# November 2012 Steering Committee Meeting

## Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agenda</td>
<td>2</td>
</tr>
<tr>
<td>CoC Renewal Ranking Instrument</td>
<td>3</td>
</tr>
<tr>
<td>New Project Scoring</td>
<td>19</td>
</tr>
<tr>
<td>Final Recommendations to CoC Steering Committee</td>
<td>22</td>
</tr>
<tr>
<td>HEARTH Act CoC Rule Comments</td>
<td>23</td>
</tr>
</tbody>
</table>

Continuum of Care
Steering Committee  
November 28, 2012  
Harris County Department of Education  
6300 Irvington, Room 501  

Agenda

3:30 PM Welcome  Tory Gunsolley

3:35 PM Interim Conflict of Interest Procedure  Marilyn Brown

3:45 PM 2012 CoC Funding Competition  Pam Wyatt
  • NOFA Overview
  • Strategy Committee Overview

4:00 PM Project Scoring and Ranking  Pam Wyatt/Whitney Fleming
  • Renewal Projects
    o Approval of Ranking Instrument
  • New Projects
    o Approval of New Project Competition Strategy
      ▪ Permanent Housing Bonus Competition
      ▪ Permanent Housing Reallocated Funding Competition
    o Approval of New Project Ranking Instrument
  • HMIS and Continuum of Care Planning Grants
    o Agreement on Ranking Order

4:30 PM Funding
  • Pro Rata Cut Recommendation
  • Administrative Budget Cap Recommendation

4:40 PM State Legislative Agenda Meeting Overview  Marilyn Brown

5:00 PM Adjourn

Next Steering Committee Meeting  
Thursday, December 13, 2012  
3:30 – 5:00 pm  
MHMRA Conference Center  
7033 Southwest Freeway

2012 Coalition for the Homeless Ranking Instrument
For renewal funded projects in Houston/Harris County/Fort Bend County Continuum of Care

Introduction
Opened on November 09, 2012, the FY2012 Continuum of Care (CoC) Program Competition is the first funding competition to be administered under the CoC Program interim rule. While the process is similar to past Homeless Assistance Grants competitions, the content and steps differ in key ways.

HUD has revised the requirements detailed in Section IV.1 of the FY2012 CoC Registration Notice. Because it is possible that the national total of the Annual Renewal Demand (ARD) amounts (see Section I.D.3.of the 2012 NOFA for more information) submitted by CoCs in the FY2012 CoC Registration exceeds the $1.61 billion available under this NOFA, CoCs will be required to rank all projects applying for grant funds that it does not reject, new and renewal, in e-snaps.

It is possible that the total renewal demand for projects submitted in the FY2012 CoC Program Competition will exceed the $1.61 billion available under this NOFA. To ensure that CoCs have the opportunity to prioritize their projects locally in the event that HUD is not able to fund all renewals, HUD is requiring that CoCs rank projects within 2 tiers in FY2012.

The two tiers are financial thresholds. Tier 1 is equal to the CoC’s Annual Renewal Demand (ARD) approved in the Registration process, less 3.5 percent. The national total for Tier 1 is $1.61 Billion, the amount available under this NOFA before any available carryover or recaptured funds are added. Tier 2 is the amount between a CoC’s Tier 1 and the CoC’s FPRN and any approved amounts for CoC planning and the PH Bonus.

In order to insure proper ranking this instrument was develop by the CoC Lead Agency and approved by the Continuum of Care Steering Committed in order to ensure ranking for all agencies are fair.

All applicants should read this FY2012 CoC Program Notice of Funding Availability (NOFA) in its entirety. In order to gain a comprehensive understanding of the requirements for the CoC Program and competition, a review of the CoC NOFA should be completed in conjunction with a thorough review of the CoC Program interim rule. This NOFA frequently makes reference to citations from 24 CFR part 578, which is the CoC Program interim rule (published on July 31, 2012 at 77 FR 45421). Both the NOFA and Interim Rule can be found at http://www.hudhre.info/.

Overview of Ranking Instrument
This ranking instrument is broken into eight sections and attempts to analyze some of the many factors and outcomes that a successful program should exhibit. Some of the data used to populate this application will be pulled from your most recently submitted APR and/or HMIS.

