilitation or that there is a lack of available appropriate units that could be rehabilitated at a cost less than new construction. For purposes of this cost comparison, costs of rehabilitation or new construction may include the cost of real property acquisition.

(b) *Ineligible costs.* Grant funds may not be used for new construction on leased property.

§ 578.49 Leasing.

(a) *Use.* (1) Where the recipient or subrecipient is leasing the structure, or portions thereof, grant funds may be used to pay for 100 percent of the costs of leasing a structure or structures, or portions thereof, to provide housing or supportive services to homeless persons for up to 3 years. Leasing funds may not be used to lease units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership, where the partnership owns the structure, unless HUD authorized an exception for good cause.

(2) Any request for an exception must include the following:

(i) A description of how leasing these structures is in the best interest of the program;

(ii) Supporting documentation showing that the leasing charges paid with grant funds are reasonable for the market; and

(iii) A copy of the written policy for resolving disputes between the landlord and tenant, including a recusal for officers, agents, and staff who work for both the landlord and tenant.

(b) *Requirements.* (1) *Leasing structures.* When grants are used to pay rent for all or part of a structure or structures, the rent paid must be reasonable in relation to rents being charged in the area for comparable space. In addition, the rent paid may not exceed rents currently being charged by the same owner for comparable unassisted space.

(2) *Leasing individual units.* When grants are used to pay rent for individual housing units, the rent paid must be reasonable in relation to rents being charged for comparable units, taking into account the location, size,

type, quality, amenities, facilities, and management services. In addition, the rents may not exceed rents currently being charged for comparable units, and the rent paid may not exceed HUD-determined fair market rents.

(3) *Utilities.* If electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds. If utilities are not provided by the landlord, these utility costs are an operating cost, except for supportive service facilities. If the structure is being used as a supportive service facility, then these utility costs are a supportive service cost.

(4) *Security deposits and first and last month's rent.* Recipients and subrecipients may use grant funds to pay security deposits, in an amount not to exceed 2 months of actual rent. An advance payment of the last month's rent may be provided to the landlord in addition to the security deposit and payment of the first month's rent.

(5) *Occupancy agreements and subleases.* Occupancy agreements and subleases are required as specified in § 578.77(a).

(6) *Calculation of occupancy charges and rent.* Occupancy charges and rent from program participants must be calculated as provided in § 578.77.

(7) *Program income.* Occupancy charges and rent collected from program participants are program income and may be used as provided under § 578.97.

(8) *Transition.* Beginning in the first year awards are made under the Continuum of Care program, renewals of grants for leasing funds entered into under the authority of title IV, subtitle D of the Act as it existed before May 20, 2009, will be renewed either as grants for leasing or as rental assistance, depending on the characteristics of the project. Leasing funds will be renewed as rental assistance if the funds are used to pay rent on units where the lease is between the program participant and the landowner or sublessor. Projects requesting leasing funds will be renewed as leasing if the funds were used to lease a unit or structure and the lease is between the recipient or subrecipient and the landowner.

§ 578.51 Rental assistance.

(a) *Use.* (1) Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

(i) The rental assistance may be short-term, up to 3 months of rent; medium-term, for 3 to 24 months of rent; or long-term, for longer than 24 months of rent and must be administered in accordance with the policies and procedures established by the Continuum as set forth in § 578.7(a)(9) and this section.

(ii) The rental assistance may be tenant-based, project-based, or sponsor-based, and may be for transitional or permanent housing.

(2) Grant funds may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of first month's rent.

(b) *Rental assistance administrator.* Rental assistance must be administered by a State, unit of general local government, or a public housing agency.

(c) *Tenant-based rental assistance.* Tenant-based rental assistance is rental assistance in which program participants choose housing of an appropriate size in which to reside. When necessary to facilitate the coordination of supportive services, recipients and subrecipients may require program participants to live in a specific area for their entire period of participation, or in a specific structure for the first year and in a specific area for the remainder of their period of participation. Program participants who are receiving rental assistance in transitional housing may be required to live in a specific structure for their entire period of participation in transitional housing.

(1) Up to 5 years worth of rental assistance may be awarded to a project in one competition.

(2) Program participants who have complied with all program requirements during their residence retain the rental assistance if they move within the Continuum of Care geographic area.

(3) Program participants who have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence), if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and move to a different Continuum of Care geographic area if they move out of the

assisted unit to protect their health and safety.

(d) *Sponsor-based rental assistance.* Sponsor-based rental assistance is provided through contracts between the recipient and sponsor organization. A sponsor may be a private, nonprofit organization, or a community mental health agency established as a public nonprofit organization. Program participants must reside in housing owned or leased by the sponsor. Up to 5 years worth of rental assistance may be awarded to a project in one competition.

(e) *Project-based rental assistance.* Project-based rental assistance is provided through a contract with the owner of an existing structure, where the owner agrees to lease the subsidized units to program participants. Program participants will not retain rental assistance if they move. Up to 15 years of rental assistance may be awarded in one competition.

(f) *Grant amount.* The amount of rental assistance in each project will be based on the number and size of units proposed by the applicant to be assisted over the grant period. The amount of rental assistance in each project will be calculated by multiplying the number and size of units proposed by the FMR of each unit on the date the application is submitted to HUD, by the term of the grant.

(g) *Rent reasonableness.* HUD will only provide rental assistance for a unit if the rent is reasonable. The recipient or subrecipient must determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit.

Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units.

(h) *Payment of grant.* (1) The amount of rental assistance in each project will be reserved for rental assistance over the grant period. An applicant's request for rental assistance in each grant is an estimate of the amount needed for rental assistance. Recipients will make draws from the grant funds to pay the actual costs of rental assistance for program participants.

(2) For tenant-based rental assistance, on demonstration of need:

(i) Up to 25 percent of the total rental assistance awarded may be spent in any year of a 5-year grant term; or

(ii) A higher percentage if approved in advance by HUD, if the recipient provides evidence satisfactory to HUD that it is financially committed to

providing the housing assistance described in the application for the full 5-year period.

(3) A recipient must serve at least as many program participants as shown in its application for assistance.

(4) If the amount in each grant reserved for rental assistance over the grant period exceeds the amount that will be needed to pay the actual costs of rental assistance, due to such factors as contract rents being lower than FMRs and program participants being able to pay a portion of the rent, recipients or subrecipients may use the excess funds for covering the costs of rent increases, or for serving a greater number of program participants.

(i) *Vacancies.* If a unit assisted under this section is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person. No additional assistance will be paid until the unit is occupied by another eligible person. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.

(j) *Property damage.* Recipients and subrecipients may use grant funds in an amount not to exceed one month's rent to pay for any damage to housing due to the action of a program participant. This shall be a one-time cost per participant, incurred at the time a participant exits a housing unit.

(k) *Resident rent.* Rent must be calculated as provided in § 578.77. Rents collected from program participants are program income and may be used as provided under § 578.97.

(l) *Leases.* (1) *Initial lease.* For project-based, sponsor-based, or tenant-based rental assistance, program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

(2) *Initial lease for transitional housing.* Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

§ 578.53 Supportive services.

(a) *In general.* Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program

participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service.

(1) Supportive services must be necessary to assist program participants obtain and maintain housing.

(2) Recipients and subrecipients shall conduct an annual assessment of the service needs of the program participants and should adjust services accordingly.

(b) *Duration.* (1) For a transitional housing project, supportive services must be made available to residents throughout the duration of their residence in the project.

(2) Permanent supportive housing projects must provide supportive services for the residents to enable them to live as independently as is practicable throughout the duration of their residence in the project.

(3) Services may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.

(4) Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month as set forth in § 578.37(a)(1)(ii)(F), to assist the program participant in maintaining long-term housing stability.

(c) *Special populations.* All eligible costs are eligible to the same extent for program participants who are unaccompanied homeless youth; persons living with HIV/AIDS; and victims of domestic violence, dating violence, sexual assault, or stalking.

(d) *Ineligible costs.* Any cost that is not described as an eligible cost under this section is not an eligible cost of providing supportive services using Continuum of Care program funds. Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible costs.

