

IV. COC PROGRAM GRANT

Regulatory Citation: CFR 578.7, 578.7(a)(9)(iii) and (iv). 578.37(a)(1)(ii),

HUD Guidance Documents and Resources:

Continuum of Care Program Roadmap <https://www.hudexchange.info/.../CoC-Program-Roadmap-Prezi-Slides.pdf>

A. Collaborative Applicant

The Collaborative Applicant is the entity designated by the Continuum of Care (CoC) to submit the CoC Registration for the Cumberland County Continuum of Care NC 511 and the CoC Program Grant Application on behalf of the CoC. The Collaborative Applicant shall be designated by the Cumberland Continuum of Care Board of Directors.

B. Grant Inventory Worksheet

In consultation with each of the CoC’s Program project applicants, the Collaborative Applicant is responsible to assure the timely submission and accuracy of the Grant Inventory Worksheet (GIW). The GIW is used to calculate the CoC’s Annual Renewal Demand for funding to be considered for the annual CoC Program Grant Competition.

C. Project Evaluation, Monitoring and Performance Reporting

The Collaborative Applicant will utilize the Continuum of Care Grant Review and Performance Evaluation and Review Committee to provide program monitoring, evaluation and reporting of programs funded under the CoC Program Grant.

The Collaborative Applicant will maintain and review HMIS, Annual Performance Reports and other documentation as necessary to measure the Continuum of Care’s progress in meeting HUD CoC Program Grant goals and objectives.

The Continuum of Care Board of Directors may establish additional performance measurement requirements as necessary to report progress on local goals and objectives. Collaborative Applicant staff will communicate with CoC Program Recipient Agencies throughout each program year to ensure that they are aware of expected performance measures required by HUD and the Continuum of Care Board of Directors.

All CoC Program Grant Recipients and Subrecipients are required to provide the following documents to the Collaborative Applicant:

- Final eSNAPS Project Application
- Final eSNAPS C1.9a Technical Submission
- Leverage Documentation
- Match Documentation
- Quarterly report on LOCCS drawdowns of CoC Program funds

a. Quarterly Continuum of Care Annual Performance Reports

The Collaborative Applicant will provide Continuum of Care – wide quarterly reporting of aggregate

performance of all CoC Program Grant Projects through a quarterly Annual Performance Report to measure progress in the annual performance goals established in the Continuum of Care Program Grant.

The quarterly reports will cover the following performance periods which will include the quarterly point in time occupancy dates measured in the HUD standardized Annual Performance Report (APR) and Annual Homeless Assessment Report (AHAR):

- November – January (APR PIT Date: Fourth Wednesday in January)
- February – April (APR PIT Date: Fourth Wednesday in April)
- May – July (APR PIT Date: Fourth Wednesday in July)
- August – October (APR PIT Date: Fourth Wednesday in October)

b. Mid-Term Program Evaluation Policy

The Collaborative Applicant will provide mid-term project evaluations of CoC Program projects to measure individual Recipient Agency progress in achieving project goals established in the CoC Program Application and the Recipient Agency Project. This evaluation assistance will be performed after six months of a program year for all program grants including one-year renewals or multi-year projects.

- i. Collaborative Applicant will contact agency at the midpoint of their operating term.
- ii. The Collaborative Applicant will review an Annual Performance Report from the HMIS system inclusive of program data from the operation start date to the midpoint review date. They will generate a mid-term project progress report that will include: progress in achieving project goals; contributions to meeting CoC level performance goals; and areas of concern for improvements. Examples of areas of concern include missing data elements within the HMIS, data not consistent with agency targets as outlined in the program's original agency application, or significant shortfalls in performance targets.
- iii. The Collaborative Applicant will submit the mid-term progress report to the Executive Director or designee of the Recipient Agency. Technical assistance will be provided upon request of the agency or as determined needful by the Collaborative Applicant. Technical assistance may include:
 - a) Review of person roles for accurate enrollment and exit documentation
 - b) Supplemental HMIS training
 - c) Recommendations for use of IHRA for persons appearing to meet independent readiness thresholds and average lengths of stay for persons consistent with program type
 - d) Review of agency records related to mainstream benefits enrollments, approvals and denials for the prior quarter
- iv. The Collaborative Applicant will provide documentation of all program monitoring, evaluation and technical assistance for recipients and subrecipients and maintain copies of all reports and correspondence in the official CoC project files.

c. Annual Performance Reports (APR)

Annual Performance Reports are used in the development of annual project performance score cards and for the aggregate CoC-wide achievements in meeting HUD Goals and Objectives reported in the CoC Program Grant.