**Overview of Sections and Scoring Categories**

<table>
<thead>
<tr>
<th>SECTIONS</th>
<th>Points</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cover Page – Agency and Project Information</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Agency Certification</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Threshold Requirements</td>
<td>20</td>
<td>20%</td>
</tr>
<tr>
<td>HEARTH Requirements</td>
<td>15</td>
<td>15%</td>
</tr>
<tr>
<td>HUD Financial Assessment and Expenditure of Funds</td>
<td>20</td>
<td>20%</td>
</tr>
<tr>
<td>APR Submissions and Performance</td>
<td>20</td>
<td>20%</td>
</tr>
<tr>
<td>HMIS Participation and Data Quality</td>
<td>25</td>
<td>25%</td>
</tr>
<tr>
<td>Bonus Points</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>115%</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Description of the Evaluation Process**

**Who should complete the 2012 Ranking Instrument?**

Projects that have been previously funded through the Houston/Harris County Continuum of Care, with grants that will expire (will run out of funds) within calendar year 2013 are eligible to apply as a renewal under this year’s process.

**Deadline & Submission**

This Instrument must be completed for each renewal project. This instrument must be submitted with the grant application. Both the instrument and application deadline is December 13, 2012 by 3:00 p.m. CST at Harris County Community Services Department, 8410 Lantern Point, Houston, Tx 77054.

**LATE SUBMISSIONS NOT BE ACCEPTED AND WILL NOT BE CONSIDERED FOR FUNDING.**

**Appeal Process**

All projects will be able to appeal their project review. Appeal procedures are as follows:

- All appeals will be reviewed by an **Appeals Committee** established by the Houston/Harris County Continuum of Care.
- Submit appeals in writing, within two (2) days, after scores are mailed/emails. Address appeals to Pamela Wyatt, Continue of Care Director and email to pwyatt@homelesshouston.org.
- Appeal should clearly outline the question(s) being appealed, the argument for overturning the decision, and any evidence to support the argument.
- Appeal decisions will be emailed to agencies. All decisions of the Appeals Committee are considered final.

**Dissemination of Ranking Results**

- Project applicants ranking along with the Priority Listing will be place on the Coalition for the Homeless Website, [www.homelesshouston.org](http://www.homelesshouston.org).
Questions on the Evaluation Instrument, application deadlines, process, training, or to receive copies of the material: Please contact the below CFTH staff.

<table>
<thead>
<tr>
<th>CFTH Staff Person</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pamela Wyatt</td>
<td>(832) 531-6016</td>
<td><a href="mailto:pwyatt@homelesshouston.org">pwyatt@homelesshouston.org</a></td>
</tr>
<tr>
<td>Thuan Huynh</td>
<td>(832) 531-6024</td>
<td><a href="mailto:thuynh@homelesshouston.org">thuynh@homelesshouston.org</a></td>
</tr>
</tbody>
</table>

Cover Page – Agency and Project Information
Please submit ONE cover page and evaluation tool for EACH project being reviewed. Answer all questions completely.
Organization Name:

HUD Project Name:

HUD Grant Number:

Site Information

**Program Site Configuration Type:** Record site as follows:
- **Single site, single building:** Housing units (or service encounters) are at one site, in a single structure.
- **Single site, multiple buildings:** Housing units (or service encounters) are at one site, in multiple structures (e.g., single apartment complex with multiple buildings and program units in two or more buildings).
- **Multiple sites:** Housing units (or service encounters) are at multiple sites (e.g., scattered-site housing, outreach).

☐ Single site, single building  ☐ Single site, multiple buildings  ☐ Scattered/Multiple sites

**GEOCODE**

(6-digit numeric code, include any leading zero’s)

**HOUSING TYPE**

☐ Mass shelter/barracks  ☐ Single apartment (non-SRO) units  ☐ Dormitory/hotel/motel
☐ Single homes/townhouses/duplexes  ☐ Shared housing  ☐ Single Room Occupancy (SRO) units  ☐ Single Room Occupancy (SRO) units  ☐ Non-residential: services only

**Program Type Code**

**PROGRAM TYPE**

☐ Emergency Shelter  ☐ Services Only program  ☐ Transitional Housing
☐ Safe Haven  ☐ Permanent Supportive Housing  ☐ Homeless Outreach
☐ Other: (Describe) ________________________  ☐ Homelessness Prevention and Rapid Re-Housing

**Total Grant Amount**

Enter your most recent total grant award

<table>
<thead>
<tr>
<th>Current Grant Award</th>
<th>$</th>
<th>.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Match</td>
<td>$</td>
<td>.</td>
</tr>
<tr>
<td>Leverage Amount</td>
<td>$</td>
<td>.</td>
</tr>
</tbody>
</table>
Operating Year
Enter dates of most recently submitted APR or project operating year, if not HUD funded.

