CoCBuilds Competition Guide

Associated Federal Funding Opportunity: FR-6800-N-25A

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Section I: Background

The Continuum of Care (CoC) Program (24 CFR part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, states, and local governments to quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals and families; and to optimize self-sufficiency among those experiencing homelessness.

To distribute appropriated funding from the CoC Program, the U.S. Department of Housing and Urban Development (HUD) issues Notices of Funding Opportunity (NOFOs). The Continuum of Care Builds (CoCBuilds) NOFO targets efforts within CoC geographic areas to address and reduce persons experiencing homelessness by adding new units of permanent supportive housing (PSH) through new construction, acquisition, or rehabilitation through one-time CoCBuilds awards under the CoC Program.

Continuums of Care (CoCs) registered with HUD may apply for one PSH project within the geography of the CoC. CoC Applications are due to HUD before the published NOFO deadline(s).

This guide describes the policies and processes used by EPCH to select a viable, necessary, and competitive project for the purposes of the CoC BUILDS conduct a local competition for Project Applications in allowed geographies to be included in the EPCH's consolidated application to HUD in the national CoC Program Competition.

Section II: HUD Guidelines for CoCBuilds

This section describes the HUD requirements that most directly affect project applicants. For more information, the NOFO and HUD's other CoC competition resources are available at: https://www.hud.gov/program_offices/cfo/gmomgmt/grantsinfo/fundingopps/CoCBuilds.

A. HUD Goals for CoCBuilds

The CoCBuilds NOFO targets efforts within CoC geographic areas to address and reduce persons experiencing homelessness by adding new units of permanent supportive housing (PSH) through new construction, acquisition, or rehabilitation through one-time CoCBuilds awards under the CoC Program.

HUD has named six goals for the CoCBuilds competition:

1. Increase housing opportunities for people with high risk of levels of need.
2. Increase the supply of permanent supportive housing units within CoC geographic areas to address individuals and families experiencing homelessness where one member of the household has a disability.
3. Encourage coordination between housing providers, health care organizations, and social service providers.
4. Ensure access to resources for projects to expand opportunities for new PSH units in States with populations less than 2.5 million.
5. Ensure new PSH units are conveniently located near local services, e.g., walking distance, near reliable transportation services, provide access to telehealth.
6. Affirmatively further fair housing by addressing barriers which perpetuate segregation, hinder access to areas of opportunity for protected class groups and concentrate affordable housing in under-resourced areas.

B. HUD Policy Priorities for CoCBuilds

Applicable Goals and Objectives from HUD's Strategic Plan
Strategic Goal 1: Support Underserved Communities Fortify support for underserved communities and support equitable community development for all people.

- 1B: Reduce Homelessness Strengthen Federal, State, Tribal, and community implementation of the Housing First approach to reducing the prevalence of homelessness, with the ultimate goal of ending homelessness.

Strategic Goal 2: Ensure Access to and Increase the Production of Affordable Housing Ensure housing demand is matched by adequate production of new homes and equitable access to housing opportunities for all people.

- 2A: Increase the Supply of Housing Enhance HUD's programs that increase the production and supply of housing across the country.

Strategic Goal 4: Advance Sustainable Communities Advance sustainable communities by strengthening climate resilience and energy efficiency, promoting environmental justice, and recognizing housing's role as essential to health.

- 4B: Strengthen Environmental Justice Reduce exposure to health risks, environmental hazards, and substandard housing, especially for low-income households and communities of color.
- 4C: Integrate Health and Housing Advance policies that recognize housing's role as essential to health.

HUD Goal numbers of 1, 2 and 4 are correct

The following are policy priorities specific to this NOFO:

