

Before Starting the CoC Application

You must submit all three of the following parts in order for us to consider your Consolidated Application complete:

1. the CoC Application,
2. the CoC Priority Listing, and
3. all the CoC's project applications that were either approved and ranked, or rejected.

As the Collaborative Applicant, you are responsible for reviewing the following:

1. The FY 2022 CoC Program Competition Notice of Funding Opportunity (NOFO) for specific application and program requirements.
2. The FY 2022 CoC Application Detailed Instructions which provide additional information and guidance for completing the application.
3. All information provided to ensure it is correct and current.
4. Responses provided by project applicants in their Project Applications.
5. The application to ensure all documentation, including attachment are provided.

Your CoC Must Approve the Consolidated Application before You Submit It
- 24 CFR 578.9 requires you to compile and submit the CoC Consolidated Application for the FY 2022 CoC Program Competition on behalf of your CoC.

- 24 CFR 578.9(b) requires you to obtain approval from your CoC before you submit the Consolidated Application into e-snaps.

Answering Multi-Part Narrative Questions

Many questions require you to address multiple elements in a single text box. Number your responses to correspond with multi-element questions using the same numbers in the question. This will help you organize your responses to ensure they are complete and help us to review and score your responses.

Attachments

Questions requiring attachments to receive points state, "You Must Upload an Attachment to the 4B. Attachments Screen." Only upload documents responsive to the questions posed—including other material slows down the review process, which ultimately slows down the funding process. Include a cover page with the attachment name.

- Attachments must match the questions they are associated with—if we do not award points for evidence you upload and associate with the wrong question, this is not a valid reason for you to appeal HUD's funding determination.

- We must be able to read the date and time on attachments requiring system-generated dates and times, (e.g., a screenshot displaying the time and date of the public posting using your desktop calendar; screenshot of a webpage that indicates date and time).

1A. Continuum of Care (CoC) Identification

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1A-1. CoC Name and Number: OR-500 - Eugene, Springfield/Lane County CoC

1A-2. Collaborative Applicant Name: Lane County

1A-3. CoC Designation: CA

1A-4. HMIS Lead: Lane County

1B. Coordination and Engagement–Inclusive Structure and Participation

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
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1B-1.	Inclusive Structure and Participation–Participation in Coordinated Entry.	
	NOFO Sections VII.B.1.a.(1), VII.B.1.e., VII.B.1.p., and VII.B.1.r.	
	In the chart below for the period from May 1, 2021 to April 30, 2022:	
	1. select yes or no in the chart below if the entity listed participates in CoC meetings, voted—including selecting CoC Board members, and participated in your CoC’s coordinated entry system; or	
	2. select Nonexistent if the organization does not exist in your CoC’s geographic area:	

	Organization/Person	Participated in CoC Meetings	Voted, Including Electing CoC Board Members	Participated in CoC’s Coordinated Entry System
1.	Affordable Housing Developer(s)	Yes	Yes	Yes
2.	Agencies serving survivors of human trafficking	Yes	No	Yes
3.	CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
4.	Disability Advocates	Yes	Yes	Yes
5.	Disability Service Organizations	Yes	Yes	Yes
6.	EMS/Crisis Response Team(s)	Yes	No	No
7.	Homeless or Formerly Homeless Persons	Yes	Yes	Yes
8.	Hospital(s)	Yes	No	No
9.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tribal Organizations)	No	No	No
10.	Law Enforcement	Yes	Yes	No
11.	Lesbian, Gay, Bisexual, Transgender (LGBTQ+) Advocates	Yes	No	Yes
12.	LGBTQ+ Service Organizations	No	No	No
13.	Local Government Staff/Officials	Yes	Yes	Yes
14.	Local Jail(s)	No	No	No
15.	Mental Health Service Organizations	Yes	Yes	Yes
16.	Mental Illness Advocates	Yes	Yes	Yes

17.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	No	No	No
18.	Organizations led by and serving LGBTQ+ persons	No	No	No
19.	Organizations led by and serving people with disabilities	Yes	No	No
20.	Other homeless subpopulation advocates	Yes	Yes	Yes
21.	Public Housing Authorities	Yes	Yes	Yes
22.	School Administrators/Homeless Liaisons	Yes	Yes	Yes
23.	State Domestic Violence Coalition	No	No	No
24.	State Sexual Assault Coalition	No	No	No
25.	Street Outreach Team(s)	Yes	No	Yes
26.	Substance Abuse Advocates	Yes	No	No
27.	Substance Abuse Service Organizations	Yes	No	Yes
28.	Victim Service Providers	Yes	Yes	Yes
29.	Domestic Violence Advocates	Yes	Yes	Yes
30.	Other Victim Service Organizations	Yes	Yes	No
31.	Youth Advocates	Yes	Yes	Yes
32.	Youth Homeless Organizations	Yes	Yes	Yes
33.	Youth Service Providers	Yes	Yes	Yes
	Other: (limit 50 characters)			
34.	Philanthropic Organization	Yes	Yes	No
35.	Healthcare Representatives	Yes	Yes	No

1B-2.	Open Invitation for New Members.	
	NOFO Section VII.B.1.a.(2)	

	Describe in the field below how your CoC:
1.	communicated a transparent invitation process annually (e.g., communicated to the public on the CoC's website) to solicit new members to join the CoC;
2.	ensured effective communication with individuals with disabilities, including the availability of accessible electronic formats;
3.	invited organizations serving culturally specific communities experiencing homelessness in the geographic area to address equity (e.g., Black, Latino, Indigenous, LGBTQ+, and persons with disabilities).

(limit 2,500 characters)

The Poverty & Homelessness Board (PHB) is the CoC board. When a PHB member position is vacated or term is expiring, announcement of a vacancy is posted on the LaneCounty.org website & emailed to a targeted distribution list of over 320 people. Vacancies occur at least annually. Voting & non-voting board position terms are staggered 3 years. Elected official or designee positions are annually appointed by their jurisdictions. CoC staff advertise vacancies at homeless service provider locations, and public or community meetings. Vacancy notices are emailed widely & shared among advocate networks and providers, as well as by the local news media and on the radio. The application is available in a variety of formats including paper, by mail, or electronic submission. Options are provided if individuals need assistance in completing an application. Information on the Lane County website, including vacancy postings, can be translated into at least ten languages. The lived experience advisory group, LEAGUE, conducts targeted outreach and helps recruit people with lived experience of homelessness to apply for open positions to both the PHB and other committees. Targeted recruiting for membership is conducted to engage key partners and individuals who represent diverse viewpoints including organizations serving culturally specific communities experiencing homelessness in the geographic area to address equity (e.g., Black, Latino, Indigenous, persons with disabilities). The CoC has improved outreach to BIPOC communities due to partnerships made with Public Health and COVID-related outreach. Concentrated and strategic outreach is conducted with special population service providers, such as those that serve youth, families, survivors of domestic violence, veterans, and rural areas to recruit for PHB voting positions & attend PHB meetings. All meetings are viewable live on the internet, and broadcast on local TV. There are designated positions for people with lived experience on the Board and through LEAGUE, including positions for homeless youth representative on the Board and Youth Executive Committee. PHB meetings are open to the public & allow public comments, which are addressed in the discussion by PHB members, & followed up as necessary. During PHB meetings, the Board chair often asks for input from the audience. Decisions made are used for system improvement opportunities.

1B-3.	CoC's Strategy to Solicit/Consider Opinions on Preventing and Ending Homelessness.	
	NOFO Section VII.B.1.a.(3)	

Describe in the field below how your CoC:	
1.	solicited and considered opinions from a broad array of organizations and individuals that have knowledge of homelessness, or an interest in preventing and ending homelessness;
2.	communicated information during public meetings or other forums your CoC uses to solicit public information; and
3.	took into consideration information gathered in public meetings or forums to address improvements or new approaches to preventing and ending homelessness.

(limit 2,500 characters)

The Lane County Poverty & Homelessness Board (PHB) is the designated CoC Board. The CoC Board, in collaboration with LC Human Services Division as CoC Lead, solicits & considers opinions from organizations & individuals that have knowledge of, or an interest in preventing & ending homelessness through its direct membership & broad outreach to the community. The 21-member board itself has broad representation including elected officials from local jurisdictions, education, law enforcement, the VA, victim services, philanthropy, business, substance abuse & mental health service agencies, faith-based orgs., local housing authority, formerly homeless adults & youth, child welfare, and homeless services providers. The CoC Board communicates and solicits relevant information at monthly public meetings. Meeting notices are sent to over 50 community agencies & 100 individuals representing advocacy groups, nonprofits, schools, city, government officials, and people with lived experience. At times up to 30 community members attend in the audience. Each meeting has an opportunity for public comment. The PHB welcomes active engagement in meetings from community members. Community representatives are invited to PHB meetings to provide for nuanced conversation about important issues. Furthermore, LC CoC has an official advisory group to the PHB, LEAGUE (Lived Experience Advisory Group for Unhoused Engagement), made up of 100% individuals with current or former experience of homelessness. This group provides an avenue for PLE to participate directly and advise the CoC on overall planning around homelessness. Since 2018, PHB meetings have been livestreamed online (CC), recorded, & broadcast community television, in addition to being archived online (available with CC). Since 2020, all meetings have been held virtually. These formats allow for increased accessibility to CoC progress for stakeholders, and for community members to expand their options to engage. In addition to formal CoC meetings, the CoC also considers opinions through other formats for more specific or nuanced topics including online surveys, focus groups, and targeted or facilitated discussions. For example, the CoC may gather providers and other stakeholders serving families with children to discuss gaps in services or needs specific to this population, or may conduct focus groups with current residents of shelter to gather feedback on plans to address unsheltered homelessness.

1B-4.	Public Notification for Proposals from Organizations Not Previously Awarded CoC Program Funding.	
	NOFO Section VII.B.1.a.(4)	
	Describe in the field below how your CoC notified the public:	
1.	that your CoC will consider project applications from organizations that have not previously received CoC Program funding;	
2.	about how project applicants must submit their project applications—the process;	
3.	about how your CoC would determine which project applications it would submit to HUD for funding; and	
4.	how your CoC effectively communicated with individuals with disabilities, including making information accessible in electronic formats.	

(limit 2,500 characters)

Prior to & upon release of the CoC NOFO, Lane County (LC) consults with the Poverty and Homelessness Board (PHB) to determine opportunities for new CoC projects, based on identified needs & gaps. In 2022, LC released a Request for Proposals (RFP) to secure a provider(s) for new CoC projects through both Bonus and DV Bonus opportunities, released 8/11/2022. RFPs are posted on the LC procurement website with instructions on how to submit a proposal, posted publicly on the county-wide listserv, sent to a borad email distribution list which includes stakeholders, community members, current CoC or non-CoC funded providers & people with lived experience (PLE). Agencies not currently receiving CoC funding are encouraged to apply and may inquire further through a LC Bidder's Conference, if held, or CoC Funding Orientation (held annually). FAQs are posted publicly on the LC bids website with the RFP. Proposals are submitted electronically to LC staff. Applications received are scored by a selection panel, with representation of PHB members and PLE, based on a pre-determined rubric posted with the RFP. In order to be inclusive to proposals from entities that have not received CoC funds, LC requests details of similar, relevant experience working with vulnerable populations, allowing providers to demonstrate parallel experience. Final recommendations for inclusion of new projects in the CoC Application are made & approved by the selection committee. Applicants have an opportunity to protest the RFP itself if they feel it is unnecessarily restrictive & also may review their scores or protest should they believe the panel has unfairly rejected the applicant's bid. In FY22, no project proposals for CoC funding were received through the posted RFP. In this instance, LC as Lead Applicant, proposed submitting a direct proposal on behalf of the CoC to the Poverty and Homelessness Board, with input from relevant stakeholders. LC has a responsibility to provide effective access to its website information, including posted RFPS, to those with disabilities. In placing information on the LC website, the LC Information Services Dept. uses the technical standards adopted by the U.S. Access Board for electronic & information technology in order to ensure accessibility. Individuals who encounter an accessibility issue related to information posted to the website are encouraged & provided with a method to contact LC to resolve the issue.

1C. Coordination and Engagement

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

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1C-1.	Coordination with Federal, State, Local, Private, and Other Organizations.	
	NOFO Section VII.B.1.b.	
	In the chart below:	
	1. select yes or no for entities listed that are included in your CoC's coordination, planning, and operations of projects that serve individuals, families, unaccompanied youth, persons who are fleeing domestic violence who are experiencing homelessness, or those at risk of homelessness; or	
	2. select Nonexistent if the organization does not exist within your CoC's geographic area.	

	Entities or Organizations Your CoC Coordinates with for Planning or Operations of Projects	Coordinates with the Planning or Operations of Projects?
1.	Funding Collaboratives	Yes
2.	Head Start Program	Yes
3.	Housing and services programs funded through Local Government	Yes
4.	Housing and services programs funded through other Federal Resources (non-CoC)	Yes
5.	Housing and services programs funded through private entities, including Foundations	Yes
6.	Housing and services programs funded through State Government	Yes
7.	Housing and services programs funded through U.S. Department of Health and Human Services (HHS)	Yes
8.	Housing and services programs funded through U.S. Department of Justice (DOJ)	Yes
9.	Housing Opportunities for Persons with AIDS (HOPWA)	Nonexistent
10.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tribal Organizations)	No
11.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	No
12.	Organizations led by and serving LGBTQ+ persons	No
13.	Organizations led by and serving people with disabilities	Yes
14.	Private Foundations	Yes
15.	Public Housing Authorities	Yes
16.	Runaway and Homeless Youth (RHY)	Yes
17.	Temporary Assistance for Needy Families (TANF)	Yes
	Other:(limit 50 characters)	

18.		
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1C-2.	CoC Consultation with ESG Program Recipients.	
	NOFO Section VII.B.1.b.	

Describe in the field below how your CoC:	
1.	consulted with ESG Program recipients in planning and allocating ESG and ESG-CV funds;
2.	participated in evaluating and reporting performance of ESG Program recipients and subrecipients;
3.	provided Point-in-Time (PIT) count and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area; and
4.	provided information to Consolidated Plan Jurisdictions within your CoC's geographic area so it could be addressed in Consolidated Plan update.

(limit 2,500 characters)

Lane County (LC, subrecipient) receives ESG funding from Oregon Housing & Community Services (OHCS, Recipient) for Rapid Re-housing (RRH), Homelessness Prevention (HP), & Emergency Shelter (ES). LC also received ESG-CV from OHCS through direct allocation & competitive award. ESG-CV is used for Street Outreach, ES, RRH, HP, & HMIS activities required to respond to COVID-19. LC consults with OHCS, CoC Board (PHB); Human Services Commission (HSC), a multi-jurisdictional committee with representation from LC, along with entitlement Cities of Eugene & Springfield; & other stakeholders, including ESG providers, to determine annual ESG funding allocations. ESG-CV allocation planning required additional input solicited directly from public health, people with lived experience, service providers, the faith-based community, and advocacy groups, among others. Final allocation plans are driven by housing needs analysis, Point In Time (PIT) and By Name List data, and evaluation of service gaps. Panel discussions of current providers are held and facilitated at the HSC monthly meetings to hear more about current trends, gaps, needs, and challenges. In 2021, provider panels were held on the topics of ES, HP, Homeless Access Centers, Workforce Services, Youth and DV Services, and Nonprofit Capacity. Final plans are presented to & approved by the PHB & HSC. A risk assessment is performed on LC ESG and ESG-CV subrecipients annually. The agency's risk level, along with ongoing evaluation, determines the level of monitoring received. At minimum, LC conducts site visits with ESG subrecipients annually. Select ESG-CV monitoring occurred in 2021 based on risk analysis and will continue in 2022. Assertive Corrective Action Plans are put in place for any deficiencies identified. Technical assistance is provided as needed to resolve issues with performance or grant administration. To report and monitor performance, LC uses HMIS to create the ESG CAPER tables as required by HUD. The report is generated quarterly for all ESG/ESG-CV projects. Each report is reviewed by LC for data quality and sent to OHCS for further review & upload into SAGE. LC CoC is an active participant in the Consolidated Plan update processes and provides information, including PIT and HIC data, to the Con Plan jurisdictions in development of their plans (City of Eugene, Springfield and State of Oregon).

1C-3.	Ensuring Families are not Separated.	
	NOFO Section VII.B.1.c.	

Select yes or no in the chart below to indicate how your CoC ensures emergency shelter, transitional housing, and permanent housing (PSH and RRH) do not deny admission or separate family members regardless of each family member's self-reported sexual orientation and gender identity:

1.	Conducted mandatory training for all CoC- and ESG-funded service providers to ensure families are not separated.	Yes
2.	Conducted optional training for all CoC- and ESG-funded service providers to ensure families are not separated.	No
3.	Worked with ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients.	Yes
4.	Worked with ESG recipient(s) to identify both CoC- and ESG-funded facilities within your CoC's geographic area that might be out of compliance and took steps to work directly with those facilities to bring them into compliance.	No
5.	Sought assistance from HUD by submitting AAQs or requesting technical assistance to resolve noncompliance of service providers.	No
6.	Other. (limit 150 characters)	
		No

1C-4.	CoC Collaboration Related to Children and Youth—SEAs, LEAs, School Districts.	
	NOFO Section VII.B.1.d.	

Select yes or no in the chart below to indicate the entities your CoC collaborates with:

1.	Youth Education Provider	Yes
2.	State Education Agency (SEA)	No
3.	Local Education Agency (LEA)	Yes
4.	School Districts	Yes

1C-4a.	Formal Partnerships with Youth Education Providers, SEAs, LEAs, School Districts.	
	NOFO Section VII.B.1.d.	

Describe in the field below the formal partnerships your CoC has with at least one of the entities where you responded yes in question 1C-4.

