

HUD FY2022 Continuum of Care Program
Notice OF Funding Opportunity (NOFO)
Local Competition

Request for Proposals (RFP)



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Collaborative Applicant

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BACKGROUND

The Flint / Genesee County Continuum of Care (CoC) is seeking applications – **in the form of a response to a Request for Proposal (RFP)** - for housing projects for inclusion in the CoC's FY2022 application for the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care (CoC) program, also known as the Notice of Funding Opportunity (NOFO).

Each year the Flint / Genesee County CoC competes with other CoCs across the country to secure federal funds to help end homelessness through HUD's CoC Program NOFO.

HUD allows each individual new project to be funded through either bonus or reallocation funds. The total funds available for new projects is listed below, as set by HUD.

The Flint / Genesee County CoC encourages applications from applicants that have never previously received CoC funds as well as from applicants that are currently receiving or have in the past received CoC funds.

A single, consolidated submission of all selected projects in the Flint/Genesee County CoC will be submitted to HUD by Metro Community Development (MCD), as the Collaborative Applicant representing Flint / Genesee County CoC. Funding will be derived from Federal Fiscal Year 2021 allocations of HUD funds and is subject to funding availability under the NOFO. Metro Community Development in collaboration with the CoC Executive Committee reserves the right to request that applicant organizations submit adjusted project budgets based on the amount of funding made available by HUD.

Metro Community Development (MCD), the Collaborative Applicant, which oversees the NOFO application process – provides technical assistance to ensure that the process is accessible to all eligible applicants, including those who have not received CoC funds in the past for Continuum of Care Homeless Assistance funding from the U.S. Department of Housing and Urban Development (HUD).

HUD publishes a CoC Notice of Funding Opportunity (NOFO) for each funding year. The FY2022 CoC Program NOFO was published on **August 1, 2022**, with a deadline of **September 30, 2022**.

<https://www.grants.gov/web/grants/view-opportunity.html?oppId=342855>

MISSION and PURPOSE

The mission of the Flint/Genesee County CoC is a community working together to achieve access to safe and affordable housing for all residents of Genesee County.

The Flint/Genesee County CoC is a broad-based coalition of housing and homeless service providers, persons with lived experience of homelessness, advocates, and government representatives who work together to shape countywide planning and decision-making around housing and homelessness. The duties of the CoC are to:

a) fulfill the responsibilities of the Continuum of Care outlined in 24 CFR 578.7 in an equitable, inclusive, and transparent way.

- b) Participate in the process of prioritizing local, state, and federal funding to promote community stabilization and prevent returns to homelessness.
- c) Coordinate county-wide applications for homeless housing and service funding, including but not limited to, Flint/Genesee County CoC annual application for HUD McKinney-Vento funding.
- d) Fulfill annual HUD-reporting requirements.
- e) Work together to maximize federal funding to meet the needs of homeless and at-risk in Genesee County.
- f) Streamline and improve the assessment, prioritization, housing matching, and placement system for homeless and at-risk households through a coordinated community-informed process.
- g) Review and monitor project and system performance to improve effectiveness, identify and fill gaps of service, and inform strategic decision making for the CoC.
- h) Identify the gaps in the system for persons experiencing homelessness and to focus resources and/or implement policies to address these gaps.
- i) Promote access to, and effective use of, mainstream programs to optimize self-sufficiency for persons who are homeless, at risk of homelessness or formerly homeless.
- j) Ensure that policies are housing first, fair, equitable, and free of bias.
- k) Minimize the trauma that homelessness causes among individuals, families, and communities by promoting trauma-informed, strength-based, and culturally sensitive best practices.

FUNDS AVAILABILITY

The amount of funding estimated to be available for Flint/Genesee County CoC (MI-505) is listed below.

- a) Annual Renewal Demand (ARD) is \$2,388,904 (projects eligible for renewal funding).
- b) Tier 1 Funding: \$2,269,459 (current projects).
- c) CoC Bonus Funding: \$239,996.00 (can be funded only through reallocation of existing project funding or through bonus funds).
- d) DV Bonus Funding: \$479,992.00.