- *Increasing Affordable Housing Supply.* The lack of affordable housing is the main driver of homelessness. This NOFO provides funding for new construction, rehabilitation, or acquisition that can increase permanent supportive housing stock in a CoC's geographic area. CoCs, applicants, and developers should partner to determine an economical way to increase permanent supportive housing supply for individuals and families experiencing homelessness that considers adaptive reuse and conversion of hotel properties. Additionally, CoCs and applicants should engage local leaders to mitigate zoning and land use issues that may impact adding permanent supportive housing units to the CoC's housing stock.
- *Ensuring Access to Supportive Services and Public Services.* Providing voluntary supportive services to individuals and families experiencing homelessness, particularly for these households that also include a family member who has a disability, can ensure the households have the tools and resources needed to successfully maintain permanent housing. Applicants must ensure households that will reside in the units developed under this NOFO will have access to CoC Program supportive services as well as other public services such as easy access to local parks and recreation, post office, etc. Additionally, applicants proposing projects in rural areas are encouraged to consider the most cost-effective method for supportive services delivery (e.g., use of internet for check-ins with program participants) and access to public services.
- *Partnering with Housing, Health, and Service Agencies.* Using cost performance and outcome data, applicants should improve how all available resources are utilized to end homelessness. This is especially important as the CARES Act and American Rescue Plan have provided significant new resources to help end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:
  - Work closely with public and private healthcare organizations and assist program participants who are interested in assistance with receiving primary care, housing related services, and with obtaining medical insurance to address healthcare needs. This includes developing close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.
  - Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) Vouchers, and other housing

voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new program resources provided through the HOME Investment Partnerships - American Rescue Plan Program (HOME-ARP) that was created through the American Rescue Plan.

- o Partner with local workforce development centers to improve employment opportunities.
- o Work with Tribes and Tribal organizations to ensure that Tribal members can access CoC funded assistance when a CoC's geographic area borders a Tribal area.

C. HUD CoC Program Components

24 CFR 578.37 states CoC funds may be used to pay for the eligible costs listed in 24 CFR 578.39 through 578.63 when used to establish and operate projects under five components: Permanent Housing – Permanent Supportive Housing (PH-PSH) or Rapid Rehousing (PH-RRH); Transitional Housing (TH); Supportive Services Only (SSO); Homeless Management Information System (HMIS); and in some cases, homelessness prevention.

For the CoCBuilds competition, HUD allows the following to be considered for funding:

- New PH-PSH which must include a capital costs budget for new construction, acquisition, or rehabilitation; and

- The application may also request no more than 20 percent of an award for CoC Program eligible activities and costs associated with such new PH-PSH projects (see Section IV.G.1 of this NOFO), and no more than 10 percent for administrative costs.

Non-capital costs funds awarded under this NOFO may be eligible for renewal in the CoC Program Competition.

D. Collaborative Applicant

HUD will only review CoCBuilds project applications submitted by the CoC-designated Collaborative Applicants. Each CoC-designated Collaborative Applicant may only submit one CoCBuilds application.

E. Maximum Award

The maximum award amount under the CoCBuilds NOFO is based on each CoC's Final Pro Rata Need for the FY 2024 CoC Competition, which HUD calculates based on need indicators and total dollars of renewable HUD CoC funding within the CoC geography. The maximum amount EPCH can request for any one project under the CoCBuilds competition is $5,000,000. If project units are located on Tribal Reservations or Trust Lands, the maximum amount EPCH can request for any one project under the CoCBuilds competition is $7,000,000.

Section III: Local CoC Goals and Responsibilities

To participate in the HUD CoCBuilds Competition, CoCs must select one PH-PSH (Permanent Supportive Housing) project to submit to HUD for consideration.

EPCH's objective for project solicitations is to advance our community's goal of ending and preventing homelessness for all people. Under the CoCBuilds competition, EPCH aims to accomplish this by:
- Strategically allocating HUD funds in conjunction with other funding sources;
- Soliciting and selecting projects that respond most directly to the PH-PSH needs identified in the region, including projects benefiting populations disparately impacted by homelessness;
- Providing specific guidance and consultation to selected project to ensure compliance, competitiveness, sustainability, and alignment with CoC goals; and
- Complying with all HUD requirements.

Project review and selection is conducted by the Planning Committee of EPCH. Committee members will abide by the Conflict of Interest statement in their scoring and ranking.

An Appeal Review Subcommittee will be formed to review any appeals submitted by applicants based on the Local CoCBuilds Competition selection process. The Appeal Review Subcommittee includes two members of the Planning Committee and two individuals not associated with any project seeking or receiving CoC funding.

Section IV: Soliciting Project Applications

All projects seeking CoCBuilds funding through the El Paso City/County CoC Local Program Competition are asked to submit a Notice of Interest. One project will be selected to submit a full application if eligible. Support is available for project applicants.