From: To:

Population Served:
What population does your current grant serve? (ex: youth, chronically homeless, etc)

What percentage of the above population being served? (ex: 75% homeless).

Contact Information

<table>
<thead>
<tr>
<th>Primary Contact Person:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title/Position:</td>
</tr>
<tr>
<td>Email Address:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2nd Contact Person:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title/Position:</td>
</tr>
<tr>
<td>Email Address:</td>
</tr>
</tbody>
</table>

Agency Certification

Certification and Acknowledgement

I certify, on behalf of my agency, that all information contained in this instrument is accurate and true, based on our current project records for the project. I understand that falsifying information or failing to provide accurate information may have a negative impact on my overall score and may result in the noncompetitive ranking of my project in future continuum of care applications.
Threshold Requirements

20 Points Available in this Section

1. **DUNS Number.** All project applicants seeking funding under this NOFA must have a DUNS number and include the number. *Question is worth 1 point.*
   
   **DUNS Number:**

2. **Active Registration in SAM.** All project applicants seeking funding under this NOFA must have an active SAM registration. Does agency have an Active Registration in SAM (CCR)? *Question is worth 1 point.*
   
   □ Yes
   □ No, enter explanation explaining why the project is not registered.

APR Compliance

3. Have you been able to submit your last two APR’s by the deadline? *Question is worth 3 points.*
   
   □ Yes
   □ No, enter explanation explaining why the project was not able to submit the APR by the submittal deadline.

   **Explanation:**

HUD Compliance

4. Is the project compliant with HUD funding requirements?

   Answer the questions below and submit any HUD monitoring reports and HUD correspondence regarding monitoring visit, if applicable. Project not monitored by HUD will not be penalized under this question. *Question is worth a maximum of 5 points.*

   a. Has the project been monitored by HUD or a HUD grantee within the last two years? *(Shelter Plus Care sponsors, contact Harris County for this information.)*
      
      □ Yes (Attach all applicable HUD monitoring reports) □ No

      • **Date of your last monitoring report?**

   b. Were there findings in your monitoring report?
      
      □ Yes □ No □ N/A

   c. Are there findings with corrective actions to be implemented?
      
      □ Yes (Attach all applicable correspondence with HUD, including agency letter explaining plan for corrective action)
      
      □ No □ N/A

   d. Were there outstanding project findings with no corrective actions taken?
      
      □ Yes □ No

   e. Is there evidence of a clean financial audit or plan of action if there are findings?.
      
      □ Agency has a clean audit. *(Enclose copy of most recent auditor’s letter)*
Agency has an audit with findings; however, a plan of action has been developed. (Enclose copy of auditor’s letter and plan of action for findings)

Project Quality Threshold
10 Points Available

5. From what destination did your participants enter into your program (from your most recently submitted APR)? Include all that apply. Question is worth 2 points.

<table>
<thead>
<tr>
<th>Destination</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Shelter</td>
<td></td>
</tr>
<tr>
<td>Transitional housing</td>
<td></td>
</tr>
<tr>
<td>Streets</td>
<td></td>
</tr>
<tr>
<td>Safe Havens</td>
<td></td>
</tr>
<tr>
<td>Institution</td>
<td></td>
</tr>
</tbody>
</table>

If coming from Institution how long did they reside?

a. What is the type, scale, and location of the housing for your program? Question is worth 2 points.

Type
Scale
Location

b. Do the type, scale, and location of the supportive services fit the needs of the program participants and the mode of transportation to those services? Question is worth 2 points.

Describe:

c. Describe your agency plan for ensuring that clients will be individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible to apply meets the needs of the program participants? Question is worth 2 points

d. Describe how participants are helped to obtain and remain in permanent housing in a manner that fits their needs? Question is worth 1 point.

e. What amenities (e.g., grocery stores, pharmacies, etc.) are accessible (within 1.5 miles) in the community? Question is worth 1 point.

HEARTH Compliance
15 Points Available in this Section

1. Age/Gender Participation

Under the HEARTH Act, any project receiving McKinney funds to provide emergency shelter, transitional housing, or permanent housing to households with children under age 18 shall not deny admission to any household based on the age/gender of any children under age 18. Does the project accept all households with children under age 18 without regard to the age and/or gender of the children? Question is worth 5 points.
Exception:  Transitional housing receiving funds may target resources to households with children of a specific age only if the project (1) operates a transitional housing program that has a primary purpose of implementing an evidence-based practice that requires that housing units be targeted to families with children in a specific age group; and (2) provides such assurances, as the Secretary shall require, than an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured.

