

2024 Letter of Intent to Renew CoC Project

Summary: A Preliminary Letter of Intent (LOI) was issued by the VC CoC on July 20, 2024 to gather relevant performance and threshold documentation from each project identified as eligible for renewal in anticipation of the HUD CoC NOFO release. All LOIs were due to VC CoC staff by August 10, 2024. The LOI is being released to allow applicants the opportunity to review the 2024/25 HUD CoC NOFO and finalized 2024 Rank and Review Policy, make relevant changes and submit a pdf copy and relevant documentation to CoC staff via venturacoc@ventura.org and in e-snaps by 2:00pm, September 23, 2024.

Instructions: Please complete one letter for each renewal application (*HUD approved consolidated grants may submit one LOI for the full consolidated project*).

Lead Agency Information

CCR #:					
DUNS # or EUI #:					
Agency Name:					
Agency Address:					
City, State ZIP:					
Phone:		Fax:		Email:	

Grant/Application Contact Person:

Name:	
Phone:	
Email:	

Agency Director:

Name:	
Phone:	
Email:	

HMIS Contact Person

Name:	
Phone:	
Email:	

Project Information:

Name of Project:	
Project Address:	
Grant Amount:	
Grant Term:	
Expiration Date:	
Program Type:	

Primary Population:	
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Annual Renewal Amount for Project:	
Total Number of Units/Beds:	

Previously approved budget amounts by activity:

Activity:	Budget Amount:
Leased Units	
Leased Structures	
Rental Assistance	
Supportive Services	
Operations	
HMIS	
Administration	
Total:	

Name and Signature of Person who will complete the application:

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Name and Signature of Person authorized to sign the HUD application:

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I certify, on behalf of my agency that all information contained in this application is accurate and true, based on our current records for the project. I understand that falsifying information or failing to provide accurate information will have a negative impact on my overall review and may result in removal from the Continuum of Care Application to HUD. I also understand that projects not submitting their Letter of Intent by the deadline may be reallocated.

Executive Director/CEO/President

Date

Background Information:

The Continuum of Care (CoC) will consider the need to continue funding for projects expiring in 2024 as required by the U.S. Department of Housing and Urban Development (HUD). However, as noted by HUD, renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards identified in the Notice of Funding Opportunity (NOFO) or they will be rejected from consideration for funding.

While considering the need to continue funding for projects expiring in 2024, the CoC Data, Performance & Evaluation Committee will review the information that HUD notes in the 2024/2024 NOFO CoC Program Competition, which is as follows:

1. When considering renewal projects for award, HUD will review financial information; Annual Performance Reports (APRs); independent or 2-CFR-200 audit reports as applicable; and information provided from the local HUD CPD Field Office, including monitoring report and performance standards on prior grants; and will assess projects using the following criteria:
 - a. Whether the project applicant's performance met the plans and goals established in the initial application, as amended.
 - b. Whether the project applicant demonstrated all timeliness standards for grants being renewed, including those standards for the expenditure of grant funds that have been met.
 - c. The project applicant's performance in assisting program participants to achieve and maintain independent living and records of success, except HMIS-dedicated projects that are not required to meet this standard; and,
 - d. 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.
2. Although a project may be recommended for funding by the CoC, 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/Monitoring finding(s) for which a response is overdue or unsatisfactory.
 - c. History of inadequate financial management accounting practices.
 - d. Evidence of untimely expenditures and unspent funds 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.

I. Recipient Compliance with Grants and Financial Management:

Per 24 CFR part 578 and the 2024/2025 CoC Program Competition NOFO requires that Project Applicants specifically identify four benchmarks for grants and financial management that communities must reach to meet this standard, which are

1. *On-time APR submission.*
2. *Resolved HUD or Office of Inspector General (OIG) Audits, if applicable.*
3. *Monthly submission of claims; and*
4. *The full expenditure of awarded funds.*

The following questions are designed to inform HUD of the recipient’s performance related to these four statutory and regulatory requirements and to provide the recipient with an opportunity to explain their inability to meet the related standards.

1. Has the recipient successfully submitted the APR on time for the most recently expired grant term related to this renewal project request?