(limit 2,500 characters)

Lane County was selected as a Round 4/5 YHDP Community which has allowed us to further develop formal education partnerships at the local and national level. The CoC has a formal partnership with the National Center for Homeless Education through our YHDP efforts. The NCHE has centered our YHDP Coordinated Community Plan with an education focus. NCHE has provided our efforts with technical assistance, links to other communities doing the work to end youth homelessness and trainings. They provided expertise during our development of the CCP. The NCHE helped to lead the work to incorporate rural school districts into the discussion. The NCHE provided the CoC with a stipend that is being used to supplement the pay of a Housing Navigator (position held through a non-profit). The HN is part of the 15th Nights efforts regarding homeless students -their efforts include the rapid access network that quickly link YYA with supplies and basic needs to help them ensure success in the completion of their education. The HN will help connect students to housing options, both in-and-out of the CoC, including ensuring the connection to CE assessments. Our education CCP efforts have linked in higher education partners including the newly developed University of Oregon Basic Needs & Off-Campus Support Department as well as Lane Community College's Basic Needs Director. Both of these positions/departments provide supportive services to higher education students, including those under the age of 25, who require supports and housing to ensure the completion of their education. We are strategically linking these two offices into our CCP strategic plan to ensure participation and completion of our action steps/goals. Our efforts include the launch of a CCP specific to education. The co-chairs of the EdCCP include the founder of 15th Night and a local McKinney Vento Liaison (MVL) (both of these people/positions have been involved from the start of our YHDP efforts beginning from our round-1 application for YHDP funds) and includes TA from the NCHE. The EdCCP is going to ensure that YYA are successful in their education needs-this an education specific CCP launch event that will include MVL/school staff from all across Lane County. This tiered approach allows the CoC to develop strong relationships with school staff from different districts, hear about those districts unique needs and develop strong strategies for accomplishing the goals outlined in the CCP.

1C-4b.	Informing Individuals and Families Experiencing Homelessness about Eligibility for Educational Services.	
	NOFO Section VII.B.1.d.	

Describe in the field below written policies and procedures your CoC adopted to inform individuals and families who become homeless of their eligibility for educational services.
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(limit 2,500 characters)

Projects that serve households with children are required to designate a staff person as the educational liaison that will ensure children are enrolled in school and connected to appropriate services in the community including early childhood programming, Head Start, and McKinney Vento Educational Services. Projects that serve households with children are also expected to incorporate the following within the service model and/or through policies and procedures, as appropriate: A case management model that includes developmentally appropriate intake and service planning for each member of the family; Services are provided where the child is living or the project provides space for home-based, early childhood services; Facilitation of on-site development screening for all children that enter the program; Actively assist families in accessing child care options; Assess, track, and monitor the health of children in the program, including providing connection to health care providers. These expectations are reviewed through the annual CoC Evaluation process and monitoring.

1C-4c.	Written/Formal Agreements or Partnerships with Early Childhood Services Providers.	
	NOFO Section VII.B.1.d.	

Select yes or no in the chart below to indicate whether your CoC has written formal agreements or partnerships with the listed providers of early childhood services:

		MOU/MOA	Other Formal Agreement
1.	Birth to 3 years	No	Yes
2.	Child Care and Development Fund	No	Yes
3.	Early Childhood Providers	Yes	No
4.	Early Head Start	No	Yes
5.	Federal Home Visiting Program–(including Maternal, Infant and Early Childhood Home and Visiting or MIECHV)	No	Yes
6.	Head Start	No	Yes
7.	Healthy Start	Yes	Yes
8.	Public Pre-K	Yes	No
9.	Tribal Home Visiting Program	No	Yes
	Other (limit 150 characters)		
10.	Relief Nursery Home Visiting	Yes	Yes

1C-5.	Addressing Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors–Collaborating with Victim Service Providers.	
	NOFO Section VII.B.1.e.	

Describe in the field below how your CoC regularly collaborates with organizations who help provide housing and services to survivors of domestic violence, dating violence, sexual assault, and stalking to:

1.	update CoC-wide policies; and
2.	ensure all housing and services provided in the CoC are trauma-informed and can meet the needs of survivors.

(limit 2,500 characters)

Lane County (LC) CoC regularly collaborates with victim service providers (VSP) to update CoC wide policies and ensure all housing and services provided are trauma informed and can meet the needs of survivors. There are dedicated representatives from a VSP on the Poverty and Homelessness Board (CoC Board) as well as the Coordinated Entry (CE) Stakeholder Committee. These two groups are involved in making improvements to the CE system and updating CoC policies. An example of this collaboration is the partnership to roll out Emergency Housing Vouchers in 2021. The CoC worked with the PHA and VSPs to prioritize survivors of domestic violence, dating violence, sexual assault and stalking for EHV. Together, we developed a streamline process through CE that emphasized client confidentiality. Lane CoC also works with service providers to coordinate an annual training for CoC projects and CE staff that addresses best practices in serving survivors.

1C-5a.	Annual Training on Safety and Best Practices to Address the Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
NOFO Section VII.B.1.e.		
Describe in the field below how your CoC coordinates to provide training for:		
1.	project staff that addresses best practices (e.g., trauma-informed, victim-centered) on safety and planning protocols in serving survivors of domestic violence and indicate the frequency of the training in your response (e.g., monthly, semi-annually); and	
2.	Coordinated Entry staff that addresses best practices (e.g., trauma informed care) on safety and planning protocols in serving survivors of domestic violence and indicate the frequency of the training in your response (e.g., monthly, semi-annually).	

(limit 2,500 characters)

Lane County (LC) CoC works collaboratively with service providers to coordinate an annual training for CoC projects and Coordinated Entry staff that addresses best practices in serving survivors of DV, dating violence, sexual assault, and stalking. All Coordinated Entry assessors are required to attend annual training on the assessment process, which includes how to use safeguards that protect the confidentiality of the survivor and prioritize their safety needs. As a part of annual training on CoC Standards, providers receive information on the requirements under VAWA and Emergency Transfer Plans. Lane County is also committed to trauma-informed care as one of the department's priority initiatives of the strategic plan. Part of this plan is to include community partners across the CoC. Lane County hosted a harm reduction training that discussed best practices to reduce harm and use motivational interviewing skills to develop victim-centered safety plans. In addition to coordinating trainings, Lane County incorporates trauma-informed care as a foundation with all contracts, providing tools on reviewing policies through a trauma informed lens, and assessing other training needs related to trauma informed care and serving vulnerable populations.

1C-5b.	Using De-identified Aggregate Data to Address the Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
NOFO Section VII.B.1.e.		

	Describe in the field below:
1.	the de-identified aggregate data source(s) your CoC uses for data on survivors of domestic violence, dating violence, sexual assault, and stalking; and
2.	how your CoC uses the de-identified aggregate data described in element 1 of this question to evaluate how to best meet the specialized needs related to domestic violence and homelessness.

(limit 2,500 characters)

Lane County has two primary victim service providers (VSPs): Hope & Safety Alliance (H&SA, formerly Womenspace) and Siuslaw Outreach Services (SOS). H&SA and SOS use separate implementations of Osnum as a comparable database. Lane County does not have access to the system structure or data in Osnum. Neither agency receives ESG or CoC funding currently. In HMIS, client history of experience with Domestic Violence data elements are collected for Adults and Heads of Household in roughly half the projects participating in HMIS in the system and all CoC or ESG projects (SO, ES, TH, RRH and PSH). In Fiscal Year 2021-2022, 12,746 clients responded to this question in the entry assessment. 24.6% of the clients reported a history of domestic violence. 25.7% of these individuals were fleeing domestic violence at the time of project enrollment (start date/entry date). Lane County utilizes data from HMIS to inform planning and funding strategy around the needs of those experiencing or fleeing domestic violence, dating violence, sexual assault, and stalking. VSPs have also been invited to participate in panel discussions at the Human Services Commission to inform the Cities and County of needs and current trends. Lane County has also used data to determine a prioritization for applicants fleeing DV, dating violence, sexual assault, and stalking for the Emergency Housing Voucher program.

1C-5c.	Communicating Emergency Transfer Plan to Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	

	Describe in the field below how your CoC communicates to all individuals and families seeking or receiving CoC Program assistance:
1.	the emergency transfer plan policies and procedures; and
2.	the process for individuals and families to request an emergency transfer.

(limit 2,500 characters)

Lane CoC adopted HUD’s model Emergency Transfer Plan in 2017. This plan requires that all households seeking or receiving CoC program assistance receive a Notice of Occupancy Rights under the Violence Against Women Act at the time of program enrollment, recertification and exit, regardless of known survivor status. This notice outlines the protections for the tenant or applicant under VAWA, procedures for removing a perpetrator from the household, moving to another unit, documentation procedures, and confidentiality. Individuals and families can request a confidential emergency transfer by submitting a written request directly with the housing program. The request should include a statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit or that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant’s request for an emergency transfer. The housing program will then review the request and make reasonable attempts to locate a new unit. The housing program will also coordinate with the Coordinated Entry System to determine bridge/emergency shelter availability and potential transfers to other housing programs.

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1C-5d.	Access to Housing for Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section VII.B.1.e.	

Describe in the field below how your CoC ensures that survivors of domestic violence, dating violence, sexual assault, or stalking have access to all of the housing and services available within the CoC’s geographic area.

(limit 2,500 characters)

Lane County (LC, applicant) contracts with local service providers for housing and service activities to assist individuals and families experiencing homelessness. Currently, LC subcontracts with Hope & Safety Alliance (H&SA) and Suislaw Outreach Services (SOS) (local VSPs) to offer services that ensure DV survivors experiencing homelessness are assisted to quickly move into safe affordable housing. H&SA operates a DV access point in the metro area offering advocacy services, emergency shelter, motel vouchers, essential needs (e.g. food, clothing closet, supplies, etc.), access to Coordinated Entry and housing navigation. H&SA offers extensive access to a variety of supportive services through internal programming and community partnerships. SOS operates programming in the coastal area, providing advocacy services, motel vouchers, essential needs, and access to housing resources. Lane County and H&SA prioritize survivors through Coordinated Entry, based on established CoC policies and procedures. Street Outreach teams that are deployed across the geographic expanse of the county ensure that survivors in all areas of the county are provide service engagement to help connect them to housing and other resources. Outreach staff are trained in provding victim-centered services and connecting survivors with the closest victim services provider. Through case conferencing efforts, DV survivors are identified and service engagement is coordinated to ensure they are being connected to appropriate resources. The unique needs of each household are discussed by the providers who participate in case conferencing to ensure that the survivors are engaged via trauma informed practices. LC has worked to develop specific housing options for people experiencing or fleeing domestic violence. A DV housing preference secured with the housing authority, Homes for Good, provides access to vouchers and individuals fleeing DV were identified as a priority group for the distribution of Emergency Housing Vouchers to ensure additional access to housing. Domestic Violence is identified in the Tenant Selection Plan as a priority population for rural-dedicated HOME Tenant Based Assistance, for which SOS (local VSP) is a referring agency.

1C-5e.	Including Safety, Planning, and Confidentiality Protocols in Coordinated Entry to Address the Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	

Describe in the field below how your CoC's coordinated entry includes:

1.	safety protocols,
2.	planning protocols, and
3.	confidentiality protocols.

(limit 2,500 characters)

CoC & non-CoC funded programs make safety and client choice a priority. The LC CoC consulted local victim service providers and adopted victim-centered practices that align with HUD’s Final Rule on VAWA, including the adoption of and training on an emergency transfer plan, amended VAWA lease addendum, and notice of occupancy rights. When service providers make contact with a homeless household (HH) fleeing DV or sexual violence, HHs are referred to victim services agencies, such as Hope and Safety Alliance (H&SA), Siuslaw Outreach Services (SOS), and Sexual Assault Support Services (SASS). To promote client safety and confidentiality, H&SA, SOS, and SASS do not add client identifying information in an electronic database for these services, while nonvictim services providers give clients the opportunity to de-identify their record in HMIS if the clients feel their safety is at risk. Victim services providers assist with emergency crisis, safety planning, legal advocacy, and counseling services. They work in collaboration with the Department of Justice and the Department of Health and Human Services where clients have the option to be screened for additional services. These services all promote trauma informed principles. H&SA and SASS offer peer-to-peer mentoring where survivors can share their common experience and form authentic relationships. Survivors receive information about the traumatic effects of abuse or violence and are offered a wide range of resources. Other safeguards to protect confidentiality include aggregate reporting and non-disclosure of the physical location of emergency shelters. There are several programs dedicated to HHs fleeing DV: 14 DV ES units with H&SA and 4 DV ES beds through SOS. Some HHs do not want to access DV services, yet still want their safety ensured. These HHs can move through the housing and homeless system while maintaining their privacy through the safeguards mentioned previously.

1C-6.	Addressing the Needs of Lesbian, Gay, Bisexual, Transgender and Queer+—Anti-Discrimination Policy and Training.	
	NOFO Section VII.B.1.f.	

	1. Did your CoC implement a written CoC-wide anti-discrimination policy ensuring that LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination?	Yes
	2. Did your CoC conduct annual CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule)?	No
	3. Did your CoC conduct annual CoC-wide training with providers on how to effectively implement Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs (Gender Identity Final Rule)?	No

1C-6a.	Anti-Discrimination Policy—Updating Policies—Assisting Providers—Evaluating Compliance—Addressing Noncompliance.	
	NOFO Section VII.B.1.f.	

Describe in the field below:	
1.	whether your CoC updates its CoC-wide anti-discrimination policy, as necessary, based on stakeholder feedback;
2.	how your CoC assisted providers in developing project-level anti-discrimination policies that are consistent with the CoC-wide anti-discrimination policy ensuring that LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination;
3.	your CoC's process for evaluating compliance with your CoC's anti-discrimination policies; and

4. your CoC's process for addressing noncompliance with your CoC's anti-discrimination policies.

(limit 2,500 characters)

The Lane County (LC) CoC has a CoC-wide anti-discrimination policy outlined in the CoC Written Standards, which is updated based on feedback, as needed, and approved by the CoC Board. Lane County is committed to non-discrimination and equal access across the homeless service system. All providers are required to comply with all State and Federal statutes regarding non-discrimination including, but not limited to, the Fair Housing Act, the Americans with Disabilities Act, the Civil Rights Act, and the Equal Access to Housing Final Rule. Discriminatory housing practices based on race, color, religion, sex, national origin, disability, familial status, language, ethnicity, socio-economic status, sexual orientation, gender identity, veteran's status, or political beliefs are prohibited. Additionally, LC requires that providers take steps to affirmatively market and outreach to those who are least likely to request assistance, remove barriers to accessing services, and ensure equity across services to the greatest extent possible. LC has required a trauma-informed and equity based framework for all programs funded in the CoC. Utilizing this framework, agencies are encouraged and assisted in ensuring their spaces are accessible and welcoming to all. CoC policies require that staff be trained in cultural competence and that programming be provided in a manner that is adaptable to meet the needs of diverse groups. LC reviews agency policies and procedures for compliance with this policy through the annual CoC Evaluation process and project-level monitoring. Upon review, if policies, procedures, or practices do not comply with the established policy, or otherwise create a barrier for individuals receiving services, including individuals or families identifying as LGBTQ+, the LC CoC would issue a corrective action, provide specific steps, and offer technical assistance as appropriate. LC will review and provide feedback on agency policies and procedures as requested.

1C-7.	Public Housing Agencies within Your CoC's Geographic Area--New Admissions--General/Limited Preference--Moving On Strategy.	
	NOFO Section VII.B.1.g.	

You must upload the PHA Homeless Preference\PHA Moving On Preference attachment(s) to the 4B. Attachments Screen.

Enter information in the chart below for the two largest PHAs highlighted in gray on the FY 2021 CoC-PHA Crosswalk Report or the two PHAs your CoC has a working relationship with--if there is only one PHA in your CoC's geographic area, provide information on the one:

Public Housing Agency Name	Enter the Percent of New Admissions into Public Housing and Housing Choice Voucher Program During FY 2021 who were experiencing homelessness at entry	Does the PHA have a General or Limited Homeless Preference?	Does the PHA have a Preference for current PSH program participants no longer needing intensive supportive services, e.g., Moving On?
Homes for Good	13%	Yes-HCV	Yes

1C-7a.	Written Policies on Homeless Admission Preferences with PHAs.	
	NOFO Section VII.B.1.g.	
	Describe in the field below:	
1.	steps your CoC has taken, with the two largest PHAs within your CoC's geographic area or the two PHAs your CoC has working relationships with, to adopt a homeless admission preference—if your CoC only has one PHA within its geographic area, you may respond for the one; or	
2.	state that your CoC has not worked with the PHAs in its geographic area to adopt a homeless admission preference.	

(limit 2,500 characters)

The Lane County CoC has worked extensively with Homes for Good, the sole PHA in Lane County, to revise their Administrative Plan (revision effective 10/1/19) and expand their existing Disabled Homeless Housing Choice Voucher local preference (DHHCV). The PHA has had a disabled homeless local preference since 2017. In 2018, Lane County signed an MOU with the PHA to refer disabled homeless individuals for the DHHCV local preference, which has 25 vouchers available per program year. Due to this partnership, the DHHCV opportunity has expanded for those in the community to include people who are Frequent Users of Systems (FUSE) clients referred by the CoC. In 2019, the CoC was able to implement this expansion of the DHHCV in conjunction with local resources and a SAMHSA grant that provides housing-focused case management to literally homeless FUSE clients. This links clients with the DHHCV as well as medical, behavioral health and case management resources. Other partners who refer for this preference include HIV Alliance, Options Counseling, and South Lane Mental Health. Landlords who rent to those with a DHHCV are able to participate in a Landlord Guaranty Program which provides financial reimbursement in the event that property is damaged by a tenant. Additionally, the CoC worked with Homes for Good to create preferences for 3 PBV projects that prioritize chronically homeless households in Permanent Supportive Housing (The Keystone, The Nel, and The Commons on MLK) that total 111 PSH units.

1C-7b.	Moving On Strategy with Affordable Housing Providers.	
	Not Scored—For Information Only	

Select yes or no in the chart below to indicate affordable housing providers in your CoC's jurisdiction that your recipients use to move program participants to other subsidized housing:

1.	Multifamily assisted housing owners	No
2.	PHA	Yes
3.	Low Income Housing Tax Credit (LIHTC) developments	Yes
4.	Local low-income housing programs	No
	Other (limit 150 characters)	
5.		

1C-7c.	Include Units from PHA Administered Programs in Your CoC's Coordinated Entry.	
	NOFO Section VII.B.1.g.	

In the chart below, indicate if your CoC includes units from the following PHA programs in your CoC's coordinated entry process?

1.	Emergency Housing Vouchers (EHV)	Yes
2.	Family Unification Program (FUP)	No
3.	Housing Choice Voucher (HCV)	Yes
4.	HUD-Veterans Affairs Supportive Housing (HUD-VASH)	No
5.	Mainstream Vouchers	No
6.	Non-Elderly Disabled (NED) Vouchers	No
7.	Public Housing	No
8.	Other Units from PHAs:	
	Project Based Vouchers used for CoC Programs	Yes

1C-7d.	Submitting CoC and PHA Joint Applications for Funding for People Experiencing Homelessness.	
	NOFO Section VII.B.1.g.	