☐ Yes (Project certifies that it accepts all households with children under age 18 without regard to age or gender.)
☐ No (Project does not comply with this new requirement.)
☐ No (Project qualifies for an exception as noted above.)
☐ N/A

2. Consumer Participation

Under the HEARTH Act, each recipient or subrecipient is required to provide for the participation of not less than one (1) homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this subtitle.

Does the project provide for the participation of at least one (1) homeless or formerly homeless individual on the board of directors or other equivalent policymaking entity?  

Question is worth 5 points.

☐ Yes (Recipient/subrecipient provides for the participation of at least one homeless or former homeless individual on the board of directors or other equivalent policymaking entity.)
☐ No (Project has received a waiver from the HUD Secretary.)
☐ No (Project does not currently comply with this requirement.)

3. Sexual Orientation

Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity

On February 3, 2012, HUD published a final rule (77 FR 53579) for the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity. HUD is implementing policy to ensure that its core programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.

Does the project accept all households without regard to sexual orientation or gender identity?  

Question is worth 5 points.

☐ Yes (Recipient/subrecipient provides equal to HUD programs regardless of sexual orientation or gender identity.)
☐ No (Project does not currently comply with this requirement.)
HUD Financial Assessment and Expenditure of Funds

20 Points Available in this Section
The Houston/Harris County Continuum of Care considers it a priority that all funding allocated through the NOFA process is distributed to projects that can best utilize the dollars to provide high quality housing and services to persons who are homeless. It is a goal of the CoC to ensure funds are expended in a timely and appropriate manner. Agencies are asked to provide information on the expenditure of their HUD grants. These questions only pertain to the project being evaluated by this instrument.

Grant Amount and Expenditures

Enter your most recent total grant award

<table>
<thead>
<tr>
<th>Total HUD Award (designated in most recently submitted APR)</th>
<th>$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of funding expended over the last HUD contract year</td>
<td>$</td>
</tr>
<tr>
<td>Amount of funding returned to HUD at end of HUD contract year (includes funding not drawn down by end of contract year with no extension from HUD to spend)</td>
<td>$</td>
</tr>
</tbody>
</table>

1. Has this project returned any funds in the last 5 years? (Please note that HUD will also provide these numbers to the CoC for verification purposes) **Question is worth 10 points.**

<table>
<thead>
<tr>
<th>Amount Returned</th>
<th>Reason for Return</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012 $</td>
<td></td>
</tr>
<tr>
<td>2011 $</td>
<td></td>
</tr>
<tr>
<td>2010 $</td>
<td></td>
</tr>
<tr>
<td>2009 $</td>
<td></td>
</tr>
<tr>
<td>2008 $</td>
<td></td>
</tr>
</tbody>
</table>

- If funding was returned, please explain why dollars were returned by checking the appropriate box(s) below. If “Other” is checked, please describe the reason why dollars were returned.

  - Excess leasing expenditures due to higher client contributions
  - Excess service and administrative funding due to staff turnover
  - Significant disruption in program (facility issues, transition of grant, etc) that suspended operations and expenditures temporarily
  - Other (please describe):

2. How often does your agency draw down HUD funds from LOCCS? **Question is worth 3 points.**

- Monthly
- Every other month
- Quarterly
- Other:

If project is drawing down less than quarterly, please provide an explanation:
3. Does your agency have 90 days working capital to ensure operational liquidity while awaiting reimbursement? (Provide documentation of cash in bank, line of credit, accounts receivable collection, etc) \textit{Question is worth 2 points}. 

☐ Yes ☐ No

4. \textbf{Leveraged Resources} 
Leverages resources may include funding or in-kind contributions, such as services or equipment. Partners providing the leveraged resources may include: governmental entities, public or private nonprofit organizations, for-profit private organizations, individuals, or other entities willing to partner with you.

How much leverage (cash and in-kind) did your agency provide to this project? (Please note that commitment letters must be submitted with the instrument.) The letters must be dated within 60 days of the CoC application deadline. \textit{Question is worth a maximum of 5 points}. Full points will be awarded to projects that have 200\% in leveraging.

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Cash Commitment</th>
<th>Total In-Kind Commitment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>$</td>
<td>$</td>
</tr>
</tbody>
</table>
**20 Points Available in this Section**

1. **Destination by Household Type (APR Q29a1 and Q29a2)**
   **Exits to Permanent Housing Destinations:** Reviewers will be assessing to determine what percentage of clients who left the project was placed into permanent destinations. *Question is worth 10 points* for TH and SSO projects and 5 points for PHS and S+C projects. This will be determined by:
   
   % of clients at exit who stayed in project for at least 12 months?
   