APRs are due within 90 days after the grant term expires. Select “**Yes**” to indicate that an APR has been submitted for the grant term that has most recently expired. Select “**No**” to indicate that an APR has not been submitted for the grant term that has most recently expired or if this is a first-time renewal for which the original grant term has not yet expired.

- Yes
- No
- This is a first-time renewal for which the original grant term has not yet expired

If you selected “**No**” above, provide a brief explanation for why the APR was not submitted on time in the box below (expand box as needed). For those first-time renewals for which the original grant term has not yet expired, please write, “First-time renewal and grant term has not yet expired” and provide the date by which the APR must be submitted.

2. Does the recipient have any unresolved HUD Monitoring and/or OIG Audit findings concerning any previous grant term related to this renewal project request?

- Yes
- No

Select **“Yes”** if there are any unresolved HUD Monitoring or OIG Audit findings, regardless of the funding year of the project for which they were originally identified. Select **“No”** if there are no unresolved HUD Monitoring or OIG Audit findings.

a. Date HUD or OIG issued the oldest unresolved finding(s):

If you selected **“Yes”** above, provide the date that the oldest unresolved finding was issued.

Date the oldest unresolved finding was issued: _____

b. Explain why the finding(s) remains unresolved:

If you selected **“Yes”** above, provide a brief explanation in the box below (expand box as needed) for why the monitoring or audit finding remains unresolved and the steps that have been taken towards resolution (e.g., responded to the HUD letter, but no final determination received).

3. Has the recipient maintained timely and consistent monthly submission of claims for the most recent grant terms related to this renewal project request?

- Yes
- No

CoC Program recipients are required to submit claims on a monthly basis. Select **“Yes”** to indicate that you have maintained monthly submission of claims for the most recent relevant grant term. For some grants, the standard will be applied to the FY 2023 renewal, for others the FY 2022, and for some multi-year first-time renewals a grant awarded in an earlier fiscal year. Select **“No”** to indicate that the recipient has not maintained consistent monthly claim submission for the most recent relevant grant term, or if this is a first-time renewal for which less than one quarter has passed.

a. Explain why the recipient has not maintained timely and consistent monthly claim submission for the most recent grant terms related to this renewal project request.

If you selected **“No”** above, provide a brief explanation in the box below (expand box as needed) for why monthly claim submissions have not been maintained. Delays in draws due to a late HUD funding announcement and receipt of renewal grant agreement may be included in such an explanation.

4. Have any funds been recaptured by or returned to HUD for any of the three (3) most recently expired grant terms related to this renewal project request?

- Yes
- No
- Project has not yet completed a grant term

Select **“Yes”** to indicate that funds have been recaptured, meaning that not all awarded funds were expended during the three previous completed grant terms. Select **“No”** to indicate that no funds were recaptured or if this is a first-time renewal for which the original grant term has not yet expired.

a. If you selected “Yes” above, explain the circumstances that led to HUD recapturing/returning funds from any of the three (3) most recently expired grant term related to this renewal project request:

Provide a brief explanation in the box below (expand box as needed) for why the total awarded funds were not expended and were returned/recaptured. Include the amount returned for each year.

II. Housing First and Low Barriers Approach

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold). It is an approach to **1)** quickly and successfully connect individuals and families experiencing homelessness to permanent housing. **2)** without barriers to entry, such as sobriety, treatment or service participation requirements;

or **3**) related preconditions that might lead to the program participant’s termination from the project. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry; however, participation in supportive services is based on the needs and desires of program participants. For more information, review the 2024 CoC Program Competition NOFO and the Housing First in PSH brief at: www.hudexchange.info/resource/3892/housing-first-in-permanent-supportive-housing-brief/

1. Does the project quickly move participants into permanent housing?

- Yes
- No

Select **“Yes”** to this question if your project will quickly move program participants into permanent housing without additional steps (e.g., required stay in transitional housing before moving to permanent housing). If you are a domestic violence (DV) program you should select **“Yes”** if you will quickly move program participants into permanent housing after immediate safety needs are addressed (e.g., a person who is still in danger from a violent situation and would move into PH once the dangerous situation has been addressed). Select **“No”** if the project does not work to move program participants quickly into permanent housing.