1.	Did your CoC coordinate with a PHA(s) to submit a competitive joint application(s) for funding or jointly implement a competitive project serving individuals or families experiencing homelessness (e.g., applications for mainstream vouchers, Family Unification Program (FUP), other programs)?	Yes
		Program Funding Source
2.	Enter the type of competitive project your CoC coordinated with a PHA(s) to submit a joint application for or jointly implement.	Mainstream Voucher

1C-7e.	Coordinating with PHA(s) to Apply for or Implement HCV Dedicated to Homelessness Including Emergency Housing Voucher (EHV).	
	NOFO Section VII.B.1.g.	

	Did your CoC coordinate with any PHA to apply for or implement funding provided for Housing Choice Vouchers dedicated to homelessness, including vouchers provided through the American Rescue Plan?	Yes
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1C-7e.1.	List of PHAs with Active MOUs to Administer the Emergency Housing Voucher (EHV) Program.	
	Not Scored—For Information Only	

	Does your CoC have an active Memorandum of Understanding (MOU) with any PHA to administer the EHV Program?	Yes
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	If you select yes to question 1C-7e.1., you must use the list feature below to enter the name of every PHA your CoC has an active MOU with to administer the Emergency Housing Voucher Program.	
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PHA
Homes for Good

1C-7e.1. List of PHAs with MOUs

Name of PHA: Homes for Good

1D. Coordination and Engagement Cont'd

1D-1.	Discharge Planning Coordination.	
	NOFO Section VII.B.1.h.	

Select yes or no in the chart below to indicate whether your CoC actively coordinates with the systems of care listed to ensure persons who have resided in them longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs.

1. Foster Care	Yes
2. Health Care	Yes
3. Mental Health Care	Yes
4. Correctional Facilities	Yes

1D-2.	Housing First—Lowering Barriers to Entry.	
	NOFO Section VII.B.1.i.	

1.	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects your CoC is applying for in FY 2022 CoC Program Competition.	10
2.	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects your CoC is applying for in FY 2022 CoC Program Competition that have adopted the Housing First approach.	10
3.	This number is a calculation of the percentage of new and renewal PSH, RRH, SSO non-Coordinated Entry, Safe-Haven, and Transitional Housing projects the CoC has ranked in its CoC Priority Listing in the FY 2022 CoC Program Competition that reported that they are lowering barriers to entry and prioritizing rapid placement and stabilization to permanent housing.	100%

1D-2a.	Project Evaluation for Housing First Compliance.	
	NOFO Section VII.B.1.i.	

Describe in the field below:

1. how your CoC evaluates every recipient—that checks Housing First on their Project Application—to determine if they are actually using a Housing First approach;
2. the list of factors and performance indicators your CoC uses during its evaluation; and
3. how your CoC regularly evaluates projects outside of the competition to ensure the projects are using a Housing First approach.

(limit 2,500 characters)

Evaluating fidelity to Housing First (HF) requires the CoC to confirm a project's commitment to HF (say it), reflect HF in policy & procedures (P&P) (write it) & demonstrate HF in project activities (do it). To confirm projects' commitment to HF, Lane County (LC) CoC conducts an annual Evaluation of projects to review performance & compliance. HF & System Priorities, incl. serving the most vulnerable, makes up 20% of the score. Agencies must affirm the project meets all requirements of HF to obtain points. This includes quickly connecting individuals with permanent housing; not screening out for income, substance use, criminal history, DV history, housing "readiness"/"motivation to change", or rental history; & not terminating for failure to participate in services or make progress on a service plan, failure to increase income, DV, or any other factor not in a typical lease agreement. Projects must also submit written eligibility & termination policies, which must align with HF & be provided to participants. LC annual monitoring process further supplements to verify information. During monitoring, agencies submit a monitoring questionnaire & most recent copies of P&P, which are reviewed for consistency with responses in the Evaluation & HF principles. During site visits, monitoring staff initiate discussion with program staff to further assess & evaluate program implementation. Files are reviewed for documentation, with attention paid to case notes, services & interactions with participants under a HF approach. If concerns are presented at any of these stages, LC provides recommendations for changes in program implementation or P&P, & offers TA as needed. HF is also monitored through Coord. Entry; LC reviews & monitors the rate of returned referrals & reasons for denial. If barriers are evident, LC works with the agency to reduce or eliminate them. Agencies are provided with & encouraged to complete the HUD HF Assessment Tool to assess their fidelity to HF. The Lived Experience Advisory Group (LEAGUE) conducts participant feedback sessions (PFS) with current participants of CoC programs. These focus groups provide feedback directly from participants in a peer to peer setting. Questions are designed to facilitate discussion of key factors such as safety, client rights/grievance & services. Agencies selected for a PFS receive a report of feedback & are asked to describe how they responded to an issue that arose from the session during the annual Evaluation.

1D-3.	Street Outreach—Scope.	
	NOFO Section VII.B.1.j.	

Describe in the field below:	
1.	your CoC's street outreach efforts, including the methods it uses to ensure all persons experiencing unsheltered homelessness are identified and engaged;
2.	whether your CoC's Street Outreach covers 100 percent of the CoC's geographic area;
3.	how often your CoC conducts street outreach; and
4.	how your CoC tailored its street outreach to persons experiencing homelessness who are least likely to request assistance.

(limit 2,500 characters)

The Lane County (LC) CoC has ten street outreach (SO) teams through LC & local service providers, serving the geographic area & targeting specialized populations including Youth, Frequent Users Systems Engagement (FUSE); SSVF (Vets); PATH; Rural LC; LC Coordinated Entry CWL Outreach; Health Focused Outreach, and Housing Navigation Outreach teams. The main goal of these teams is to connect individuals to housing & support services. All of the SO teams are trained as Front Door Assessors to connect individuals to the Coordinated Entry System (CES). This approach improves accessibility of the CES for people who may not otherwise access mainstream or homeless services. SO teams have Spanish-speaking bilingual staff, cell phones, & bus passes to distribute. Staff are trained in motivational interviewing, harm reduction, and trauma informed practices to increase engagement. SO also employs peers, or people with lived experience, as a strategy to build trust with participants. Currently outreach covers 100% of the accessible geographic area, including the metro area, all of the larger rural communities & the vast majority of outlying areas (LC is nearly 90% forestland). SO is conducted 6 days a week between all 10 teams. Although the specific times of day each SO team conducts their outreach varies, SO efforts are being provided across our CoC between 8am-9pm, Monday-Saturday. Bi-weekly SO case conferencing meetings are hosted by LC staff & attendees include all 10 of the contracted SO teams as well as several other grassroots outreach teams. Through group discussion, utilization of the Homeless By Name List (HBNL), and HMIS data, we are able to identify individuals experiencing homelessness in our community who have not been engaged by SO teams, identify ways to locate them & coordinate outreach engagement. FUSE SO identifies & engages individuals who are regularly accessing emergency rooms & jails, often those least likely to request assistance & highly vulnerable. Through partnerships with local law enforcement, city & county public works depts., unsheltered individuals they come into contact with are identified & shared with LC SO Supervisor who deploys SO teams to engage those individuals. SO teams track those engaged both internally & through HMIS so we are easily able to identify individuals who are being engaged by multiple teams, reduce duplication, and focus efforts on engaging individuals on the HBNL who are not being engaged by any outreach teams.

1D-4.	Strategies to Prevent Criminalization of Homelessness.	
	NOFO Section VII.B.1.k.	

Select yes or no in the chart below to indicate strategies your CoC implemented to ensure homelessness is not criminalized and to reverse existing criminalization policies in your CoC's geographic area:

		Ensure Homelessness is not Criminalized	Reverse Existing Criminalization Policies
1.	Engaged/educated local policymakers	Yes	Yes
2.	Engaged/educated law enforcement	Yes	Yes
3.	Engaged/educated local business leaders	Yes	Yes
4.	Implemented community wide plans	Yes	Yes
5.	Other:(limit 500 characters)		

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1D-5.	Rapid Rehousing–RRH Beds as Reported in the Housing Inventory Count (HIC).	
	NOFO Section VII.B.1.i.	

		2021	2022
	Enter the total number of RRH beds available to serve all populations as reported in the HIC—only enter bed data for projects that have an inventory type of “Current.”	297	254

1D-6.	Mainstream Benefits–CoC Annual Training of Project Staff.	
	NOFO Section VII.B.1.m.	

Indicate in the chart below whether your CoC trains program staff annually on the following mainstream benefits available for program participants within your CoC’s geographic area:

	Resource	CoC Provides Annual Training?
1.	Food Stamps	No
2.	SSI–Supplemental Security Income	No
3.	TANF–Temporary Assistance for Needy Families	No
4.	Substance Abuse Programs	No
5.	Employment Assistance Programs	No
6.	Other (limit 150 characters)	

1D-6a.	Information and Training on Mainstream Benefits and Other Assistance.	
	NOFO Section VII.B.1.m	

Describe in the field below how your CoC:

	1. systemically provides up-to-date information on mainstream resources available for program participants (e.g., Food Stamps, SSI, TANF, substance abuse programs) within your CoC’s geographic area;
	2. works with project staff to collaborate with healthcare organizations, including substance abuse treatment and mental health treatment, to assist program participants with receiving healthcare services; and
	3. works with projects to promote SSI/SSDI Outreach, Access, and Recovery (SOAR) certification of program staff.

(limit 2,500 characters)

As both the Community Action Agency (CAA) and the CoC, Lane County (LC) remains abreast of legislative actions, state, local, & federal resources & systematically updates CoC partners & the community through an extensive email list, regular HMIS Agency Admin meetings, ad-hoc provider meetings, & monthly advisory board meetings. CoC program staff assess households (HH) so they can apply for benefits that add to housing & economic stability. They assist with mainstream benefit applications for federal/state/local programs. LC facilitates case coordination between Department of Human Services (DHS) Family Coaches under the TANF program & housing programs. LC & the Public Child Welfare Agency (DHS) created an ROI process to be able to coordinate when families receiving TANF are in need of housing assistance. CoC staff is designated as the local SOAR lead, coordinating SOAR efforts locally and connecting program staff to training. Oregon funds a General Assistance (GA) program for those applying for SSI, the CoC has disseminated information about GA availability. The CoC funds & trains CoC staff to assist people with mainstream benefits. The CoC targets rural, urban, & vulnerable subpopulations to increase mainstream benefits, including funding bilingual staff. LC coordinates with the FQHC and White Bird, the two largest primary care providers for unhoused patients and certified Medicaid assisters, to help clients enroll in health insurance. The CoC HealthCare Workgroup (HCW) focuses on designing strategies & tactics to increase access to integrated healthcare. Members represent the FQHC, Medicaid, Volunteers in Medicine, service providers, & behavioral health. The CoC works with LC Behavioral Health and advocates for additional billing codes through local CCOs/Medicaid to include tenancy supports.

1D-7.	Increasing Capacity for Non-Congregate Sheltering.	
	NOFO Section VII.B.1.n.	

Describe in the field below how your CoC is increasing its capacity to provide non-congregate sheltering.

(limit 2,500 characters)

Over the past several years, Lane County (LC) CoC has worked to increase its capacity for non-congregate shelter through multiple strategies, building upon existing infrastructure and best practices. The LC homeless services system offered several non-congregate options prior to the COVID 19 pandemic, but expanded on this intervention as the need for non-congregate shelter grew. The use of non-congregate options such as motel voucher programs, Conestoga Huts, and tiny homes have been strategies the LC CoC has employed for many years. During the urgency of the pandemic, these programs increased to accommodate a growing number of individuals and families in need of non-congregate shelter, and now these resources continue to exist and serve a larger number of people. Additionally, LC CoC implemented new strategies including Pallet Shelters and Hotel/Motel Shelter Programs. LC leased two local motels to serve as non-congregate shelter for those at highest risk of complications from COVID 19. Lane County also purchased, and is making use of, 182 Pallet Shelters in both urban and rural settings, serving single adults, youth and families. Pallet Shelters are leveraged by a number of organizations for various programs, including rural winter warming, transitional housing, and temporary emergency shelter in urban areas. Pallet shelters are also being utilized for safe sleeping programs in combination with vehicles and other locally produced micro-shelters, like Conestoga Huts. Locally, these non-congregate shelter sites are being described as alternative shelter. Moreover, the motels rented by LC served approximately 120 single adults at a time, providing a safe non-congregate setting for vulnerable seniors and people with health conditions in 2020 through 2022.

In addition to Pallet Shelters, Lane County is making use of local Turnkey Project funds to support non-congregate shelter using a local motel, Bridges on Broadway (BOB). The BOB will support up to 50 non-congregate units serving both individuals and couples, who are at highest risk for complications from COVID 19. Participants in this non-congregate shelter program receive on-site case management and supportive services to ensure access to resources for stability and opportunities for permanent housing. In the future, it is the intent to develop the building to create additional Permanent Supportive Housing units.

ID-8.	Partnerships with Public Health Agencies—Collaborating to Respond to and Prevent Spread of Infectious Diseases.	
	NOFO Section VII.B.1.o.	
	Describe in the field below how your CoC effectively collaborates with state and local public health agencies to:	
1.	develop CoC-wide policies and procedures to respond to infectious disease outbreaks; and	
2.	prevent infectious disease outbreaks among people experiencing homelessness.	

(limit 2,500 characters)

Lane County (LC) CoC collaborated with Lane County Public Health (LCPH) to develop policies to respond to infectious disease outbreaks including COVID 19. LC CoC has communicated with LCPH to implement COVID safety precautions for both congregate and non-congregate facilities. Policies and procedures have been developed for non-congregate shelter beds that are reserved for people who are unhoused, are ill with COVID 19 or have had recent exposure. Additionally, policies and procedures have been developed for non-congregate shelter beds that are reserved for people at high risk of COVID. LCPH has also developed a Congregate Care Settings Tool Kit that provides detailed guidance for staff to manage and prevent COVID 19 outbreaks within facilities. These apply to any congregate settings including shelters and residential care facilities. Furthermore, LC CoC requires that contracts for shelter programs uphold guidance from the CDC, Oregon Health Authority and LCPH regarding COVID 19 precautions. During the pandemic, LCPH in collaboration with LC CoC mobilized an incident command structure that included representatives from various departmental divisions. The incident command was able to overcome challenges, utilize streamlined processes and coordinate to ensure effective communication and response to infectious disease mitigation and prevention. This type of governance structure created an understanding of the challenges faced by the unhoused during a pandemic. This understanding led to better targeted policy guidance and resource allocation. For example, LCPH and the LC CoC collaborated around spacing requirements for congregate shelters. Moreover, LCPH and the LC CoC coordinated with street outreach teams to distribute PPE and vaccine to unsheltered individuals. This same type of collaboration and coordination with shelter providers was employed to ensure that unhoused individuals in shelter and shelter operators have access to vaccine, PPE, testing kits and other essentials, free of charge. Additionally, policy changes for Coordinated Entry "Front Door Sites" were implemented and in-person assessments were changed to telephone assessments to help mitigate exposure. More recently, this same collaboration has facilitated the sharing of prevention procedures for Monkeypox with shelter providers. Before the pandemic, LCPH has also coordinated with LC CoC shelter providers to prevent the spread of TB via education and training.

ID-8a.	Collaboration With Public Health Agencies on Infectious Diseases.	
	NOFO Section VII.B.1.o.	
	Describe in the field below how your CoC effectively equipped providers to prevent or limit infectious disease outbreaks among program participants by:	
1.	sharing information related to public health measures and homelessness, and	
2.	facilitating communication between public health agencies and homeless service providers to ensure street outreach providers and shelter and housing providers are equipped to prevent or limit infectious disease outbreaks among program participants.	

(limit 2,500 characters)

In order to prevent and limit infectious disease outbreaks such as COVID 19, the Lane County (LC) CoC has shared information related to public health measures and how that information pertains to homelessness, by communicating with Coordinated Care Organizations (CCOs), local hospitals, Lane County Public Health (LCPH) and Community Health Centers (CHCs) to ensure provision for transportation to testing sites and identify active cases amongst the unhoused for contact tracing efforts. Lane County was involved with community-wide efforts to establish drive-thru testing sites at various locations in urban and rural settings to serve both housed and unhoused community members, including those who are recipients of Medicaid. Information about these efforts was shared with providers serving unhoused community members in order to ensure access to the disease prevention resources available. Community-based organizations serving sheltered and unsheltered individuals have had active communication with LCPH focusing on shelter-in-place supports, and COVID testing, including regular on-site testing in shelter settings. LCPH also partnered with street outreach teams, to provide information and supplies to help control infections, including PPE and vaccine access at key locations. Additionally, LCPH, helped to organize testing and vaccine clinics at local permanent supportive housing sites, such as the MLK Commons Permanent Supportive Housing Project. Currently, LCPH collaborates with LC CoC program providers to ensure access to respite sites for unhoused individuals who have tested positive for COVID 19, need isolation and have no other options for housing. This type of collaboration prevents outbreaks within congregate shelter facilities. Throughout the past two and a half years, shelter providers have adhered to CDC, as well as state and local public health guidance regarding appropriate response to the COVID 19 pandemic and infectious disease prevention. More recently, LCPH developed a specialized informational guide for congregate care settings, including shelters serving the unhoused, that gives detailed guidance based on current CDC and local recommendations to prevent the spread of COVID 19.

1D-9.	Centralized or Coordinated Entry System–Assessment Process. NOFO Section VII.B.1.p.	
	Describe in the field below how your CoC’s coordinated entry system:	
1.	covers 100 percent of your CoC’s geographic area;	
2.	uses a standardized assessment process; and	
3.	is updated regularly using feedback received from participating projects and households that participated in coordinated entry.	

(limit 2,500 characters)

Lane County (LC) CoC uses a “no wrong door” approach in which homeless families and individuals can present at different access points for the entire CoC and be assessed using the same assessment process and methodology. Access to Coordinated Entry occurs both in brick and mortar locations operated by providers across the geographic expanse of our county, as well as via street outreach teams that operate in hard to reach urban and rural areas that include smaller communities, remote wooded areas and riverbanks. Additionally, Lane County (LC) CoC is finalizing a contract with 211.org to bring on virtual access points via a phone hotline and website. All households (hh) are assessed using the VI-SPDAT (for Adult HH and Unaccompanied Youth) or the VI-(F)SPDAT (for HH with children) to determine the household’s vulnerability and level of service needs. Once assessed, they are prioritized based on who is most in need of assistance, rather than a first come first-serve basis. The standardized assessment ensures the prioritization and referral process is consistent across the geographic area, regardless of where someone presents for assistance. There are three exceptions where there are specialized access points to take into account the different needs, vulnerabilities and risks factors of 3 populations: unaccompanied youth, adults accompanied by children, and households fleeing DV. Households who encompass more than one of these populations can be served at all the access points for which they qualify as a target population. As of May 2021, a Coordinated Entry Stakeholders group has been working on a variety of Coordinated Entry improvement goals including working to ensure the use of a standardized assessment that is racially equitable, improving ease of access to Coordinated Entry and identifying our own local prioritization plan. The committee is comprised of representatives from participating projects as well as individuals with lived experience of homelessness and Coordinated Entry. Additionally, in May of 2022 a University of Oregon Capstone project surveyed homeless households that participated in Coordinated Entry and Lane County used that feedback to help determine goals for the Coordinated Entry Stakeholder Committee's scope of work.