   **Numerator** - Total numbers who were placed into permanent housing [subtotal (a):
   
   **Denominator** - Total number of clients who left the project [subtotal (e) minus *Deceased:
   
   **Percentage** – Divide Numerator into Denominator (a/e minus deceased):

2. **Increased or Maintained Income: Cash and Non-Cash Sources (APR Q23, Q24, Q26a1, Q26a2, Q26b1, Q26b2)**
   Reviewers will be assessing to determine if at least 60% of clients (stayers and leavers) increased or maintained their income/non-cash benefits. *Question is worth 10 points.*

   % of clients (stayers) who increased their income: Increased_____ Maintained_____
   
   % of clients (leavers) who increased their income: Increased_____ Maintained_____

3. **Length of Participation by Exit Status (APR Q27)**
   **Permanent Housing Retention:** For SHP Permanent Supportive Housing (PSH) and Shelter plus Care (S+C) projects reviewers will be assessing to determine if at least 80% of clients, at the time of exit, stayed in the project for at least 12 months. *Question is worth 5 points* for PSH and S+C Projects only.

   % of clients at exit who stayed in project for at least 12 months?
HMIS Participation and Data Quality

25 Points Available in this Section

HMIS implementation and participation is a priority for Houston/Harris County Continuum of Care and HUD. Implementing a system-wide HMIS will assist the Houston Continuum of Care to provide continuous and accurate information on persons served by homeless assistance programs including whether the numbers are increasing or decreasing, and whether the current approaches to the problem are appropriately designed. HMIS participation and good data quality are essential in assisting the Houston Continuum of Care in measuring success in implementing our strategic plan and in meeting HUD HEARTH Performance Measures.

All agencies that serve homeless persons (except victim service providers) are expected to participate in the data collection for HMIS, which includes completing the necessary training and certifications.

This section of the evaluation tool focuses on the implementation of HMIS at each agency. Questions focus on a project’s ability to:

1. Regularly check HMIS data quality for the project; and
2. Enter all client records, completely and accurately, into HMIS in a timely manner.

General HMIS Participation

1. **HMIS Bed/Unit Utilization APR Q6**
   - Benchmark is 100% of beds participate in HMIS. *(Will be provided by HMIS staff).* **Question is worth a total of 10 points.**

   What percentage did your agency participate in HMIS? ______

<table>
<thead>
<tr>
<th>Percentage</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>100%</td>
<td>10</td>
</tr>
<tr>
<td>90%</td>
<td>9</td>
</tr>
<tr>
<td>80%</td>
<td>8</td>
</tr>
<tr>
<td>70%</td>
<td>7</td>
</tr>
<tr>
<td>60%</td>
<td>6</td>
</tr>
<tr>
<td>50%</td>
<td>5</td>
</tr>
<tr>
<td>40%</td>
<td>4</td>
</tr>
<tr>
<td>30%</td>
<td>3</td>
</tr>
<tr>
<td>20%</td>
<td>2</td>
</tr>
<tr>
<td>10%</td>
<td>1</td>
</tr>
</tbody>
</table>

   If less than 90% please provide explanation.

2. **Is your agency a Victim Service Provider as defined by the Violence Against Women and Department of Justice Re-authorization Act of 2005 (VAWA)?** *(Question is not scored.)*

   Yes ☐ No ☐
Victim Service Providers cannot participate in HMIS, but may be required to enter information into a comparable database. A comparable database allows the recipient and the CoC to obtain the aggregate data needed while respecting the sensitive nature of the client-level information. The comparable database must collect client-level data over time and generate unduplicated aggregate reports based on that data. It cannot be a database that only records aggregate information. Comparable databases must comply with all HMIS data, technical, and security standards as established in rule or notice.

3. If your agency is a Victim Service Provider, are you entering information on clients into a comparable database? *Question is worth 25 Points.*

☐ Yes
☐ No
☐ N/A (Project does not provide family violence prevention or treatment services through the project.)

4. In what manner does your agency participate in HMIS? *Question is worth 2 Points.*

☐ Direct User
☐ Have signed MOU and or attended training, but have not yet started data entry
☐ Does Not Participate in HMIS (Project does not comply with this requirement. Enter narrative below explaining why the project does not participate or how the project will comply with this HEARTH Act requirement below.)