2. Has the project removed the following barriers to accessing housing and services?

- Having too little or little income
- Active or history of substance abuse
- Having a criminal record with exceptions for state-mandated restrictions
- Fleeing domestic violence (e.g. lack of a protective order, a period of separation from abuser or law enforcement involvement)
- None of the above

(Select ALL that apply): Check the box next to each item to confirm that your project has removed (or never had) barriers to program access related to each of the following: 1) Having too little or little income; 2) Active or history of substance abuse; 3) Having a criminal record with exceptions for state-mandated restrictions; and 4) Fleeing domestic violence (e.g., lack of a protective order, period of separation from abuser, or law enforcement involvement). If all of these barriers to access still exist, select “None of the above.”

3. Has the project removed the following as reasons for program termination

- Failure to participate in supportive services
- Failure to make progress on a service plan
- Loss of income or failure to improve income

- Fleeing domestic violence
- Any other activity not covered in a lease agreement typically found in the project's geographic area
- None of the above

Check the box next to each item to confirm that your project has removed (or never had) reasons for program participant termination related to each of the following: 1) Failure to participate in supportive services; 2) Failure to make progress on a service plan; 3) Loss of income or failure to improve income; 4) Fleeing domestic violence; and 5) Any other activity not covered in a lease agreement typically found in the project's geographic area. If all of these reasons for program termination still exist, select "None of the above."

Additional attachments: Please attach the following supporting documentation that shows that your agency provided staff training and policies and procedures so that staff fully understands how to implement the Housing First approach: a copy of the agency Policies and Procedures, staff training materials, and any forms or other related documents.

III. Supportive Services for Participants

Please identify whether the project includes the following activities:

1. Transportation assistance to clients to attend mainstream benefit appointments, employment training, or jobs?

- Yes
- No

Select **"Yes"** if the project provides regular or as needed transportation assistance to mainstream and community resources, including appointments, employment training, educational programs, or jobs. Select **"No"** if transportation is not regularly provided or cannot be provided consistently as requested.

2. Use of a single application form for four or more mainstream programs?

- Yes
- No

Select **"Yes"** if the project uses a *single application form that allows program participants to sign up for four or more mainstream programs. Select **"No"** if application forms cover 3 or fewer mainstream programs.

*** Agencies utilizing *My Benefits CalWIN* meet this requirement.**

3. Regular follow-ups with participants to ensure mainstream benefits are received and renewed?

- Yes
- No

Select **“Yes”** if the project regularly follows-up with program participants at least annually to ensure that they have applied for, are receiving their mainstream benefits, and renew benefits when required. Select **“No”** if there is no or irregular follow-up concerning mainstream benefits.

4. Do program participants have access to SSI/SSDI technical assistance provided by the applicant, a subrecipient, or partner agency?

- Yes
- No

Select **“Yes”** if program participants have access to SSI/SSDI technical assistance. The assistance can be provided by the applicant, a subrecipient, or a partner agency—through a formal or informal relationship. Select **“No”** if there is no or significantly limited access to SSI/SSDI technical assistance

5. Has the staff person providing the technical assistance completed SOAR training in the past 24 months?

- Yes
- No

This question will only appear if **“Yes”** is selected to the previous question. Select **“Yes”** to indicate that the applicant, subrecipient or partner agency staff person who will be providing the SSI/SSDI technical assistance has completed SOAR training, online or in person, in the past 24 months. If more than one person will provide technical assistance, select **“Yes”** only if all persons have completed the training. Otherwise, select **“No.”**

6. Does the agency intend to incorporate the 2024 VC CoC Supportive Services Plan Guidebook, utilizing best practices into their Permanent Supportive Housing Project?

- Yes
- No
- N/A - Our agency is not a PSH provider

IV. Outreach for Participants

Project Applicants are required to identify where their eligible program participants come from with respect to HUD’s homeless definition and must include percentages of program participants that are served using requested funds. Project Applicants must ensure that all persons served in renewal RRH projects meet the requirements found in 24 CFR part 578 and the 2022 CoC Program Competition NOFO.

