

Continuum of Care (CoC) Information Session:

Office of Community and Homeless Services
Human Services Department
June 28, 2023



Continuum of Care (CoC) Program

- ▶ Federal funds administered by U.S. Department of Housing and Urban Development (HUD)
- ▶ Primary goals:
 - Promote community-wide commitment to end homelessness
 - Provide funding to quickly rehouse homeless individuals and families
 - Promote access to, and effective utilization of, mainstream services
 - Optimize self-sufficiency



Continuum of Care Program

- ▶ CoC Program Interim Rule covers two types of activities:
 - Establishing and operating a Continuum of Care
 - Providing funding for homeless housing and services projects

Continuum of Care

- ▶ The Continuum of Care is the group responsible for carrying out the duties defined in the interim rule.
- ▶ The group must be composed of representatives of relevant organizations within the geographic area served by the Continuum.
- ▶ CoC is required to appoint a CoC Board and to designate an HMIS Lead agency and a Collaborative Applicant to assist with its responsibilities.



Partnership to End Homelessness (PEH)

- ▶ The PEH is the CoC Board for Everett/Snohomish County
- ▶ The Board’s purpose is to:
 - Promote community-wide commitment to the goal of ending homelessness
 - Utilize CoC funding for efforts by nonprofit providers and local governments to re-house homeless individuals and families rapidly
 - Ensure strategic utilization of all available resources
 - Establish community-wide systems’ approach with interagency coordination to alleviate poverty
 - Transform mission, vision and values into strategy
 - Promote access to and effective use of mainstream programs by homeless individuals and families
 - Promote self-sufficiency among individuals and families by providing access to a wide range of culturally relevant housing and necessary services

▶ [PEH CoC Board Website](#)

Board Member Representative Groups	
Adults without Children	Advocates
Affordable Housing Development	Business
Chemical Dependency	Chronically Homeless
Disabilities	Education (Early Childhood)
Employment/Training	Faith Based Organizations
City of Everett (Government)	Snohomish County (Government)
Healthcare	HIV/AIDS Issues
Homeless Families	Hospital
Law Enforcement	Legal
LGBTQ+ Community	Mental Health Agencies
Non-Profit Homeless Assistance Provider	Personal Homelessness Experience
Philanthropy	Public Housing Authority
Refugee/Immigrant	School District
Senior Issues	State Social Services
Transportation	Tribal Government
University	Veterans, Organizations which serve
Victim Service Provider	Youth Issues
Youth Under 25	

Collaborative Applicant

- ▶ The PEH has designated Snohomish County as its Collaborative Applicant
 - Supports the operation and activities of the CoC
 - Facilitates the CoC funding process for homeless housing and service projects and application to HUD for these funds
 - Responsible for contracting with and monitoring organizations awarded CoC project funds

Homeless Management Information System (HMIS)

- ▶ The PEH has designated Snohomish County as its Homeless Management Information System (HMIS) Lead.
- ▶ HMIS is a required electronic database that collects client-level data on homeless persons assisted through various programs.
- ▶ **CoC-funded projects must collect and enter data on persons served into this system.**
- ▶ HMIS participation includes:
 - Technical set up;
 - Staff training;
 - Development and adherence to an HMIS implementation schedule;
 - Adherence to the requirements set forth in the Local HMIS Data Quality Plan, including timely data entry, internal monitoring of data quality, and timely correction of data;
 - Adherence to requirements as set forth in the [Snohomish County HMIS Policy and Procedures Manual](#); and
 - Adherence to the requirements set forth in the “Agency Partner Agreement” and “User Policy, Code of Ethics and Responsibility Statement” executed by the Recipient and the Recipient’s staff.