1D-9a.	Program Participant-Centered Approach to Centralized or Coordinated Entry.	
	NOFO Section VII.B.1.p.	

	Describe in the field below how your CoC's coordinated entry system:
1.	reaches people who are least likely to apply for homeless assistance in the absence of special outreach;
2.	prioritizes people most in need of assistance;
3.	ensures people most in need of assistance receive permanent housing in a timely manner, consistent with their preferences; and
4.	takes steps to reduce burdens on people using coordinated entry.

(limit 2,500 characters)

To ensure accessibility, Lane County (LC) CoC uses a “no wrong door” approach in which homeless families and individuals can present at different access points for the entire CoC and be assessed using the same assessment process and methodology. All households (hh) are assessed using the VI-SPDAT (for Adult HH and Unaccompanied Youth) or the VI-(F)SPDAT (for HH with children) to determine the household’s vulnerability and level of service needs. Once assessed, they are prioritized based on who is most vulnerable, rather than a first come first-serve basis, and scores are weighted by length of time homeless. Street outreach teams are trained to conduct assessments in the community while doing outreach, which improves accessibility of the CE system for individuals who are least likely to seek assistance at one of the existing access points. These teams conduct outreach in the urban and rural areas, including hard-to-reach areas like the woods and riverbanks. Specialized teams target specific vulnerable populations, such as Youth, Frequent Users of Systems (FUSE) and those in remote rural areas. LC staff work closely with street outreach providers and assessors to evaluate existing coverage and identify ways to expand coverage, with coordination occurring via bi-weekly street outreach case conferencing. The LC Coordinated Entry team utilizes the Homeless By-Name List (HBNL) to better engage individuals who are less likely to seek assistance or who have not yet been assessed. LC is also currently finalizing a contract with 211.org to allow for virtual access to CE via phone hotline, website and cell phone app which will allow for a greater ease of access and less burden for those households who are least likely to apply for homeless assistance. In order to ensure individuals access PH in a timely manner, once added to the CE housing referral list, prioritized households are immediately engaged by the LC CE Outreach Team and begin work on housing navigation activities that help to streamline the time it takes between referral and program enrollment. This team can help identify and remove barriers to housing, assist in obtaining needed documentation, and maintain ongoing contact with individuals until warm handoff to a housing provider occurs. Additionally, households are presented with and able to speak with team member about what housing options are available and are able to make a choice of which program to be referred to based on their personal preferences.

1D-10.	Promoting Racial Equity in Homelessness—Conducting Assessment.	
	NOFO Section VII.B.1.q.	

1.	Has your CoC conducted a racial disparities assessment in the last 3 years?	Yes
2.	Enter the date your CoC conducted its latest assessment for racial disparities.	08/26/2022

1D-10a.	Process for Analyzing Racial Disparities—Identifying Racial Disparities in Provision or Outcomes of Homeless Assistance.	
	NOFO Section VII.B.1.q.	

Describe in the field below:

1.	your CoC's process for analyzing whether any racial disparities are present in the provision or outcomes of homeless assistance; and
2.	what racial disparities your CoC identified in the provision or outcomes of homeless assistance.

(limit 2,500 characters)

The Lane County (LC) CoC conducts a racial disparities analysis annually by comparing available data from the Homeless Management Information System (HMIS) and US Census data. HMIS staff examine aggregate records for over 40,000 participants who received services tracked in HMIS between July 2021-June 2022. The analysis is intended to determine whether any populations are over or under represented in various program types, based on new entries and exits for each group and their representation in the overall population. The analysis also includes comparison of racial disparities year over year. In the most recent analysis (21-22), the analysis found:

Those identifying as Asian are generally underrepresented in all program types, compared to representation in the general population.

Those identifying as Latino or Hispanic (any race) are generally overrepresented in new entries (+9%). When we look closer, we can identify that the overrepresentation in new entries is primarily to COVID Rental Assistance programs (+20%) and Homelessness Prevention programs (+13%). This may be due to targeted outreach and resource allocations to Latino households and Latino-serving agencies for prevention and rent assistance as a result of the over-representation of this population in LC COVID cases.

Those identifying as Black or African American (+2%), American Indigenous (+1.6%), and Multi Race (+8%) have some level of overrepresentation in PSH entries.

In looking at exits to permanent housing, those identifying as BIPOC or Latino are more likely to exit Emergency Shelter to Permanent Housing (19%) as compared with those identifying as White (14%). Those identifying as American Indigenous are less likely to exit ES to PH (8%) and less likely to exit RRH to PH (46%) compared with those identifying as White (14%,69%).

1D-10b.	Strategies to Address Racial Disparities.	
	NOFO Section VII.B.1.q.	

Select yes or no in the chart below to indicate the strategies your CoC is using to address any racial disparities.

1.	The CoC's board and decisionmaking bodies are representative of the population served in the CoC.	No
2.	The CoC has identified steps it will take to help the CoC board and decisionmaking bodies better reflect the population served in the CoC.	Yes
3.	The CoC is expanding outreach in geographic areas with higher concentrations of underrepresented groups.	Yes
4.	The CoC has communication, such as flyers, websites, or other materials, inclusive of underrepresented groups.	Yes

5.	The CoC is training staff working in the homeless services sector to better understand racism and the intersection of racism and homelessness.	Yes
6.	The CoC is establishing professional development opportunities to identify and invest in emerging leaders of different races and ethnicities in the homelessness sector.	No
7.	The CoC has staff, committees, or other resources charged with analyzing and addressing racial disparities related to homelessness.	Yes
8.	The CoC is educating organizations, stakeholders, boards of directors for local and national nonprofit organizations working on homelessness on the topic of creating greater racial and ethnic diversity.	Yes
9.	The CoC reviewed coordinated entry processes to understand their impact on people of different races and ethnicities experiencing homelessness.	Yes
10.	The CoC is collecting data to better understand the pattern of program use for people of different races and ethnicities in its homeless services system.	Yes
11.	The CoC is conducting additional research to understand the scope and needs of different races or ethnicities experiencing homelessness.	Yes
	Other:(limit 500 characters)	
12.		

1D-10c.	Actions Taken to Address Known Disparities.	
	NOFO Section VII.B.1.q.	

Describe in the field below the steps your CoC and homeless providers have taken to address disparities identified in the provision or outcomes of homeless assistance.

(limit 2,500 characters)

Lane County (LC) has developed a Racial Equity Plan (REP) which outlines goals/action steps around racial equity in several key areas: Governance & Leadership; Contracting; Training; Data; & Programs. Gov. & Leadership focuses primarily on ensuring leadership of LC & CoC Board (PHB) are representative of people served. LC is recruiting a more diverse Board membership, incl. BIPOC individuals & people with lived experiences. The Membership Committee of the PHB has discussed strategies to take action in this area. Contracting goals include better engagement with culturally specific organizations (CSOs) & eliminating barriers to contracting with CSOs not previously funded, as well as reinforcing an equity focus in contracting. Changes have been made to incorporate changes into Requests for Proposals (i.e. added equity framework questions, staff/board racial or ethnic makeup, etc.). Training goals include ensuring staff have training at CoC & project level to best meet the needs of BIPOC individuals, & have an understanding of how racism is embedded in our systems & what can be done to dismantle it. Through data, we have committed to further analyze disparities that exist in our system to gain a better understanding of why disparities exist & how to address them. The data will inform our strategies under Programs going forward and LC, through the PHB, has affirmed a commitment to an equity framework in all programs. One area we have begun to address on the system level is Coordinated Entry assessment, noting that the VI-SPDAT may not be an equitable CE tool & reviewing other options. In 2022, LC added an Equity and Inclusion section to the annual CoC project Evaluation to gather information about providers' strategies to address disparities in service provision, as well as successes and challenges. Providers noted various strategies and steps taken to improve racial equity incl. collaborating with CSOs, such as NAACP or Black Unity, or consultants to provide training for staff; incorporate cultural competence into staff training requirements; hiring BIPOC individuals & making sure that staff reflect the populations that are being served; reviewing data to identify disparities; creating equity committees or workgroups for accountability; & creating welcoming physical environments for all persons seeking services. The CoC will continue to assess and work with providers to address racial disparities in service provision and outcomes.

1D-10d.	Tracking Progress on Preventing or Eliminating Disparities.	
	NOFO Section VII.B.1.q.	

Describe in the field below the measures your CoC has in place to track progress on preventing or eliminating disparities in the provision or outcomes of homeless assistance.

(limit 2,500 characters)

As part of the annual Racial Disparities Analysis completed by Lane County, the CoC compares data year over year to determine progress on preventing or eliminating disparities. Lane County developed, and presented to the CoC Board, a Racial Equity Plan in 2021 outlining key areas of focus for racial equity including governance and leadership; contracting; training; data; and program specific areas to be determined. This Racial Equity Plan was the first step in moving forward on continuous quality improvement around racial equity in the CoC. While we have a long way to go, we have identified these key areas where measures and goals will be identified. Once specific measures are identified, the CoC will track progress more closely on a system and project level using data available through HMIS as other sources.

1D-11.	Involving Individuals with Lived Experience of Homelessness in Service Delivery and Decisionmaking–CoC’s Outreach Efforts.	
	NOFO Section VII.B.1.r.	

Describe in the field below your CoC’s outreach efforts (e.g., social media announcements, targeted outreach) to engage those with lived experience of homelessness in leadership roles and decision making processes.

(limit 2,500 characters)

Lane County (LC) has an active Lived Experience Advisory Group for Unhoused Engagement, known as LEAGUE that began in 2018. LEAGUE is made up of 100% homeless or formerly homeless individuals and is an official advisory group to the Poverty & Homelessness Board (PHB, CoC Board). LEAGUE members are engaged as leaders and decision-makers in our community and advise on all topics related to the CoC’s efforts to address homelessness. The PHB Chair is a member with lived experience. LEAGUE members also participate in committees of the PHB, review panels, and other special projects (e.g. PSH development). LEAGUE members are consulted on CoC required tasks such as the PIT Count strategy, local Evaluation process, selection of projects, and CoC application completion. LEAGUE is actively recruiting additional members, with particular emphasis on recruiting individuals with recent experience, those living in rural areas of Lane County, as well as those who identify with marginalized groups (e.g BIPOC, LGBTQ+) or represent diverse experiences. Members of LEAGUE conduct outreach to recruit additional leaders through word of mouth, tenant councils, other community groups, flyers, social media (e.g. local FB groups), & local radio (KEPW). The membership application goes out via email to over 100 stakeholders & is posted publicly on the Lane County website. Recognizing that LEAGUE’s membership is limited & not fully representative of all groups, the LC CoC conducts targeted outreach to specific groups as needed for input on strategies, project development, or other nuanced topics, particularly if input is most relevant from people with current experience of homelessness. For example, focus groups or surveys are conducted with people residing in shelter to gauge needs, gaps or insights for planning purposes (e.g. shelter/navigation center design). In addition, LC is a YHDP Community with an active Youth Advisory Board of young leaders who make all critical decisions as they relate to youth homelessness in the CoC. Youth leaders act as decision makers for selection of projects, goals identified in the Coordinated Community Plan, and project design. Recruitment and leadership development efforts continue for the YAB. Outreach is conducted through existing YAB members, youth tenant councils, word of mouth, schools, community groups, drop in centers, social media, etc. There is also designated representation from Youth on the PHB.

1D-11a.	Active CoC Participation of Individuals with Lived Experience of Homelessness.	
	NOFO Section VII.B.1.r.	

Enter in the chart below the number of people with lived experience who currently participate in your CoC under the five categories listed:

	Level of Active Participation	Number of People with Lived Experience Within the Last 7 Years or Current Program Participant	Number of People with Lived Experience Coming from Unsheltered Situations
1.	Included and provide input that is incorporated in the local planning process.	5	0
2.	Review and recommend revisions to local policies addressing homelessness related to coordinated entry, services, and housing.	5	0
3.	Participate on CoC committees, subcommittees, or workgroups.	5	0
4.	Included in the decisionmaking processes related to addressing homelessness.	5	0
5.	Included in the development or revision of your CoC's local competition rating factors.	5	0

1D-11b.	Professional Development and Employment Opportunities for Individuals with Lived Experience of Homelessness.	
	NOFO Section VII.B.1.r.	

Describe in the field below how your CoC or CoC membership organizations provide professional development and employment opportunities to individuals with lived experience of homelessness.

(limit 2,500 characters)

One of the primary ways Lane County (LC) provides professional development opportunities for people with lived experience (PLE) is through the Lived Experience Advisory Group for Unhoused Engagement, known as LEAGUE. LEAGUE is made up of 100% homeless or formerly homeless individuals and is an official advisory group to the Poverty & Homelessness Board (PHB, CoC Board). Participating in LEAGUE allows PLE to gain experience participating in an advisory board, facilitating meetings, leading group efforts, and conducting public presentations. LC supports and seeks out professional development opportunities for LEAGUE members, invites members to participate in trainings, and assists in removing barriers as needed. LEAGUE members were sponsored in 2022 to attend as presenters at the Housing First Partners' Conference in Seattle. Three members were able to present as a panel on best practices for incorporating a lived experience advisory group into the CoC structure. CoC organizations also provide for professional development opportunities in a variety of ways including through employment, volunteer positions, and peer leader and mentorship programs. Many CoC funded programs have added peer support specialist positions which allows PLE, often individuals who have previously engaged with an agency or program themselves, to further develop professional experience by supporting individuals as peers who are still engaged in programming or working toward stability. In recognizing the value PLE bring to this work, agencies prioritize hiring individuals with lived experience for support roles as well as leadership positions. CoC organizations also provide professional development opportunities through established tenant councils, group activities, and resident volunteer programs.

1D-11c.	Routinely Gathering Feedback and Addressing Challenges of Individuals with Lived Experience of Homelessness.	
NOFO Section VII.B.1.r.		
Describe in the field below how your CoC:		
1.	how your CoC routinely gathered feedback from people experiencing homelessness and people who have received assistance through the CoC or ESG program on their experience receiving assistance; and	
2.	the steps your CoC has taken to address challenges raised by people with lived experience of homelessness	

(limit 2,500 characters)

Lane County (LC) has an established formal process for gathering feedback from people who have received assistance through CoC and ESG programs referred to as Participant Feedback Sessions (PFS). PFS is a feedback process developed by the Lived Experience Advisory Group (LEAGUE), which is made up of 100% homeless or formerly homeless individuals. A number of projects are selected for PFS annually. When selected for a PFS, the project must arrange for a time for individuals currently enrolled in programming to attend a focus group session, led by LEAGUE members as peers. During the PFS, LEAGUE members facilitate group discussion and gather general feedback about the program, as well as have each individual rate the project through a survey on a variety of topics including connection to services, interactions with staff, safety, stability, grievance and issue resolution, among others. No program staff are present during these discussions and all feedback is collected anonymously. Once the PFS is completed, the agency receives a report summarizing the scores from the survey, general comments or feedback (positive and negative) and noted areas for improvement. During the annual evaluation, agencies selected for a PFS must select at least one issue that arose from feedback, describe how they responded to it, and how this response was communicated back to participants. Agencies not selected for a PFS are asked to provide a specific issue that arose from their own feedback processes and how they responded. All projects are expected to have anonymous methods for feedback and to seek feedback regularly from participants to improve programming. This is reviewed during annual Evaluation and monitoring. In addition, LC will ask about steps taken to address challenges raised by PLE during annual monitoring and how the agency has addressed those challenges. Aside from this formal process, LC also will seek feedback from other program areas not funded through CoC or ESG, such as shelter programs, to gain insight into what can be improved, either through survey or focus groups. This feedback is used to develop or improve future programming. Lastly, public comment is offered at all LC public meetings, including CoC Board meetings. This is an opportunity for any individual to present issues, concerns, or challenges, including PLE or those enrolled in programming. Public comment may be responded to during the meeting or after through follow up discussion individually.

1D-12.	Increasing Affordable Housing Supply.	
NOFO Section VII.B.1.t.		
Describe in the field below at least 2 steps your CoC has taken in the past 12 months that engage city, county, or state governments that represent your CoC's geographic area regarding the following:		

1.	reforming zoning and land use policies to permit more housing development; and
2.	reducing regulatory barriers to housing development.

(limit 2,500 characters)

The CoC advocated to support the City of Eugene's missing middle ordinance, approved in May 2022. The ordinance aims to increase the housing types and promote affordability by requiring smaller minimum lot sizes, minimum parking spot reductions for housing near transit and permitted detached plexes. The CoC also provided feedback on Oregon Housing and Community Services' proposed legislative agenda, which includes regulatory changes and promote collaborative approaches across state and local governments regulatory changes to increase affordable housing development. The Lane County Affordable Housing Action Plan was adopted in April 2022. The CoC advocated for the adoption and participated in providing feedback for the plan during its development. The plan encourages public land identification and highlights a number of potential land use and zoning changes that can occur within Lane County to further the supply of affordable housing as well as opportunities to remove and reduce regulatory barriers specifically in unincorporated areas within Lane County to match current housing demand.

1E. Project Capacity, Review, and Ranking–Local Competition

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1E-1.	Web Posting of Your CoC's Local Competition Deadline–Advance Public Notice.	
	NOFO Section VII.B.2.a. and 2.g.	
	You must upload the Local Competition Deadline attachment to the 4B. Attachments Screen.	

	Enter the date your CoC published the deadline for project applicants to submit their applications to your CoC's local competition.	05/25/2022
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1E-2.	Project Review and Ranking Process Your CoC Used in Its Local Competition. We use the response to this question and the response in Question 1E-2a along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below.	
	NOFO Section VII.B.2.a., 2.b., 2.c., and 2.d.	