- 1. Enter the percentage of homeless person(s) who will be served by the proposed project for each of the following locations: Indicate the percentage of homeless persons who will be admitted from each of the listed locations. Not all of the following locations are eligible locations for all project’s types. For example, persons coming from transitional housing are not eligible for PH-RRH projects. Instead, renewal RRH projects must continue to serve individuals and families coming from the streets or emergency shelters. New RRH projects created through reallocation could also serve persons fleeing domestic violence Note: It is critical that you refer to 24 CFR part 578 and the current year CoC Program Competition NOFO to confirm the eligible locations for each type of project (please contact your local HUD field office if you are unclear as to which NOFO requirements take precedence). The total percentage must equal 100% in order to submit the project application.**

%	Eligible Locations:
	Directly from the street or other locations not meant for human habitation.
	Directly from emergency shelters. (this includes domestic violence emergency shelters)
	Directly from safe havens.
	From transitional housing and previously resided in a place not meant for human habitation or emergency shelters, or safe havens.
	Persons fleeing domestic violence (or attempting to flee).
	Total of above percentages

Individuals coming from an institution where they have resided for 90 days or less AND have entered the institution from the streets, emergency shelter, or safe haven, maintain their homeless status during that time. Include these program participants in the percentages for streets, places not meant for human habitation, emergency shelters, and safe havens accordingly.

Projects that have been approved to change from TH to PH-RRH should list residents who are remaining in the program from the previous grant term according to the place from which they originally entered. They should not be listed as entering from transitional housing simply because they were in the program during the previous grant term.

Refer to 24 CFR part 578, the 2024 CoC Program Competition NOFO, and the homeless definition at www.hudexchange.info/resource/1928/hearth-defining-homeless-final-rule/ for further guidance.

V. Participation in Homeless Management Information System (HMIS)

The Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care (CoC) Program interim rule places a high emphasis on having a functioning and comprehensive HMIS in the CoC jurisdiction as it is critical to gathering unduplicated, aggregated data on homelessness in the community for both the CoC and Emergency Solutions Grant (ESG) Programs.

- Does this project provide client level data to HMIS at least annually? Yes No

If the project is providing participant data in the HMIS – indicate the total number of participants served by the project, and the total number of clients reported in the HMIS.

Total number of participants served by the project: _____

Total number of clients reported in the HMIS: _____

If the project is not providing participant data in the HMIS – indicate one or more of the four (4) reason(s) for non-participation:

- Federal law prohibits (please cite specific law) State law prohibits (please cite specific law)
- New project not yet in operation Other (please specify prohibition)

Also, for those participant records that were reported in the HMIS, indicate the percentage of values that were missing (“Null or Missing Values”) and/or unknown (“Don’t Know or Refused”). If there were no unknown values, note a “0” value.

Data Collection Requirements

All CoC Program funded projects are required to collect all of the Universal Data Elements and a select number of Program-Specific Data Elements.

*** Indicate the percentage of unduplicated client records with null or missing values during the last 10 days of January 2024**

Universal Data Element (Use HMIS Data Quality Report)	Records with no values (%)	Records where value is refused or unknown (%)
3.1 Name		
3.2 Social Security Number		
3.3 Date of Birth		
3.4 Race		
3.5 Ethnicity		
3.6 Gender		
3.7 Veteran Status		
3.8 Disabling condition		
3.917 Living Situation		
3.10 Project entry date		
3.11 Project exit date		
3.12 Destination		
3.15 Relationship to Head of Household		
3.16 Client Location		
Program Specific Data Element (From the most recent APR)	Records with no values (%)	Records where value is refused or unknown (%)
4.2 Income and Sources		
4.3 Non-Cash Benefits		
4.4 Health Insurance		
4.5 Physical Disability		
4.6 Developmental Disability		
4.7 Chronic Health Condition		
4.8 HIV/AIDS		
4.9 Mental Health Problem		
4.10 Substance Abuse		
4.11 Domestic Violence		
4.17 Residential Move-In Date (RRH only)		

VI. Participation in Coordinated Entry System

CoC funded projects are required to participate in the local Coordinated Entry System. As defined by HUD:

“Coordinated entry is a key step in assessing the needs of homeless individuals and families and prioritizing them for assistance. In addition to engaging people who are seeking assistance, Coordinated Entry processes should be integrated with communities’ outreach work to ensure that people living in unsheltered locations are prioritized for help”. Coordinated Entry should achieve several goals:

- Make it easier for persons experiencing homelessness or a housing crisis to access the appropriate housing and service interventions.
- Prioritize persons with the longest histories of homelessness and the most extensive needs.
- Lower barriers to entering programs or receiving assistance; and,
- Ensure that persons receive assistance and are housed as quickly as possible.²

The definition of Centralized or Coordinated Assessment can be found at 24 CFR 578.3. Provisions at 24 CFR 578.7(a)(8) detail the responsibilities of the CoC with regard to establishing and operating such a system. In addition to the definition, HUD also posted on the HUD Exchange the Coordinated Entry Policy Brief in February 2015 that helps inform local efforts to further develop CoCs’ coordinated entry processes.

- 1. How many households (a household can be a single individual or family) entered your program during the past 12 months? (July 1, 2023-July 1, 2024) _____**
 - a. How many of the households that you stated in the question above entered your project through the coordinated entry system? _____**
- 2. If any households entered your program during the past 12 months that were not referred through the coordinated entry system, please explain why in the box below (expand box as needed).**

Note: this information will be verified through HMIS.

VII. Performance Measures

The purpose of the HUD’s System Performance Measures is to help communities gauge their progress in preventing and ending homelessness and provide a more complete picture of how well a community is achieving this goal. The performance of each project in the CoC is crucial in the overall performance of the CoC. The source data for performance measures include the APR and System Performance Measures

1. Bed Utilization for Permanent Supportive Housing (PSH)

A bed utilization rate is equal to the total number of people served on any given day divided by the total number of beds available on that day. Bed utilization rates below 65 percent are usually attributed to the project not entering all their clients into the HMIS or the project was under-utilized. Bed utilization rates above 105 means the project did not capture exit dates for all their clients and/or the project offered overflow beds.

From your most recent APR, complete the table below on the point-in-time count of households served on the last Wednesdays in

	*Total # of Beds	Total # of Clients Served	Utilization Rate
January			
April			
July			
October			

*The total number of beds should equal the number of beds submitted in your application.

2. Rapid Rehousing (RRH)

Rapid Re-Housing (RRH) provides short- or medium-term tenant-based rental assistance in community-based housing paired with necessary supportive services for homeless individuals and families (with or without a disability). RRH assistance usually begins prior to the client entering housing. Project performance is measured when client moves into permanent housing. Using data from HMIS during the past 12 months, answer the questions below:

- Proposed number of households: _____
- Total number of households served: _____
- Total number of households moved into permanent housing: _____
- If the total number of households that move into permanent housing is lower than the proposed number of households, please explain why in the box below (expand box as needed).

3. Employment and Income Growth

HUD’s System Performance Measure 2 – Change in employment income during the reporting period for program stayers. Meeting this criterion will be based on demonstrating that the percent of homeless adults being served in CoC Program projects increase their earned (i.e., employment) income. From your most recent APR, complete the table below to indicate the number of program stayers and leavers who increased employment or earned income.

	Total # of Adults in Program	# of Adults with increased employment/earned income	% of adults with increased employment/earned income
Program Stayers			
Program Leavers			

4. Obtain and Maintain Permanent Housing

HUD’s System Performance Measure 7b: Successful Placement in or Retention of Permanent Housing. Meeting this criterion will be based on demonstrating an increase in the percent of persons served in permanent housing projects who retain permanent housing or exit to permanent housing destinations.

# of Persons in Permanent Housing*	# of Persons who remained in permanent housing	# of Persons who exited from permanent housing to permanent housing

*Permanent housing includes:

- *Owned by client, no ongoing housing subsidy*
- *Owned by client, with ongoing housing subsidy*
- *Rental by client, no ongoing housing subsidy*
- *Rental by client, with VASH housing subsidy*
- *Rental by client, with GPD TIP housing subsidy*
- *Rental by client, with other ongoing housing subsidy*
- *Staying or living with family, permanent tenure*
- *Staying or living with friends, permanent tenure*

5. LENGTH OF TIME HOMELESS

Length of Time between Project Start Date and Housing Move-in Date

# Of Persons Moved into Housing	Average length of time prior to housing	# Of Persons who exited Without move-in

Additional attachments: Please attach the following system performance documentation for each project from the most recent complete grant term:

HMIS Report FY 2024 CoC APR

VIII. HEARTH Act Compliance

This section of the Letter of Intent (LOI) asks questions of all renewal projects to ensure compliance with the requirements of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act): Continuum of Care (CoC) Program Interim Rule. (Please note, this section does not encompass all changes under the HEARTH Act, and it is recommended that all projects should review the Act in its entirety).

