

**Orange County  
Continuum of Care Board  
Special Meeting  
July 12, 2022**

Business Calendar, Agenda Item 1

**Date:** July 12, 2022

**Subject:** Continuum of Care Supplemental to Address Unsheltered and Rural Homelessness Notice of Funding Opportunity (CoC Special NOFO)

**Recommended Action:**

- a. Authorize the Orange County Continuum of Care’s participation in the CoC Special NOFO.
- b. Approve the issuance of a local competition process for the CoC Special NOFO to address unsheltered homelessness in Orange County.
- c. Establish an Ad Hoc comprised of non-conflicted members to support the local competition process for the CoC Special NOFO.

**Background and Analysis**

The U.S. Department of Housing and Urban Development (HUD) is making approximately \$322 million in funding available through a Continuum of Care Supplemental to Address Unsheltered and Rural Homelessness Notice of Funding Opportunity (CoC Special NOFO). Funding will be utilized to support communities in developing plans to address rural and unsheltered homelessness, particularly in communities with very high levels of unsheltered homelessness. Eligible project types for this funding include permanent housing (rapid rehousing and permanent supportive housing), joint transitional housing and rapid rehousing, supportive services only, and Homeless Management Information Systems (HMIS). The CoC Special NOFO application for the three-year grant is due on October 20, 2022.

The County of Orange’s Office of Care Coordination as the Collaborative Applicant for the Orange County Continuum of Care (CoC) has identified this funding opportunity as important to support the ongoing efforts to address unsheltered homelessness. The Collaborative Applicant is seeking support from the Orange County CoC Board membership to apply for the opportunity, proposed timeline, and establish an Ad Hoc comprised of non-conflicted members for the CoC Special NOFO. The establishment of an Ad Hoc for the CoC Special NOFO will support the Orange County CoC in submitting a competitive application that could bring additional housing resources to Orange County.

The CoC Special NOFO funding application includes several activities and requirements to be completed, including a CoC Plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs. The Office of Care Coordination will be working to facilitate stakeholder engagement and feedback through the development of the plan and will return to the CoC Board for the plan’s approval.

Further details on the Special NOFO including the application timeline, available funds, HUD’S Homeless Policy Priorities and application requirements can be found in Attachment A.

**Attachments**

Attachment A – Unsheltered and Rural Homelessness Special NOFO Overview

## Item 1 Attachment A

### Continuum of Care Supplemental to Address Unsheltered and Rural Homelessness Notice of Funding Opportunity (NOFO) Overview

#### Program Description:

- The U.S. Department of Housing and Urban Development (HUD) is seeking to fund programs that:
  - Target efforts to reduce unsheltered homelessness, particularly in communities with very high levels of unsheltered homelessness
  - Support communities to implement coordinated approaches -- grounded in Housing First and public health principles -- to reduce the prevalence of unsheltered homelessness, and improve services engagement, health outcomes, and housing stability among highly vulnerable unsheltered individuals and families

#### Timeline:

- Wednesday, June 22, 2022 – Funding opportunity announcement
- Tuesday, September 20, 2022 – Project Applications are required to be submitted to the CoC no later than 30 days before the application deadline –
- Wednesday, October 5, 2022 – CoCs are required to notify all project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC no later than 15 days before the Special NOFO application submission deadline
- Monday, October 17, 2022 – Post all parts of the Consolidated Application, including the CoC application, attachments, priority listings and community notifications.
- Thursday, October 20, 2022 – Application deadline

#### Available Funds:

- Approximately \$322,000,000
  - \$54,500,000 for rural communities
  - \$267,500,000 for unsheltered homelessness set aside
    - \$19,846,828 for Orange County Continuum of Care
- Initial grant term will be for 3 years.

#### Application Process:

- CoC Application completed and submitted by Collaborative Applicant
  - Will be scored and will determine the order in which CoCs are funded
- Project Applications
  - Must describe population and subpopulations to be served
  - Must describe the type of housing and services to be provided
  - Must include budget activities that are being requested
  - Cannot contain request for acquisition, new construction or rehabilitation funds (otherwise it will be rejected)
- CoC Priority Listings
  - Ranks all project applications in order of priority, including CoC Planning Grants, and identify any project applications rejected by the CoC

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### Eligible Applicants:

- Collaborative Applicants – County of Orange’s Office of Care Coordination
- Project Applicants – include nonprofit organizations, state and local governments. Public housing authorities are eligible without limitation or exclusion. For-profit entities are ineligible.