You must upload the Local Competition Scoring Tool attachment to the 4B. Attachments Screen.
Select yes or no in the chart below to indicate how your CoC ranked and selected project applications during your local competition:

1.	Established total points available for each project application type.	Yes
2.	At least 33 percent of the total points were based on objective criteria for the project application (e.g., cost effectiveness, timely draws, utilization rate, match, leverage), performance data, type of population served (e.g., DV, youth, Veterans, chronic homelessness), or type of housing proposed (e.g., PSH, RRH).	Yes
3.	At least 20 percent of the total points were based on system performance criteria for the project application (e.g., exits to permanent housing destinations, retention of permanent housing, length of time homeless, returns to homelessness).	Yes
4.	Provided points for projects that addressed specific severe barriers to housing and services.	Yes
5.	Used data from comparable databases to score projects submitted by victim service providers.	Yes

1E-2a.	Scored Project Forms for One Project from Your CoC's Local Competition. We use the response to this question and Question 1E-2. along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below. NOFO Section VII.B.2.a., 2.b., 2.c., and 2.d.	
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You must upload the Scored Forms for One Project attachment to the 4B. Attachments Screen.
 Complete the chart below to provide details of your CoC's local competition:

1.	What were the maximum number of points available for the renewal project form(s)?	78
2.	How many renewal projects did your CoC submit?	11
3.	What renewal project type did most applicants use?	PH-PSH

1E-2b.	Addressing Severe Barriers in the Local Project Review and Ranking Process. NOFO Section VII.B.2.d.	
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- Describe in the field below:
- | | |
|----|---|
| 1. | how your CoC collected and analyzed data regarding each project that has successfully housed program participants in permanent housing; |
| 2. | how your CoC analyzed data regarding how long it takes to house people in permanent housing; |
| 3. | how your CoC considered the specific severity of needs and vulnerabilities experienced by program participants preventing rapid placement in permanent housing or the ability to maintain permanent housing when your CoC ranked and selected projects; and |
| 4. | considerations your CoC gave to projects that provide housing and services to the hardest to serve populations that could result in lower performance levels but are projects your CoC needs in its geographic area. |

(limit 2,500 characters)

The Evaluation and Intent to Renew (E&IR, local competition) process is determined and approved annually by a committee of the CoC Board (PHB). The E&IR is completed by all current projects seeking renewal CoC funding. The FY22 Evaluation included 6 sections: Grant Expenditure & Match; HMIS; Equity & Inclusion; Participant Focus; System Priorities & Housing First; and Project Performance for a total of 78 points. All projects are evaluated and scored based on objective criteria utilizing HMIS and APR data to analyze performance on a variety of metrics including bed utilization; rapid placement in, exits to & retention in PH; income & non-cash benefits increase; expenditure of funds; and data quality. DV providers (none currently CoC funded) will be evaluated based on data from comparable database. Projects must run and submit reports (i.e. APR, CoC Evaluation Report) with their E&IR submission. Data are reviewed and further verified in HMIS for all measures.

To consider the severity of needs & vulnerabilities of participants, and account for the potential impact on performance, the evaluation reviews whether the project follows a Housing First (HF) approach, the level of vulnerability of those served (average VI-SPDAT score, weighted by length of time homeless), and the percentage of participants who are chronically homeless or included in a local priority population (Frequent Users of Systems, Youth, etc.). All projects are scored on these measures equally in the System Priorities and Housing First section of the Evaluation. These measures are intended to review the extent to which projects serve the most vulnerable populations in the community and prioritize those with the highest need, with minimal barriers to entry, for purposes of ranking. Projects that subscribe to a HF approach while serving highly vulnerable and CH persons receive additional points for ranking purposes and to offset impacts on performance. The specific vulnerabilities accounted for within the VI-SPDAT (completed through Coordinated Entry) include history of homelessness, trauma & abuse; risk of harm & exploitation; physical & mental health; & substance use. Frequent System Users are those who have demonstrated a high rate of utilization of emergency and crisis services and are often the most vulnerable with extremely intense service needs. VI-SPDAT scores are further weighted by length of time homeless based on local Coordinated Entry policy.

1E-3.	Promoting Racial Equity in the Local Competition Review and Ranking Process.	
	NOFO Section VII.B.2.e.	
	Describe in the field below:	
1.	how your CoC obtained input and included persons of different races, particularly those over-represented in the local homelessness population;	
2.	how the input from persons of different races, particularly those over-represented in the local homelessness population, affected how your CoC determined the rating factors used to review project applications;	
3.	how your CoC included persons of different races, particularly those over-represented in the local homelessness population, in the review, selection, and ranking process; and	
4.	how your CoC rated and ranked projects based on the degree to which their project has identified any barriers to participation (e.g., lack of outreach) faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population, and has taken or will take steps to eliminate the identified barriers.	

(limit 2,500 characters)

A committee of the CoC Board (PHB) is responsible for determining and approving the local competition review and rating factors (CoC Evaluation) used to review renewal project applications. This committee is made up of various stakeholders including people with lived experience, elected officials, law enforcement, and business representatives. Representatives from LEAGUE, the lived experience advisory group made up entirely of people currently or formerly experiencing homelessness, made up the majority of membership on the review committee. For FY22, the committee approved the addition of an Equity and Inclusion section in the Evaluation tool. This section evaluated all renewal projects on the steps and methods the agency has taken to address equity, the agency’s strategy for identifying and addressing racial disparities in programming, and the extent to which agency staff are trained in cultural competence and able to meet the needs of diverse populations. As part of these responses, agencies were asked to speak to successes and challenges, and any substantive changes, citing specific examples, they have made as a result of analysis. Projects were scored utilizing a rubric provided with the Evaluation and projects will be assessed for improvement over time. At this time, the review and approval process for the Evaluation was completed using existing CoC structures and membership, which is not fully representative of the people we serve, or underrepresented groups. The LC CoC is currently in the process of strategic planning, which will include a review of the current CoC Board, committee structure & membership. The CoC has made a formal commitment to apply a racial equity lens throughout the strategic planning process, paying particular attention to ensuring the Board and committees are representative of those we serve, particularly underrepresented populations. All programs funded under the CoC must also incorporate an equity framework in all aspects of programming to actively address disparities.

1E-4.	Reallocation—Reviewing Performance of Existing Projects.	
	NOFO Section VII.B.2.f.	
	Describe in the field below:	
	1. your CoC’s reallocation process, including how your CoC determined which projects are candidates for reallocation because they are low performing or less needed;	
	2. whether your CoC identified any projects through this process during your local competition this year;	
	3. whether your CoC reallocated any low performing or less needed projects during its local competition this year; and	
	4. why your CoC did not reallocate low performing or less needed projects during its local competition this year, if applicable.	

(limit 2,500 characters)

Lane County (LC) CoC determines projects for reallocation through established Competition policies. Policies are reviewed annually, approved through a committee of the CoC Board, and posted to the LC website. The current policy for FY22 includes methods for reallocation for: Projects that have outstanding monitoring findings/concerns for at least two years in a row; Projects that are determined to have an expenditure issue; Projects that are determined to have a project performance issue (includes consistent poor or declining outcomes over multiple years; failure to correct deficiencies in program design, operations, or administration; or failure to comply with standards as outlined by the CoC); & Projects willing to voluntarily reallocate any portion of unused funds and if funds can be better utilized in a higher performing project. All projects or portions of projects being reallocated are notified in writing prior to the competition deadline. In all situations, the LC and the designated PHB committee will review all circumstances and determine if the findings/concerns are being actively addressed. If compliance is not able to be achieved in a timely manner, or if the non-compliance results in a high risk of loss or misuse of funding, the project may be considered for reallocation. Lane County will review expenditure and performance issues through the Evaluation and monitoring processes and provide recommendation to the committee. LC CoC did not identify any projects for reallocation in FY22 competition year and did not reallocate any projects. All projects have been determined to provide critical housing and services within our community. No project demonstrated significant, incurable deficiencies warranting reallocation. For projects with current performance or spending issues, the LC CoC works to address the issues through targeted technical assistance. For the current renewal projects, many of the issues identified are the direct result of the ongoing pandemic & impact thereof, such as ongoing staffing shortages and turnover, lower than usual vacancy rates & increased rents. These impacts will not be mitigated by reallocating funds to a new project, which would cause significant disruption to individuals currently being housed or assisted in the existing renewal project. Impacts on the broader system and current participants are always considered prior to reallocating a CoC funded project.

1E-4a.	Reallocation Between FY 2017 and FY 2022.	
	NOFO Section VII.B.2.f.	

	Did your CoC cumulatively reallocate at least 20 percent of its ARD between FY 2017 and FY 2022?	No
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1E-5.	Projects Rejected/Reduced–Notification Outside of e-snaps.	
	NOFO Section VII.B.2.g.	
	You must upload the Notification of Projects Rejected-Reduced attachment to the 4B. Attachments Screen.	

1.	Did your CoC reject or reduce any project application(s)?	No
2.	Did your CoC inform applicants why their projects were rejected or reduced?	

	3. If you selected Yes for element 1 of this question, enter the date your CoC notified applicants that their project applications were being rejected or reduced, in writing, outside of e-snaps. If you notified applicants on various dates, enter the latest date of any notification. For example, if you notified applicants on 06/26/2022, 06/27/2022, and 06/28/2022, then you must enter 06/28/2022.	
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1E-5a.	Projects Accepted–Notification Outside of e-snaps.	
	NOFO Section VII.B.2.g.	
	You must upload the Notification of Projects Accepted attachment to the 4B. Attachments Screen.	

	Enter the date your CoC notified project applicants that their project applications were accepted and ranked on the New and Renewal Priority Listings in writing, outside of e-snaps. If you notified applicants on various dates, enter the latest date of any notification. For example, if you notified applicants on 06/26/2022, 06/27/2022, and 06/28/2022, then you must enter 06/28/2022.	09/15/2022
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1E-5b.	Local Competition Selection Results–Scores for All Projects.	
	NOFO Section VII.B.2.g.	
	You must upload the Final Project Scores for All Projects attachment to the 4B. Attachments Screen.	

	Does your attachment include: 1. Applicant Names; 2. Project Names; 3. Project Scores; 4. Project Rank–if accepted; 5. Award amounts; and 6. Projects accepted or rejected status.	Yes
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1E-5c.	1E-5c. Web Posting of CoC-Approved Consolidated Application.	
	NOFO Section VII.B.2.g.	
	You must upload the Web Posting–CoC-Approved Consolidated Application attachment to the 4B. Attachments Screen.	

	Enter the date your CoC posted the CoC-approved Consolidated Application on the CoC’s website or partner’s website–which included: 1. the CoC Application; and 2. Priority Listings for Reallocation forms and all New, Renewal, and Replacement Project Listings.	09/19/2022
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1E-5d.	Notification to Community Members and Key Stakeholders that the CoC-Approved Consolidated Application is Posted on Website.	
	NOFO Section VII.B.2.g.	
	You must upload the Notification of CoC-Approved Consolidated Application attachment to the 4B. Attachments Screen.	

	Enter the date your CoC notified community members and key stakeholders that the CoC-approved Consolidated Application has been posted on the CoC’s website or partner’s website.	09/19/2022
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2A. Homeless Management Information System (HMIS) Implementation

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2A-1.	HMIS Vendor.	
	Not Scored–For Information Only	

	Enter the name of the HMIS Vendor your CoC is currently using.	Wellsky Community Services
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2A-2.	HMIS Implementation Coverage Area.	
	Not Scored–For Information Only	

	Select from dropdown menu your CoC's HMIS coverage area.	Single CoC
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2A-3.	HIC Data Submission in HDX.	
	NOFO Section VII.B.3.a.	

	Enter the date your CoC submitted its 2022 HIC data into HDX.	05/03/2022
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2A-4.	Comparable Database for DV Providers–CoC and HMIS Lead Supporting Data Collection and Data Submission by Victim Service Providers.	
	NOFO Section VII.B.3.b.	

	In the field below:	
	1. describe actions your CoC and HMIS Lead have taken to ensure DV housing and service providers in your CoC collect data in databases that meet HUD's comparable database requirements; and	
	2. state whether your CoC is compliant with the 2022 HMIS Data Standards.	

(limit 2,500 characters)

The Lane County (LC) CoC HMIS offers, at no cost, the WellSky Community Services comparable database to Domestic Violence/Victim service providers (VSP). However, the two VSPs in Lane County (Siuslaw Outreach Services and Hope & Safety Alliance) have opted to use the Osnum system at the request of the State of the Oregon Department of Human Services DV Council. Osnum is able to produce the ESG-CAPER and CoC-APR, and is compliant with the 2022 HMIS data standards.

2A-5.	Bed Coverage Rate—Using HIC, HMIS Data—CoC Merger Bonus Points.	
	NOFO Section VII.B.3.c. and VII.B.7.	

Enter 2022 HIC and HMIS data in the chart below by project type:

Project Type	Total Beds 2022 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
1. Emergency Shelter (ES) beds	695	18	677	100.00%
2. Safe Haven (SH) beds	0	0	0	
3. Transitional Housing (TH) beds	94	0	94	100.00%
4. Rapid Re-Housing (RRH) beds	254	0	254	100.00%
5. Permanent Supportive Housing	969	0	969	100.00%
6. Other Permanent Housing (OPH)	0	0	0	

2A-5a.	Partial Credit for Bed Coverage Rates at or Below 84.99 for Any Project Type in Question 2A-5.	
	NOFO Section VII.B.3.c.	

For each project type with a bed coverage rate that is at or below 84.99 percent in question 2A-5, describe:

1.	steps your CoC will take over the next 12 months to increase the bed coverage rate to at least 85 percent for that project type; and
2.	how your CoC will implement the steps described to increase bed coverage to at least 85 percent.

(limit 2,500 characters)

n/a all project types are above 85%

2A-6.	Longitudinal System Analysis (LSA) Submission in HDX 2.0.	
	NOFO Section VII.B.3.d.	

Did your CoC submit LSA data to HUD in HDX 2.0 by February 15, 2022, 8 p.m. EST?	Yes
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2B. Continuum of Care (CoC) Point-in-Time (PIT) Count

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2B-1.	PIT Count Date.	
	NOFO Section VII.B.4.b	

	Enter the date your CoC conducted its 2022 PIT count.	01/26/2022
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2B-2.	PIT Count Data–HDX Submission Date.	
	NOFO Section VII.B.4.b	

	Enter the date your CoC submitted its 2022 PIT count data in HDX.	05/03/2022
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2B-3.	PIT Count–Effectively Counting Youth.	
	NOFO Section VII.B.4.b.	

Describe in the field below how during the planning process for the 2022 PIT count your CoC:

1.	engaged stakeholders that serve homeless youth;
2.	involved homeless youth in the actual count; and
3.	worked with stakeholders to select locations where homeless youth are most likely to be identified.

(limit 2,500 characters)

Lane County engaged area youth serving stakeholders by utilizing area youth outreach teams to do the actual PIT count and also using a modified version of the Homeless By Name list as the primary method for the unsheltered PIT count. Outreach teams focused their efforts in areas that generally have Individuals not engaged in HMIS Services. The Youth Homeless Solutions Workgroup stakeholders and YHDP Youth Advisory Council were asked to help identify those areas. Young people experiencing homelessness were asked to assist youth street outreach teams by identifying areas where young people congregate. Youth were encouraged to help with the actual count but due to safety concerns, many chose not to engage the efforts.

2B-4.	PIT Count–Methodology Change–CoC Merger Bonus Points.	
	NOFO Section VII.B.5.a and VII.B.7.c.	
	In the field below:	
	1. describe any changes your CoC made to your sheltered PIT count implementation, including methodology or data quality changes between 2021 and 2022, if applicable;	
	2. describe any changes your CoC made to your unsheltered PIT count implementation, including methodology or data quality changes between 2021 and 2022, if applicable; and	
	3. describe how the changes affected your CoC’s PIT count results; or	
	4. state “Not Applicable” if there were no changes or if you did not conduct an unsheltered PIT count in 2022.	

(limit 2,500 characters)

No changes were made to the sheltered PIT count between 2021 and 2022. 100% of beds are HMIS participating, so HMIS data was used exclusively for the sheltered count in both years.

In both 2021 and 2022, Lane County used a modified version of the Homeless By-Name List as the primary method for the unsheltered Point-in-Time count. In both years, this count was supplemented by street outreach surveys conducted in areas that were likely to have individuals who are not engaged in HMIS services. A small change was made to the Homeless By-Name List (HBNL) methodology between 2021 and 2022 at HUD’s request. In both 2021 and 2022, individuals were included in the unsheltered count if they were enrolled in one of the following HMIS projects on the night of the count: Alternative shelter (car camping, micro-site camping, overnight parking programs), Winter warming sites, and Homeless day access centers. Individuals were also included in the count in both years if they were enrolled in any HMIS-participating project with a homeless living situation at entry and had received a service within a short period of time preceding the PIT count. In 2021 this was 30 days before the count, while in 2022 HUD asked for the window to be shortened to 14 days before the PIT count.

Narrowing the service utilization window for the Homeless By-Name List count from 30 days to 14 days was expected to slightly reduce 2022 PIT count numbers. However, other factors resulted in a higher count in 2022 than in 2021. Unsheltered numbers increased slightly due to COVID and economic conditions. Sheltered numbers increased significantly due to the return of many congregate shelter beds that were unavailable in January 2021, and because cold weather warming sites were open on the night of the PIT in 2022, but not in 2021.

2C. System Performance

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2C-1.	Reduction in the Number of First Time Homeless–Risk Factors Your CoC Uses.	
	NOFO Section VII.B.5.b.	

	In the field below:	
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	1. describe how your CoC determined the risk factors to identify persons experiencing homelessness for the first time;	
	2. describe your CoC’s strategies to address individuals and families at risk of becoming homeless; and	
	3. provide the name of the organization or position title that is responsible for overseeing your CoC’s strategy to reduce the number of individuals and families experiencing homelessness for the first time	

(limit 2,500 characters)

Lane County (LC) examines risk factors such as income level (% of FPL) & mainstream benefits access (e.g. households (HHs) accessing energy/utility assistance), as well as household access to other social services (e.g. food pantries). In addition to programs serving individuals experiencing homelessness, LC collects data for anti-poverty programs in the HMIS such as community service centers, food pantries, senior services, etc., allowing us to identify risk factors in the community through available data. As a Community Action Agency (CAA), LC is responsible for overseeing local strategies to reduce HHs becoming homeless for the first time. LC conducts a Community Needs Assessment every three years to determine community needs, including housing. LC has experienced a high number of newly homeless HHs, about 180 newly homeless individuals entering the homeless & crisis response system each month. LC commits a significant amount of resources toward Homeless Prevention & Diversion efforts across LC. In the most recent FY, LC committed \$3.5 million in local & state funding for HP to serve individuals, families & youth. In 2021, LC began a new Diversion and Rapid Resolution program using local funds that aims to connect with HHs at point of system entry in order to divert them to resources outside of the homeless service system. 467 individuals were served by Rapid Resolution in FY 21-22. 80 individuals (17%) were successful diverted from homelessness and entered into permanent housing. An additional, 51 (11%) individuals who were engaged by Rapid Resolution while residing in shelter were exited to temporary or permanent housing within 30 days. Other HP programs include Elderly Rental Assistance, for HHs with an individual over age 58 & at-risk; and Housing Stabilization Program (HSP), prioritizing families who are enrolled in or eligible for TANF benefits, in coordination with DHS, providing up to four months in rental assistance, case management, & services. As a result of the pandemic, LC allocated additional ESG-CV HP funding to assist HHs at risk of homelessness and has to date distributed \$35M in rental assistance (CARES, Dept. of Treasury, etc.) to 5338 households impacted by COVID-19. In 2022, LC dispersed \$2.6 million in Eviction Prevention funding through 6 local providers to support HHs who are facing eviction or in an eviction process. These resource commitments significantly reduce the number of individuals entering the homeless service system.