1. Participation of homeless individuals

The HEARTH Act CoC Program Interim Rule states that the recipient or subrecipient must document its compliance with the homeless participation requirements under § 578.75(g), which is as follows:

(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.

a. Does your agency 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 sub recipient, 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 sub recipient 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?

Yes

No

If not, please provide an action plan/timeline on when your agency will be compliant with this requirement in the following box (expand box as needed).

b. Does your agency, 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?

- Yes
- No

If not, please provide an action plan/timeline as to when your agency will be compliant with this requirement in the box below (expand box as needed).

2. Faith-based activities

The HEARTH Act CoC Program Interim Rule states that the recipient or subrecipient must document its compliance with faith-based activities requirements under § 578.87(b), which is as follows:

(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.

- a. **Does your proposed renewal program 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?**

Yes

No

3. Involuntary family separation

The HEARTH Act CoC Program Interim Rule states that the recipient or subrecipient must document its compliance with involuntary family separation requirements under § 578.93(e), which is as follows:

- (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.

- a. Does the project accept all families with children under age 18 without regard to the age of any child? In general, under the HEARTH Act, any project sponsor receiving funds to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18.**

Note there is an exception outlined in the Act: Project sponsors of transitional housing receiving funds may target transitional housing resources to families with children of a specific age only if the project sponsor: (1) operates a transitional housing program that has a primary purpose of implementing evidence based practice that requires that housing units be targeted to families with children in a specific age group; and (2) provides assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured.

- Yes. Project certifies that it accepts all families with children under age 18 without regard to the age of any child.
- No. Project does not comply with this requirement. A narrative is attached explaining how the project will comply with this HEARTH Act requirement.
- No. Project does not comply with this requirement but qualifies for an exception because it is implementing an evidence-based practice that requires housing units targeted to families with children in a specific age group. A narrative is attached explaining how the project will comply with the exception, including identification of the evidenced based practice being utilized.
- N/A Project does not serve families.
- N/A Project is new and has not started yet.

4. Discrimination Policy

Federal and California State laws note that discrimination can be based on race, color, national origin or gender. Discrimination can also be based on age, religion, disability, familial status or sexual orientation.

Does your program deny services to potential recipients based on any of the following?

- Age Yes No
- Color Yes No
- Disability Yes No
- Familial Status Yes No
- Gender Yes No
- Marital Status Yes No
- National Origin Yes No
- Race Yes No
- Religion Yes No
- Sexual Orientation Yes No

If you answered “yes” to any of the above, please explain why in the box below (expand box as needed).

5. Active participation in local Continuum of Care meetings

HUD states that a successful CoC will have involvement from a variety of organizations representing the public and private sectors, as well as interested individuals within the CoC jurisdiction(s). These organizations should have an active role in the CoC.

- a. Describe what local Continuum of Care committees, subcommittees, and/or working groups that your agency participates in on a regular basis in the box below (expand box as needed). Please include the names and titles of those participating as well as their level of involvement/participation.**

6. Housing Quality Standards (HQS)

The HEARTH Act CoC Program Interim Rule states that the recipient or subrecipient must document its compliance with housing quality standards requirements under § 578.75(b), which is as follows:

(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.

a. Does your project meet applicable Housing Quality Standards?

- Yes
- No
- This is a new project and has not yet started

Please briefly explain your inspection process for HQS in the box below (expand box as needed).

b. Has your project received HQS corrective action plan in the last 2 years?

- Yes
- No
- This is a new project and has not yet started

If you selected Yes, explain the nature of the concerns/issues and how it was resolved in the box below (expand the box as needed).

IX. Cost Effectiveness

HUD states in the 2024 CoC Program Application that “CoCs should consider how much each project spends to serve and house an individual or family as compared to other projects serving similar populations.”