Explanation:

5. Does your agency currently have policies/procedures in place to regularly check the project’s HMIS data quality that includes the items outlined below? *(Please submit a copy of your agency’s data policies and procedures.) Question is worth 3 points.*

- Frequency of HMIS data review, which must occur, at minimum, on a monthly basis;
- Description of what reports are used to complete the data review; and
- Outline of the process for how data reviews are used to improve the project’s data quality.

☐ Yes, policies and procedures have been put in place that outline frequency of data review, a description of what reports are used and an outline of the process for how data reviews are used to improve the project’s data quality.

☐ Policies and procedures have been documented, but not yet implemented.

☐ No (Project does not comply with this requirement)

6. Data Quality APR Q7
The Universal Data Standards contain demographic and program-specific questions about project participants. Data Quality refers to the extent that the Universal and Program-Specific Data Elements recorded in HMIS accurately reflect the extent of homelessness in our continuum of care area. It is our CoCs goal to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent of homelessness and the impact of homeless services in our area. Reviewers will be assessing to determine the percentage of Don’t Know/Refused and Missing Data elements. Benchmark is 5% or less for each data element. *Question is worth 10 Points.*

**Bonus Points**

**10 Points Available in this Section**

a. What percentage of your program participants were chronically homeless before entering your program? *Question is worth 4 Points*

   %

b. What percentage of your program participants are veterans? *Question is worth 4 Points*

   %

c. What percentage of your program participants were households with children under 18 upon entering your program? *Question is worth 2 Points*

   %
<table>
<thead>
<tr>
<th>Threshold</th>
<th>Yes or No</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>For Reallocation Funding: Will the project exclusively serve people who are chronically homeless, have substance abuse, mental health, or co-occurring diagnoses?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>For Bonus Project Funding: Will the project exclusively serve 100% chronically homeless individuals and families?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does the project allow for people with zero income to be served long-term through the PSH program?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does the project use standard lease requirements to maintain tenancy?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does the project allow for both men and women to be housed?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Will the project be in compliance with HUD’s Sexual Orientation and Gender Identity rule?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does the SHP request meet HUD eligibility for allowable activities?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does the agency have an existing CoC grant that has not yet begun enrolling clients?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Capacity re. Existing CoC Grants</th>
<th>Score</th>
<th>Does not meet expectations: -1</th>
<th>Meets expectations: 0</th>
<th>Not applicable: 0</th>
<th>Weight</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>If the agency has existing COC grants, are they compliant with HMIS participation or a comparable database if a domestic violence provider?</td>
<td>5</td>
<td>0</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If the agency has existing CoC grants, did they have any de-obligated funds?</td>
<td>5</td>
<td>0</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If the agency has existing CoC grants, were the projects at enrollment capacity?</td>
<td>5</td>
<td>0</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If the agency has existing CoC grants, did they meet performance expectations?</td>
<td>5</td>
<td>0</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Services</td>
<td>Score</td>
<td>Does not meet expectations: -1</td>
<td>Meets expectations: 1</td>
<td>Exceeds expectations: 2</td>
<td>Weight</td>
<td>Comments</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>-------</td>
<td>--------------------------------</td>
<td>-----------------------</td>
<td>--------------------------</td>
<td>--------</td>
<td>----------</td>
</tr>
<tr>
<td>Will the program implement at least one Evidence Based Practice or</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>promising practice?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does the agency already have experience implementing the Evidence</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Based Practice or has identified adequate training?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are the services comprehensive enough to help clients maintain housing?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Are the services comprehensive enough to help clients increase income?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>If the program cites partners or subgrantees are MOUs in place?</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Outcomes</td>
<td>Score</td>
<td>-1 = does not meet expectations, 1 = meets expectations, 2 = exceeds expectations</td>
<td>Weight</td>
<td>Comments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the target for maintaining housing appropriate?</td>
<td></td>
<td></td>
<td>2.5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the target for maintaining or increasing income appropriate?</td>
<td></td>
<td></td>
<td>2.5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the additional outcome measurable and appropriate?</td>
<td></td>
<td></td>
<td>2.5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Housing</td>
<td>Score</td>
<td>-1 = does not meet expectations, 1 = meets expectations, 2 = exceeds expectations</td>
<td>Weight</td>
<td>Comments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If the project would be scattered site leasing, does the program have</td>
<td></td>
<td></td>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>dedicated to housing location and a plan to find housing for clients who</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>have significant barriers?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If it is a development project, is it in construction or have a</td>
<td></td>
<td></td>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>groundbreaking date within 12 months of the grant application?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Budget</td>
<td>Score</td>
<td>-1=does not meet expectations, 1=meets expectations</td>
<td>Weight</td>
<td>Comments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------------------------------------------------------------</td>
<td>-------</td>
<td>-----------------------------------------------------</td>
<td>--------</td>
<td>----------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Have all of the match items been documented for source of funding?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Have all of the leverage items been documented for source of funding?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the leverage amount twice the amount of the total request?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are the requested amount and committed match reasonable for the</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>proposed project?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does your agency have 90 days working capital to ensure operational</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>liquidity while awaiting reimbursement? (Provide documentation of</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>cash in bank, line of credit, accounts receivable collection, etc)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>0</td>
<td></td>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
November 16, 2012