(e) *Eligible costs.*

(1) *Annual Assessment of Service Needs.* The costs of the assessment required by § 578.53(a)(2) are eligible costs.

(2) *Assistance with moving costs.* Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.

(3) *Case management.* The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:

- (i) Counseling;
- (ii) Developing, securing, and coordinating services;
- (iii) Using the centralized or coordinated assessment system as required under § 578.23(c)(9).
- (iv) Obtaining federal, State, and local benefits;
- (v) Monitoring and evaluating program participant progress;
- (vi) Providing information and referrals to other providers;
- (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(4) *Child care.* The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.

(i) The children must be under the age of 13, unless they are disabled children.

(ii) Disabled children must be under the age of 18.

(iii) The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(5) *Education services.* The costs of improving knowledge and basic educational skills are eligible.

(i) Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).

(ii) Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

(6) *Employment assistance and job training.* The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of

providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

(i) Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.

(ii) Services that assist individuals in securing employment consist of:

(A) Employment screening, assessment, or testing;

(B) Structured job skills and job-seeking skills;

(C) Special training and tutoring, including literacy training and pre-vocational training;

(D) Books and instructional material;

(E) Counseling or job coaching; and

(F) Referral to community resources.

(7) *Food.* The cost of providing meals or groceries to program participants is eligible.

(8) *Housing search and counseling services.* Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.

(i) Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.

(ii) Other eligible costs are:

(A) Mediation with property owners and landlords on behalf of eligible program participants;

(B) Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and

(C) The payment of rental application fees.

(9) *Legal services.* Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.

(i) Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.

(ii) Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.

(iii) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a

legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(iv) Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.

(10) *Life skills training.* The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

(11) *Mental health services.* Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(12) *Outpatient health services.* Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:

(i) Providing an analysis or assessment of an individual's health problems and the development of a treatment plan;

(ii) Assisting individuals to understand their health needs;

(iii) Providing directly or assisting individuals to obtain and utilize appropriate medical treatment;

(iv) Preventive medical care and health maintenance services, including in-home health services and emergency medical services;

(v) Provision of appropriate medication;

(vi) Providing follow-up services; and

(vii) Preventive and noncosmetic dental care.

(13) *Outreach services.* The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying

potential program participants, are eligible.

(i) Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.

(ii) Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.

(14) *Substance abuse treatment services.* The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

(15) *Transportation.* Eligible costs are:

(i) The costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section.

(ii) Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;

(iii) The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;

(iv) The cost of gas, insurance, taxes, and maintenance for the vehicle;

(v) The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and

(vi) If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

(A) Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);

(B) Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and

(C) The recipients or subrecipients may require program participants to

share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

(16) *Utility deposits.* This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.

(17) *Direct provision of services.* If the service described in paragraphs (e)(1) through (e)(16) of this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:

(i) The costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and

(ii) The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.

§ 578.55 Operating costs.

(a) *Use.* Grant funds may be used to pay the costs of the day-to-day operation of transitional and permanent housing in a single structure or individual housing units.

(b) *Eligible costs.* (1) The maintenance and repair of housing;

(2) Property taxes and insurance;

(3) Scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost);

(4) Building security for a structure where more than 50 percent of the units or area is paid for with grant funds;

(5) Electricity, gas, and water;

(6) Furniture; and

(7) Equipment.

(c) *Ineligible costs.* Program funds may not be used for rental assistance and operating costs in the same project. Program funds may not be used for the operating costs of emergency shelter and supportive service-only facilities. Program funds may not be used for the maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease.

§ 578.57 Homeless Management Information System.

(a) *Eligible costs.* (1) The recipient or subrecipient may use Continuum of Care program funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care, including the costs of:

(i) Purchasing or leasing computer hardware;

(ii) Purchasing software or software licenses;

(iii) Purchasing or leasing equipment, including telephones, fax machines, and furniture;

(iv) Obtaining technical support;

(v) Leasing office space;

(vi) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;

(vii) Paying salaries for operating HMIS, including:

(A) Completing data entry;

(B) Monitoring and reviewing data quality;

(C) Completing data analysis;

(D) Reporting to the HMIS Lead;

(E) Training staff on using the HMIS;

and
(F) Implementing and complying with HMIS requirements;

(viii) Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;

(ix) Paying staff travel costs to conduct intake; and

(x) Paying participation fees charged by the HMIS Lead, as authorized by HUD, if the recipient or subrecipient is not the HMIS Lead.

(2) If the recipient or subrecipient is the HMIS Lead, it may also use Continuum of Care funds to pay the costs of:

(i) Hosting and maintaining HMIS software or data;

(ii) Backing up, recovering, or repairing HMIS software or data;

(iii) Upgrading, customizing, and enhancing the HMIS;

(iv) Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems;

(v) Administering the system;

(vi) Reporting to providers, the Continuum of Care, and HUD; and

(vii) Conducting training on using the system, including traveling to the training.

(3) If the recipient or subrecipient is a victim services provider, or a legal services provider, it may use Continuum of Care funds to establish and operate a comparable database that complies with HUD's HMIS requirements.

(b) *General restrictions.* Activities funded under this section must comply with the HMIS requirements.

§ 578.59 Project administrative costs.

(a) *Eligible costs.* The recipient or subrecipient may use up to 10 percent of any grant awarded under this part, excluding the amount for Continuum of Care Planning Activities and UFA costs, for the payment of project administrative costs related to the planning and execution of Continuum

of Care activities. This does not include staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57, because those costs are eligible as part of those activities. Eligible administrative costs include:

(1) *General management, oversight, and coordination.* Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:

(i) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

- (A) Preparing program budgets and schedules, and amendments to those budgets and schedules;
- (B) Developing systems for assuring compliance with program requirements;
- (C) Developing agreements with subrecipients and contractors to carry out program activities;
- (D) Monitoring program activities for progress and compliance with program requirements;
- (E) Preparing reports and other documents directly related to the program for submission to HUD;
- (F) Coordinating the resolution of audit and monitoring findings;
- (G) Evaluating program results against stated objectives; and
- (H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section.

(ii) Travel costs incurred for monitoring of subrecipients;

(iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and

(iv) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office

supplies, and rental and maintenance (but not purchase) of office space.

(2) *Training on Continuum of Care requirements.* Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings.

(3) *Environmental review.* Costs of carrying out the environmental review responsibilities under § 578.31.

(b) *Sharing requirement.* (1) *UFAs.* If the recipient is a UFA that carries out a project, it may use up to 10 percent of the grant amount awarded for the project on project administrative costs. The UFA must share the remaining project administrative funds with its subrecipients.

(2) *Recipients that are not UFAs.* If the recipient is not a UFA, it must share at least 50 percent of project administrative funds with its subrecipients.

§ 578.61 Relocation costs.

(a) *In general.* Relocation costs under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 are eligible.

(b) *Eligible relocation costs.* Eligible costs are costs to provide relocation payments and other assistance to persons displaced by a project assisted with grant funds in accordance with § 578.83.

§ 578.63 Indirect costs.

(a) *In general.* Continuum of Care funds may be used to pay indirect costs in accordance with OMB Circulars A-87 or A-122, as applicable.

(b) *Allocation.* Indirect costs may be allocated to each eligible activity as provided in subpart D, so long as that allocation is consistent with an indirect cost rate proposal developed in accordance with OMB Circulars A-87 or A-122, as applicable.

(c) *Expenditure limits.* The indirect costs charged to an activity subject to an expenditure limit under §§ 578.39, 578.41, and 578.59 must be added to the direct costs charged for that activity when determining the total costs subject to the expenditure limits.

Subpart E—High-Performing Communities

§ 578.65 Standards.

(a) *In general.* The collaborative applicant for a Continuum may apply to HUD to have the Continuum be designated a high-performing community (HPC). The designation shall be for grants awarded in the same competition in which the designation is applied for and made.

(b) *Applying for HPC designation.* The application must be submitted at such

time and in such manner as HUD may require, must use HMIS data where required to show the standards for qualifying are met, and must contain such information as HUD requires, including at a minimum:

(1) A report showing how the Continuum of Care program funds received in the preceding year were expended;

(2) A specific plan for how grant funds will be expended; and

(3) Information establishing that the Continuum of Care meets the standards for HPCs.