### HUD’s Homeless Policy Priorities (Four of the six apply to the Orange County Continuum of Care)

- *Unsheltered Homelessness.* Unsheltered homelessness is continuing to rise and recent analysis of homelessness data shows that people experiencing unsheltered homelessness report significantly greater health challenges and experiences of trauma and violence than their sheltered peers. This NOFO supports this highly vulnerable population by supporting CoCs in their efforts to identify people living in unsheltered situations, including encampments, and connects them with health and housing resources.
- *Involving a Broad Array of Stakeholders in the CoC’s Efforts to Reduce Homelessness.* Ending homelessness cannot be achieved by homeless service organizations alone. It requires coordination with a variety of other stakeholders, including affordable housing developers, mainstream service providers, the business community, victim service providers, political leaders, and healthcare providers. This NOFO supports and encourages CoCs to invite a variety of stakeholders to develop and implement a CoC Plan to Serve Individuals and Families Experiencing Homelessness with Severe Service Needs.
- *Advancing Equity.* HUD is emphasizing system and program changes to address equity within CoCs through identifying and addressing the needs of subpopulations who are disproportionately more likely to experience homelessness, and other populations who are disproportionately more likely to experience homelessness. CoCs should be reviewing their strategies to support and serve underserved communities in their geographic area, identify barriers that led to any disparities in communities being served, and take steps to eliminate these barriers. This includes, in conjunction with people experiencing homelessness, reviewing local policies, procedures, and processes to determine where and how to address disparities affecting underserved communities experiencing homelessness.
- *Use a Housing First approach.* Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. Projects funded under this NOFO should help individuals and families move quickly into permanent housing, and the CoC should measure and help projects reduce the length of time people experience homelessness as well as ensure projects are correctly implementing a Housing First approach. Additionally, CoCs should engage landlords and property owners to identify an inventory of housing available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt service delivery methods that respond to the preferences and needs of the individual or family presenting for assistance.

### HUD Funding Process:

- HUD will select CoCs for funding based on CoC score, meaning the highest scoring CoC will have its rated and ranked projects that pass thresholds as described in the NOFO conditionally selected for funding. HUD will select projects in this manner until no more funds are available.

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### Target Population:

- Program participants must meet the criteria of homelessness:
  - paragraph (1) of the definition of homeless at 578.3, except those persons coming from transitional housing must have originally come from places not meant for human habitation, emergency shelters, safe havens, or institutions where they resided for 90 days or less and originally came from places not meant for human habitation, safe havens, or emergency shelters; or
  - meet the criteria of paragraph (4) of the definition of homeless at 578.3.
- And have Severe Service Needs, meaning any combination of the following factors:
  - facing significant challenges or functional impairments, including any physical, mental, developmental or behavioral health disabilities regardless of the type of disability, which require a significant level of support in order to maintain permanent housing (this factor focuses on the level of support needed and is not based on disability type); high utilization of crisis or emergency services to meet basic needs, including but not limited to emergency rooms, jails, and psychiatric facilities; currently living in an unsheltered situation or having a history of living in an unsheltered situation; experiencing a vulnerability to illness or death; having a risk of continued or repeated homelessness; and having a vulnerability to victimization, including physical assault, trafficking or sex work.
- And/or Underserved Communities,
  - Populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. These communities include Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; and persons otherwise adversely affected by persistent poverty or inequality.

### Application Requirements:

- CoCs are being required to develop a plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs.
  - These plans must describe the CoC's current strategies for conducting coordinated and comprehensive outreach, providing access to low-barrier shelter and other temporary accommodations, and providing immediate access to low-barrier permanent housing.
  - The maximum length of the plan is 15 pages, using single-spacing and at least ½ inch for all margins, 12-point font, Times New Roman font.
- CoCs must demonstrate how they will leverage both mainstream housing and healthcare resources to assist in their efforts to end unsheltered homelessness and stabilize individuals and their families in housing and increase access to employment opportunities for those experiencing homelessness.
  - Letters of commitment, contracts, or other formal written agreements demonstrating the development of new units and new housing opportunities for people experiencing homelessness.
    - These written commitments must demonstrate the number of new units being developed or set aside for individuals experiencing homelessness and the date by which they will be available.
  - Written commitments from hospitals, healthcare clinics, insurance agencies, medicaid state agencies, public health departments, mental health clinics, Federally Qualified Health Center (FQHC), or Drug Treatment Facilities.