A. Postings

EPCH issues a Call for CoCBuilds Projects to solicit new projects. New projects are invited from eligible applicants that serve the El Paso County region. The Call for Projects describes eligible and priority project types for the Competition, threshold requirements for applicants and projects, timelines, selection criteria, and resources for applicants.

The Call for CoCBuilds Projects is posted on the EPCH website and distributed via the EPCH email listserv, which includes members and partners across the region. In addition, EPCH sends the Call for Projects to other relevant listservs to invite new projects. EPCH listserv members are also encouraged to share the announcement with their networks.

B. Timelines

The Call for Projects is posted at www.epchomeless.org and distributed via the listserv at least 30 days before the Notice of Interest deadline.

Application materials will be due by 4:00pm on the date(s) listed on the Call for Projects and in the method proscribed.

C. Resources and Support for Project Applicants

Resources are available to assist project applicants. These resources for Project Applicants include:

- Competition guidance and materials, along with HUD and *e-snaps* guides, posted on the EPCH website at https://www.epchomeless.org/.
- Staff webinars for project applicants
- 1:1 Technical Assistance provided by EPCH staff

Details on these resources, together with information on support available through HUD are included in the Call for Projects.

Section V: Receiving Project Applications

Complete project applications include two primary components: a) Notice of Interest and b) Full application.

A. Notice of Interest

Notice of Interest is required for project applicants in the Local CoCBuilds. Notice of Interest includes information about the applicant and proposed subrecipients, project description, implementation readiness, partnerships in place, budget, and any other items relevant to CoCBuilds requirements.

Notice of Interest must be submitted before the established deadline and in accordance with the method or format defined by the Call for Projects. Notice of Interest is due by 4:00pm on the date set in the Call for Projects.

All projects with submitted Notice of Interest will be reviewed by the EPCH for acceptance or rejection for the CoCBuilds competition. Project applicants are strongly encouraged to communicate with the EPCH Director before submitting a Notice of Interest to ensure compliance and to receive technical assistance if needed.

B. Project Application

The project selected from the Notice of Interest review will complete a full Project Application. Representatives of the project and EPCH staff will set a schedule for completion, including consultation times with EPCH staff and members of the Lived Experience Group to ensure application completeness, quality, and competitiveness in the final HUD review process.

Section VI: Reviewing & Scoring Projects

A. Review and Scoring Process

All project Notices of Interest received in accordance with the guidelines for Receiving Project Applications will be reviewed and scored by the Planning Committee. EPCH staff will collect all application materials and deliver them to the Committee.

The Committee members read all project applications and documentation submitted for completeness and consistency. Threshold requirements will be checked first for all project applicants. Projects that do not meet thresholds will not be scored.

The Committee may, but is not required to, request clarifications or additional information from applicants if the information is not clear enough to score the project. However, the committee must apply the same standard to all applications in seeking clarification. The Committee will record and submit questions to the EPCH Director, who will seek input from the applicant on behalf of the Committee.

Reviewers from the Committee will read each applicant's materials to score individual elements. The Committee will use an objective review and rating tool that meets HUD requirements and aligns with the objectives for the funding round to calculate a total score for each project. The score received will be shared with each applicant in a written Project Score Report.

The Score Report must include:

- Notification of whether the project is accepted or rejected for the CoCBuilds Competition, with reason for any rejections;
- Total score;
- Score received for each element; and
- Reviewer comments to applicant, including any conditions placed on the application in preparing the full application.

The Committee may place conditions on applications regarding corrections or clarifications to be made before final submittal.

A List of CoCBuilds Projects selected and rejected will also be generated, including total scores and funding requests. This List is distributed to project applicants and posted to the EPCH website (with notification of posting to the email listserv).

B. Scoring Criteria

The Project Review and Selection Tool for CoCBuilds addresses the following applicant and project eligibility and project quality thresholds established by HUD. This section includes a general review of criteria and standards. Applicants should review the CoCBuilds NOFO and the Project Rating Tool for details.