HUD states that the project must be cost-effective and not deviate substantially from the norm in that locale for the type of activity including case management and other supportive services.

1. Is your project cost-effective concerning case management and other supportive services?

- Yes
- No
- This is a new project and has not yet started
- Not applicable to this project

If you answered “yes” or “no” please explain your response in the box below (expand box as needed).

X. Miscellaneous Information

1. Match requirement

Match must equal 25 percent of the total grant request including Admin costs but excluding leasing costs (i.e., any funds identified for Leased Units and Leased Structures). Match must be met on an annual basis. HUD requires match letters to be submitted with the e-snaps application. Match contributions can be cash, in-kind, or a combination of the two; and, match must be used for an eligible cost as set forth in Subpart D of CoC Program interim rule.

For an in-kind match, the recipient may use the value of property, equipment, goods, or

services contributed to the project, provided that, if the recipient or sub recipient had to pay for such items with grant funds, the costs would have been eligible. The full value of property or equipment can only be claimed once (i.e. renewal projects may only claim a portion of the value over the expected period of use – an ‘annual’ amount of the full value). If third party services are to be used as match, 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 part will provide such services and value towards the project. The MOU must contain specific information. Please note that the following requirements apply to in-kind match documentation:

- In-kind Contributions
 1. Grantees/subrecipients using in-kind contributions may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipients/subrecipients would have to pay for them with grant funds, the costs would be eligible.
 2. During the term of the grant, the recipients/subrecipients must maintain and make available for inspection records documenting the value of real property, equipment, goods, or services contributed to the project as match.
 3. Grantees/subrecipients must adhere to the requirements of 2 CFR 200.306 **and must execute a Memorandum of Understanding (MOU) with any third party that will provide services before grant execution per 24 CFR 578.73(c)(3)**. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient’s/subrecipient’s organization. If the recipient/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. It is the responsibility of the recipient to provide evidence of cost reasonableness.
 4. **For supportive services provided, an MOU must establish unconditional commitment, except for selection to receive a grant, by the third party to provide the services, including the following:**
 - i. **the specific service to be provided.**
 - ii. **the profession of the persons providing the service.**
 - iii. **the hourly cost of the service to be provided; and**
 - iv. **the total hours of service to be contributed to the project during the grant term.**
 5. During the term of the grant, the recipient/subrecipient must maintain and make available inspection records documenting the service hours provided.
 6. HUD has determined that eligible activities paid for under the VAWA costs category are not subject to the CoC program’s spending caps on administrative costs under section 423(a)(10), (11), and (12). This activity may be included in new project applications, added to eligible renewal projects through expansion or added to eligible renewal projects by shifting up to 10 percent of funds from one eligible activity to the VAWA costs line item.

HUD also notes that all CoC Program activities are subject to environmental review requirements 24 CFR 578.31 of the CoC Program interim rule. Specifically, the rule states that the recipient or subrecipient

may not lease property for a project or commit or expend HUD or local funds for such eligible activities until HUD or the responsible entity (RE) has performed an environmental review of the project. HUD recommends a new review being conducted every five years, or sooner if environmental conditions have changed. Please review your environmental review record for the subject grant and ensure that the project is in compliance prior to expending any grant funds.

- Will your agency be able to provide the match requirement for your renewal project (including a commitment letter or MOU)?
 - Yes
 - No

2. Exit Surveys

HUD encourages client surveys particularly exit surveys.

- Does your renewal program conduct exit surveys or interviews with clients?
 - Yes
 - No
 - This is a new project and has not yet started
 - Not applicable to this project

If no, please explain why in the box below (expand box as needed).

XI. Attachments

Please note that all or a portion of the application can be denied if incomplete, if CoC Staff is unable to determine what applicant is proposing or whether the application does not meet minimum threshold requirements.

With your application, please make sure to include the following documentation:

- Printed copy of the most recent HUD CoC Annual Performance Report (APR)
- Printed copy of eLOCCS expenditure report/close out report for the most completed grant term
- Intake procedures and program policies for following Housing First and Best Practices
- Copy of sample lease agreement used for program
- Staffing plan for project
- Copy of full program budget, including all funding sources