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- These written commitments must demonstrate the types of services being made available on a voluntary basis, the value of the commitment, and the dates the healthcare resources will be provided.
- Letter of commitment from PHA(s) serving the CoC’s geographic area. The Consolidated Appropriations Act, 2021 (Public Law 116-260, approved December 20, 2020) makes available \$43,439,000 of new incremental voucher assistance under section 8(o) of the United States Housing Act of 1937 for use by individuals and families experiencing or at-risk of homelessness; those fleeing or attempting to flee domestic violence, dating violence, sexual assault, and stalking; veterans and families that include a veteran family member that meets one of the preceding criteria (Stability Vouchers). HUD expects to announce this funding opportunity in FY 2022.
  - HUD is asking CoCs to demonstrate written commitments with PHAs to: (1) pair vouchers with CoC-funded supportive services; and (2) to work with the CoC and other stakeholders to develop a prioritization plan for a potential allocation of Stability Vouchers or a preference for general admission to Housing Choice Voucher Program through the coordinated entry process for individuals and families experiencing homelessness, at risk of homelessness, or fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking.
- CoCs must demonstrate how they will support underserved communities, identify barriers that led to any disparities in communities being served, and support equitable community development by taking steps to address such barriers when using these funds and how they will involve individuals with lived experience in the decision-making process of the CoC.
  - Letter signed by working group comprised of persons with lived experience of homelessness.
    - The letter must be signed by either (1) at least three members involved in the working group comprised of individuals with lived experience or (2) an authorized representative of the workgroup (e.g., a working chair) along with evidence that the person is authorized to represent the group.
    - The letter must demonstrate support of the priorities in the CoCs Plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs in the CoC’s geographic area outlined in the Special NOFO CoC Application and the Project Applications.
- CoCs must demonstrate how they will ensure resources funded under this Special NOFO will contribute to reducing unsheltered homelessness in their geographic area.
- CoCs must identify the steps taken to ensure traditionally marginalized populations (such as racial and ethnic minorities and persons with disabilities) will be able to meaningfully participate in the planning process.

### Eligible Project Components

- Permanent Housing
  - Rapid Rehousing (RRH)
  - Permanent Supportive Housing (PSH)
- Joint Transitional Housing and Permanent Housing – Rapid Rehousing (Joint TH and PH-RRH)
- Supportive Services Only (SSO)
- Homeless Management Information System (HMIS)

### Project Eligibility Threshold

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- Project applicants and potential subrecipients must meet the eligibility requirements of the CoC Program as described in 24 CFR part 578 and provide evidence of eligibility.
- Project applicants must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds
- Project applicants must submit the required certifications as specified in this NOFO.
- Project must serve the target population.
- Project applicants must agree to participate in a local HMIS.

### Project Quality Threshold

- *Permanent Housing* – PSH and/or RRH – must meet 4 out of the 5 criteria below:
  - The type of housing proposed, including the number and configuration of units, will fit the needs of the program participants.
  - The type of supportive services that will be offered to program participants will ensure successful retention in or help to obtain permanent housing, including all supportive services regardless of funding source.
  - The proposed project has a specific plan for ensuring program participants will be individually assisted to obtain the benefits of mainstream health, social, and employment programs for which they are eligible to apply and which meet the needs of program participants (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).
  - Program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g., provides the participant with some type of transportation to access needed services, safety planning, case management, housing that meets accessibility related needs, additional assistance to ensure retention of permanent housing).
  - The proposed project is consistent with the CoC's plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs.
- *Joint TH and PH-RRH* – must meet at least 4 out of the 5 criteria below:
  - The type of housing proposed, including the number and configuration of units, will fit the needs of the program participants (e.g., ensuring a range of bedroom sizes to assist various family sizes.)
  - The proposed project will provide enough rapid rehousing assistance to ensure that at any given time a program participant may move from transitional housing to permanent housing. This may be demonstrated by identifying a budget that has twice as many resources for the rapid rehousing portion of the project than the TH portion, by having twice as many PH-RRH units at a point in time as TH units, or by demonstrating that the budget and units are appropriate for the population being served by the project.
  - The type of supportive services that will be offered to program participants will ensure successful retention or help to obtain permanent housing, including all supportive services regardless of funding source.
  - The proposed project has a specific plan for ensuring program participants will be individually assisted to obtain the benefits of mainstream health, social services, and employment programs for which they are eligible to apply and which meet the needs of the program participants (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).