1. Threshold review
Projects must meet minimum project eligibility, capacity, and timeliness standards identified in the NOFO. All CoCBuilds Applications must meet the following requirements:

- Submit application materials for the Local CoCBuilds Competition within published timelines for the competition and via the methods prescribed.
- Provide evidence of eligibility under the CoCBuilds program for project applicants and subrecipients.
- Demonstrate the financial and management capacity of project applicants and subrecipients to conduct the project as proposed and administer federal funds.
- Be identified as PH-PSH (Permanent Supportive Housing).
- Meet a regional need.
- Establish eligibility of project participants and propose to serve eligible populations applicable to the project type, per 2 CFR §578.3 and any guidance in the NOFO.
- Agree to participate in the local Homeless Management Information System (HMIS).
- Agree to accept and prioritize client referrals through the EPCH Coordinated Entry System.
- Maximize leveraging and identify non-HUD funding for the project. A minimum of 25% match from other sources is required, and partnerships for rental subsidies and healthcare services are strongly encouraged.
- Request less than 20% for services and less than 10% in administrative funding.
- Submit the required certifications and forms as specified in the NOFO.

HUD will also review all projects to determine that projects meet quality thresholds, including assessment of past performance in managing funds. The criteria and scoring for the HUD project quality threshold review are included in NOFO Section VI.A.1. and VI.A.2.

2. Project quality assessment
CoCBuilds project quality assessment elements fall into three primary areas: Need and impact in El Paso County CoC region, Strength of project team, and Anticipated Competitiveness of Project.

Need and impact:

- Number of units proposed for target population
- Funding requested per unit
- Commitment to Housing First implementation
- Lived experience involvement in project
- Local plan/support for the project

Strength of project team:

- Extent of developer/owner experience
- Extent of property management experience
- Extent of service provider experience
- Level of team cohesion

Anticipated competitiveness of project:

- Readiness and project timeline
- Level of community integration
- Experience promoting racial equity
- Commitment of healthcare services to project
- Commitment of rental assistance to project

C. Criteria for Reducing or Rejecting a Project Proposal

The EPCH reserves the right to reduce or reject a funding request from a project applicant for any or the following reasons:

- Failure to meet any threshold criteria for grantees of the HUD CoC Program
- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon
- Evidence of any of the following:
  - o Audit finding(s) for which a response is overdue or unsatisfactory
  - o History of inadequate fiscal management and accounting practices
  - o Noncompliance with HUD policies and/or EPCH membership agreement or policies
  - o History of other capacity issues that have significantly impacted the operation of the project and its performance, such as untimely expenditures on prior awards, delay in reimbursing subrecipients for eligible costs, or a pattern of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established time limits
- Failure to provide documentation required by EPCH for a project application or project review in the time or manner required
- Funding limits set within the CoCBuilds NOFO.

Any criteria applied by the EPCH for reducing or rejecting funding requests will be applied equitably to similar projects and situations within consideration under the CoCBuilds NOFO.

Section IX: Selections and Award Notifications

All project applicants will be notified of their project status following the process below.

A. El Paso City/County CoC Local CoCBuilds Competition

1. Notice to applicants: The EPCH CoC Planning Committee (or a non-conflicted subset of the Committee) will review Notices of Interest using the EPCH CoCBuilds Project Rating Tool. By the date posted in the Call for Projects, the Committee (via the Director) will provide all project applicants notice of project acceptance/rejection, any funding   changes, and score.

One project will be selected to continue with a Full Application to be submitted by the CoC to HUD. The notification for the selected project will include required and recommended areas for discussion/improvement to be addressed during the full application stage. EPCH staff will also contact the selected project applicant to establish the consultation and completion process for the Full Application.

All Full Application materials must be submitted to EPCH by 4:00pm on the date set in the Call for Projects to be included in the final submittal to HUD by the CoC.

2. Notice to EPCH members and stakeholders: membership will be notified by listserv and   website posting about certain aspects of project applications submitted in the CoCBuilds   Competition. This includes project applicant, project name, project city, project total funding   request, project total score, project acceptance/rejection status, and notice of final submittal of   application to HUD.

B. HUD CoCBuilds Competition

HUD will conduct a threshold review of projects for all CoCs that submit a CoCBuilds Application by the application deadline. Projects and applicants that do not meet threshold eligibility and capacity requirements set forth in the NOFO will be rejected (For detail, review NOFO Section VI.A.1. and VI.A.2).