KEY INFORMATION

- a) Threshold Requirements: All projects must meet the threshold criteria shown in the attached Appendix A (see page 7)– Threshold Criteria for Continuum of Care Grant Proposals.
- b) Proposed funding for new projects cannot supplant funding from other sources.
- c) Participants in CoC-funded projects must meet HUD’s eligibility requirements, which vary by program component. More information on the CoC regulations is found below.
- d) Permanent Supportive Housing projects may serve families or individuals. An adult participant in each household served in any permanent supportive housing program must have a physical and/or mental disability.
- e) Projects may not charge participants program fees in any program.
- f) Funds are not available for transitional housing, except in the new component, which combines transitional housing and rapid re-housing.
- g) Emergency shelter and services are not eligible for funding under the CoC Program.
- h) All eligible funding costs except leasing must be matched with no less than a 25 percent cash or in-kind match. Leasing costs are not required to be matched.
- i) HUD will allow new projects to request 1 year of funding with a longer initial grant term not to exceed 18 months.

- j) Any new projects requesting capital costs (i.e., new construction, acquisition, or rehabilitation) are not eligible for 1-year requests. If 1-year of funding is requested for new
- k) projects with capital costs, HUD will increase the grant term to 3-years and the new project will be required to spend the funds requested over a 3-year period.
- l) Any new expansion project that is submitted to expand an eligible renewal CoC program- funded project may only request a 1-year grant term, regardless of the project type
- m) Any new project that requests tenant-based rental assistance may request a 1-year, 2-year, 3-year, 4-year, or 5-year grant term.
- n) Any new project that requests leasing costs-either leasing costs only or leasing costs plus other costs (i.e., supportive services, HMIS) may only request up to a 3-year grant term
- o) Any new project that requests project -based rental assistance or sponsor-based rental assistance, or operating costs may request up to a 15-year grant term; however, the project applicant may only request up to 5 years of funds. Funding for the remainder of the term is subject to availability.
- p) Any new project that requests operating costs, supportive services only, HMIS and project administrative costs may request 1-year, 2-year, 3-year, 4-year, or 5-year grant terms
- q) Collaborative efforts by community agencies are encouraged.

The HUD 2022 NOFO was published on August 1, 2022.

<https://www.grants.gov/web/grants/view-opportunity.html?oppld=342855>

DESCRIPTION OF PROJECTS

Renewal Projects currently funded under the Continuum of Care Program are eligible for renewal for FY2022 funds if they have a HUD agreement that expires in Calendar Year 2022 . Projects may renew as is, or they may be part of transition, expansion or consolidated projects as further described in this section:

- **“Transition Grants:”** This year, HUD is permitting HUD transition grants that will allow renewal projects to “transition” from one CoC Program component to another during the CoC Program Competition. Transition Grants are not an additional source of funding but rather, would be part of the existing Annual Renewal Demand (ARD) amount for the CoC. No more than 50% of each transition grant may be used for costs of eligible activities of the program component originally funded, transition grants in this competition are eligible for renewal in subsequent fiscal years for eligible activities of the new program component and eligibility to receive a transition grant requires renewal project applicants to have the consent of its CoC and meet all other criteria and standards in the NOFO. *See page 26 cc. of the HUD NOFO for further details.*
- **“Expansion Projects”:** *Expansion Project.* HUD will allow project applicants to apply for a new expansion project (see page 44 (6) of this NOFO) through reallocation, CoC Bonus, and DV Bonus processes to expand existing projects to increase the number of units, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-CE projects. If the new expansion project will expand an existing eligible CoC Program renewal project HUD will not fund capital costs (i.e., new constructions, rehabilitation, or acquisition) and will only allow 1-year funding requests. YHDP projects cannot use the expansion process. Project applicants may expand an existing renewal project that is not currently dedicated to serving survivors of

domestic violence, dating violence, sexual assault, or stalking that meet the definition of homeless (24 CFR 578.3) to dedicate additional beds, units, persons served, or services provided to existing program participants to this population.