Final Recommendations to the Houston/Harris County Continuum of Care Steering Committee re. 2012 CoC NOFA Strategies

Presented by: Continuum of Care Grant Strategy Committee (public agency members)
Kelly Opot—Harris County Community Services Department
Keith Bynam—City of Houston Housing and Community Development
Melody Barr—City of Houston Housing and Community Development

Staffed by: Coalition for the Homeless Houston/Harris County
Pamela Wyatt
Thuan Huynh
Whitney Patterson

Recommendations re. Scoring and Ranking
Renewal Projects: See attached scoring instrument

New Projects: See attached scoring instruments.
Revised Recommendation—because the 2012 NOFA dictates that the Permanent Housing Bonus Projects are only allowed to fund permanent supportive housing for 100% chronically homeless, we recommend that there be two new project competitions if there is additional local reallocation dollars.

- Permanent Housing Bonus Project Competition (HUD approved $2,205,929): 100% Chronically Homeless
- Permanent Housing Reallocated Funding Competition (estimated $1 million): Chronically Homeless or Substance Abuse Diagnosis or Mental Health Diagnosis or Co-Occurring Diagnosis

HMIS and Continuum of Care Planning grants: Prioritize at the top of Tier 1 in ranking because the sole source for HMIS and CoC Lead Agency duties

Recommendations re. Funding
Administer pro-rata cuts across the board.

Administrative Budget: In order to secure points in the CoC scoring process, cap administrative budgets at 7% (which is an increase from the current 5%, but lower than the HUD allowable rate of 10%).
Houston/Harris County Continuum of Care

November 15, 2012

Office of the Assistant Secretary for Community Planning and Development
Department of Housing and Urban Development

Comments re. Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act:
Continuum of Care Program

The Houston/Harris County Continuum of Care is submitting the following comments to the Department of Housing and Urban Development in response to the Continuum of Care Program Interim Rule. The membership of the CoC met to develop the recommendations through consensus, and the comments were approved by the CoC Steering Committee, which acts as the CoC’s governing board.

Permanent Housing
In response to the proposed requirement for all permanent housing tenants to have a one-year lease, while we support the concept of ensuring that permanent housing tenants are truly placed in “permanent” housing, we recommend changing this language to say that lease terms of permanent housing tenants must be consistent with leases given to other tenants in the property. In our community, it is not uncommon for mainstream rental properties to offer tenants 6 month leases or for leases to be renewed month-to-month after the initial lease term, and we would like for the regulation language to allow for this length of tenancy in order for permanent housing tenants to have broader access to units. Homeless persons are less likely to have excellent credit history and more likely to have broken leases and/or criminal records. This already will limit the availability of units that will lease to homeless persons. Requiring homeless persons to secure one year leases will act as another barrier. We recommend that HUD changes the requirement that the permanent housing clients use the same lease agreement that the landlord uses with other tenants (ie, if a 6-month lease is typically offered, that the permanent housing tenant use a 6 month lease).

Establishing the Continuum of Care
As an initial accomplishment of the HUD Priority Community technical assistance, the Houston/Harris County CoC has re-developed the CoC governing board and broader CoC structure. The newly-established CoC board has all of the required characteristics of board compositions listed in the CoC Program Interim Rule. We are in full agreement with this proposal from HUD and our CoC is already benefiting from the funding and service coordination that results from including ESG recipients, housing authorities, people who have experienced homelessness, and homeless service providers on the CoC’s governing board.

Coordinated Assessment and Domestic Violence, Dating Violence, Sexual Assault, and Stalking
Local victim service providers have been working for several years to resolve the issues surrounding their participation in a centralized or coordinated assessment system. It has proven to be a complicated and difficult issue. Local victim service providers are in support of the recommendations of the National Network to End Domestic Violence that CoCs not be required to have a coordinated assessment system including domestic violence providers. However, locally victim service providers within the Continuum
of Care are in support of creating a comparable coordinated access system for the domestic violence and sexual assault system, as well as coordinating with the mainstream homeless coordinated access system to ensure safe access to available housing. System wide, the Houston/Harris County CoC does not yet have a specific policy on how its particular system will address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers. But, policies and training to protect domestic violence/sexual assault victims will be incorporated into the planning and implementation process.