HUD will conditionally accept applications based on its requirements and priorities. Notifications will be sent by email to the person listed as the authorized representative on the application.

After HUD has made selections, HUD will finalize specific terms of the award and budget in consultation with the selected applicant. If HUD and the selected applicant do not finalize the terms and conditions of the award in a timely manner, or the selected applicant fails to provide requested information, an award will not be made to that applicant. In this case, HUD may select another eligible applicant. HUD may also impose specific conditions on an award as provided under 2 CFR 200.208.

Administrative and reporting requirements for successful applicants are outlined in the NOFO Section VI.B. and VI.C.)

Section X: Appeals

Project applicant may submit appeals to the decisions of the Project Performance & Review Committee in certain circumstances where the applicant believes the project application was harmed by a miscalculation on the part of the Committee, a violation of established HUD   policy, or a violation of Program Competition guidelines as defined in this document.

Disagreement with the results of a decision that followed appropriate process will be deemed an invalid appeal.

Appeals will be limited to:
1. Verified Conflict of Interest
2. Violation of established voting policies or procedures
3. Violation of regulations established by HUD
4. Technical errors such as mathematical miscalculations by the scoring Committee. (Errors in data submitted by the applicant do not qualify.)

Projects wishing to appeal related to scoring must submit the appeal in writing using the Appeals form attached by the deadlines set forth in the Call for Projects. All agencies filing an appeal must be prepared to rapidly respond to requests from the committee.

The Appeal Review Subcommittee will assess claims within three business days and communicate decisions on that day via the CoC Director. Decisions of the Appeal Review Subcommittee are final for the purposes of the Local CoCBuilds Competition. Applicants may review the CoCBuilds NOFO for guidelines regarding appeals in the National Competition.

Appendix A: Appeal Form (Local Competition)

Agency:_____Project: _____

For each item appealed, identify the eligible category of appeal, describe the issue, and <u>attach evidence</u> to support your claim.

Eligible Appeal Category	Description of issue	Evidence attached (list)
☐ Verified Conflict of Interest ☐ Violation of established voting policies or procedures ☐ Violation of regulations established by HUD ☐ Technical errors such as mathematical miscalculations <u>by the scoring Committee</u>.		
☐ Verified Conflict of Interest ☐ Violation of established voting policies or procedures ☐ Violation of regulations established by HUD ☐ Technical errors such as mathematical miscalculations <u>by the scoring Committee</u>.		

Certification: I certify that all the information provided in this appeal request (and any enclosed documents) is correct, accurate and complete to the best of my knowledge. I understand that the decisions of the Appeal Review Committee are final.

_____   _____ _____
Signature   Printed Name   Date

Appendix B. Full Application Consultation and Support Process

After project proposals are reviewed in the Notice of Interest phase, one project will be selected to complete the full project application for consideration by HUD.

To ensure that the project meets all requirements of the CoCBuilds competition and is likely to be competitive in the HUD funding review, the CoC staff will engage in a consultation and support process with the selected project.

Applicants engaging in this process should expect to take part in the following ways.

Activity	Purpose	Date
1. Full Application Kick-Off meeting	• Review Project Score Report and comments • Review Full Application elements for HUD • Discuss and set up priority action areas	Thursday, October 10, 2024 (Please contact Camille Castillo for Zoom Link and time)
2. Mid-point check-in and consultation	• Review progress and next steps on priority action areas • Address any emerging issues with project/application	As needed
3. Drafts of application and presentation for Planning Committee meeting due	• Provide written feedback for application components • Prepare for Planning Committee engagement • Arrange further consultation as needed	Friday, October 18, 2024
4. Project presentation to CoC Planning Committee	• Inform CoC about development of project • Receive input or questions about project	Tuesday, October 22, 2024
5. Final check-in and materials review	• Review progress and next steps on priority action areas, with focus on forms and materials • Address any emerging issues with project/application	Monday, November 4, 2024
6. Final application materials submittal to CoC	• Ensure timely submittal of project application to HUD with other CoC materials	Friday, November 8, 2024

All meetings will be virtual unless otherwise arranged. Dates and times of check-ins may be adjusted by agreement of applicant and CoC staff.