Coordinated Entry (CE) System

- ▶ CoC's are required to establish a Coordinated Entry (CE) system
- ▶ CE system streamlines access and referrals to organizations that operate homeless housing programs and services
- ▶ Prioritizes individuals and families experiencing homelessness who are most in need of assistance through uniform assessment
- ▶ **Referrals for all homeless housing openings assisted with CoC funds must come through the CE system**
- ▶ See the Snohomish County Continuum of Care [Coordinated Entry Policies and Procedures](#)

CoC Program Competition

- ▶ HUD conducts a national competition each year for CoC funding through a Notice of Funding Opportunity (NOFO)
 - CoC's submit an application to HUD for homeless housing and service projects for their community through this process
 - CoC's must conduct a local competition to choose which projects to include in the application
 - HUD selects which projects are funded
- ▶ HUD CoC NOFO timeline
 - Varies each year; NOFO typically released in summer
 - Awards typically announced in winter (e.g., February or March)
 - Program Year starts July 1



CoC Program Competition

▶ HUD CoC NOFO also:

- Specifies eligible project types and participants, how projects will be selected by HUD, key policy priorities, local competition guidance, and amount of funding available
- Typically allows for both renewal and new projects to apply for funding
- Specifies other areas that will be scored on related to CoC operation and activities



CoC Program Competition - FY2023

▶ Fiscal Year 2023 CoC NOFO

- Not yet released by HUD
- Grant term starts July 1, 2024
- 1-Year Grant term for most projects - July 1, 2024, to June 30, 2025
- Grant term for a few types of projects may be longer (e.g., capital projects)

▶ Fiscal Year 2023 CoC Local Competition

- Phase 1 for Renewal Project Applications closed on 6/15
- Phase 2 for New, Expansion, and YHDP Project Applications is TBD; will be released after 2023 CoC NOFO released

▶ [Snohomish County CoC Program Funding Webpage](#)



Local Competition

- ▶ Application Oversight Committee (AOC), a subcommittee of PEH, oversees local competition
 - Project review, ranking, and selection priorities
 - Project rating/scoring criteria
- ▶ Project Review Committee (PRC), an independent body, reviews and ranks project applications and makes funding recommendations to AOC
- ▶ AOC has authority to approve or reject PRC's recommendations
- ▶ Final recommendations reviewed by PEH for approval and inclusion in application to HUD

Performance Outcome Measures

- ▶ Recent HUD CoC NOFO's encourage project performance to be key part of the local competition scoring criteria
- ▶ Current outcome measures adopted by the PEH align with HUD performance measures
- ▶ Projects awarded CoC funding are expected to contribute positively to system performance outcomes as measured in HMIS and these outcomes are an integral part of contracting for funds awarded

Performance Outcome Measures

- ▶ Key outcomes measures for CoC projects include:
 - Participants re-housed quickly
 - Participants retain stable housing while in project and exit project to stable housing
 - Participants increase income while in project (employment and non-employment)
 - Future returns to homelessness prevented

Eligible Project Applicants

Eligible CoC project applicants include:

- ▶ Private non-profit organizations that have received 501(c)(3) federal tax-exempt status from the U.S. Internal Revenue Service (IRS) and are registered as a non-profit corporation in the State of Washington
- ▶ Units of general purpose local government and instrumentalities of local government
- ▶ CoC NOFO's typically also require:
 - ▶ Registration with System Awards Management (SAM) at <https://www.sam.gov/SAM>
 - ▶ Valid Unique Entity Identifier (UEI) at <https://www.sam.gov/SAM>

Homeless Definitions - Eligible Populations

- ▶ Persons served must meet applicable HUD homeless definitions for eligible populations included in CoC NOFO
- ▶ Key eligible populations in recent NOFO's include:
- ▶ Category 1: An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - Residing in emergency shelter (including shelter facilities and shelter provided in hotels or motels paid for by charitable organizations or government programs)
 - Residing in place not ordinarily used as regular sleeping accommodation for human beings (e.g., streets, car, park, abandoned building, etc.)
 - Person exiting an institution where they resided for 90 days or less and they resided in placed listed above before entering the institution

Homeless Definitions - Eligible Populations

▶ Category 4: An individual or family that:

- 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
- Has no other residence or resources to obtain other permanent housing.

▶ Chronically Homeless: An individual or family that:

- Meets Category 1 Definition
- Has a disability
- Has been homeless for at least 12 months consecutively or has been homeless at least 4 times over past 3 years for a total of at least 12 months.