- **“Consolidated Projects:”** Eligible renewal project applicants have the ability to consolidate two or more eligible renewal projects into one project application during the application process. This means that a CoC Program recipient no longer must wait for a grant agreement amendment to be executed to consolidate two or more grants before it can apply for a single consolidated project in the CoC Competition. Consultation with the Collaborative applicant prior to undertaking this opportunity is required as HUD must confirm eligibility to consolidate projects. *See page 45 (7) of the HUD NOFO for further details.*
- **New Continuum of Care Projects (Bonus Projects)**
 - **“PH-PSH Projects”** New permanent supportive housing projects that will serve 100% chronically homeless individuals or persons who meet the definition of Dedicated PLUS (see page 22) families are eligible to apply in this competition. 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 leasing, rental assistance, operating costs and supportive services; definitions and guidance for each of these items is at 24 CFR 578.43- 578.63.
 - **“New PH-RRH, Joint TH and PH-RRH”** must follow a housing first approach and may serve persons who qualify as homeless under paragraphs (1), (2), or (4) or 24 CFR 578.3.
 - **“New Coordinated SSO Projects for Coordinated Entry (SSO-CE)”** to develop or operate a centralized or coordinated assessment system.
 - **“New Dedicated HMIS Project”** for the costs at 24 CFR 578.37(a)(4) that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant and is listed on the HMIS Lead form in the CoC Applicant Profile in *e-snaps*. Additionally, if the CoC has organizations within its geographic area that are victim service providers, the HMIS Lead, or subrecipient, may request HMIS funds for a comparable database. Victim service providers may also request HMIS funds in their project application budgets to enter data into a comparable database.

New Continuum of Care Projects (DV Bonus Project) See page 38

The Flint / Genesee County CoC may apply for up to \$479,992.00.

- **“New PH-RRH Projects”** dedicated to serving survivors of domestic violence, dating violence, sexual assault, or stalking that are defined as homeless (24 CFR 578.3)
- **“New Joint TH and PH-RRH Projects”** component projects defined on page 38 (b) of this NOFO dedicated to serving survivors of domestic violence dating violence, sexual assault, or stalking who are defined a homeless (24 CRF 578.3)
- **“New SSO-Coordinated Entry Project”** to implement policies, procedures, and practices that equip the CoC’s coordinated entry to better meet the needs of survivors of domestic

SUBMISSION PROCEDURE

- **Letter of Intent (LOI) to apply** as described below is due by **Monday, August 22, 2022, by 11:59 PM**. Both renewal and new LOIs must be submitted to Metro Community Development at nofo@metroflint.org
Include the following information on letterhead signed by CEO/Executive Director or (appropriate Position):
 - Project Type: Renewal (consolidated), New (CoC Bonus, DV Bonus, Expansion)
 - Project Summary (1 paragraph)
 - Program type (Permanent Supportive Housing, Rapid Re-Housing, New “Joint Project”, Supportive Services including HMIS and Coordinated Intake):
 - Proposed Funding Amount
 - Contact person and contact information
 - Please include “FY2022 NOFO LOI” in the subject line
- **Applications** both renewal and new applications must be submitted to Metro Community Development at nofo@metroflint.org by **11:59 PM. on Monday, August 29, 2022, by 11:59PM**. Submission procedures are described below.