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- Program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g., provides the participant with some type of transportation to access needed services, safety planning, case management, housing that meets accessibility related needs, additional assistance to ensure retention of permanent housing).
- The proposed project is consistent with the CoC's plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs.
- *SSO- Coordinated Entry System (CES)* – must meet at least 2 out of the 4 criteria below:
  - The centralized or coordinated assessment system is easily available/reachable for all persons within the CoC's geographic area who are seeking homeless assistance. The system must also be accessible for persons with disabilities within the CoC's geographic area.
  - There is a strategy for advertising that is designed specifically to reach homeless persons with the highest barriers within the CoC's geographic area.
  - There is a standardized assessment process.
  - Ensures program participants are directed to appropriate housing and services that fit their needs.
- *SSO* – must meet at least 4 out of the 6 criteria below:
  - The proposed project has a strategy for providing supportive services to those with the highest service needs, including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services.
  - Program participants are assisted to obtain and maintain permanent housing in a manner that fits their needs.
  - The proposed project has a specific plan for ensuring program participants will be individually assisted to obtain the benefits of mainstream health, social services, and employment programs for which they are eligible to apply and which meet the needs of the program participants (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education)
  - The project proposed will participate in coordinated entry. (Accounts for 2 criteria)
  - The proposed project is consistent with the CoC's plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs.
- *HMIS* – must meet at least 3 out of the 4 criteria below:
  - How the HMIS funds will be expended in a way that is consistent with the CoC's funding strategy for the HMIS and furthers the CoC's HMIS implementation.
  - The HMIS collects all Universal Data Elements as set forth in the HMIS Data Standards.
  - The ability of the HMIS to un-duplicate client records.
  - The HMIS produces all HUD-required reports and provides data as needed for HUD reporting (e.g., APR, quarterly reports, data for CAPER/ESG reporting) and other reports required by other federal partners.
- *CoC Planning* – must meet at least 3 out of the 3 criteria below:
  - Governance and Operations-The CoC conducts meetings of the entire CoC membership that are inclusive and open to members and demonstrates the CoC has a written governance charter in place that includes CoC policies.



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- CoC Committees-The CoC has CoC-wide planning committees, subcommittees, or workgroups to address homeless needs in the CoC's geographic area that recommends and sets policy priorities for the CoC.
- The proposed planning activities that will be carried out by the CoC with grant funds are compliant with the provisions of 24 CFR 578.7. (Accounts for 2 criteria)
- The funds requested will improve the CoC's ability to evaluate the outcome of both CoC Program-funded and ESG-funded projects.

### Consolidated Application Scoring and Criteria

- CoC Consolidated Applications will be assessed on a 100-point scale for the Unsheltered Homelessness Set Aside
- CoCs must receive at least 50 percent of the points available, not including bonus points, for the funding opportunity to receive funding of any of its projects.
- **Project, Capacity, Review and Ranking** (4 points maximum)
  - *Objective Criteria and Past Performance.* Demonstrate the use of objective criteria to review project applications requesting CoC Program funding (2 points)
  - *Ranking and Selection Process.* Demonstrate the use of an objective ranking and selection process for project applications that is publicly announced by the CoC. (2 points)
- **System Performance** (18 points maximum)
  - *Reducing the Number of Homeless Individuals and Families.* Up to 3 points to CoCs that demonstrate an overall reduction of at least 5 percent in the number of individuals and families who experience homelessness (3 points)
  - *Reduction in the number of First Time Homeless.* Demonstrate how the CoC works to reduce the number of individuals and families who become homeless for the first time. (3 points)
  - *Length of Time Homeless.* Reduce the length of time individuals and families remain homeless and describe how the CoC will reduce the length of time individuals and families remain homeless in the future. (3 points)
  - *Successful Permanent Housing Placement or Retention.* Demonstrate an increase in the rate in which individuals and families move to permanent housing destinations or continue to reside in permanent housing projects and describe how the CoC will improve their rate of permanent housing placement. (3 points)
  - *Returns to Homelessness.* Reduce the extent to which individuals and families leaving homelessness experience additional spells of homelessness and describe how the number of individuals and families who return to homelessness will be reduced in the community. (3 points)
  - *Jobs and Income Growth.* Increase participants' incomes from employment and describe specific strategies to assist program participants' incomes. (3 points)
- **CoC Coordination and Engagement** (8 points maximum)
  - *Inclusive Structure and Participation.* CoC has an inclusive membership of a variety of stakeholders within the geographic area and considers the needs of all relevant subpopulations; has an invitation process for new members to join; solicits and considers opinions from knowledgeable individuals and organizations; and accepts and considers proposals from organizations that have not previously received CoC Program funding. (4 points)