(c) *Standards for qualifying as an HPC.* To qualify as an HPC, a Continuum must demonstrate through:

(1) Reliable data generated by the Continuum of Care's HMIS that it meets all of the following standards:

(i) *Mean length of homelessness.*

Either the mean length of episode of homelessness within the Continuum's geographic area is fewer than 20 days, or the mean length of episodes of homelessness for individuals or families in similar circumstances was reduced by at least 10 percent from the preceding federal fiscal year.

(ii) *Reduced recidivism.* Of individuals and families who leave homelessness, less than 5 percent become homeless again at any time within the next 2 years; or the percentage of individuals and families in similar circumstances who become homeless again within 2 years after leaving homelessness was decreased by at least 20 percent from the preceding federal fiscal year.

(iii) *HMIS coverage.* The Continuum's HMIS must have a bed coverage rate of 80 percent and a service volume coverage rate of 80 percent as calculated in accordance with HUD's HMIS requirements.

(iv) *Serving families and youth.* With respect to Continuums that served homeless families and youth defined as homeless under other federal statutes in paragraph (3) of the definition of homeless in § 576.2:

(A) 95 percent of those families and youth did not become homeless again within a 2-year period following termination of assistance; or

(B) 85 percent of those families achieved independent living in permanent housing for at least 2 years following termination of assistance.

(2) Reliable data generated from sources other than the Continuum's HMIS that is provided in a narrative or other form prescribed by HUD that it meets both of the following standards:

(i) *Community action.* All the metropolitan cities and counties within the Continuum's geographic area have a

comprehensive outreach plan, including specific steps for identifying homeless persons and referring them to appropriate housing and services in that geographic area.

(ii) *Renewing HPC status.* If the Continuum was designated an HPC in the previous federal fiscal year and used Continuum of Care grant funds for activities described under § 578.71, that such activities were effective at reducing the number of individuals and families who became homeless in that community.

§ 578.67 Publication of application.

HUD will publish the application to be designated an HPC through the HUD Web site, for public comment as to whether the Continuum seeking designation as an HPC meets the standards for being one.

§ 578.69 Cooperation among entities.

An HPC must cooperate with HUD in distributing information about its successful efforts to reduce homelessness.

§ 578.71 HPC-eligible activities.

In addition to using grant funds for the eligible costs described in subpart D of this part, recipients and subrecipients in Continuums of Care designated as HPCs may also use grant funds to provide housing relocation and stabilization services and short- and/or medium-term rental assistance to individuals and families at risk of homelessness as set forth in 24 CFR 576.103 and 24 CFR 576.104, if necessary to prevent the individual or family from becoming homeless. Activities must be carried out in accordance with the plan submitted in the application. When carrying out housing relocation and stabilization services and short- and/or medium-term rental assistance, the written standards set forth in § 578.7(a)(9)(v) and recordkeeping requirements of 24 CFR 576.500 apply.

Subpart F—Program Requirements

§ 578.73 Matching requirements.

(a) *In general.* The recipient or subrecipient must match all grant funds, except for leasing funds, with no less than 25 percent of funds or in-kind contributions from other sources. For Continuum of Care geographic areas in which there is more than one grant agreement, the 25 percent match must be provided on a grant-by-grant basis. Recipients that are UFAs or are the sole recipient for their Continuum, may provide match on a Continuum-wide basis. Cash match must be used for the costs of activities that are eligible under

subpart D of this part, except that HPCs may use such match for the costs of activities that are eligible under § 578.71.

(b) *Cash sources.* A recipient or subrecipient may use funds from any source, including any other federal sources (excluding Continuum of Care program funds), as well as State, local, and private sources, provided that funds from the source are not statutorily prohibited to be used as a match. The recipient must ensure that any funds used to satisfy the matching requirements of this section are eligible under the laws governing the funds in order to be used as matching funds for a grant awarded under this program.

(c) *In-kind contributions.* (1) The recipient or subrecipient may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible under Subpart D, or, in the case of HPCs, eligible under § 578.71.

(2) The requirements of 24 CFR 84.23 and 85.24 apply.

(3) Before grant execution, services to be provided by a third party must be documented by a memorandum of understanding (MOU) between the recipient or subrecipient and the third party that will provide the services. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

(i) The MOU must establish the unconditional commitment, except for selection to receive a grant, by the third party to provide the services, the specific service to be provided, the profession of the persons providing the service, and the hourly cost of the service to be provided.

(ii) During the term of the grant, the recipient or subrecipient must keep and make available, for inspection, records documenting the service hours provided.

§ 578.75 General operations.

(a) *State and local requirements.* (1) Housing and facilities constructed or rehabilitated with assistance under this part must meet State or local building codes, and in the absence of State or local building codes, the International Residential Code or International Building Code (as applicable to the type

of structure) of the International Code Council.

(2) Services provided with assistance under this part must be provided in compliance with all applicable State and local requirements, including licensing requirements.

(b) *Housing quality standards.*

Housing leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable housing quality standards (HQS) under 24 CFR 982.401 of this title, except that 24 CFR 982.401(j) applies only to housing occupied by program participants receiving tenant-based rental assistance. For housing rehabilitated with funds under this part, the lead-based paint requirements in 24 CFR part 35, subparts A, B, J, and R apply. For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. For residential property for which funds under this part are used for acquisition, leasing, services, or operating costs, 24 CFR part 35, subparts A, B, K, and R apply.

(1) Before any assistance will be provided on behalf of a program participant, the recipient, or subrecipient, must physically inspect each unit to assure that the unit meets HQS. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.

(2) Recipients or subrecipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

(c) *Suitable dwelling size.* The dwelling unit must have at least one bedroom or living/sleeping room for each two persons.

(1) Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room.

(2) If household composition changes during the term of assistance, recipients and subrecipients may relocate the household to a more appropriately sized unit. The household must still have access to appropriate supportive services.

(d) *Meals.* Each recipient and subrecipient of assistance under this part who provides supportive housing for homeless persons with disabilities must provide meals or meal preparation facilities for residents.

(e) *Ongoing assessment of supportive services.* To the extent practicable, each

project must provide supportive services for residents of the project and homeless persons using the project, which may be designed by the recipient or participants. Each recipient and subrecipient of assistance under this part must conduct an ongoing assessment of the supportive services needed by the residents of the project, the availability of such services, and the coordination of services needed to ensure long-term housing stability and must make adjustments, as appropriate.

(f) *Residential supervision.* Each recipient and subrecipient of assistance under this part must provide residential supervision as necessary to facilitate the adequate provision of supportive services to the residents of the housing throughout the term of the commitment to operate supportive housing. Residential supervision may include the employment of a full- or part-time residential supervisor with sufficient knowledge to provide or to supervise the provision of supportive services to the residents.

(g) *Participation of homeless individuals.* (1) Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

(2) Each recipient and subrecipient of assistance under this part must, to the maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.

(h) *Supportive service agreement.* Recipients and subrecipients may require the program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused

by the disability. Notwithstanding this provision, if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program.

(i) *Retention of assistance after death, incarceration, or institutionalization for more than 90 days of qualifying member.* For permanent supportive housing projects surviving, members of any household who were living in a unit assisted under this part at the time of the qualifying member's death, long-term incarceration, or long-term institutionalization, have the right to rental assistance under this section until the expiration of the lease in effect at the time of the qualifying member's death, long-term incarceration, or long-term institutionalization.

§ 578.77 Calculating occupancy charges and rent.

(a) *Occupancy agreements and leases.* Recipients and subrecipients must have signed occupancy agreements or leases (or subleases) with program participants residing in housing.

(b) *Calculation of occupancy charges.* Recipients and subrecipients are not required to impose occupancy charges on program participants as a condition of residing in the housing. However, if occupancy charges are imposed, they may not exceed the highest of:

(1) 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses);

(2) 10 percent of the family's monthly income; or

(3) If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs.

(4) *Income.* Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Recipients and subrecipients must examine a program participant's income initially, and if there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.