The Collaborative Applicant will work with each CoC Recipient in the preparation of their Annual Performance Report. Final APRs will be reviewed and approved by the Collaborative Applicant prior to

submission in the HUD electronic reporting system “eSNAPS” in order to confirm that data being reported to HUD is consistent with data reported in the local HMIS system.

i. APR Approval Procedures

- a) The Collaborative Applicant will contact the CoC Program Recipient Agency within one week of the expiration of each program year to initiate an APR data review and confirm APR due date.
- b) At initial APR data review, the Collaborative Applicant will provide a first draft APR to agency staff through the HMIS System and will include a report of any findings to be adjusted by agency staff. Examples of findings include missing data or data not consistent with agency targets as outlined in the program’s original agency Continuum of Care Program application.
- c) The Collaborative Applicant will consult with Recipient Agency to determine a planned submission date of the APR to eSNAPS which will be set prior to the HUD submission deadline. This planned submission date will take into consideration time allotted for any corrections that need to be made to HMIS data prior to submission in eSNAPS.
- d) The Collaborative Applicant will conduct a final data review no later than the first week of the month of the HUD submission deadline to ensure that any necessary findings were corrected in HMIS and will send a final HMIS APR version to agency staff to be used for eSNAPS data entry.
- e) The Recipient Agency will send a copy of their eSNAPS APR to the Collaborative Applicant for verification prior to submitting to HUD
- f) The Recipient Agency will use the Collaborative Applicant approved APR to complete their APR in eSNAPS and will send a final version of the eSNAPS generated APR to the Collaborative Applicant for the official CoC Planning files.

ii. Annual Performance Scorecards for CoC Program Grant Competition

The Collaborative Applicant will draft an annual CoC Program Grant Project Scorecard template to be used as a tool for prioritization and funding in the CoC Program Grant local competition. The Draft Scorecard will be approved by the CoC Board of Directors prior to the CoC Program Grant local competition. Scorecard elements will reflect performance measures for both HUD and local CoC goals and objectives.

a.) CoC Program Projects Scorecard Procedures:

- i.) The Collaborative Applicant will populate the individual Preliminary Project Scorecards for review by the recipient agency. Agencies will review for data accuracy and final performance measures will be confirmed from APR and other HMIS and Collaborative Applicant records.
- ii.) Agencies will have the opportunity to provide a narrative response to any performance measure as part of the final Project Scorecard.
- iii.) The complete scorecard with comments will be included in the local CoC Program competition application.
- iv) Coordinated Entry projects will be prioritized for Tier 1 funding and ranked as number one unless there is a significant reason to do otherwise.

b.) Actions Against Poor Performance

CoC Program recipients who do not meet local and/or HUD performance targets and/or do not meet

expectations and compliance of program and grant management of their CoC programs, as documented in either or both the CoC Score Card or monitoring and evaluation reports, may be subject to having their projects reduced in whole or in part and reallocated to other projects during the Community Projects Review Committee local competition renewal process as allowed in a HUD Notice of Funding Availability. (Emergency Solutions Grant recipients and subrecipients actions against poor performance are detailed in the ESG section of the policies and procedures.)

D. Application for CoC Program Grant Funds

Upon HUD issuance of the CoC Program Grant Notice of Funding Availability, the Collaborative Applicant will prepare a master timeline of the CoC Program Grant process and will conduct the following steps to assure a well communicated process for organizations to make application for CoC Program Funds to include, but not limited to:

- a. Establish all application, review and announcement deadlines sufficient to achieve reasonable public participation in the grant process and allow for timely submission to HUD
- b. Issue the local request for proposals for CoC Program Funds
- c. Publicize the request for proposal announcement through the Collaborative Applicant website, listserv, and email broadcasts
- d. Conduct a briefing on the CoC Program Grant Application process in advance of deadlines
- e. Prepare applications for prioritization and ranking
- f. Assist project applicants in the submission of application in eSNAPS

E. CoC Project Ranking and Funding Decision Process

The Continuum of Care Board of Directors shall utilize the CoC's Grant Review and Performance Evaluation and Review Committee whose primary purpose will be to carry out the project ranking and funding decisions for the Continuum of Care Program local competition. This committee may also serve in other prioritization and funding allocation capacities as determined by the CoC Board of Directors.

a. Conflicts of Interest

Grant Review and Performance Evaluation and Review Committee members may not be employees, contractors, or serve in any representative capacity of an applicant or a subrecipient agency party to a funding application.

b. CoC Program Grant Ranking and Prioritization Procedures

The Collaborative Applicant will provide training to the Grant Review and Performance Evaluation and Review Committee on the CoC Grant Process that will be open to the public. The Grant Review and Performance Evaluation and Review Committee training will follow HUD guidance and the prioritization and ranking rules within the CoC Program Notice of Funding Availability.