2C-2.	Length of Time Homeless—CoC's Strategy to Reduce.	
	NOFO Section VII.B.5.c.	
	In the field below:	
	1. describe your CoC's strategy to reduce the length of time individuals and persons in families remain homeless;	
	2. describe how your CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and	
	3. provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the length of time individuals and families remain homeless.	

(limit 2,500 characters)

Average length of time (LOT) homeless was 118 days in FFY20 & 145 days in FFY21, an increase of 27 days on average. Lane County (LC) has implemented several strategies to reduce LOT incl. prioritizing households (hh) placed on the Central Wait List (CWL) based on LOT homeless (weighted VI-SPDAT score) to address long-term stayers; creating staff positions to work with HH on the CWL awaiting referral to expedite documentation, address barriers, & reduce time to housing once matched with a PSH or RRH provider; increasing a Barrier Busters fund to eliminate barriers to PH placement (deposits, arrears); creating a Bridge program which quickly places individuals in a temp. unit who have been accepted into a program until they can secure a permanent unit; & staffing programs with a Housing Navigator to specifically locate housing units & work with landlords. There still continues to be a lack of units & LC is actively working to increase unit capacity with a goal of adding at least 350 more PSH units. Over 95 additional PSH units have been developed and made available since 2021 using Project Based Vouchers, coupled with CoC and healthcare funded services. Additional strategies to reduce LOT include: a new 75 bed Shelter & Navigation Center, opening 2022, focused on rapidly connecting the most vulnerable HH to housing; better coordination & expansion of RRH resources –LC implemented new standards in 2021 that emphasize a progressive engagement approach allowing more HH to be served quickly under RRH; expanding diversion strategies – LC added a new Rapid Resolution program in 2021 to connect newly homeless HH to resources outside the system; expanding & better coordinating outreach services – LC has expanded outreach teams, implemented case conferencing, and improved outreach coordination; improving CE – moving toward dynamic prioritization & phased assessment; creating centralized landlord & housing partner management – LC hired a new Landlord Liaison position in August 2022; & move-on strategies to increase openings in PSH units. LC Human Services Division, in collaboration with the CoC Board, is responsible for overseeing strategies to reduce the LOT homeless.

2C-3.	Exits to Permanent Housing Destinations/Retention of Permanent Housing–CoC’s Strategy NOFO Section VII.B.5.d.	
	In the field below:	
1.	describe your CoC’s strategy to increase the rate that individuals and persons in families residing in emergency shelter, safe havens, transitional housing, and rapid rehousing exit to permanent housing destinations;	
2.	describe your CoC’s strategy to increase the rate that individuals and persons in families residing in permanent housing projects retain their permanent housing or exit to permanent housing destinations; and	
3.	provide the name of the organization or position title that is responsible for overseeing your CoC’s strategy to increase the rate that individuals and families exit to or retain permanent housing.	

(limit 2,500 characters)

In FFY21, Lane County (LC) exited 493 persons in ES, SH, TH, & RRH to PH, or 29%. This is a 12% increase from FFY20. LC has a very tight housing market due to low vacancy rates & rising rental costs. It is increasingly difficult to locate affordable units. Since the pandemic, vacancies have been scarce, rents have increased, & landlords have been hesitant to rent to tenants deemed risky. To address these challenges, LC has implemented a coordinated landlord engagement strategy. Several agencies within the CoC have hired Housing Navigators who have specialized skills working with landlords, negotiating leases, & locating units. LC has also hired a dedicated Landlord Liaison position (August 2022) to coordinate landlord engagement across the system and build partnerships with property owners. Even with this strategy, an increase in PSH units is needed. LC, in collaboration with the housing authority, Homes for Good, brought over 96 new PSH units online since 2021. A hotel purchased to serve those displaced by wildfire will be repurposed to create at least 50 additional PSH units in 2023. These projects leverage PBV, CoC, & healthcare funding to maximize resources & create new PSH. To free up existing PSH units and create more movement in the system, LC CoC has also implemented a Move-On strategy, with dedicated vouchers for people ready to transition to an independent subsidy. LC used Emergency Housing Vouchers (EHV) to strategically target HH enrolled in RRH, increasing exits to PH from RRH & freeing up additional opportunities for those who remain homeless. LC has also opened a new 75 bed Shelter & Navigation Center, focused on rapidly connecting the most vulnerable HH directly to housing. In FFY21, LC reported that 925 persons, or 98%, retained PH. This is a 2% increase over FFY20. Retention remains high, however the CoC continues to review improvements such as better incorporating tenancy supports into programming to improve retention & stability in PH. LC Human Services Division, along with the CoC Board, is responsible for overseeing the strategies to increase exits to PH & increase availability of PH units.

2C-4.	Returns to Homelessness—CoC's Strategy to Reduce Rate.	
	NOFO Section VII.B.5.e.	
	In the field below:	
	1. describe your CoC's strategy to identify individuals and families who return to homelessness;	
	2. describe your CoC's strategy to reduce the rate of additional returns to homelessness; and	
	3. provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the rate individuals and persons in families return to homelessness.	

(limit 2,500 characters)

In FFY21, Lane County (LC) reported that 33 persons (4%) exiting to PH returned to homelessness in 12 months, while 82 persons (10%) returned within 6 months. LC identifies returns to homelessness within HMIS (Wellsky). LC expanded the collection of follow up data in order to better identify individuals and families who return to homelessness. All projects (CoC and non-CoC) with persons exiting to PH now report both 6 and 12 month follow up data. By expanding follow up data collection, LC is now better equipped to identify risk factors to ensure intervention occurs prior to an episode of homelessness. Providers who identify households at risk of homelessness at time of follow up are able to connect individuals to homelessness prevention programs, available throughout Lane County. LC has heavily invested in HP for individuals, families, and youth through federal, state, and local resources to prevent first time homelessness and reduce returns to homelessness. LC has emphasized eviction prevention with all CoC partners and will continue to improve training on best practices, as well as increase tenancy supports in order to prevent further returns to homelessness. Lane County, along with the CoC Board, is responsible for overseeing the CoC’s strategy to reduce the rate of individuals and families returning to homelessness.

2C-5.	Increasing Employment Cash Income—CoC’s Strategy.	
	NOFO Section VII.B.5.f.	
	In the field below:	
1.	describe your CoC’s strategy to access employment cash sources;	
2.	describe how your CoC works with mainstream employment organizations to help individuals and families experiencing homelessness increase their cash income; and	
3.	provide the organization name or position title that is responsible for overseeing your CoC’s strategy to increase income from employment.	

(limit 2,500 characters)

In FFY21, 8% of stayers and 19% of leavers (those exiting programs) achieved an increase in earned income, a 1% decrease and 4% increase from FFY20, respectively. Overall, 35% of adult stayers and 38% of adult leavers increased their total income from all sources. While the unemployment rate in Lane County (LC) has been low (about 4%), it was nearly 15% during the pandemic. While the availability of employment opportunities has rebounded, individuals experiencing homelessness or enrolled in housing programs still face multiple barriers to employment incl. long-term disabilities, criminal history, substance use & lack of skills to maintain living-wage employment. LC, in collaboration with the PHB & Employment Work Group, is responsible for overseeing strategies, including strengthening collaborations, improving data & engaging the community & business partners. CoC projects make referrals to WorkSource Lane (WSL), a One-Stop hub for employment services. LC has coupled state-funded housing resources (EHA) directly with employment assistance through WSL. HHs enrolled in Supplemental Nutrition Assistance Employment & Training Program (STEP) who are homeless or at-risk can be eligible to receive rental assistance to establish housing. STEP Employment Specialists provide intensive career coaching for training, employment & career advancement focusing on industry sectors with high demand, high-wage jobs. Other strategies include promoting partnerships & access to employment opportunities within the private sector through hiring events, job fairs, or other targeted outreach. LC has two WSL staff dedicated to job development & employer outreach. LC also offers several training programs to help individuals build skills that are in demand in the local labor market: On-the-Job Training (OJT) and TANF JOBS Plus, both “Earn While You Learn” (EWYL) training programs; LC partnerships providing training, including private sector businesses who are willing to train the employee on those skills needed for the job and partnerships with businesses to help individuals who are on TANF access these training & employment opportunities; and Occupational Skills Training for those who are seeking short term training that will build their skills for in-demand jobs. Many of the participants have transitioned from homelessness to housing through employment in occupations such as healthcare, welding, & truck driving.

2C-5a.	Increasing Non-employment Cash Income—CoC's Strategy	
	NOFO Section VII.B.5.f.	
	In the field below:	
	1. describe your CoC's strategy to access non-employment cash income; and	
	2. provide the organization name or position title that is responsible for overseeing your CoC's strategy to increase non-employment cash income.	

(limit 2,500 characters)

In Lane County (LC), 34% of adult stayers and 22% of adult leavers (those exiting programs) increased non-employment cash income in FFY21. LC, in collaboration with the Poverty and Homelessness Board, is responsible for overseeing the CoC’s strategy to increase non-employment cash income. All housing programs are tasked with ensuring households are connected to mainstream benefits for which they may be eligible including SSI/SSDI, General Assistance, and TANF. LC participates in case coordination in partnership with DHS around households who are receiving housing assistance and may be eligible for or are currently receiving TANF. This collaboration allows both DHS & the CoC to maximize resources to support homeless families. To further increase access to SSI/SSDI benefits LC, as the local SOAR lead, collaborates with local partners to implement their action plan to increase access to SSI/SSDI benefits utilizing the SOAR model. SOAR trained staff and/or benefits specialists are available to assist households through WhiteBird (PATH), SSVF, Lane Independent Living Alliance (LILA), LC Behavioral Health, and ShelterCare. LC plans to increase the number of dedicated, countywide SOAR trained staff over the next few years. LC continues to promote SOAR training for direct service staff to increase HHS receiving SSI/SSDI benefits.

3A. Coordination with Housing and Healthcare

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3A-1.	New PH-PSH/PH-RRH Project–Leveraging Housing Resources.	
	NOFO Section VII.B.6.a.	
	You must upload the Housing Leveraging Commitment attachment to the 4B. Attachments Screen.	

	Is your CoC applying for a new PH-PSH or PH-RRH project that uses housing subsidies or subsidized housing units which are not funded through the CoC or ESG Programs to help individuals and families experiencing homelessness?	No
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3A-2.	New PH-PSH/PH-RRH Project–Leveraging Healthcare Resources.	
	NOFO Section VII.B.6.b.	
	You must upload the Healthcare Formal Agreements attachment to the 4B. Attachments Screen.	

	Is your CoC applying for a new PH-PSH or PH-RRH project that uses healthcare resources to help individuals and families experiencing homelessness?	No
--	--	----

3A-3.	Leveraging Housing/Healthcare Resources–List of Projects.	
	NOFO Sections VII.B.6.a. and VII.B.6.b.	
	If you selected yes to questions 3A-1. or 3A-2., use the list feature icon to enter information about each project application you intend for HUD to evaluate to determine if they meet the criteria.	

Project Name	Project Type	Rank Number	Leverage Type
This list contains no items			

3B. New Projects With Rehabilitation/New Construction Costs

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3B-1.	Rehabilitation/New Construction Costs–New Projects.	
	NOFO Section VII.B.1.s.	

Is your CoC requesting funding for any new project application requesting \$200,000 or more in funding for housing rehabilitation or new construction?	No
--	----

3B-2.	Rehabilitation/New Construction Costs–New Projects.	
	NOFO Section VII.B.1.s.	

If you answered yes to question 3B-1, describe in the field below actions CoC Program-funded project applicants will take to comply with:

1.	Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u); and
2.	HUD’s implementing rules at 24 CFR part 75 to provide employment and training opportunities for low- and very-low-income persons, as well as contracting and other economic opportunities for businesses that provide economic opportunities to low- and very-low-income persons.

(limit 2,500 characters)

N/A

3C. Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3C-1.	Designating SSO/TH/Joint TH and PH-RRH Component Projects to Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section VII.C.	

	Is your CoC requesting to designate one or more of its SSO, TH, or Joint TH and PH-RRH component projects to serve families with children or youth experiencing homelessness as defined by other Federal statutes?	No
--	--	----

3C-2.	Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section VII.C.	

You must upload the Project List for Other Federal Statutes attachment to the 4B. Attachments Screen.

If you answered yes to question 3C-1, describe in the field below:

1.	how serving this population is of equal or greater priority, which means that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under Section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth than serving the homeless as defined in paragraphs (1), (2), and (4) of the definition of homeless in 24 CFR 578.3; and
2.	how your CoC will meet requirements described in Section 427(b)(1)(F) of the Act.

(limit 2,500 characters)

N/A

4A. DV Bonus Project Applicants

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

4A-1.	New DV Bonus Project Applications.	
	NOFO Section II.B.11.e.	

	Did your CoC submit one or more new project applications for DV Bonus Funding?	Yes
--	--	-----

4A-1a.	DV Bonus Project Types.	
	NOFO Section II.B.11.e.	

Select yes or no in the chart below to indicate the type(s) of new DV Bonus project(s) your CoC included in its FY 2022 Priority Listing.

	Project Type	
1.	SSO Coordinated Entry	Yes
2.	PH-RRH or Joint TH and PH-RRH Component	No

You must click "Save" after selecting Yes for element 2 PH-RRH or Joint TH/RRH Component to view questions 4A-3b. through 4A-3h.

4A-2.	Information About the Project Applicant for the New Support Services Only Coordinated Entry (SSO-CE) DV Bonus Project.	
	NOFO Section II.B.11.(e)(2)	

Enter in the chart below information about the project applicant applying for the new SSO-CE DV Bonus project:

1.	Applicant Name	Lane County
2.	Project Name	Lane County Coordinated Entry (DV)
3.	Project Ranking on Priority Listing	13
4.	Unique Entity Identifier (UEI)	XCLAXTCSJF71
5.	Amount Requested	\$90,263

4A-2a.	Addressing Coordinated Entry Inadequacies through the New SSO-CE DV Bonus Project.	
	NOFO Section II.B.11.(e)(2)(c)	

Describe in the field below:

1.	the inadequacies of your CoC's current Coordinated Entry that limits its ability to better meet the needs of survivors of domestic violence, dating violence, sexual assault, or stalking; and
2.	how the proposed project addresses inadequacies identified in element 1 of this question.

(limit 2,500 characters)

The Lane County Coordinated Entry (CE) Domestic Violence Bonus (DV) Supportive Services Only (SSO) Project will be utilized to address inadequacies of the current CE system in meeting the needs of survivors of domestic violence, dating violence, sexual assault or stalking. Currently, identifying survivors who provide consent receive a warm handoff to survivor-focused agency and access point in their community. More ideally, we envision a system that could respond to survivors in the moment and meet them where they are, ensuring immediate safety needs are met and connecting individuals to both short and long term housing options. Due to inadequate capacity and system level coordination, this immediate response is not possible through Coordinated Entry. Providing this level of direct support in the moment would require additional dedicated coordinated entry staffing and funding for ongoing victim-centered training and technical assistance and ideally, CE and DV services would be co-located.

The proposed CE-DV SSO project would fund a 0.5FTE coordinated entry staff member to focus on bridging the gap between CE and victim services providers. Activities of the staff would include conducting front door assessments for survivors using a trauma-informed, victim centered approach; providing trainings and technical assistance to victim services providers regarding coordinated entry pathways to housing and supports; decreasing barriers to accessing housing for DV survivors; improve best practices through updated CE policies and procedures related to serving DV survivors; and ongoing continuous quality improvement that incorporates input from victim service providers, individuals with lived experience, and other stakeholders.

4A-2b.	Plan to Involve Survivors in Policy and Program Development in the New SSO-CE DV Bonus Project.	
	NOFO Section II.B.11.(e)(2)(d)	

Describe in the field below how the new project will involve survivors with a range of lived expertise in policy and program development throughout the project's operation.