(c) *Resident rent.* (1) *Amount of rent.*

(i) Each program participant on whose behalf rental assistance payments are

made must pay a contribution toward rent in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 (42 U.S.C. 1437a(a)(1)).

(ii) Income of program participants must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a).

(2) *Review.* Recipients or subrecipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified.

(3) *Verification.* As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income. Program participants must provide the recipient or subrecipient with information at any time regarding changes in income or other circumstances that may result in changes to a program participant's contribution toward the rental payment.

§ 578.79 Limitation on transitional housing.

A homeless individual or family may remain in transitional housing for a period longer than 24 months, if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living. However, HUD may discontinue assistance for a transitional housing project if more than half of the homeless individuals or families remain in that project longer than 24 months.

§ 578.81 Term of commitment, repayment of grants, and prevention of undue benefits.

(a) *In general.* All recipients and subrecipients receiving grant funds for acquisition, rehabilitation, or new construction must operate the housing or provide supportive services in accordance with this part, for at least 15 years from the date of initial occupancy or date of initial service provision.

Recipient and subrecipients must execute and record a HUD-approved Declaration of Restrictive Covenants before receiving payment of grant funds.

(b) *Conversion.* Recipients and subrecipients carrying out a project that provides transitional or permanent housing or supportive services in a structure may submit a request to HUD to convert a project for the direct benefit of very low-income persons. The request must be made while the project is operating as homeless housing or supportive services for homeless

individuals and families, must be in writing, and must include an explanation of why the project is no longer needed to provide transitional or permanent housing or supportive services. The primary factor in HUD's decision on the proposed conversion is the unmet need for transitional or permanent housing or supportive services in the Continuum of Care's geographic area.

(c) *Repayment of grant funds.* If a project is not operated as transitional or permanent housing for 10 years following the date of initial occupancy, HUD will require repayment of the entire amount of the grant used for acquisition, rehabilitation, or new construction, unless conversion of the project has been authorized under paragraph (b) of this section. If the housing is used for such purposes for more than 10 years, the payment amount will be reduced by 20 percentage points for each year, beyond the 10-year period in which the project is used for transitional or permanent housing.

(d) *Prevention of undue benefits.* Except as provided under paragraph (e) of this section, upon any sale or other disposition of a project site that received grant funds for acquisition, rehabilitation, or new construction, occurring before the 15-year period, the recipient must comply with such terms and conditions as HUD may prescribe to prevent the recipient or subrecipient from unduly benefiting from such sale or disposition.

(e) *Exception.* A recipient or subrecipient will not be required to comply with the terms and conditions prescribed under paragraphs (c) and (d) of this section if:

(1) The sale or disposition of the property used for the project results in the use of the property for the direct benefit of very low-income persons;

(2) All the proceeds are used to provide transitional or permanent housing that meet the requirements of this part;

(3) Project-based rental assistance or operating cost assistance from any federal program or an equivalent State or local program is no longer made available and the project is meeting applicable performance standards, provided that the portion of the project that had benefitted from such assistance continues to meet the tenant income and rent restrictions for low-income units under section 42(g) of the Internal Revenue Code of 1986; or

(4) There are no individuals and families in the Continuum of Care geographic area who are homeless, in which case the project may serve

individuals and families at risk of homelessness.

§ 578.83 Displacement, relocation, and acquisition.

(a) *Minimizing displacement.* Consistent with the other goals and objectives of this part, recipients and subrecipients must ensure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of projects assisted under this part. "Project," as used in this section, means any activity or series of activities assisted with Continuum of Care funds received or anticipated in any phase of an undertaking.

(b) *Temporary relocation.* (1) *Existing Building Not Assisted under Title IV of the McKinney-Vento Act.* No tenant may be required to relocate temporarily for a project if the building in which the project is being undertaken or will be undertaken is not currently assisted under Title IV of the McKinney-Vento Act. The absence of such assistance to the building means the tenants are not homeless and the tenants are therefore not eligible to receive assistance under the Continuum of Care program. When a tenant moves for such a project under conditions that cause the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), 42 U.S.C. 4601–4655, to apply, the tenant must be treated as permanently displaced and offered relocation assistance and payments consistent with paragraph (c) of this section.

(2) *Existing Transitional Housing or Permanent Housing Projects Assisted Under Title IV of the McKinney-Vento Act.* Consistent with paragraph (c)(2)(ii) of this section, no program participant may be required to relocate temporarily for a project if the person cannot be offered a decent, safe, and sanitary unit in the same building or complex upon project completion under reasonable terms and conditions. The length of occupancy requirements in § 578.79 may prevent a program participant from returning to the property upon completion (See paragraph (c)(2)(iii)(D) of this section). Any program participant who has been temporarily relocated for a period beyond one year must be treated as permanently displaced and offered relocation assistance and payments consistent with paragraph (c) of this section. Program participants temporarily relocated in accordance with the policies described in this paragraph must be provided:

(i) Reimbursement for all reasonable out-of-pocket expenses incurred in connection with the temporary

relocation, including the cost of moving to and from the temporarily occupied housing and any increase in monthly rent/occupancy charges and utility costs; and

(ii) Appropriate advisory services, including reasonable advance written notice of:

(A) The date and approximate duration of the temporary relocation;

(B) The location of the suitable, decent, safe, and sanitary dwelling to be made available for the temporary period;

(C) The reasonable terms and conditions under which the program participant will be able to occupy a suitable, decent, safe, and sanitary dwelling in the building or complex upon completion of the project; and

(D) The provisions of paragraph (b)(2)(i) of this section.

(c) *Relocation assistance for displaced persons.* (1) *In general.* A displaced person (defined in paragraph (c)(2) of this section) must be provided relocation assistance in accordance with the requirements of the URA and implementing regulations at 49 CFR part 24. A displaced person must be advised of his or her rights under the Fair Housing Act. Whenever possible, minority persons must be given reasonable opportunities to relocate to decent, safe, and sanitary replacement dwellings, not located in an area of minority concentration, that are within their financial means. This policy, however, does not require providing a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling. See 49 CFR 24.205(c)(2)(ii)(D).

(2) *Displaced person.* (i) For the purposes of paragraph (c) of this section, the term "displaced person" means any person (family, individual, business, nonprofit organization, or farm) that moves from real property, or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project. This includes any permanent, involuntary move for a project, including any permanent move from the real property that is made:

(A) After the owner (or person in control of the site) issues a notice to move permanently from the property, or refuses to renew an expiring lease, if the move occurs after the date of the submission by the recipient or subrecipient of an application for assistance to HUD (or the recipient, as applicable) that is later approved and funded and the recipient or subrecipient has site control as evidenced in accordance with § 578.25(b); or

(B) After the owner (or person in control of the site) issues a notice to move permanently from the property, or refuses to renew an expiring lease, if the move occurs after the date the recipient or subrecipient obtains site control, as evidenced in accordance with § 578.25(b), if that occurs after the application for assistance; or

(C) Before the date described under paragraph (c)(2)(i)(A) or (B) of this section, if the recipient or HUD determines that the displacement resulted directly from acquisition, rehabilitation, or demolition for the project; or

(D) By a tenant of a building that is not assisted under Title IV of the McKinney-Vento Act, if the tenant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition of the property for the project; or

(ii) For the purposes of paragraph (c) of this section, the term "displaced person" means any person (family, individual, business, nonprofit organization, or farm) that moves from real property, or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project. This includes any permanent, involuntary move for a project that is made by a program participant occupying transitional housing or permanent housing assisted under Title IV of the McKinney-Vento Act, if any one of the following three situations occurs:

(A) The program participant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition of the property for the project and is either not eligible to return upon project completion or the move occurs before the program participant is provided written notice offering the program participant an opportunity to occupy a suitable, decent, safe, and sanitary dwelling in the same building or complex upon project completion under reasonable terms and conditions. Such reasonable terms and conditions must include a lease (or occupancy agreement, as applicable) consistent with Continuum of Care program requirements, including a monthly rent or occupancy charge and monthly utility costs that does not exceed the maximum amounts established in § 578.77; or

(B) The program participant is required to relocate temporarily, does not return to the building or complex, and any one of the following situations occurs:

(1) The program participant is not offered payment for all reasonable out-

of-pocket expenses incurred in connection with the temporary relocation;

(2) The program participant is not eligible to return to the building or complex upon project completion; or

(3) Other conditions of the temporary relocation are not reasonable; or

(C) The program participant is required to move to another unit in the same building or complex, and any one of the following situations occurs:

(1) The program participant is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move;

(2) The program participant is not eligible to remain in the building or complex upon project completion; or

(3) Other conditions of the move are not reasonable.