Rules that affect how HUD evaluates applications

Assessing Applicant Risk

In evaluating risks posed by project applicants, HUD may use a risk-based approach and may consider any items such as the following:

- a) Financial stability.
- b) Quality of management systems and ability to meet the management standards prescribed in 2 CFR part 200.
- c) History of performance. The applicant's record in managing Federal awards, if it is a prior recipient of Federal awards, including timeliness of compliance with applicable reporting requirements, failing to make significant progress in a timely manner, failing to meet planned activities in a timely manner, conformance to the terms and conditions
 - a. of previous Federal awards, and if applicable, the extent to which any previously awarded amounts will be expended prior to future awards.
- d) Reports and findings from audits performed under Subpart F—Audit Requirements of 2 CFR part 200 or the reports and findings of any other available audits; and
- e) The applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities.

Past Performance

In evaluating project applications for funding, HUD will consider a project applicant’s past performance in managing funds. Items HUD will consider include, but are not limited to:

- a) the ability to account for funds in compliance with applicable reporting and recordkeeping requirements.
- b) timely use of funds received from HUD.
- c) timely submission and quality of reports submitted to HUD.

- d) meeting program requirements.
- e) meeting performance targets as established in the grant agreement.
- f) the project applicant's organizational capacity, including staffing structures and capabilities.
- g) timely completion of activities and receipt and expenditure of promised matching funds;
- h) the number of persons served or targeted for assistance.
- i) promoting self-sufficiency and economic independence.
- j) producing positive outcomes and results.
- k) Encouraging participation with faith-based entities.

HUD may reduce scores based on the past performance review. Wherever possible, HUD will obtain past performance information and if this review results in an adverse finding related to integrity of performance, HUD reserves the right to take any of the remedies necessary.

Statutory and Regulatory Requirements

To be eligible for funding under the FY 2022 CoC Program Competition NOFO, project applicants must meet all statutory and regulatory requirements in the Act and the Rule. The FY 2022 YHDP noncompetitive renewals and replacements are administered under the Consolidated Appropriations Act, 2022 which permits YHDP projects to be renewed or replaced non-competitively through the CoC Program notwithstanding any conflict with the requirements of the CoC Program (see page 12 7. of this NOFO). Project applicants can obtain a copy of the Act and the Rule on [HUD's website](#) or by contacting the NOFO Information Center at 1-800- 483-8929.

Threshold Requirements.

- a) **Ineligible Applicants.** HUD will not consider a project application from an ineligible project applicant, including an application submitted for CoC planning funds or UFA Costs from a project applicant other than the Collaborative Applicant.
- b) **Project Eligibility Threshold.** HUD will review all projects to determine if they meet the following project eligibility threshold requirements on a pass/fail standard. If HUD determines the applicable standards are not met for a project, the project will be rejected. 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 (e.g., monitoring findings, results from investigations by HUD's Office of Inspector General, the recipient routinely does not draw down funds from eLOCCS at least once per quarter, consistently late Annual Performance Report (APR) submissions). Approval of new and renewal projects is not a determination by HUD that a recipient is compliant 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 Act and the Rule and provide evidence of eligibility required in the application (e.g., nonprofit documentation).
 - (2) Project applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds. Demonstrating capacity may include a description of the applicant and subrecipient experience with similar projects and with successful administration of SHP, S+C, or CoC Program funds or other federal funds.

- (3) Project applicants must submit the required certifications specified in this NOFO.
- (4) The population to be served must meet program eligibility requirements as described in the Act, the Rule, and page 17 f. of this NOFO.
- (5) 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 must not 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.

Project Quality Threshold. HUD will review all new project applications to determine if they meet the following project quality threshold requirements. HUD will not award funds to a new project unless the project was created through reallocation, or the CoC has demonstrated to HUD's satisfaction that projects are evaluated and ranked based on the degree to which they improve the CoC's system performance. Any project requesting renewal funding, including renewing YHDP, will be considered as having met project quality threshold requirements through its previously approved grant application unless information to the contrary is received (e.g., monitoring findings, results from investigations by HUD's Office of Inspector General, the recipient routinely does not draw down funds from eLOCCS at least once per quarter, consistently late APR submissions) and/or if the renewal project has compliance issues which results in the project not operating in accordance with the Rule. If awarded, a recipient is required to meet all the criteria listed in the criteria column for its component. Additionally, 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 compliant with applicable fair housing and civil rights requirements.