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- *Coordination with Federal, State, Local, Private, and Other Organizations.* Coordinates with other organizations that serve individuals, families, unaccompanied youth, and persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who are experiencing or at risk of homelessness. CoCs must consult with Emergency Solutions Grants (ESG) recipients within the geographic area on the plan for allocating ESG funds and reporting on and evaluating the performance of ESG recipients and subrecipients. Each CoC is required to demonstrate how it is coordinating with ESG recipients. (1 point)
- *Discharge Planning.* Coordinates with and assists in state or local discharge planning efforts to ensure persons discharged do not become homeless. (1 point)
- *CoC Collaboration Related to Children and Youth.* Demonstrate the CoC collaborates with education providers, local educational authorities, and school districts. (1 point)
- *Mainstream Benefits and Other Assistance.* The CoC provides information and training to CoC Program-funded projects to supplement CoC Program funds with resources from other public and private sources, including mainstream programs that assist program participants in applying for and receiving mainstream benefits. (1 point)
- **CoC Plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs (70 points maximum)**
  - *Leveraging Housing Resources.* (18 points)
    - Development of new units and creation of housing opportunities. CoCs must demonstrate the number of new permanent housing units that includes the date the units will be available for program participants and how many new permanent housing units will be available for individuals and families experiencing homelessness that include the preferences or set aside created. (10 points)
    - Landlord Recruitment. CoCs must demonstrate their current strategy for recruiting landlords, and their units, in which to utilize tenant-based assistance. (8 points)
  - *Leveraging Healthcare Resources.* (10 points) These points are available for CoCs that propose to develop permanent housing projects, including permanent supportive housing and rapid re-housing projects, that utilize health care resources to help individuals and families experiencing homelessness. Sources of healthcare resources include:
    - Direct contributions from a public or private health insurance provider to the project; and
    - Provision of health care services, including mental health services, by a private or public organization (including FQHCs and state or local health departments) tailored to the program participants of the project.
    - Direct partnerships with organizations that provide healthcare services, including mental health services to individuals and families (including FQHCs and state or local public health departments) experiencing homelessness who have HIV/AIDS.
    - Eligibility for the project must comply with HUD program and fair housing requirements. Eligibility criteria cannot be restricted by the eligibility requirements of the health care service provider.
  - *CoCs Current Strategy to Identify, Shelter, and House Individuals and Families Experiencing Unsheltered Homelessness.* (9 points)
    - Current Street Outreach Strategy. The extent to which they have a street outreach strategy that regularly engages individuals and families experiencing

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- unsheltered homelessness in the locations where they reside, including a specific strategy for engaging those with the highest vulnerabilities. (3 points)
- Current Strategy to Provide Immediate Access to Low-Barrier Shelter and Temporary Housing for Individuals and Families Experiencing Unsheltered Homelessness. The current strategy used by the CoC to provide low-barrier emergency shelter (especially non-congregate shelter), transitional housing, or other temporary accommodations to individuals and families experiencing unsheltered homelessness who want to reside in shelter or temporary housing before identifying a permanent housing option. (3 points)
  - Current Strategy to Provide Immediate Access to Low Barrier Permanent Housing for Individuals and Families Experiencing Unsheltered Homelessness. The current strategy to rapidly house individuals and families experiencing homelessness in low-barrier permanent housing. (3 points)
- *Updating the CoCs Strategy to Identify, Shelter, and House Individuals Experiencing Unsheltered Homelessness with Data and Performance.* CoCs will provide information on how the current strategies to provide shelter and housing to individuals experiencing homelessness and to conduct street outreach will be updated and enhanced using data and performance. (8 points)
  - *Identify and Prioritize Households Experiencing or with Histories of Unsheltered Homelessness.* How the CoC will ensure that resources funded under this Special NOFO serve individuals and families who are currently unsheltered or have histories of unsheltered homelessness and how the CoC's prioritization strategies will contribute to reducing unsheltered homelessness within the CoC's geographic area. (12 points)
  - *Involving Individuals with Lived Experience of Homelessness in Decision Making.* CoCs must demonstrate individuals and families experiencing homelessness, particularly those who have experienced unsheltered homelessness, are meaningfully and intentionally integrated into the CoC decision-making structure. Additionally, CoCs must demonstrate how they encourage projects to involve individuals and families with lived experience of unsheltered homelessness in the delivery of services (5 points)
  - Supporting Underserved Communities and Supporting Equitable Community Development. (8 points)
- **Unsheltered Homelessness Bonus.** (30 points maximum)
    - HUD will award bonus points to CoCs applying for the Unsheltered Set Aside based on the number of unsheltered people reported in the 2019 Point in Time Count.
      - Orange County CoC will receive 10 bonus points.