(iii) Notwithstanding the provisions of paragraph (c)(2)(i) or (ii) of this section, a person does not qualify as a "displaced person" if:

(A) The person has been evicted for serious or repeated violation of the terms and conditions of the lease or occupancy agreement; the eviction complied with applicable federal, State, or local requirements (see § 578.91); and the recipient or subrecipient determines that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance;

(B) The person moved into the property after the submission of the application but, before signing a lease or occupancy agreement and commencing occupancy, was provided written notice of the project's possible impact on the person (e.g., the person may be displaced, temporarily relocated, or incur a rent increase) and the fact that the person would not qualify as a "displaced person" (or for any relocation assistance provided under this section), as a result of the project;

(C) The person is ineligible under 49 CFR 24.2(a)(9)(ii);

(D) The person is a program participant occupying transitional housing or permanent housing assisted under Title IV of the Act who must move as a direct result of the length-of-occupancy restriction under § 578.79; or

(E) HUD determines that the person was not displaced as a direct result of acquisition, rehabilitation, or demolition for the project.

(iv) The recipient may request, at any time, HUD's determination of whether a displacement is or would be covered under this section.

(3) *Initiation of negotiations.* For purposes of determining the formula for computing replacement housing payment assistance to be provided to a displaced person pursuant to this

section, if the displacement is a direct result of privately undertaken rehabilitation, demolition, or acquisition of the real property, "initiation of negotiations" means the execution of the agreement between the recipient and the subrecipient, or between the recipient (or subrecipient, as applicable) and the person owning or controlling the property. In the case of an option contract to acquire property, the initiation of negotiations does not become effective until execution of a written agreement that creates a legally enforceable commitment to proceed with the purchase, such as a purchase agreement.

(d) *Real property acquisition requirements.* Except for acquisitions described in 49 CFR 24.101(b)(1) through (5), the URA and the requirements of 49 CFR part 24, subpart B apply to any acquisition of real property for a project where there are Continuum of Care funds in any part of the project costs.

(e) *Appeals.* A person who disagrees with the recipient's (or subrecipient's, if applicable) determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance for which the person is eligible, may file a written appeal of that determination with the recipient (see 49 CFR 24.10). A low-income person who is dissatisfied with the recipient's determination on his or her appeal may submit a written request for review of that determination to the local HUD field office.

§ 578.85 Timeliness standards.

(a) *In general.* Recipients must initiate approved activities and projects promptly.

(b) *Construction activities.* Recipients of funds for rehabilitation or new construction must meet the following standards:

(1) Construction activities must begin within 9 months of the later of signing of the grant agreement or of signing an addendum to the grant agreement authorizing use of grant funds for the project.

(2) Construction activities must be completed within 24 months of signing the grant agreement.

(3) Activities that cannot begin until after construction activities are completed must begin within 3 months of the date that construction activities are completed.

(c) *Distribution.* A recipient that receives funds through this part must:

(1) Distribute the funds to subrecipients (in advance of expenditures by the subrecipients);

(2) Distribute the appropriate portion of the funds to a subrecipient no later than 45 days after receiving an approvable request for such distribution from the subrecipient; and

(3) Draw down funds at least once per quarter of the program year, after eligible activities commence.

§ 578.87 Limitation on use of funds.

(a) *Maintenance of effort.* No assistance provided under this part (or any State or local government funds used to supplement this assistance) may be used to replace State or local funds previously used, or designated for use, to assist homeless persons.

(b) *Faith-based activities.* (1) *Equal treatment of program participants and program beneficiaries.* (i) *Program participants.* Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to participate in the Continuum of Care program. Neither the Federal Government nor a State or local government receiving funds under the Continuum of Care program shall discriminate against an organization on the basis of the organization's religious character or affiliation. Recipients and subrecipients of program funds shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

(ii) *Beneficiaries.* In providing services supported in whole or in part with federal financial assistance, and in their outreach activities related to such services, program participants shall not discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

(2) *Separation of explicitly religious activities.* Recipients and subrecipients of Continuum of Care funds that engage in explicitly religious activities, including activities that involve overt religious content such as worship, religious instruction, or proselytization, must perform such activities and offer such services outside of programs that are supported with federal financial assistance separately, in time or location, from the programs or services funded under this part, and participation in any such explicitly religious activities must be voluntary for the program beneficiaries of the HUD-funded programs or services.

(3) *Religious identity.* A faith-based organization that is a recipient or subrecipient of Continuum of Care program funds is eligible to use such

funds as provided under the regulations of this part without impairing its independence, autonomy, expression of religious beliefs, or religious character. Such organization will retain its independence from federal, State, and local government, and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct program funds to support or engage in any explicitly religious activities, including activities that involve overt religious content, such as worship, religious instruction, or proselytization, or any manner prohibited by law. Among other things, faith-based organizations may use space in their facilities to provide program-funded services, without removing or altering religious art, icons, scriptures, or other religious symbols. In addition, a Continuum of Care program-funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.

(4) *Alternative provider.* If a program participant or prospective program participant of the Continuum of Care program supported by HUD objects to the religious character of an organization that provides services under the program, that organization shall, within a reasonably prompt time after the objection, undertake reasonable efforts to identify and refer the program participant to an alternative provider to which the prospective program participant has no objection. Except for services provided by telephone, the Internet, or similar means, the referral must be to an alternate provider in reasonable geographic proximity to the organization making the referral. In making the referral, the organization shall comply with applicable privacy laws and regulations. Recipients and subrecipients shall document any objections from program participants and prospective program participants and any efforts to refer such participants to alternative providers in accordance with the requirements of § 578.103(a)(13). Recipients shall ensure that all subrecipient agreements make organizations receiving program funds aware of these requirements.

(5) *Structures.* Program funds may not be used for the acquisition, construction, or rehabilitation of structures to the extent that those structures are used for explicitly religious activities. Program funds may

be used for the acquisition, construction, or rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under this part. When a structure is used for both eligible and explicitly religious activities, program funds may not exceed the cost of those portions of the acquisition, new construction, or rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to the Continuum of Care program. Sanctuaries, chapels, or other rooms that a Continuum of Care program-funded religious congregation uses as its principal place of worship, however, are ineligible for Continuum of Care program-funded improvements. Disposition of real property after the term of the grant, or any change in the use of the property during the term of the grant, is subject to governmentwide regulations governing real property disposition (see 24 CFR parts 84 and 85).

(6) *Supplemental funds.* If a State or local government voluntarily contributes its own funds to supplement federally funded activities, the State or local government has the option to segregate the federal funds or commingle them. However, if the funds are commingled, this section applies to all of the commingled funds.

(c) *Restriction on combining funds.* In a single structure or housing unit, the following types of assistance may not be combined:

- (1) Leasing and acquisition, rehabilitation, or new construction;
- (2) Tenant-based rental assistance and acquisition, rehabilitation, or new construction;
- (3) Short- or medium-term rental assistance and acquisition, rehabilitation, or new construction;
- (4) Rental assistance and leasing; or
- (5) Rental assistance and operating.

(d) *Program fees.* Recipients and subrecipients may not charge program participants program fees.

§ 578.89 Limitation on use of grant funds to serve persons defined as homeless under other federal laws.

(a) *Application requirement.* Applicants that intend to serve unaccompanied youth and families with children and youth defined as homeless under other federal laws in paragraph (3) of the homeless definition in § 576.2 must demonstrate in their application, to HUD's satisfaction, that the use of grant funds to serve such persons is an equal or greater priority than serving persons defined as homeless under paragraphs (1), (2), and (4) of the

definition of homeless in § 576.2. To demonstrate that it is of equal or greater priority, applicants must show that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth.