Eligible Populations

Populations who may be served by each of the project types are, as follow:

Permanent Supportive Housing (PSH)

- All PSH projects must dedicate 100% of the units to chronically homeless individuals and/or chronically homeless families as defined by HUD or persons who meet the definition of Dedicated PLUS.
- Project applicants must demonstrate that they will first serve the chronically homeless according to the order of priority established in Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons.
- Disabilities: All PSH projects must serve exclusively disabled households as defined by HUD.
- PSH projects may serve survivors of domestic violence, dating violence, sexual assault, or stalking as defined in paragraph (4) at 24 CFR 578.3.

Rapid Re-Housing (RRH)

- All projects must serve 100% literally homeless families and/or single adults coming from emergency shelters and/or unsheltered locations or meeting the criteria of paragraph (1), (2), or (4) of the HUD definition of homeless including survivors of domestic violence, dating violence, sexual assault, or stalking as defined in paragraph (4) at 24 CFR 578.3.
- Persons in transitional housing are not eligible for either project type, even if they met the criteria described above prior to entering the Transitional Housing (TH) Program, unless they meet the

criteria of category (4) definition of homelessness at 24 CFR 578.3 (survivors of domestic violence, dating violence, sexual assault, or stalking as defined). A household would meet category 4 of the definition of homelessness if they are fleeing or attempting to flee from domestic violence and meet all other requirements, regardless of where they are residing.

Joint Transitional Housing (TH) and Rapid Re-Housing Component Projects

- Individuals and families experiencing homelessness including those survivors of domestic violence, dating violence, sexual assault or stalking as defined in paragraph (4) at 24 CFR 578.3.
- Combines the TH and RRH components into a single project.
- Joint TH and RRH projects must provide low-barrier, temporary housing while individuals and families quickly move to permanent housing with a seamless program design. Projects must have the capacity to provide both kinds of assistance to each participant.

Supportive Services Only – Coordinated Entry Projects

- Supportive Services Only: coordinated entry project to implement policies, procedures, and practices that equip the CoC’s coordinated entry to better meet the needs of survivors of domestic violence, dating violence, sexual assault or stalking.

Eligible Costs

The following guidance indicates the costs that may be included in program budgets, to be paid for by the CoC grant or by matching funds.

Rental Assistance

Rental assistance for homeless individuals and families, including tenant-based rental assistance. Grant funds may be used for security deposits in an amount not to exceed two months of rent, as well as last month’s rent.

Leasing

The costs of leasing scattered site units to provide housing to homeless persons.

Leasing: Limits on rent costs. Rents paid must be reasonable in relation to comparable space or units and may not be more than the owner charges others for comparable units. Rents for residential units cannot exceed the HUD Fair Market Rent (FMR).

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

Security deposits and first and last month’s rent. Grant funds may be used to pay security deposits, in an amount not to exceed two months of actual rent, as well as last month’s rent.

Supportive Services in PSH and RRH Programs Must Relate to Housing Stability.

Supportive services must be necessary to assist program participants obtain and maintain housing and agencies must conduct an annual assessment of the service needs of the program participants and adjust services accordingly to achieve those ends.

Supportive Services

The eligible costs of supportive services that address the special needs of the program participants.

Eligible supportive services costs:

- Reasonable one-time moving costs
Case management
- Food—meals or groceries for program participants
Housing search and counseling services
- Life skills training
Outreach services
Transportation
- Utility deposits (one-time fee, paid to utility companies)
- Direct provision of services: 1) costs of labor, supplies, and materials; and 2) salary and benefit packages of service delivery staff.
- **Ineligible costs:** Any cost that is not described as an eligible cost is not an eligible cost.

Operating Costs

Grant funds may be used to pay the costs of the day-to-day operation of permanent supportive housing in a single structure or individual housing units.