[Homeless Eligibility - CoC At A Glance - Virtual Binders \(hudexchange.info\)](#)

[Chronic Homelessness Status - CoC At A Glance - Virtual Binders \(hudexchange.info\)](#)

Allowable Project Types

Key allowable project types in recent CoC NOFO's include:

▶ Permanent Supportive Housing (PSH)

- Permanent housing in which housing assistance (e.g., long-term leasing or rental assistance) and supportive services are provided to households experiencing homelessness where at least one member has a disability to achieve housing stability and live independently
- Housing assistance is not time-limited and may be tenant-based, sponsor-based, or project-based
- Participant portion of rent is 30% of income
- Annual assessment required

▶ Rapid Rehousing (RRH)

- Provides supportive services and and/or short-term (up to 3 months) and/or medium-term (3 to 24 months) tenant-based rental assistance as necessary to help homeless households move as quickly as possible into permanent housing and achieve housing stability
- Emphasizes housing search, rent and move-in assistance, and rapid rehousing case management and services
- Participant portion of rent based on graduated rental subsidy
- Requires more frequent assessment (e.g., quarterly)

Allowable Project Types

- ▶ Joint Transitional Housing - Rapid Rehousing (TH-RRH)
 - Designed to assist communities in providing:
 1. Short-term crisis housing via Transitional Housing (TH) with financial assistance and
 2. Wrap-around supportive services needed by program participants to quickly move into permanent housing via Rapid Re-housing(RRH) and achieve housing stability
 - Applicants must be able to provide both components, including the units supported by the TH component (to be operated as short-term crisis housing) and the tenant-based rental assistance and services provided through the RRH component, to all program participants up to 24 months as needed by the program participants
 - TH may be through leased or site-based units
 - TH intended to be brief
- ▶ Emergency Shelter is not an eligible project type under CoC
- ▶ Traditional Transitional Housing with longer multi-month stays is an eligible project type under CoC, but HUD CoC NOFO's have not included this as allowable project type for new projects for several years

Current CoC Housing Project Overview

FY2022		
Type of Housing	# of Projects	# of Units
Rapid Rehousing (RRH)	4	33
Joint TH-RRH	3	53 (12 TH and 41 RRH)
Permanent Supportive Housing (PSH)*	14	447
Total	21	542

*13 PSH projects are dedicated to chronically homeless; 1 is a DedicatedPLUS project serving chronically homeless and other designated categories of persons with long histories of homelessness and severe service needs.

FY2022	
Special Populations	# of Projects and Units
Veterans	2 projects (28 units)
Young adults (under 25)	1 projects (19 units)
Victims of Domestic Violence	3 projects (32 units)
Chronically Homeless	14 projects (477 units)

Low-Barrier and Housing First

HUD encourages CoC projects to operate using low-barrier, housing first approach and recent CoC NOFO's have placed greater emphasis on this.

- ▶ **Low-Barrier Approach:** Allows eligible homeless individuals and families to enter the project without barriers, such as income or sobriety requirements, or service participation requirements.
- ▶ To be considered Low-Barrier, participants must *not* be screened out based on the following:
 - Having too little or no income
 - Active or history of substance abuse
 - Having a criminal record with exceptions for state-mandated restrictions
 - History of domestic violence (e.g., lack of a protective order, period of separation from abuser, or law enforcement involvement)



Low-Barrier and Housing First

- ▶ **Housing First Approach:** Offers supportive services through active engagement. Participation is voluntary and based on the needs and desires of the program participant.
- ▶ Program application and admission policies are as streamlined as possible in order to move participants into housing quickly.
- ▶ Persons may be terminated from the program *only* when violations are serious, and only in the most severe cases. If a participant is evicted from the housing unit, this does not mean they must be terminated from the program; the program may continue serving the participant in another housing unit.
- ▶ To be considered Housing First, the project must follow a Low-Barrier approach *and* must *not* terminate participants from the program for the following reasons:
 - Failure to participate in supportive services
 - Failure to make progress on a service plan
 - Loss of income or failure to improve income
 - Being a victim of domestic violence
 - Any other activity not covered in a lease agreement typically found in the project's geographic area