(b) *Limit.* No more than 10 percent of the funds awarded to recipients within a single Continuum of Care's geographic area may be used to serve such persons.

(c) *Exception.* The 10 percent limitation does not apply to Continuums in which the rate of homelessness, as calculated in the most recent point-in-time count, is less than one-tenth of one percent of the total population.

§ 578.91 Termination of assistance to program participants.

(a) *Termination of assistance.* The recipient or subrecipient may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same individual or family.

(b) *Due process.* In terminating assistance to a program participant, the recipient or subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

(1) Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;

(2) Written notice to the program participant containing a clear statement of the reasons for termination;

(3) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and

(4) Prompt written notice of the final decision to the program participant.

(c) *Hard-to-house populations.* Recipients and subrecipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.

§ 578.93 Fair Housing and Equal Opportunity.

(a) *Nondiscrimination and equal opportunity requirements.* The nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) are applicable.

(b) *Housing for specific subpopulations.* Recipients and subrecipients may exclusively serve a particular homeless subpopulation in transitional or permanent housing if the housing addresses a need identified by the Continuum of Care for the geographic area and meets one of the following:

(1) The housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex;

(2) The housing may be limited to a specific subpopulation, so long as admission does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR 5.105 (e.g., the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless persons and families).

(3) The housing may be limited to families with children.

(4) If the housing has in residence at least one family with a child under the age of 18, the housing may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the project so long as the child resides in the housing.

(5) Sober housing may exclude persons who refuse to sign an occupancy agreement or lease that prohibits program participants from possessing, using, or being under the influence of illegal substances and/or alcohol on the premises.

(6) If the housing is assisted with funds under a federal program that is limited by federal statute or Executive Order to a specific subpopulation, the housing may be limited to that subpopulation (e.g., housing also-assisted with funding from the Housing Opportunities for Persons with AIDS program under 24 CFR part 574 may be limited to persons with acquired immunodeficiency syndrome or related diseases).

(7) Recipients may limit admission to or provide a preference for the housing to subpopulations of homeless persons and families who need the specialized supportive services that are provided in the housing (e.g., substance abuse

addiction treatment, domestic violence services, or a high intensity package designed to meet the needs of hard-to-reach homeless persons). While the housing may offer services for a particular type of disability, no otherwise eligible individuals with disabilities or families including an individual with a disability, who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

(c) *Affirmatively furthering fair housing.* A recipient must implement its programs in a manner that affirmatively furthers fair housing, which means that the recipient must:

(1) Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;

(2) Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and

(3) Provide program participants with information on rights and remedies available under applicable federal, State and local fair housing and civil rights laws.

(d) *Accessibility and integrative housing and services for persons with disabilities.* Recipients and subrecipients must comply with the accessibility requirements of the Fair Housing Act (24 CFR part 100), Section 504 of the Rehabilitation Act of 1973 (24 CFR part 8), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR parts 35 and 36). In accordance with the requirements of 24 CFR 8.4(d), recipients must ensure that their program's housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities.

(e) *Prohibition against involuntary family separation.* The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part.

§ 578.95 Conflicts of interest.

(a) *Procurement.* For the procurement of property (goods, supplies, or equipment) and services, the recipient and its subrecipients must comply with the codes of conduct and conflict-of-interest requirements under 24 CFR 85.36 (for governments) and 24 CFR

84.42 (for private nonprofit organizations).

(b) *Continuum of Care board members.* No Continuum of Care board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.

(c) *Organizational conflict.* An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or subrecipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this part, or when a covered person's, as in paragraph (d)(1) of this section, objectivity in performing work with respect to any activity assisted under this part is or might be otherwise impaired. Such an organizational conflict would arise when a board member of an applicant participates in decision of the applicant concerning the award of a grant, or provision of other financial benefits, to the organization that such member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations under § 578.49(b)(2) and § 578.51(g) and housing quality inspections of property under § 578.75(b) that the recipient, subrecipient, or related entity owns.

(d) *Other conflicts.* For all other transactions and activities, the following restrictions apply:

(1) No covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.

(2) *Exceptions.* Upon the written request of the recipient, HUD may grant an exception to the provisions of this section on a case-by-case basis, taking into account the cumulative effects of

the criteria in paragraph (d)(2)(ii) of this section, provided that the recipient has satisfactorily met the threshold requirements of paragraph (d)(2)(ii) of this section.

(i) *Threshold requirements.* HUD will consider an exception only after the recipient has provided the following documentation:

(A) Disclosure of the nature of the conflict, accompanied by a written assurance, if the recipient is a government, that there has been public disclosure of the conflict and a description of how the public disclosure was made; and if the recipient is a private nonprofit organization, that the conflict has been disclosed in accordance with their written code of conduct or other conflict-of-interest policy; and

(B) An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law, or if the subrecipient is a private nonprofit organization, the exception would not violate the organization's internal policies.

(ii) *Factors to be considered for exceptions.* In determining whether to grant a requested exception after the recipient has satisfactorily met the threshold requirements under paragraph (c)(3)(i) of this section, HUD must conclude that the exception will serve to further the purposes of the Continuum of Care program and the effective and efficient administration of the recipient's or subrecipient's project, taking into account the cumulative effect of the following factors, as applicable:

(A) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;

(B) Whether an opportunity was provided for open competitive bidding or negotiation;

(C) Whether the affected person has withdrawn from his or her functions, responsibilities, or the decision-making process with respect to the specific activity in question;

(D) Whether the interest or benefit was present before the affected person was in the position described in paragraph (c)(1) of this section;

(E) Whether undue hardship will result to the recipient, the subrecipient, or the person affected, when weighed against the public interest served by avoiding the prohibited conflict;

(F) Whether the person affected is a member of a group or class of persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally

the same interests or benefits as are being made available or provided to the group or class; and

(G) Any other relevant considerations.

§ 578.97 Program income.

(a) *Defined.* Program income is the income received by the recipient or subrecipient directly generated by a grant-supported activity.

(b) *Use.* Program income earned during the grant term shall be retained by the recipient, and added to funds committed to the project by HUD and the recipient, used for eligible activities in accordance with the requirements of this part. Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to grant funds.

(c) *Rent and occupancy charges.* Rents and occupancy charges collected from program participants are program income. In addition, rents and occupancy charges collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing.

§ 578.99 Applicability of other federal requirements.

In addition to the requirements set forth in 24 CFR part 5, use of assistance provided under this part must comply with the following federal requirements:

(a) *Environmental review.* Activities under this part are subject to environmental review by HUD under 24 CFR part 50 as noted in § 578.31.

(b) *Section 6002 of the Solid Waste Disposal Act.* State agencies and agencies of a political subdivision of a state that are using assistance under this part for procurement, and any person contracting with such an agency with respect to work performed under an assisted contract, must comply with the requirements of Section 6003 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. In accordance with Section 6002, these agencies and persons must:

(1) Procure items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired in the preceding fiscal year exceeded \$10,000;

(2) Procure solid waste management services in a manner that maximizes energy and resource recovery; and

(3) Must have established an affirmative procurement program for the procurement of recovered materials identified in the EPA guidelines.

(c) *Transparency Act Reporting.* Section 872 of the Duncan Hunter Defense Appropriations Act of 2009, and additional requirements published by the Office of Management and Budget (OMB), requires recipients to report subawards made either as pass-through awards, subrecipient awards, or vendor awards in the Federal Government Web site *www.fgfrs.gov* or its successor system. The reporting of award and subaward information is in accordance with the requirements of the Federal Financial Assistance Accountability and Transparency Act of 2006, as amended by section 6202 of Public Law 110-252 and in OMB Policy Guidance issued to the federal agencies on September 14, 2010 (75 FR 55669).

(d) *The Coastal Barrier Resources Act of 1982* (16 U.S.C. 3501 *et seq.*) may apply to proposals under this part, depending on the assistance requested.