Eligible operating costs:

- Maintenance and repair of housing
Property taxes and insurance
- Building security for a structure where more than 50 percent of the units or area is paid for with grant funds
- Electricity, gas, and water Furniture
- Equipment

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 maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease.

Matching Funds

The grantee and sub-recipients must match all funds, except for leasing funds, with no less than 25% of funds or in-kind contributions from other sources. Guidance regarding cash and in-kind match is at 24 CFR 578.73. Cash match must be used for the costs of activities that are eligible CoC Program costs. Appendix C provides information required to document match.

Homeless Management Information System

All successful project applicants—with the exception of entities that are victim service providers—must participate in the CoC's Homeless Management Information System (HMIS).

Coordinated Entry/Assessment System

All successful applicants must participate in the CoC's coordinated entry/assessment system.

Grant Term

Renewal and new projects may only apply for one year grant terms.

Please note: any new project application that includes leasing—either leasing alone or leasing costs plus other costs (e.g., supportive services, HMIS, etc.)—may only request up to a 1-year grant term.

BONUS FUNDS

Bonus funds may be used to create the following types of new projects:

1. New permanent supportive housing projects that will primarily serve chronically homeless individuals and families including youth experiencing chronic homelessness.
2. New rapid rehousing projects that will serve homeless individuals and families who enter directly from the streets or emergency shelters, including youth up to age 24, and includes persons fleeing violence as defined by HUD.
3. New joint component projects, which will combine transitional housing and rapid rehousing into a single project to serve individuals and families experiencing homelessness
4. Supportive services only: coordinated entry projects to develop or operate a coordinated assessment system

REALLOCATED FUNDS

Continuums of Care may reduce or eliminate funds from eligible renewal projects and reallocate the funds to create or expand the following types of projects:

1. Permanent supportive housing projects that will primarily serve chronically homeless individuals and families including youth experiencing chronic homelessness.
2. Rapid rehousing projects that will serve homeless individuals and families who enter directly from the streets or emergency shelters, including youth up to age 24, and includes persons fleeing violence as defined by HUD.
3. Joint component projects, which will combine transitional housing and rapid rehousing into a single project to serve individuals and families experiencing homelessness.
4. Supportive Services projects for centralized or coordinated assessment systems.

PROJECT RANKING PROCESS

HUD requires that all projects be ranked and prioritized in a two-tiered list. Tier 1 will be the top priority projects. Tier 2 will be lower priority projects. Either new or renewal projects may be ranked in Tier 1 or Tier 2. The placement of each project on the priority list will be determined through a multi-stage process including review by the Fiscal Workgroup and the Flint / Genesee County CoC voting membership.

Based on the highly competitive nature of the grant program, ranking of each project will be critical in determining the likelihood of funding. Projects ranked in Tier 2, particularly at the bottom of Tier 2, have a low probability of funding. New projects created through reallocation or bonus funding may be included in either Tier 1 or Tier 2.

Renewal projects will be reviewed and ranked through the CoC process based on the HUD Rating and Ranking tool. New project proposals will be reviewed in reference to organizational

capacity, strategic priority, project approach and design, and cost effectiveness and ranked through the CoC process (HUD rating and ranking tool) .

HUD PROGRAM INFORMATION

All parties intending to apply for funding are strongly encouraged to review the program regulations, including those organizations that are currently or were previously funded. Proposals that do not conform to the regulations will not be considered for funding. The regulations and other information for the Continuum of Care Program may be found at [this link](#).

FUNDS AVAILABILITY

Once awarded by HUD, grant funds are estimated to be made available by HUD by **the first half of calendar year 2023**. However, the awarding of funds and the timing of awards and grant-making by HUD is outside of the control of Metro Community Development. Agencies seeking renewal funding must be aware of all operating year start and end dates and must decide to accommodate any period for which a HUD funding award is denied or delayed. It should be noted that projects created through reallocation are not renewal projects and may have different start dates than the grants from which funds were taken.