

**Attachment D**  
**Central Florida Continuum of Care (CoC FL-507)**  
**Selected Policies and Priorities Re: the 2018 Application for HUD CoC Program Funding**

**A. Projects and Applications**

**1. Types of Projects Eligible for Consideration through the Community Process**

The HUD regional application review and selection process should score and rank submitted applications for funding to form projects within the following six (6) categories:

- a. Permanent Supportive Housing (PSH)
- b. Rapid Rehousing (RRH)
- c. Youth-Specific Transitional Housing (TH) or Supportive Services Only (SSO) Renewals
- d. Transitional Housing- Rapid Rehousing (TH-RRH)
- e. Essential System Supports – Coordinated Entry System (CES)
- f. Essential System Supports – Homeless Management Information System (HMIS)

CoC FL-507 should include at least one project in each of the above categories on its list of highest-priority (Tier 1) projects in the Submission to HUD (assuming at least one eligible project is submitted in each category), with the exception of TH-RRH.

**2. Types of Projects Ineligible for Consideration through the Regional Application Process**

The following types of projects should be ineligible for consideration through the CoC FL-507 regional application process:

- a. All other TH projects
- b. All other SSO projects, unless they are or can be directly bundled with a PSH, RRH or are linked to a youth TH project
- c. Safe Haven projects
- d. Expansion CES or HMIS projects

**3. Types of Projects Eligible for Consideration through the Regional Application Process, but Unlikely to be Included in the Submission to HUD**

The following types of projects should be eligible for review through the regional application process, but ineligible for inclusion in the Application to HUD without the express approval of the CoC FL-507 Board:

- a. Projects that propose to use HUD funding for acquisition, new construction or rehabilitation activity.
- b. Projects that propose to use HUD funding for project- or sponsor-based rental assistance, where the housing units are not yet on-line.
- c. Projects proposed in applications that do not meet threshold (i.e., do not meet the basic criteria to be eligible for consideration by HUD).

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**B. Jurisdictional Issues**

**1. Option for Jurisdictions to Express Preference for Jurisdiction-Specific Projects**

- a. The regional application process should include a mechanism whereby each participating jurisdiction has the option to indicate a preference among all Applicants dedicated to serving a particular county, in the event that the CoC receives an application for a single-jurisdiction application.
- b. As a secondary option, a jurisdiction should have the opportunity to verify and quantify its history of investing or leveraging funds for Projects administered by the Applicant in the past. This information may be helpful in

determining if a jurisdiction is choosing to develop capacity for a specific agency and/or if the HUD funds will be leveraged in a way that reduces the service per HUD dollar ratio.

**2. Option for Jurisdictions to Corroborate Applicant Claims that a Project Will Serve the**

- a. Each jurisdiction should be afforded the opportunity to confirm (or deny) jurisdiction-specific activities that an Applicant claims in its proposal. Specifically, if in its application, the Applicant asserts that it has “served” households in/from a particular jurisdiction, that jurisdiction should have the opportunity to confirm the assertion. If the jurisdiction is not aware of any activity, the Applicant would have to provide verification to the jurisdiction.
- b. The definition of “served” will vary based on the nature of the Project. In many cases, however, the determination of whether the jurisdiction will be served will be immediate.
- c. An Applicant that expresses the intent to serve a jurisdiction without a documented history of doing so would not receive points that another applicant with an established history would receive.

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**C. Specific Project Factors Relevant to the Application Process**

**1. Project “Bundling”**

- a. Given the flexibility afforded by an approach that “bundles” housing with supportive services - both with regard to budgeting and programming - application bundling should continue to be the preferred approach to building housing-services linkages within PSH and RRH projects, subject to HUD’s expectation that no more than 20 percent of a Project’s funding be provided for services.
  
- b. Notwithstanding a., no consensus has emerged on the issue of whether an attempt should be made to reduce the number of applicants receiving funding for supportive services (depth vs. breadth). Instead, the recommendation was that, if existing bundled projects are selected for renewal, the renewal will incorporate the same general distribution of funding among agencies, unless an Applicant chooses not to renew or has already-documented performance issues.

**2. Administration of Scattered-Site Rental Assistance**

In light of the fact that the administration of scattered-site rental assistance/leasing funds across the CoC is such a specialized and complex function, HSN should continue to administer these resources CoC-wide. Because of the increased efficiency and reduced regional confusion associated with having a single point of contact, these funds should continue to be administered on a consolidated basis across the region. This recommendation was also based on a recognition that rental assistance funds are pass-through dollars to landlords, stretch an agency’s cash flow capacity, and do not tend to build organizational capacity.

**3. Funding Request Limits for Renewal Projects**

Applicants submitting renewals should be discouraged (but are not prohibited) from seeking funding to expand their projects in 2018, because: a) many of these projects have only recently become operational, and 2) the source of any additional funding would likely be a reduction in funding for another renewal Project.