(e) *Applicability of OMB Circulars.* The requirements of 24 CFR part 85—Administrative Requirements for Grants and Cooperative Agreements to State, Local, and Federally Recognized Indian Tribal Governments and 2 CFR part 225—Cost Principles for State, Local and Indian Tribal Governments (OMB Circular A-87)—apply to governmental recipients and subrecipients except where inconsistent with the provisions of this part. The requirements of 24 CFR part 84—Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations; 2 CFR part 230—Cost Principles for Non-Profit Organizations (OMB Circular A-122); and 2 CFR part 220—Cost Principles for Education Institutions apply to the nonprofit recipients and subrecipients, except where inconsistent with the provisions of the McKinney-Vento Act or this part.

(f) *Lead-based paint.* The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to activities under this program.

(g) *Audit.* Recipients and subrecipients must comply with the audit requirements of OMB Circular A-133, "Audits of States, Local Governments, and Non-profit Organizations."

(h) *Davis-Bacon Act.* The provisions of the Davis-Bacon Act do not apply to this program.

(i) *Section 3 of the Housing and Urban Development Act.* Recipients and subrecipients must, as applicable, comply with Section 3 of the Housing and Urban Development Act of 1968 and its implementing regulations at 24 CFR part 135, as applicable.

Subpart G—Grant Administration

§ 578.101 Technical assistance.

(a) *Purpose.* The purpose of Continuum of Care technical assistance is to increase the effectiveness with which Continuums of Care, eligible applicants, recipients, subrecipients, and UFAs implement and administer their Continuum of Care planning process; improve their capacity to prepare applications; prevent the separation of families in projects funded under the Emergency Solutions Grants, Continuum of Care, and Rural Housing Stability Assistance programs; and adopt and provide best practices in housing and services for persons experiencing homelessness.

(b) *Defined.* Technical assistance means the transfer of skills and knowledge to entities that may need, but do not possess, such skills and knowledge. The assistance may include, but is not limited to, written information such as papers, manuals, guides, and brochures; person-to-person exchanges; web-based curriculums, training and Webinars, and their costs.

(c) *Set-aside.* HUD may set aside funds annually to provide technical assistance, either directly by HUD staff or indirectly through third-party providers.

(d) *Awards.* From time to time, as HUD determines the need, HUD may advertise and competitively select providers to deliver technical assistance. HUD may enter into contracts, grants, or cooperative agreements, when necessary, to implement the technical assistance. HUD may also enter into agreements with other federal agencies for awarding the technical assistance funds.

§ 578.103 Recordkeeping requirements.

(a) *In general.* The recipient and its subrecipients must establish and maintain standard operating procedures for ensuring that Continuum of Care program funds are used in accordance with the requirements of this part and must establish and maintain sufficient records to enable HUD to determine whether the recipient and its subrecipients are meeting the requirements of this part, including:

(1) *Continuum of Care records.* Each collaborative applicant must keep the following documentation related to

establishing and operating a Continuum of Care:

(i) Evidence that the Board selected by the Continuum of Care meets the requirements of § 578.5(b);

(ii) Evidence that the Continuum has been established and operated as set forth in subpart B of this part, including published agendas and meeting minutes, an approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least once every 5 years, evidence required for designating a single HMIS for the Continuum, and monitoring reports of recipients and subrecipients;

(iii) Evidence that the Continuum has prepared the application for funds as set forth in § 578.9, including the designation of the eligible applicant to be the collaborative applicant.

(2) *Unified funding agency records.* UFAs that requested grant amendments from HUD, as set forth in § 578.105, must keep evidence that the grant amendment was approved by the Continuum. This evidence may include minutes of meetings at which the grant amendment was discussed and approved.

(3) *Homeless status.* Acceptable evidence of the homeless as status is set forth in 24 CFR 576.500(b).

(4) *At risk of homelessness status.* For those recipients and subrecipients that serve persons at risk of homelessness, the recipient or subrecipient must keep records that establish "at risk of homelessness" status of each individual or family who receives Continuum of Care homelessness prevention assistance. Acceptable evidence is found in 24 CFR 576.500(c).

(5) *Records of reasonable belief of imminent threat of harm.* For each program participant who moved to a different Continuum of Care due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking under § 578.51(c)(3), each recipient or subrecipient of assistance under this part must retain:

(i) Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the program participant's case file. This may be written observation of the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; court records or law enforcement records; or written certification by the

program participant to whom the violence occurred or by the head of household.

(ii) Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking, which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence. This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program participant to whom the violence occurred or the head of household.

(6) *Annual income.* For each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant, the recipient or subrecipient must keep the following documentation of annual income:

(i) Income evaluation form specified by HUD and completed by the recipient or subrecipient; and

(ii) Source documents (e.g., most recent wage statement, unemployment compensation statement, public benefits statement, bank statement) for the assets held by the program participant and income received before the date of the evaluation;

(iii) To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period; or

(iv) To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

(7) *Program participant records.* In addition to evidence of "homeless" status or "at-risk-of-homelessness" status, as applicable, the recipient or

subrecipient must keep records for each program participant that document:

(i) The services and assistance provided to that program participant, including evidence that the recipient or subrecipient has conducted an annual assessment of services for those program participants that remain in the program for more than a year and adjusted the service package accordingly, and including case management services as provided in § 578.37(a)(1)(ii)(F); and

(ii) Where applicable, compliance with the termination of assistance requirement in § 578.91.

(8) *Housing standards.* The recipient or subrecipient must retain documentation of compliance with the housing standards in § 578.75(b), including inspection reports.

(9) *Services provided.* The recipient or subrecipient must document the types of supportive services provided under the recipient's program and the amounts spent on those services. The recipient or subrecipient must keep record that these records were reviewed at least annually and that the service package offered to program participants was adjusted as necessary.

(10) *Match.* The recipient must keep records of the source and use of contributions made to satisfy the match requirement in § 578.73. The records must indicate the grant and fiscal year for which each matching contribution is counted. The records must show how the value placed on third party in-kind contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

(11) *Conflicts of interest.* The recipient and its subrecipients must keep records to show compliance with the organizational conflict-of-interest requirements in § 578.95(c), the Continuum of Care board conflict-of-interest requirements in § 578.95(b), the other conflict requirements in § 578.95(d), a copy of the personal conflict-of-interest policy developed and implemented to comply with the requirements in § 578.95, and records supporting exceptions to the personal conflict-of-interest prohibitions.

(12) *Homeless participation.* The recipient or subrecipient must document its compliance with the homeless participation requirements under § 578.75(g).

(13) *Faith-based activities.* The recipient and its subrecipients must document their compliance with the faith-based activities requirements under § 578.87(b).

(14) *Affirmatively Furthering Fair Housing.* Recipients and subrecipients

must maintain copies of their marketing, outreach, and other materials used to inform eligible persons of the program to document compliance with the requirements in § 578.93(c).

(15) *Other federal requirements.* The recipient and its subrecipients must document their compliance with the federal requirements in § 578.99, as applicable.

(16) *Subrecipients and contractors.* (i) The recipient must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable.

(ii) The recipient must retain documentation of monitoring subrecipients, including any monitoring findings and corrective actions required.

(iii) The recipient and its subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 24 CFR 85.36 and 24 CFR part 84.

(17) *Other records specified by HUD.* The recipient and subrecipients must keep other records specified by HUD.

(b) *Confidentiality.* In addition to meeting the specific confidentiality and security requirements for HMIS data, the recipient and its subrecipients must develop and implement written procedures to ensure:

(1) All records containing protected identifying information of any individual or family who applies for and/or receives Continuum of Care assistance will be kept secure and confidential;

(2) The address or location of any family violence project assisted with Continuum of Care funds will not be made public, except with written authorization of the person responsible for the operation of the project; and

(3) The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with State and local laws regarding privacy and obligations of confidentiality;

(c) *Period of record retention.* All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

(1) Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must

be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served; and

(2) Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants.

(d) *Access to records.* (1) *Federal Government rights.* Notwithstanding the confidentiality procedures established under paragraph (b) of this section, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of the recipient and its subrecipients that are pertinent to the Continuum of Care grant, in order to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period, but last as long as the records are retained.