CoC Local Standards

- ▶ Projects receiving CoC funds must follow the CoC's Local Standards
- ▶ Includes policies and procedures for determining participant eligibility, providing assistance, and complying with required regulations
- ▶ [Snohomish County CoC-ESG Local Standards](#)

Financial & Match Requirements

- ▶ Projects receiving CoC funds must follow federal financial requirements at 2 CFR 200
- ▶ Payment from contracted grant funds is on reimbursement basis
- ▶ Match Requirement
 - 25% of grant award, except for leasing funds
 - Cash match or in-kind contributions from other sources
 - Cash example:
 - Private fundraising or non-CoC grant funds used for RRH Case Manager salary and benefits
 - In-Kind example: MOU (required) with agency providing service
 - Medical health services provided to CoC project participants by another agency not operating the project
 - Match contributions must be for eligible CoC costs - meaning costs must fall under 24 CFR part 578

Leveraging Other Funds: Healthcare

Recent CoC NOFO's have emphasized new projects that leverage healthcare and housing assistance funds through other sources. Recent guidelines for health care leverage included:

- ▶ Utilizing healthcare resources to help individuals and families experiencing homelessness may include:
 - Direct contributions from a public or private health insurance provider to the project
 - Provision of healthcare services by a private or public organization tailored to the program participants of the project
- ▶ Eligibility for the project must comply with HUD program and Fair Housing requirements. Eligibility criteria cannot be restricted by the eligibility requirements of the health care service provider
- ▶ Documentation of healthcare commitment must be written and include the value of the commitment and the dates the healthcare resources will be provided
- ▶ The value of assistance must:
 - Will provide access to treatment or recovery services for **all program participants** who qualify and choose the service
 - OR
 - An amount that is equivalent to **25%** of the funding being requested for the project

Leveraging Other Funds: Housing

Recent CoC NOFO's have emphasized new projects that leverage healthcare and housing assistance funds through other sources. Recent guidelines for housing leverage included:

- ▶ Utilizing housing subsidies not funded through CoC or ESG programs
- ▶ Housing subsidies must:
 - Provide at least **25%** of the units in the project (Permanent supportive housing)
OR
 - Serve at least **25%** of the participants anticipated to be served by the project
- ▶ Housing subsidies may be funded through any of the following resources:
 - Private organizations
 - State or local government
 - Public Housing Agencies, including use of set-aside or limited preference
 - Faith-based organizations, or
 - Federal programs other than CoC or ESG
- ▶ Documentation of housing commitment must be written and demonstrate the subsidy being provided to support the project

Eligible Components per Project Type

Eligible Costs	PSH	RRH	TH-RRH
Acquisition*	X		
Rehabilitation*	X		
New Construction*	X		
Leasing	X		X
Rental Assistance	X	X	X
Supportive Services	X	X	X
Operating Costs	X		X
HMIS	X	X	X
Project Administration	X	X	X

*Onetime costs, please reach out to us directly if you are interested in utilizing

Leasing - PSH and TH of Joint TH-RRH Program

- ▶ Agencies must complete the following for each unit:
 - Lease Agreement (with landlord/property management)
 - Occupancy Agreement (with program participants)
 - FMR and Rent Reasonableness
 - HQS Inspection
 - Lead Based Paint Assessment
 - Environmental Review

- ▶ Allowable Costs: <https://files.hudexchange.info/resources/documents/Virtual-Binders-At-A-Glance-Leasing.pdf>
 - Rent (must be reasonable in relation to rents being charged in the area for comparable spaced)
 - Utilities included in lease
 - Security deposit (up to 2 months of rent)
 - First and last month's rent

Rental Assistance - PSH and RRH

▶ 3 Rental Assistance Models

- RRH and PSH:
 - Tenant-Based Rental Assistance (TBRA): Participants locate housing in the private market. Participants may retain rental assistance if they move.
- PSH Only:
 - Sponsor-Based Rental Assistance (SBRA): Participant must reside in housing owned or leased by the sponsor.
 - Project-Based Rental Assistance (PBRA): Provided through a contract with the owner of an existing structure, where the owner agrees to lease the subsidized units to participants. Participants will not retain rental assistance if they move.