Requirement for Provision of Case Management
The Houston/Harris County CoC agrees that programs should, at the minimum, require case management for some initial period after exiting homelessness. The CoC's provider and consumer workgroups have both supported the need for case management as people enter permanent housing in order to attain long-term stability and have incorporated such requirements in the areas' written program standards for ESG subrecipients, and the action plan resulting from our CoC's charrette process will include developing a standard service model for people exiting homelessness.

Housing Quality Standards
Members of the Houston/Harris County CoC are in agreement that HQS inspections help ensure that housing people are entering is safe. Providers appreciate being able to have staff trained in making HQS inspections rather than having to access the inspections through local government agencies or housing authorities.

Preventing Involuntary Family Separation Requirement
The Houston/Harris County CoC members do not foresee this being a problem for agencies that currently receive CoC or other HUD funds.

Rental Assistance and Leasing Categories
The Houston/Harris County CoC has many concerns regarding the changes reflected in the Grant Inventory Worksheet, specifically the changes in the definition of Leasing vs. Rental Assistance.

In the guidance for the Grant Inventory Worksheet, to be considered leasing, the project must have the following characteristics:

1) The recipient or subrecipient must be the tenant of the landowner or sublessor
2) The program participant must either be the subleasee of the recipient or subrecipient OR have an occupancy agreement with the recipient or subrecipient
3) The recipient or subrecipient must pay rent directly to the landowner or sublessor based on actual costs
4) Occupancy charges imposed on the program participant are capped at the income calculation set forth in § 578.77
5) The recipient or subrecipient is responsible for 100% of the rent or sublease rent to the landowner or sublessor, even if the program participant does not pay the occupancy charge in a given month
6) The recipient or subrecipient can pay rent on a vacant unit
7) Leasing dollars do not have a matching requirement

To be considered rental assistance, the project must have the following characteristics:

1) Program participant must be the sole party on the lease with the landowner or sublessor
2) The recipient, subrecipient or rental assistance administrator must have a written agreement with the landowner or sublessor governing the payment of rental assistance.

3) The lease requires the program participant to pay rent directly to the landowner or sublessor based on the income calculation set forth in § 578.77.

4) The administrator of the rental assistance must be a State or local government, or a PHA. Unless the project was originally funded under the S+C Program and the nonprofit originally administered the assistance.

5) The recipient, subrecipient, or rental assistance administrator must make rental assistance payments to the landowner or sublessor based on the difference between the total rent and the amount paid by the program participant.

6) The recipient, subrecipient, or rental assistance administrator is not responsible for the portion of the rent paid by the program participant if the program participant misses a rent payment in any given month.

7) The recipient or subrecipient or rental assistance administrator cannot make rental assistance payments on a vacant unit except as provided in § 578.51(l).

8) The recipient or subrecipient must provide match for rental assistance funds as set forth in § 578.73.

Within the Houston/Harris County CoC, the majority of permanent housing and some transitional housing use the scattered site housing model. Leases are between the program participant and the landowner. This allows projects to receive leasing funds used to provide housing to participants and receive operating funds to support the function and the operation of the project that may include expenses for conducting on-going assessments of the supportive services needed by participants.

With the proposed changes, the majority of SHP projects in the Houston/Harris County Continuum of Care will have to reclassify their leasing funds to rental assistance. This will eliminate all operating funds, significantly reducing the amount of funding received by each project, which will create an increased burden for the non-profit grantees. The administrator of the rental assistance must be a State or local government, or a PHA. Currently, the Houston/Harris County CoC does not have any collaborative agreement with a state or local government or a PHA to be the administrator. The addition of a rental administrator creates an unnecessary bureaucratic barrier for service delivery to project participants, as well as longer wait times for HQS inspections. We urge HUD and Congress to make the needed legislative or regulatory changes to prevent the reclassification of leasing projects to rental assistance.

Overall, our Continuum of Care looks forward to the implementation of the HEARTH Act through the CoC Program rule and the better coordination and focus on system-level performance that it encourages. Thank you for taking our recommendations into consideration as the final rule is implemented.

Daphne Lernelle
Vice Chair, Houston/Harris County Continuum of Care Steering Committee
Community Development Director, Harris County Community Services Department