(2) *Public rights.* The recipient must provide citizens, public agencies, and other interested parties with reasonable access to records regarding any uses of Continuum of Care funds the recipient received during the preceding 5 years, consistent with State and local laws regarding privacy and confidentiality requirements in this part.

(e) *Reports.* In addition to the reporting requirements in 24 CFR parts 84 and 85, the recipient must collect and report data on its use of Continuum of Care funds in an Annual Performance Report (APR), as well as in any additional reports as and when required by HUD. Projects receiving grant funds only for acquisition, rehabilitation, or new construction must submit APRs for 15 years from the date of initial occupancy or the date of initial service provision, unless HUD provides an exception under § 578.81(e).

§ 578.105 Grant and project changes.

(a) *For Unified Funding Agencies and Continuums having only one recipient.*

(1) The recipient may not make any significant changes without prior HUD approval, evidenced by a grant amendment signed by HUD and the recipient. Significant grant changes include a change of recipient, a shift in a single year of more than 10 percent of the total amount awarded under the grant for one approved eligible activity category to another activity and a permanent change in the subpopulation served by any one project funded under the grant, as well as a permanent

proposed reduction in the total number of units funded under the grant.

(2) Approval of substitution of the recipient is contingent on the new recipient meeting the capacity criteria in the NOFA under which the grant was awarded, or the most recent NOFA. Approval of shifting funds between activities and changing subpopulations is contingent on the change being necessary to better serve eligible persons within the geographic area and ensuring that the priorities established under the NOFA in which the grant was originally awarded, or the most recent NOFA, are met.

(b) *For Continuums having more than one recipient.* (1) The recipients or subrecipients may not make any significant changes to a project without prior HUD approval, evidenced by a grant amendment signed by HUD and the recipient. Significant changes include a change of recipient, a change of project site, additions or deletions in the types of eligible activities approved for a project, a shift of more than 10 percent from one approved eligible activity to another, a reduction in the number of units, and a change in the subpopulation served.

(2) Approval of substitution of the recipient is contingent on the new recipient meeting the capacity criteria in the NOFA under which the grant was awarded, or the most recent NOFA. Approval of shifting funds between activities and changing subpopulations is contingent on the change being necessary to better serve eligible persons within the geographic area and ensuring that the priorities established under the NOFA in which the grant was originally awarded, or the most recent NOFA, are met.

(c) *Documentation of changes not requiring a grant amendment.* Any other changes to an approved grant or project must be fully documented in the recipient's or subrecipient's records.

§ 578.107 Sanctions.

(a) *Performance reviews.* (1) HUD will review the performance of each recipient in carrying out its responsibilities under this part, with or without prior notice to the recipient. In conducting performance reviews, HUD will rely primarily on information obtained from the records and reports from the recipient and subrecipients, as well as information from on-site monitoring, audit reports, and information generated from HUD's financial and reporting systems (e.g., LOCCS and e-snaps) and HMIS. Where applicable, HUD may also consider relevant information pertaining to the recipient's performance gained from

other sources, including citizen comments, complaint determinations, and litigation.

(2) If HUD determines preliminarily that the recipient or one of its subrecipients has not complied with a program requirement, HUD will give the recipient notice of this determination and an opportunity to demonstrate, within the time prescribed by HUD and on the basis of substantial facts and data that the recipient has complied with the requirements. HUD may change the method of payment to require the recipient to submit documentation before payment and obtain HUD's prior approval each time the recipient draws down funds. To obtain prior approval, the recipient may be required to manually submit its payment requests and supporting documentation to HUD in order to show that the funds to be drawn down will be expended on eligible activities in accordance with all program requirements.

(3) If the recipient fails to demonstrate to HUD's satisfaction that the activities were carried out in compliance with program requirements, HUD may take one or more of the remedial actions or sanctions specified in paragraph (b) of this section.

(b) *Remedial actions and sanctions.* Remedial actions and sanctions for a failure to meet a program requirement will be designed to prevent a continuation of the deficiency; to mitigate, to the extent possible, its adverse effects or consequences; and to prevent its recurrence.

(1) HUD may instruct the recipient to submit and comply with proposals for action to correct, mitigate, and prevent noncompliance with program requirements, including:

(i) Preparing and following a schedule of actions for carrying out activities and projects affected by the noncompliance, including schedules, timetables, and milestones necessary to implement the affected activities and projects;

(ii) Establishing and following a management plan that assigns responsibilities for carrying out the remedial actions;

(iii) Canceling or revising activities or projects likely to be affected by the noncompliance, before expending grant funds for them;

(iv) Reprogramming grant funds that have not yet been expended from affected activities or projects to other eligible activities or projects;

(v) Suspending disbursement of grant funds for some or all activities or projects;

(vi) Reducing or terminating the remaining grant of a subrecipient and either reallocating those funds to other

subrecipients or returning funds to HUD; and

(vii) Making matching contributions before or as draws are made from the recipient's grant.

(2) HUD may change the method of payment to a reimbursement basis.

(3) HUD may suspend payments to the extent HUD determines necessary to preclude the further expenditure of funds for affected activities or projects.

(4) HUD may continue the grant with a substitute recipient of HUD's choosing.

(5) HUD may deny matching credit for all or part of the cost of the affected activities and require the recipient to make further matching contributions to make up for the contribution determined to be ineligible.

(6) HUD may require the recipient to reimburse the recipient's line of credit in an amount equal to the funds used for the affected activities.

(7) HUD may reduce or terminate the remaining grant of a recipient.

(8) HUD may condition a future grant.

(9) HUD may take other remedies that are legally available.

(c) *Recipient sanctions.* If the recipient determines that a subrecipient is not complying with a program requirement or its subrecipient agreement, the recipient must take one of the actions listed in paragraphs (a) and (b) of this section.

(d) *Deobligation.* HUD may deobligate funds for the following reasons:

(1) If the timeliness standards in § 578.85 are not met;

(2) If HUD determines that delays completing construction activities for a project will mean that the funds for

other funded activities cannot reasonably be expected to be expended for eligible costs during the remaining term of the grant;

(3) If the actual total cost of acquisition, rehabilitation, or new construction for a project is less than the total cost agreed to in the grant agreement;

(4) If the actual annual leasing costs, operating costs, supportive services costs, rental assistance costs, or HMIS costs are less than the total cost agreed to in the grant agreement for a one-year period;

(5) Program participants have not moved into units within 3 months of the time that the units are available for occupancy; and

(6) The grant agreement may set forth in detail other circumstances under which funds may be deobligated and other sanctions may be imposed.

§ 578.109 Closeout.

(a) *In general.* Grants will be closed out in accordance with the requirements of 24 CFR parts 84 and 85, and closeout procedures established by HUD.

(b) *Reports.* Applicants must submit all reports required by HUD no later than 90 days from the date of the end of the project's grant term.

(c) *Closeout agreement.* Any obligations remaining as of the date of the closeout must be covered by the terms of a closeout agreement. The agreement will be prepared by HUD in consultation with the recipient. The agreement must identify the grant being closed out, and include provisions with respect to the following:

(1) Identification of any closeout costs or contingent liabilities subject to payment with Continuum of Care program funds after the closeout agreement is signed;

(2) Identification of any unused grant funds to be deobligated by HUD;

(3) Identification of any program income on deposit in financial institutions at the time the closeout agreement is signed;

(4) Description of the recipient's responsibility after closeout for:

(i) Compliance with all program requirements in using program income on deposit at the time the closeout agreement is signed and in using any other remaining Continuum of Care program funds available for closeout costs and contingent liabilities;

(ii) Use of real property assisted with Continuum of Care program funds in accordance with the terms of commitment and principles;

(iii) Use of personal property purchased with Continuum of Care program funds; and

(iv) Compliance with requirements governing program income received subsequent to grant closeout.

(5) Other provisions appropriate to any special circumstances of the grant closeout, in modification of or in addition to the obligations in paragraphs (c)(1) through (4) of this section.

Dated: June 28, 2012.

Mark Johnston,

Assistant Secretary for Community Planning and Development (Acting).

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