The committee will conduct two private meetings inclusive of Collaborative Applicant staff as part of the project review and selection process. The first meeting will involve receipt of all CoC Program Application Materials. The committee Chair will provide final instruction to the committee on the review process. The second meeting will involve the final review, prioritization and funding decisions.

The Collaborative Applicant will prepare the project priority list and funding decision as presented by the committee. The list and committee report will be presented at the next CoC Board of Directors meeting. The CoC Board of Directors will vote to accept the decisions of the committee. The Grant Review and Performance Evaluation and Review Committee is the final decision-making body for the determination of project priorities and funding levels. The CoC Board of Directors may direct the Collaborative Applicant to make minor

budgetary corrections consistent with HUD application rules, as needed. The Collaborative Applicant will be charged with communicating budget adjustments to individual applicants before final submission of the application to HUD.

F. CoC Program Rapid Rehousing Rental Assistance

Rapid Rehousing Permanent Housing Projects are designed to provide flexible programming that will expedite a household's ability to become self-sufficient through time-limited rental subsidy programs. Per 24 CFR part 578.37(a)(1)(ii), the CoC will establish annually priority populations to receive Rapid Rehousing assistance consistent with HUD Continuum of Care Program NOFA requirements and in response to analysis of point in time count and housing inventory and unmet need reports.

The CoC will establish a Rapid Rehousing Rental Assistance Subsidy Policy to determine the amount or percentage of rent each program participant must pay and the maximum amount or percentage of rental assistance that a program participant may receive.

The CoC will also establish a Rapid Rehousing Rental Assistance Subsidy Policy to determine the maximum number of months that a program participant may receive rental assistance, the maximum number of times that a program participant may receive rental assistance, and the extent to which a program participant must share the cost of rent.

Continuum of Care Rapid Rehousing Program applicants must identify and select one of two rental subsidy program models for all their project participants upon initial CoC Program Grant application during the local competition. CoC approved subsidy models include the Income Based Subsidy and the Gradual Declining Subsidy.

Program Participants may participate in a Rapid Rehousing Program within the Fayetteville Cumberland County Continuum of Care a maximum of two times over a 24-month period including participation in an ESG Rapid Rehousing Program. Eligibility for frequency of participation will be determined by the Coordinated Assessment System review of person service history recorded in the HMIS and through consultation with any domestic violence Rapid Rehousing program.

a. Calculation of Eligible Participant Household Income The calculation of household adjusted gross income must follow existing Continuum of Care Program Requirements.

CoC Rapid Rehousing program participants adjusted gross household incomes must fall below or equal to 60% AML. Household income will be recertified at least every 90 days to determine the appropriate level of rental subsidy.

b. Continuum of Care Rapid Rehousing Rental Subsidy Program

Rapid Rehousing Projects funded from CoC Program Funds must select one of the two models at program application and at program renewal and must apply that model to all persons within the CoC Rapid Rehousing project.

RENTAL ASSISTANCE SUBSIDY MODEL	Rent to be Paid by Program Participant	Maximum Amount of Rental Assistance Received	Maximum Number of Months of Rental Assistance	Frequency of Income and Self-Sufficiency Assessments	Maximum Number of Months in Case Management
Income Based Subsidy	30% of Adjusted Gross household Income. \$0 minimum	Monthly Rent	12 months (Short Term or Medium-Term Programs)	First 90 days. Every 30 days from month 4 to program completion	24 months
Gradual Declining Subsidy	0% months 1-3 50% months 4-6 75% months 7-9 100% months 10-24	100% months 1-3 50% months 4-6 25% months 7-9	9 months (Medium Term Programs Only)	First 90 days. Every 30 days from month 4 to program completion	24 months

Extensions – Extensions of rental assistance can be made for three additional months if the sub-recipient agency has submitted its extension policy to the Collaborative Applicant at program start-up.