(limit 2,500 characters)

The LC CoC solicits feedback on policy and program development from individuals with lived experience, including survivors of DV, through our lived experience advisory group of the Poverty and Homelessness Board (LEAGUE). This advisory group provides valuable lived experience input on a variety of CoC related projects including Coordinated Entry, shelter and permanent housing programs. Their guidance has helped to influence how those projects operate to ensure services are trauma informed and client centered. Another sub-committee of the PHB, the Coordinated Entry Stakeholder Committee, is primarily responsible for advising on improvements to the coordinated entry system. This group has two voting members with lived experience, representatives from LEAGUE, as well as a victim services provider represented. As this committee continues to develop Coordinated Entry practices specifically related to DV, the intent is to create a series of focus groups comprised of survivors of DV to help guide the creation of DV Coordinated Entry policies related to access, assessment and referral. Our goal is to fully center survivors in the work so that we can improve our current system and create trauma-informed and safe access for those fleeing DV in the community

Applicant Name
This list contains no items

4B. Attachments Screen For All Application Questions

We have provided the following guidance to help you successfully upload attachments and get maximum points:

- | | |
|----|---|
| 1. | You must include a Document Description for each attachment you upload; if you do not, the Submission Summary screen will display a red X indicating the submission is incomplete. |
| 2. | You must upload an attachment for each document listed where 'Required?' is 'Yes'. |
| 3. | We prefer that you use PDF files, though other file types are supported—please only use zip files if necessary. Converting electronic files to PDF, rather than printing documents and scanning them, often produces higher quality images. Many systems allow you to create PDF files as a Print option. If you are unfamiliar with this process, you should consult your IT Support or search for information on Google or YouTube. |
| 4. | Attachments must match the questions they are associated with. |
| 5. | Only upload documents responsive to the questions posed—including other material slows down the review process, which ultimately slows down the funding process. |
| 6. | If you cannot read the attachment, it is likely we cannot read it either. |
| | . We must be able to read the date and time on attachments requiring system-generated dates and times, (e.g., a screenshot displaying the time and date of the public posting using your desktop calendar; screenshot of a webpage that indicates date and time). |
| | . We must be able to read everything you want us to consider in any attachment. |
| 7. | After you upload each attachment, use the Download feature to access and check the attachment to ensure it matches the required Document Type and to ensure it contains all pages you intend to include. |

Document Type	Required?	Document Description	Date Attached
1C-7. PHA Homeless Preference	No	1C-7 PHA Homeless...	09/19/2022
1C-7. PHA Moving On Preference	No	1C-7 PHA Moving O...	09/19/2022
1E-1. Local Competition Deadline	Yes	1E-1 Local Compet...	09/09/2022
1E-2. Local Competition Scoring Tool	Yes	1E-2 Local Compet...	09/19/2022
1E-2a. Scored Renewal Project Application	Yes	1E-2a Scored Rene...	09/19/2022
1E-5. Notification of Projects Rejected-Reduced	Yes	1E-5 Notification...	09/19/2022
1E-5a. Notification of Projects Accepted	Yes	1E-5a Notificatio...	09/19/2022
1E-5b. Final Project Scores for All Projects	Yes	1E-5b Final Proje...	09/19/2022
1E-5c. Web Posting—CoC-Approved Consolidated Application	Yes		
1E-5d. Notification of CoC-Approved Consolidated Application	Yes		
3A-1a. Housing Leveraging Commitments	No		

3A-2a. Healthcare Formal Agreements	No		
3C-2. Project List for Other Federal Statutes	No		

Attachment Details

Document Description: 1C-7 PHA Homeless Preference

Attachment Details

Document Description: 1C-7 PHA Moving On Preference

Attachment Details

Document Description: 1E-1 Local Competition Deadline

Attachment Details

Document Description: 1E-2 Local Competition Scoring Tool

Attachment Details

Document Description: 1E-2a Scored Renewal Project Application

Attachment Details

Document Description: 1E-5 Notification of Projects Rejected - Reduced

Attachment Details

Document Description: 1E-5a Notification of Projects Accepted

Attachment Details

Document Description: 1E-5b Final Project Scores for All Projects

Attachment Details

Document Description:

Attachment Details

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Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. CoC Identification	09/19/2022
1B. Inclusive Structure	09/19/2022
1C. Coordination and Engagement	09/19/2022
1D. Coordination and Engagement Cont'd	09/19/2022
1E. Project Review/Ranking	Please Complete
2A. HMIS Implementation	09/19/2022
2B. Point-in-Time (PIT) Count	09/19/2022
2C. System Performance	09/19/2022
3A. Coordination with Housing and Healthcare	09/19/2022
3B. Rehabilitation/New Construction Costs	09/19/2022
3C. Serving Homeless Under Other Federal Statutes	09/19/2022

4A. DV Bonus Project Applicants	09/19/2022
4B. Attachments Screen	Please Complete
Submission Summary	No Input Required

Attachment 1C-7: PHA Homeless Preference

Included:

- PHA (Homes for Good) Administrative Plan section 4-III.C.,
Local Preferences

4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

PHA Policy

The PHA will offer the following preferences:

Homeless Veteran Family Preference

This preference applies to homeless veteran families who have been referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'homeless' and 'veteran' for this purpose will be included in the MOU/MOA with the qualified entity.

Transitional Homeless Family Preference

This preference applies to transitional housing persons who are homeless and entering Lane County from Jail or prison who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'homeless' and 'transitional' for this purpose will be included in the MOU/MOA with the qualified entity.

Displaced Family Preference (Fire)

This preference applies to families who are displaced as a result of a fire. Persons who claim they are being or have been displaced due to fire must be a resident of Lane County, and have written verification from a Homes for Good approved entity, such as the Red Cross, local Fire Department, etc., of displacement. Referrals must be received within 45 days of the displacement.

Title XIX Preference (limited to 25 families selected under this preference per PHA Fiscal Year)

This preference applies to persons who qualify for Title XIX services and who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good).

Domestic Violence Preference (limited to 25 families selected under this preference per PHA Fiscal Year)

This preference applies to persons who are victims of domestic violence, dating violence, sexual assault, or stalking (as defined under VAWA; see Chapter 16) who have been referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good).

Shelter Plus Care Preference (limited to 25 families selected under this preference per PHA Fiscal Year)

This preference applies to participants in Homes for Good's Shelter Plus Care Program. To qualify, participants must have participated in the program for a minimum of two years, be in compliance with case management requirements, and not have violated their Family Obligations within 12 months of referral from the Case Manager.

Disabled Homeless Preference

This preference applies to disabled homeless persons who reside in cities where an established overnight homeless shelter is not within the city limits. Persons must be referred by a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'disabled homeless' for this purpose will be included in the MOU/MOA with the qualified entity.

Over/Under Housed Homes for Good Project-Based Preference

This preference applies to families who are currently receiving project-based housing assistance from Homes for Good and are over/under housed according to occupancy guideline for their current housing program, and there is no available unit to rectify the under/over housed issue in the family's current housing program.

Under this policy selected is defined as the date in which the voucher was issued.

Attachment 1C-7: PHA Moving On Preference

Included:

- PHA (Homes for Good) Administrative Plan section 4-III.C.,
Local Preferences

4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

PHA Policy

The PHA will offer the following preferences:

Homeless Veteran Family Preference

This preference applies to homeless veteran families who have been referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of ‘homeless’ and ‘veteran’ for this purpose will be included in the MOU/MOA with the qualified entity.

Transitional Homeless Family Preference

This preference applies to transitional housing persons who are homeless and who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of ‘homeless’ and ‘transitional’ for this purpose will be included in the MOU/MOA with the qualified entity.

Displaced Family Preference (Fire or Natural Disaster)

This preference applies to families who are displaced as a result of a fire or Natural Disaster. Persons who claim they are being or have been displaced due to fire or Natural Disaster must be a resident of Lane County, and have written verification from a Homes for Good approved entity, such as First Place Family Center, the Red Cross, local Fire Department, etc., of displacement. Referrals must be received within 45 days of the displacement.

Elderly or Disabled Preference

This preference applies to persons who are elderly or disabled and who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good).

Domestic Violence Preference

This preference applies to persons who are victims of domestic violence, dating violence, sexual assault, or stalking (as defined under VAWA; see Chapter 16) who have been referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good).

Continuum of Care Preference

Participants in Lane County's Continuum of Care programs, who have completed an assessment for move on readiness with a system screening tool and are referred through Lane County Coordinated Entry based on prioritized readiness.

Disabled Homeless Preference

This preference applies to disabled homeless families. Families must be referred by a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'disabled homeless' for this purpose will be included in the MOU/MOA with the qualified entity.

Permanent Housed Family Preference

This preference applies to families that are currently served in other permanent housing assistance programs administered by Homes for Good, when the other program is unable to serve the family and when such assistance is necessary for Homes for Good to appropriately house the family. This preference requires approval of Directors of both programs

Non-Elderly Person with Disabilities Preference (limited to 33 families utilizing a Mainstream voucher during a calendar year)

This preference applies to non-elderly persons with disabilities who are referred from a Homes for Good approved entity, who are transitioning out of institutional and other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless.

Under this policy selected is defined as the date in which the voucher was issued.

Permanent Housed Family Preference will be given priority above other local preferences. First Priority - Permanent Housed Family Preference referrals. Referrals received under this preference will be prioritized by date and time of referral. Second priority - Referrals from Sponsors (a current Homes for Good approved entity) under the Transitional Homeless Family Preference. Referrals received under this preference will be prioritized by date and time of referral. All other local preference referrals will be prioritized by date and time of referral.

Attachment 1E-2: Local Competition Scoring Tool

Included:

- Intent to Renew and Evaluation (Local Competition) Scoring Tool for Renewal CoC Projects
- Intent to Renew and Evaluation Instruction Manual for Renewal CoC Projects
- RFP and Scoring Rubric (Local Selection) for New CoC Projects under this NOFO



2022 HUD CoC Competition Intent to Renew and Evaluation

To be completed by all HUD CoC funded programs in the Lane County Continuum of Care (OR-500)

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Introduction

Lane County Human Services Division, as the Collaborative Applicant for Lane County CoC (OR-500), on behalf of the RFP-Evaluation Committee, implements an evaluation process for all projects applying for renewal in the upcoming HUD Continuum of Care (CoC) competition.

The 2022 Evaluation will consist of 6 sections (detailed below), for a total of **78 points possible**. All agencies receiving HUD CoC funding will need to submit an **Intent to Renew** form and completed **Evaluation** for each HUD CoC project (PSH, RRH) in order to be eligible to receive renewal funding.

The Evaluation will consist of 6 sections:

Grant Expenditure and Match (~15%): Spend down/Recapture; Match commitment	HMIS (~15%): Data Quality; Participation; Missing Data; Timelines	Equity and Inclusion (~7.5%): Cultural competency; racial disparities; equity lens
Participant Focus (~7.5%): Participant involvement in programming; feedback process; Client Rights	System Priorities and Housing First (~20%): Serving Chronically Homeless/Highest Vulnerability; Dedicated/Prioritization CH beds; Priority Populations or Focus Areas (Youth, High Vulnerability, FUSE); Housing First Assessment	Project Performance (~35%): Unit Utilization; Exits to Permanent Housing; Increase in Income; Non-Cash Benefits; Retention in PH; Follow Ups; Cost Efficiency

All agencies receiving CoC funding will also be monitored by Lane County as the Collaborative Applicant for OR-500, which includes submission of a Monitoring Questionnaire, as well as either a desk review or site visit, dependent upon agency risk rating determination. While not scored, the Monitoring Questionnaire will be used as a companion document to the annual Evaluation.

HUD Continuum of Care Competition Process

Annually, the US Department of Housing and Urban Development (HUD) provides funding for homelessness assistance programs authorized under the HEARTH Act through a Continuum of Care (CoC) Notice of Funding Opportunity (NOFO) process. In order for a project to apply for renewal, the CoC will require all projects to submit a local application for evaluation to determine renewal status. The evaluation process helps ensure a high standard of quality for renewal applicants, and may also be used to make ranking and funding decisions at the local level. After the evaluation process, eligible renewal applications may be submitted to HUD via the Collaborative Applicant (Lane County HSD) for submission upon release of the NOFO.

In Lane County, the Poverty and Homelessness Board (PHB) is responsible for setting local priorities under direction of a Strategic Plan. The PHB has charged the RFP-Evaluation Committee with evaluation

and ranking of CoC funded projects. Lane County Human Services Division (LC HSD), as the Collaborative Applicant, executes the evaluation and application process for HUD CoC funding.

The purpose of the Evaluation is to:

- Secure additional, and ensure efficient use of current resources
- Implement strategies outlined in the PHB Strategic Plan
- Improve the overall homeless system and service delivery outcomes
- Communicate local priorities

Scoring and Ranking Process

All questions in the 2022 Evaluation will be scored. Questions are assigned a point value and will be scored utilizing the criteria noted. All projects are scored on each question, unless otherwise noted or specified.

In 2022, agencies will complete an Intent to Renew and Evaluation for submission for each CoC funded project they intend to renew through the upcoming competition period. New projects, for which a full grant period has not been completed, will not be evaluated. Agencies should still complete an Intent to Renew form for new projects that they intend to renew. Lane County will score all submissions based on the criteria outlined in the document.

Scores will be reviewed by the RFP-Evaluation Committee of the Poverty and Homelessness Board. The PHB, along with the RFP-Evaluation Committee, are responsible for establishing Ranking Policies upon the release of the NOFA from HUD. Evaluation scores are one factor that may be considered when determining Ranking Policies. The Committee may utilize other requested data or information to make ranking decisions. All agencies will be notified of their ranking and application status during the CoC Competition period.

Appeals

LC HSD staff will review and score all Evaluations and provide a detailed score sheet for each project to the agency. Agencies will have the opportunity to appeal any score received if they believe an error was made in determining the score. Appeals must be submitted in written format by the provided deadline in order to be considered by the RFP-Evaluation Committee. Agencies are encouraged to contact LC HSD staff prior to submitting an appeal to receive clarity on any given score. Should any appeal be granted, LC staff will adjust the scoring as appropriate and provide an updated score sheet to the agency.

Intent to Renew Form

This form is to be completed via Cognito form by no later than 5pm (PT) on June 21, 2022: [LINK](#)

Agency Name:	
Agency Address:	
Executive Director:	
Executive Director Email and Phone Number:	
HUD Project Name (complete for each CoC Project):	
HUD Grant Number:	
Do other funding sources support this project?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please indicate all other funding sources: <input type="checkbox"/> DHS <input type="checkbox"/> RHY <input type="checkbox"/> VA <input type="checkbox"/> DOJ <input type="checkbox"/> Project Based Vouchers (PBV) <input type="checkbox"/> Healthcare funding <input type="checkbox"/> State funding <input type="checkbox"/> Private funding <input type="checkbox"/> Other HUD (non CoC) <input type="checkbox"/> Other:
HMIS Project ID(s):	

Is the agency intending to renew the above CoC project through the upcoming CoC Competition?	<input type="checkbox"/> Yes <input type="checkbox"/> No If No, please provide explanation:
If the project intends to renew, please complete the following information:	
Primary Program Contact Information	
<i>This should be the person primarily contacted regarding this project (e.g Executive Director, Program Manager)</i>	
Name:	
Phone Number:	
Email:	
Secondary Program Contact Information	
<i>This should be the person contacted in the event the primary person is unavailable</i>	

Intent to Renew and Evaluation via online submission due no later than 5 PM (PST) on June 21, 2022

Name: Phone Number: Email:
Other Contact Information <i>This can be an additional person who should be contacted regarding this project (e.g. fiscal)</i>
Name: Phone Number: Email:
1. Did you submit the most recent APR to HUD in Sage within 90 days of grant end date? <input type="checkbox"/> Yes <input type="checkbox"/> Check here if your APR is submitted by Lane County HSD <input type="checkbox"/> No <input type="checkbox"/> N/A – New project for which full grant year not yet completed
2. Does the project participate in HMIS? <i>Participation is defined as entering all required data elements for all persons in the project.</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
3. Does this project participate in Coordinated Entry? <i>Sole referral source is Central Wait List (CWL) managed by Lane County HSD.</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
4. Does the project serve families with at least one parent and one child? (Informational) <input type="checkbox"/> Yes – Continue to 4a-4c, which are Threshold questions. <input type="checkbox"/> No – N/A
If the project serves families, project must answer affirmatively to the following questions: 4a. Does the project accept all families with children 18 and under without regard to the age or gender of the child(ren)? <input type="checkbox"/> Yes <input type="checkbox"/> No 4b. Does the project have a staff person who has designated responsibility for ensuring that children are enrolled in school and are connected to appropriate services in the community? <input type="checkbox"/> Yes <input type="checkbox"/> No 4c. Are the project policies and practices consistent with all applicable laws related to providing education services to individuals and families? <input type="checkbox"/> Yes <input type="checkbox"/> No
5. Is the project able to meet the match requirements upon execution of grant agreement? <i>Projects are required to match at 25% (minus leasing) and must have required documentation of commitments prior to grant agreement.</i> <input type="checkbox"/> Yes (match letters will be requested prior to the grant period) <input type="checkbox"/> No
6. Is the project in compliance with the Final Rule on Equal Access in Accordance with Gender Identity? <ul style="list-style-type: none"> • Equal Access is provided in accordance with gender identity

Intent to Renew and Evaluation via online submission due no later than 5 PM (PST) on June 21, 2022

<ul style="list-style-type: none"> • In single-sex facilities/programs, individuals are placed/served in accordance with one's self-identified gender identity • Individuals are not subjected to intrusive questioning or asked to provide anatomical information or physical/medical evidence of gender identity • Non-discriminatory steps are taken to address privacy concerns, including updating operating policies and procedures <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>7. Is the project in compliance with the Final Rule on the Violence Against Women Act (VAWA)?</p> <ul style="list-style-type: none"> • Lease Addendum signed for each participant • Acknowledgement of Rights under VAWA signed by each participant • Participants are not denied assistance based on current or previous domestic violence, dating violence, sexual assault, or stalking. • Emergency transfers, bifurcation of lease, and tenant moves are accommodated when requested as a result of domestic violence, dating violence, sexual assault, or stalking. <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>8. Has the project resolved all monitoring findings or concerns from HUD and/or Lane County? If no, please submit a letter of explanation outlining the findings and steps taken to address them.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A- This project has not received any monitoring findings</p>

Note: *New Projects for which a full grant year has not yet been completed will skip to Certification after minimum threshold questions.*

Intent to Renew and Evaluation via online submission due no later than 5 PM (PST) on June 21, 2022

Eugene, Springfield/Lane County CoC HUD CoC Evaluation 2022

Grant Expenditure and Match (12 Points)

<p>1. Was the project able to fully expend 100% of the funds <u>initially contracted</u> (through HUD or LC HSD) for this project for the grant term that most recently ended?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No – Complete 1A-1B</p> <p><i>This question will be scored using data from Sage Reporting System and Lane County Contracting records.</i></p>	<p><i>8 points - 100% expenditure</i></p> <p>4 points for 90-99.9% or less than \$5,000</p> <p>0 points for greater than 10% or \$5,000 left unspent</p>
<p>1A. If no, how much was left unspent? <i>Including any funds that were moved from your agency prior to grant year end due to non-expenditure (Lane County subcontracted agencies).</i></p> <p>What is the total amount of the grant for the operating period (HUD CoC funding)?</p>	
<p>1B. If funds were not expended in full, Lane County will review previous <u>three</u> completed grant terms. Please complete the Recapture Spreadsheet and attach.</p>	<p><i>If project has unspent funds for 2 years or more, reallocation of average unspent funds over three years may be considered.</i></p>
<p>2. What level of match was provided for the grant term that most recently ended (as reported in the APR)?</p>	<p>4 points – 51% or greater match 3 points – 26-50% match 2 points - 25% (minimum match required)</p> <p>-2 points for below 25% match</p> <p><i>Note: No points will be awarded if the project provided greater than 25% match with less than 100% expenditure of funds</i></p>

Homeless Management Information System (HMIS) and Data Quality (11 points)

