

# Lincoln, NE CoC NOFA Competition Policies

## 1. Renewal of Grants

- a. The CoC will renew expiring CoC funded grants provided that:
  - i. There is a continuing need in the CoC for project and the services provided to homeless people
  - ii. The project has satisfactory performance in terms of meeting the performance targets set by the CoC
  - iii. The grantee has regularly contributed data to HMIS
  - iv. There have been no significant unresolved monitoring findings
  - v. The grantee has substantially expended prior grant funds
  - vi. The grantee is participating (to the extent possible) in the CoCs coordinated access process
- b. Ranking of renewal grants
  - i. The CoC will rank the grants for renewal in a priority order:
    1. Grants will be grouped by component in the following priority order:
      - a. Permanent Housing: Permanent Supportive Housing
      - b. Permanent Housing: Rapid Rehousing
      - c. Transitional Housing
    2. Within each component, grantees will be ranked according to their performance scores
    3. Grants that are not comparable but essential to the CoC – HMIS and planning – will be ranked in an order that will assure that the projects are within the funding cutoffs.

## 2. Reallocation of Grants

- a. Grantees are strongly encouraged to review their programs. Transitional Housing projects in particular should assess whether:
  - i. There is continuing need for the project
  - ii. The project is succeeding in accomplishing CoC outcomes
  - iii. The project is targeted to a population in transition
- b. Grantees with projects with satisfactory performance may voluntarily reallocate their project to a higher priority need (permanent housing)
  - i. Grantees voluntarily reallocating will be able to retain the current HUD dollar commitment to be used for the reallocated project
- c. Grantees that are not meeting the CoC determined performance benchmarks are at risk of having their funding involuntarily reallocated to a new project and provider
  - i. Grantees not meeting performance benchmarks will have a six month period in which to improve performance.
  - ii. Grantees may develop a plan of correction to address performance shortcomings. Grants with a plan of correction, approved by the CoC, and who are in compliance with the approved plan of correction, will be eligible to renew their grants.

- iii. HMIS will re-issue performance reports every six months. Grantees who are substantially below performance benchmarks for two six-month performance reporting periods, will risk non-renewal of their grants in the 2017 competition.
- d. Any CoC funding that is involuntarily reallocated will be made available to other eligible applicants in the CoC through a competitive process (described below under New Funding).
  - i. Grantees may reapply for funding that was involuntarily reallocated but must demonstrate in their applications that performance issues in prior grant will not impact the new grant request.

### **3. New Funding**

- a. New funding includes: funds from involuntary reallocation; possible bonus funding; and any new funding possibilities from HUD.
- b. All new funds will be competitively awarded
- c. The CoC will proactively engage in outreach to potential providers and seek to engage the participation of new organizations, in particular those serving underserved populations in the CoC
- d. Applicants for funds will be reviewed according to an objective scoring rubric, approved in advance by the CoC.
- e. Applications will be reviewed and scored by an objective panel consisting of persons who are disinterested in the outcome
- f. Project applicants achieving the highest scores will be selected

### **4. Transitional Housing Priorities**

- a. The following are the priority populations to be served by transitional housing:
  - i. Youth
  - ii. Persons seeking to continue recovery in recovery-focused housing
  - iii. Institutional re-entry (may not be eligible for CoC funding but needed from people leaving criminal justice and mental health facilities)
  - iv. Persons fleeing domestic abuse or violence where it is not possible to find units for rapid rehousing
- b. Transitional housing grants successfully meeting performance standards and serving a priority population will continue to be eligible for renewal.
- c. Transitional housing projects not serving a priority population will be encouraged to reallocate to a permanent housing project. In future CoC competitions, TH projects not serving a priority population may be required to reallocate.

### **5. Permanent Supportive Housing and Housing First**

- a. Housing First. Providers of permanent supportive housing shall use the Housing First model as outlined below. Any new projects funded by the CoC must use the Housing First model. Any existing permanent supportive housing project that has indicated in application to HUD that it employs the Housing First model must follow the standards as set forth below. Existing permanent supportive housing projects that have not indicated Housing First are 'grandfathered' from this policy.
- b. Housing First projects defined:
  - i. Housing is not contingent on compliance with services – participants are provided with a standard one year lease agreement. The lease agreement can

only be terminated in accordance with the State of Nebraska Uniform Residential Landlord and Tenant Act (76-1401 to 76-1449)

- ii. Participants are provided with services and supports to help maintain housing and prevent eviction.
- iii. There is no requirement for sobriety prior to being offered housing and admission shall not be conditioned on credit or background checks. Criminal backgrounds will be considered only to the extent necessary to protect safety and well-being.
- iv. Participants shall be given choice in their housing subject to program limitations.
- v. Participants are not required to participate in services but providers are required to persistently and consistently seek to engage participants.
- vi. Providers are encouraged to support staff in implementing Evidence Based Practices that support Housing First (Critical Time Intervention, Motivational Interviewing, Stages of Change)

#### **6. Prioritization of Chronic Homeless in Permanent Supportive Housing**

- a. Entry to permanent supportive housing shall be prioritized in accordance with CPD Notice CPD-14-012.
  - i. Order of priority 1: Chronic homeless people, with longest histories of homelessness and most severe service needs;
  - ii. Order of priority 2: Chronic homeless people with a long period of homelessness but without severe service needs;
  - iii. Order of priority 3: Chronically homeless people with 4 or more occasions of homelessness in the past 3 years but whose total length of time homeless is less than 12 months and who have severe service needs.
  - iv. Order of priority 4: Chronically homeless people with 4 or more occasions of homelessness in the past 3 years but whose total length of time homeless is less than 12 months and who does not have severe service needs.
- b. Priority shall be given to chronic homeless families and individuals for admission to permanent supportive housing. This includes the turnover of units in existing permanent supportive housing and all units in newly developed projects. It is the CoC policy that all permanent supportive housing units prioritize chronically homeless people on turnover.
- c. Projects that have been designated to serve a specific population may prioritize chronically homeless persons that are members of the designated populations.
  - i. If the grant agreement specifies a target population (mentally ill), the project must serve that population but must prioritize chronically homeless persons who meet those criteria.

#### **7. Grievance Policy**

- a. It is the intent of the CoC to conduct the competition in a fair, equitable and transparent manner.
- b. A grievance may be filed by any applicant organization that claims it has been adversely affected by:
  - i. Improper application of rules, regulations and procedures concerning participation in the Consolidated Grant application process;

- ii. Improper interpretation of rules, regulations and procedures concerning participation in the Consolidated Grant application process;
  - iii. Disparity in the application of rules, regulations and procedures regarding participation in the Consolidated Grant application process;
  - iv. Violation of rules, regulations or procedures concerning participation in the Consolidated Grant application process;
  - v. The score assigned to the application
- c. Grievances must be made in writing to the CoC with three working days of the event that triggered the grievance. The grievance must be specific regarding the alleged violation.
- d. The CoC will review all grievances within three working days and provide a written response.
- e. Applicant organizations not satisfied with the CoC response may submit an appeal to HUD under 24 CFR 578.