**4. Domestic Violence (DV) Bonus Project**

CoC FL-507 should include at least one and perhaps all (but not more one of each) of the following Project types as a DV Bonus Project serving survivors of domestic violence and/or human trafficking in the Submission to HUD: 1) Rapid ReHousing 2) Joint Transitional Housing – Permanent Housing/Rapid ReHousing, 3) Coordinated Entry for Domestic Violence (Victim Services).

**5. Permanent Housing Bonus Project**

CoC FL-507 should include at least one of the following as a Permanent Housing Bonus Project in the Submission to HUD, all other things being equal: 1) a TH-RRH Project serving youth, 2) a RRH project serving families with children and/or youth, or 3) a Permanent Supportive Housing Leasing project serving chronically homeless individuals and/or families (particularly if securing matching funds proves challenging.)

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**D. Application Ranking and Project Selection Process**

**1. Grouping of Applications for Initial Ranking**

Each Application should be scored so that it competes only with other projects within the same Project and activity type, at least for purposes of generated the initial ranked project list. For example, all Applicants proposing to provide supportive services to RRH Projects should be scored and ranked as a separate and distinct group, and none would be evaluated in comparison with Applicants proposing to provide services to PSH projects.

**2. Baseline Assumptions for Use in the Community Ranking and Project Selection Process**

Because many of the Projects awarded funding in FY 2015 were newly configured re-allocations that have not yet completed two full years of operation, declining to renew them would be disruptive to the system. Absent compelling circumstances (e.g., serious performance concerns with performance on the part of Applicants with regard to their current projects.) Therefore, the baseline assumption for the FY 2018 scoring and selection process should be that:

- a. The distribution of FY 2017 awards should generally favor the current mix of PSH vs. RRH project funding (approximately 75%-25%) and housing vs. supportive services funding (80%-20%). The latter split is also an implicit expectation of HUD. This distribution will be reflected in the publication of baseline renewal amounts by Project and activity type.
- b. All other things being equal, particularly while CoC FL-507 is in the process of collecting more and better performance data, projects funded in FY 2017 should be prioritized for renewal.
- c. Notwithstanding a. and b., the need for some adjustments could become clear through the Community Ranking and Project Selection process in the form of documented system and project performance concerns.

**5. Baseline Tier 1 Assumptions**

Because of the expectation that a PSH unit be made available to a resident for as long as it may be needed, the cost to the region of losing a PSH unit is significantly greater than the cost of losing a RRH unit. Consequently, all other things being equal, PSH renewals should be funded in Tier 1 and in front of RRH projects in order to reduce the likelihood that these resources are imperiled.

**6. Baseline Tier 2 Assumptions**

In order to maximize the competitiveness of the Submission to HUD based on published criteria, CoC FL-507 should include only one Project in Tier 2. Assuming consistency with CoC FL-507 priorities, such a Project would be a RRH Project straddling Tier 1 and Tier 2, so that even in a scenario under which Tier 2 is not funded, a portion of the RRH Project would be preserved.

**7. Baseline Permanent Housing Bonus Assumptions.**

Given the manner in which HUD has structured the Permanent Housing Bonus opportunity, funding requests by all Applicants associated with a particular proposed Permanent Housing Bonus Project should not exceed a total of \$100,000, of which no more than 20 percent should be proposed for supportive services.

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## **E. CoC FL-507 Prioritization**

### **1. Definition of Homelessness**

In order to be eligible to receive housing assistance and/or supportive services through a HUD CoC Program- or OCAG-funded Project, a Program Participant must meet the definition of homelessness found in either Category 1 (i.e., is literally homeless) or Category 4 (i.e., fleeing or attempting to flee domestic violence) of the HUD definition of homelessness (24 CFR §578.3).

Category 1: Any individual or family who lacks, regular and adequate nighttime residence, meaning:

- Has 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;
- Is living in a public or privately operated shelter (congregate shelters, transitional housing and hotels and motels are paid for by charitable organizations or federal, state and local government; or
- Is exiting an institution where (s) he has 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.

Category 4: Any individual or family who:

- Is fleeing, or is attempting to flee domestic violence, human trafficking, dating violence, stalking, or sexual assault;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

### **2. Income**

Any individual or family with household income exceeding 50 percent of the Area Median Income (AMI) most recently published by HUD for the Orlando-Kissimmee-Sanford MSA is assumed to have sufficient resources to obtain other permanent housing and is not eligible for HUD CoC Program- or OCAG-funded PSH, RRH or TH assistance.

### **3. Chronicity**

PSH housing assistance and supportive services are prioritized for individuals and families experiencing the longest histories of homelessness histories and most severe needs.