▶ Agencies must complete the following for each unit

- FMR and Rent Reasonableness
- HQS Inspection
- Lead Based Paint Assessment
- Lease:
 - For TBRA and PBRA, participant must have a lease with the landlord
 - For SBRA, the lease is between recipient or subrecipient and landlord; the recipient or subrecipient subleases to the participant

Rental Assistance (cont.)

- ▶ Allowable Costs: <https://files.hudexchange.info/resources/documents/Virtual-Binders-At-A-Glance-Rental-Assistance.pdf>
 - Rent (must be reasonable in relation to rents being charged in the area for comparable spaced)
 - Utilities included in lease
 - Security deposit (up to 2 months of rent)
 - First and last month's rent

Supportive Services - PSH, RRH, and TH-RRH

- ▶ There are 17 eligible supportive service categories:

<https://files.hudexchange.info/resources/documents/Virtual-Binders-At-A-Glance-Supportive-Services.pdf>

1. Annual assessment of service needs
2. Assistance with moving costs
3. Case management
4. Childcare
5. Education services
6. Employment assistance and job training
7. Food
8. Housing search and counseling
9. Legal services
10. Life skills training
11. Mental health services
12. Outpatient health services
13. Outreach services
14. Substance abuse treatment services
15. Transportation
16. Utility deposits
17. Direct provision of services

Operating - PSH and TH of Joint TH-RRH Program

- ▶ Allowable Costs: <https://files.hudexchange.info/resources/documents/Virtual-Binders-At-A-Glance-Operating-Costs.pdf>
 - The costs of maintenance and repair of housing not included in the lease
 - Property taxes and insurance
 - Scheduled payments to a reserve fund for the future replacement of major buildings systems
 - Security for a housing program where the CoC Program funds more than 50 percent of the units or building area
 - Utilities including electricity, gas, heating oil or other heating/cooling costs, water, sewer, and trash removal
 - Furniture that remains with the project, with the exception of mattresses which can remain with the program participant
 - Equipment, including appliances such as microwaves, refrigerators, stoves, washers and dryers, etc. that remain with the project

HMIS - PSH, RRH, and TH-RRH

- ▶ Allowable Costs: <https://files.hudexchange.info/resources/documents/Virtual-Binders-At-A-Glance-Homeless-Management-Information-Systems.pdf>
 - Purchasing or leasing computer hardware, software, and/or software licenses
 - Purchasing or leasing equipment and furniture for HMIS activities
 - Leasing office space
 - Paying charge for utilities for HMIS activities
 - Salaries, operating costs, technical support costs, and duties as required to operate a HMIS
 - Conducting or attending trainings related to the use of HMIS
 - Reporting to the HMIS Lead (Snohomish County - OCHS)

Administration - PSH, RRH, and TH-RRH

- ▶ 10% cap of project budget
- ▶ Allowable Costs
 - General management, oversight, and coordination
 - Salaries/wages and related costs for staff engaged in program administration
 - Travel costs incurred for monitoring
 - Administrative services performed third-party contracts or agreements, including general legal services, accounting services, and audit services
 - 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
 - Training on CoC requirements
 - Environmental review

New Project Resources

- ▶ CoC 24 CFR 578: <https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml>
- ▶ CoC Virtual Binder: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/coc-eligible-activities-overview/>
- ▶ Allowable CoC Program Components: <https://files.hudexchange.info/resources/documents/Virtual-Binders-At-A-Glance-Program-Components.pdf>
- ▶ CoC Funding Website: <https://www.snohomishcountywa.gov/720/Continuum-of-Care-CoC>
- ▶ HUD CoC Website: <https://www.hudexchange.info/programs/coc/>

Contact Information

- ▶ If you have questions about the CoC Program, please contact Molly Bauer
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Questions