<p>1. Has your agency administrator(s) attended Agency Admin meetings in the past calendar year?</p> <p><input type="checkbox"/> Yes, at least 3 meetings</p> <p><input type="checkbox"/> Yes, less than 3 meetings</p> <p><input type="checkbox"/> No, did not attend Agency Admin meetings</p> <p><i>Record of attendance is kept on file by HMISLead</i></p>	<p>1 Point if attended at least <u>3</u> meetings in 2021</p>
<p>2. Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><i>This question will be scored using HMIS data and reporting.</i></p>	<p>2 points – A to A+</p> <p>1 point – B+ to B-</p> <p>0 points – C or below</p>
<p>3. What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) _____</p> <p><i>This question will be scored using HMIS data and reporting.</i></p>	<p>2 Points – A or A+</p> <p>1 Points – B+ to B-</p> <p>0 Points – C or below</p>
<p>4. Has the project completed and entered all required interim/annual reviews into ServicePoint?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>% missing interim/annual review: _____</p> <p><i>This question will be scored using HMIS data and reporting.</i></p>	<p>3 Points – 100% complete interim reviews</p> <p>2 points – <5% missing interims</p> <p>1 points – 5-10%</p> <p>0 points – >10% missing interims</p>
<p>5. Has the project completed and entered all required interim/annual reviews for the same calendar month as the entry assessment?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>% late interim/annual review: _____</p> <p><i>This question will be scored using HMIS data and reporting.</i></p>	<p>3 Points – <5% late interim reviews</p> <p>2 points – 5-10%</p> <p>1 points – 10-15%</p> <p>0 points – >15% late interims</p>

System Priorities and Housing First (15 points)

<p>1. Does the project serve individuals or families that meet HUD’s definition of chronically homeless? Number of households served between January 1, 2021 – December 31, 2021 with at least one individual who is chronically homeless / total number of households served in same period</p> <p><i>This question will be scored using HMIS data and reporting.</i></p>	<p>4 points for serving >75% CH</p> <p>3 points: 60%-74.9%</p> <p>2 points: 45-59.9%</p> <p>1 point: 25-44.9%</p> <p>0 points: <25%</p>
<p>2. Does the project serve individuals or families that meet the specialized population criteria below?</p> <p>How many households have you served from January 1, 2021- December 31, 2021? _____</p> <p>How many of the households served had a head of household who met the following criteria:</p> <p><input type="checkbox"/> Youth head of household (under 25) _____</p> <p><input type="checkbox"/> Highly Vulnerable (VI-SPDAT score 15 and above) _____</p> <p><input type="checkbox"/> Frequent Users of Systems (FUSE) _____</p> <p><i>This question will be scored using HMIS data and reporting.</i></p>	<p>4 points for serving 75% or greater priority population</p> <p>3 points: 65%-74.9%</p> <p>2 points: 50-64.9%</p> <p>1 points: 25-49.9%</p> <p>0 points: < 25% priority population</p>
<p>3. Does the project follow a Housing First approach, according to HUD guidelines?</p> <p>a. Does the project quickly move participants into permanent housing (without preconditions or extra steps required to be met)?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>b. Is the project able to answer affirmatively to <u>all</u> of the following statements:</p> <p><input type="checkbox"/> This project does not screen out for reasons related to income (Having too little or no income)</p> <p><input type="checkbox"/> This project does not screen out for active or history of substance use (including requirements for participation in treatment once enrolled, sobriety or intention to become/remain sober)</p> <p><input type="checkbox"/> This project does not screen out for having a criminal record (with exceptions only for <i>state-mandated restrictions</i>. If restrictions in place, please list what they are and corresponding state mandate)</p> <p style="padding-left: 40px;">If no, please list restriction and mandate: _____</p> <p><input type="checkbox"/> This project does not screen out for having a history of domestic violence (e.g. lack of protection order, period of separation from abuser, or law enforcement involvement, etc.)</p>	<p>5 Points if all Housing First criteria met</p> <p>If the project cannot answer Yes to <u>all</u> of the criteria, 0 points.</p> <p>Scoring for this question will be based on project’s grant agreement and previous submissions, unless updated information has been provided.</p>

Lane County 2022 HUD CoC Evaluation

<p><input type="checkbox"/> This project does not screen out based on an individual’s “housing readiness” or “motivation to change” or any other similar criteria</p> <p><input type="checkbox"/> This project does not screen out based on previous rental history (evictions, damages, etc.)</p> <p>c. Is the project able to answer affirmatively that none of the following are reasons for program termination:</p> <p><input type="checkbox"/> Failure to participate in supportive services</p> <p><input type="checkbox"/> Failure to make progress on a service plan</p> <p><input type="checkbox"/> Loss of income or failure to improve income</p> <p><input type="checkbox"/> Domestic violence</p> <p><input type="checkbox"/> Any other activity not covered in a lease agreement typically found in the project’s geographic area.</p>	
<p>4. Does the project provide and explain the written eligibility criteria which are in alignment with Housing First principles to participants?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>1 point for Yes with Attachment</p>
<p>5. Do the project’s written discharge or termination policies include all of the following:</p> <p><input type="checkbox"/> a. An internal, due process hearing or investigation prior to discharging the participant</p> <p><input type="checkbox"/> b. Assistance with locating other housing options, if needed</p> <p><input type="checkbox"/> c. A statement that the agency will make and document all reasonable attempts to avoid discharging participants into a homeless situation or without basic needed services</p> <p><input type="checkbox"/> d. A policy allowing participants to remain in the project even if they require an absence of 90 days or less due to substance use or mental health treatment, hospitalization, or incarceration</p> <p><input type="checkbox"/> None of the above</p>	<p>1 point for Yes with Attachment</p>

Equity and Inclusion (6 points)

<p>1. Indicate the steps and methods used to address equity within the agency:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Agency has made a public written commitment to address/eliminate racial and ethnic inequities or has incorporated this into the mission, vision, and goals of the agency <input type="checkbox"/> Agency has a racial equity plan or strategy that is regularly monitored <input type="checkbox"/> Agency participated in ongoing evaluation of policy, service, or program impacts and progress towards racial equity <input type="checkbox"/> Agency has completed its own racial disparities assessment to determine inequities that exist within the agency or programs it offers. <input type="checkbox"/> Agency has internal structures to address equity issues (i.e. an established equity committee, formal or informal complaint resolution process, community advisory body) <input type="checkbox"/> Racial equity knowledge, skills, and practices are a part of staff job descriptions and work plans <input type="checkbox"/> Staff receive training and support around racial equity and how their role is important in addressing institutional racism (i.e. anti-oppression trainings, etc.) <input type="checkbox"/> Management consistently applies a racial equity lens <p>Other (please list):</p>	<p>2 points for at least two selected</p>
<p>2. Provide a description of the project’s strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?</p>	<p>2 points based on rubric</p>
<p>3. Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to programming.</p>	<p>2 points based on rubric</p>

Participant Focus (6 points)

<p>1. Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Weekly “house” meetings or similar <input type="checkbox"/> b. Resident/tenant council or similar <input type="checkbox"/> c. On-site employment opportunities <input type="checkbox"/> d. Volunteer projects or similar <input type="checkbox"/> e. Peer Leadership/Mentorship <input type="checkbox"/> f. Other*: <input type="checkbox"/> <i>No, the project does not have ways for participants to contribute to day-to-day operations</i> <p><i>*Participation on the Board of Directors is required and does not count toward this contribution. Feedback processes/anonymous surveying also do not count toward this contribution.</i></p>	<p>1 point for at least one selected</p>
<p>2. Does the agency have a written notice or “Client Rights” document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Confidentiality policy <input type="checkbox"/> b. Non-discriminatory practices <input type="checkbox"/> c. Right to refuse services and have consequences, if any, explained <input type="checkbox"/> d. Grievance policy <p><input type="checkbox"/> Attach most recent Client Rights document</p>	<p>2 points for Yes to <u>All</u> with attachment</p>
<p>3. Indicate the method the agency uses to regularly receive and respond to feedback from participants:</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Conducts at least annual satisfaction surveys <input type="checkbox"/> b. Ongoing anonymous feedback processes <input type="checkbox"/> c. Other: <p>Narrative: Must provide at least one issue that arose from feedback in the past year, how the agency responded, AND how this response was communicated back to participants.</p>	<p>3 points based on rubric</p>

Project Performance Outcomes (28 Points Total)

All Project Performance Outcomes measures will be scored using verified HMIS data only. Lane County may run reports from Wellsky on or after June 21, 2022 to verify all data. Lane County may adjust scoring using statistical methods (i.e. grading on a curve, percentile scoring, etc.) as needed to account for abnormal distributions. Agencies will see this noted in final scorecards if applicable.

Select the program type:

Permanent Supportive Housing

Rapid Re-housing

1. Was the project at or above 80% utilization for the previous calendar year?	6 points for projects at or above 80% for the average bed utilization rate AND each of the four point-in-time bed utilization rates, based on the full capacity in grant agreement 0 points for <80% at any point in time
2. Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	6 points for 90-100% 5 points for 80-89.9% 4 points for 70-79.9% 3 points for 60-69.9% 2 point for 50-59.9% 1 point for 40-49.9% No points for <40%
3. Of the individuals who left the project (leavers) what percentage exited to a permanent destination?	6 points for 100% 5 points for 90-99.9% 4 points for 80-89.9% 3 points for 70-79.9% 2 points for 60-69.9% 1 point for 50-59.9% No points for <50%
4. What percentage of adults and heads of household without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	5 points for 75-100% 4 points for 60-74.9% 3 points for 40-59.9% 2 points for 20-39.9% 1 point for 10-19.9% No points for <10%
5. What percentage of adults maintained or increased their income through cash benefits, earned income, or both?	5 points for 80-100% 4 points for 70-79.9% 3 points for 60-69.9% 2 points for 50-59.9% 1 point for 30-49.9% No points for <30%
6. What is the program's cost per permanent exit (cost effectiveness)?	<i>Informational – may be used as a factor in determining ranking</i>

Lane County 2022 HUD CoC Evaluation

Project cost divided by stayers who remain permanently housed for 12 months or more or leavers to exit to permanent destination.	
<p>LC CoC APR, CoC PROJECT EVALUATION, and DQ for UDE PLUS REPORTS:</p> <p><i>Agencies must run the necessary reports to complete the responses within the Evaluation and attach these reports. Lane County will run each project's reports to verify all submitted data on or after June 21, 2022. Final scoring will be based on data in Wellsky only. Agencies are encouraged to correct any data quality issues prior to scoring date.</i></p>	



2022 HUD CoC Competition Intent to Renew and Evaluation

Instruction Guide

Document Owner: Amanda Borta

5/25/2022

For all HUD CoC-funded projects in the OR-500 Eugene/Springfield/Lane County Continuum of Care

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Introduction

Annually, the US Department of Housing and Urban Development (HUD) provides funding for homeless programs authorized under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act through a Continuum of Care (CoC) Notice of Funding Opportunity (NOFO) process. In order to be eligible for renewal funding, the Lane County CoC requires all projects to complete a local Evaluation to determine renewal status. The Evaluation process ensures a high standard of quality for renewal applicants, and may also be used to make ranking and funding decisions at the local level. After the local application submission (Intent to Renew/Evaluation), eligible renewal applicants may be invited to submit a HUD application to the Collaborative Applicant (Lane County) once the NOFO is released. Lane County subrecipients will have the HUD application completed on their behalf.

HUD, through the CoC Interim Rule (24 CFR Part 578), encourages CoCs to establish formal policies and review procedures to evaluate the effectiveness of projects, with particular emphasis on performance targets and outcomes measurement. In Lane County, the Poverty and Homelessness Board (PHB) is responsible for setting local policies and priorities under direction of a Strategic Plan. The PHB has charged the RFP-Evaluation Committee with evaluation and ranking of the CoC funded projects. Lane County Human Services Division, as the Collaborative Applicant, executes the evaluation and application process for HUD CoC funding.

The purpose of this Evaluation is to:

- Secure additional, and ensure efficient use of current resources.
- Implement strategies outlined in the 2016-2021 PHB Strategic Plan.
- Improve the overall homeless system and service delivery outcomes.
- Communicate local priorities.

Evaluation Process

The Evaluation must be submitted by all CoC funded projects, including those subcontracted through Lane County Human Services Division. CoC Planning and HMIS projects will be evaluated separately.

APPLICANT	SUBRECIPIENT	PROJECT	TYPE
LANE COUNTY	SHELTERCARE	CAMAS	PSH
LANE COUNTY	SHELTERCARE	CASCADES	RRH
LANE COUNTY	MAINSTREAM HOUSING	EMERALD	PSH
LANE COUNTY	SHELTERCARE, CCS, LOOKING GLASS	MCKENZIE	RRH
LANE COUNTY	SHELTERCARE	SAHALIE	PSH
LANE COUNTY	SHELTERCARE	SHANKLE (Sc.Sites)	PSH
LANE COUNTY	SHELTERCARE	MLK	PSH
LANE COUNTY	LAUREL HILL CENTER	THE NEL	PSH
HOMES FOR GOOD	SHELTERCARE, LAUREL HILL CENTER	MADRONE/SPC	PSH
SVDP		CONNECTIONS	RRH
SVDP		LIFT	PSH
SVDP		VET LIFT	PSH

The Evaluation is updated each year to ensure it is in line with the HEARTH Act, Federal Strategic Plan to End Homelessness, and most up to date best practice guidance. Agencies should make efforts throughout the year to stay informed of both national and local policies and priorities to ensure compliance with requirements. The CoC recognizes that agencies will need reasonable time to come into compliance with any new expectations or requirements.

The 2022 Evaluation will consist of 6 sections (detailed below), for a total of **78 points possible**. All agencies receiving HUD CoC funding will need to submit an **Intent to Renew** form and completed **Evaluation** for each HUD CoC project (PSH, RRH) in order to be eligible to receive renewal funding.

The Evaluation will consist of 6 sections:

<p>Grant Expenditure and Match (~15%): Spend down/Recapture; Match commitment</p>	<p>HMIS (~15%): Data Quality; Participation; Missing Data; Timelines</p>	<p>Equity and Inclusion (~7.5%): Cultural competency; racial disparities; equity lens</p>
<p>Participant Focus (~7.5%): Participant involvement in programming; feedback process; Client Rights</p>	<p>System Priorities and Housing First (~20%): Serving Chronically Homeless/Highest Vulnerability; Dedicated/Prioritization CH beds; Priority Populations or Focus Areas (Youth, High Vulnerability, FUSE); Housing First Assessment</p>	<p>Project Performance (~35%): Unit Utilization; Exits to Permanent Housing; Increase in Income; Non-Cash Benefits; Retention in PH; Follow Ups; Cost Efficiency</p>

All agencies receiving CoC funding will also be monitored by Lane County as the Collaborative Applicant for OR-500, which includes submission of a Monitoring Questionnaire, as well as either a desk review or site visit, dependent upon agency risk rating determination. While the CoC monitoring process will not impact Evaluation scoring, the Monitoring Questionnaire will be used as a companion document to the annual Evaluation process. Agencies should always be sure to complete the Monitoring Questionnaire by the stated deadlines in order to remain eligible for renewal funding.

Failure to submit an Intent to Renew form or Evaluation by the stated deadline may result in a loss of funding.

Deadline and Submission Instructions

All Intent to Renew and Evaluation submissions are due to Lane County by **5:00pm (PST) on JUNE 21st 2022**. Agencies will be submitting the Intent to Renew form and Evaluation online via Cognito. Paper copies or submission through other methods will not be accepted.


Intent to Renew and Evaluation Submission

The Intent to Renew form and Evaluation is located here:

<https://www.cognitofrms.com/LaneCounty1/HUDCoCIntentToRenewAndEvaluationFY22>

You will need to submit one form for **each** project that receives HUD CoC funding (listed on page 2).

Helpful Tips

- **It is highly recommended that you only complete the online survey only once you have all of the necessary information and have all of the required documents ready to upload.** Some questions will be indicated with an asterisk (*) next to the question. You will not be able to continue to the next page without answering these required questions. It is not recommended that you enter inaccurate or “placeholder” information in order to move to other sections of the survey. ***Please use the PDF version of the Evaluation to complete the responses outside of Cognito first.***
- Questions that require an attachment are identified in this guide with this symbol: . All attachments must be uploaded directly within the online survey. If you are having difficulty uploading a document, please first check to be sure you are uploading the correct file type (.pdf, .doc, etc.) indicated in the question. Next, be sure the file size is not too large. All files are limited to **no more than 5MB**. A pdf file should be a **text** file, rather than an *image* file, which significantly increases file size. If your file is over an indicated size limit, you may need to compress the file.
- Agencies will be able to save and return to complete the survey later (within 7 days only). However, as noted above, agencies are encouraged to have all responses ready prior to entering the online survey. Responses are saved only when you click Next, Back, or Submit, but may not save automatically as questions are answered if you do not progress through to the next page. ***if you close out of the survey without saving or submit it, you will not be able to edit your responses and will need to start a new survey submission.***
- Program staff should work with their Agency Administrator to review the required reports and correct any data errors. Most of the questions within the Evaluation will be scored using data from WellSky Community Services (formerly ServicePoint). It is recommended that staff review

the reports as soon as possible and ensure corrections are made in advance of submission. **DO NOT WAIT UNTIL THE LAST MINUTE TO REVIEW YOUR REPORTS!** All scoring will be based on verified data from WellSky only.

Questions and Technical Assistance

If you have any questions after reviewing the available resources, please contact Amanda Borta at Amanda.borta@lanecountyor.gov

Please consult with your Agency Administrator on any questions that require the use of WellSky data. If you have questions regarding reports, data quality, or WellSky, please contact the HMIS Helpdesk directly: HSDheldes@lanecountyor.gov



Scoring and Ranking

All questions in the 2022 Evaluation will be scored. Questions are assigned a point value and will be scored utilizing the criteria noted. All projects are scored on each question, unless otherwise noted or specified. Informational questions are used only for informational purposes and will not contribute to the overall score.

After the submission deadline, Lane County staff will review available data and score each project based on the criteria outlined. Scores will be reviewed by the RFP - Evaluation Committee of the Poverty and Homelessness Board. The PHB, along with the RFP-Evaluation Committee, are responsible for establishing Ranking Policies upon the release of the NOFO. Evaluation scores are one factor that may be considered when determining Ranking Policies. The Committee may utilize other requested data or information. All agencies will be notified of their ranking and application status.

Appeals

Lane County HSD staff will review and score each Evaluation and provide a detailed score sheet for each project to the agency. Agencies will have the opportunity to appeal any score received if they believe an error was made in determining the score. Appeals must be submitted in written format by the provided deadline in order to be considered by the RFP-Evaluation Committee. Instructions for appeals will be provided with your preliminary scorecard. Agencies are encouraged to contact LC HSD staff prior to submitting an appeal to receive clarity on any given score. Should any appeal be granted, LC staff will adjust the scoring as appropriate and provide an updated score sheet to the agency.

Detailed Instructions

For 2022, Agencies will be required to complete the Intent to Renew form and full Evaluation to be submitted to Lane County via Cognito by no later than **JUNE 21st 2022**.

As mentioned, you should prepare all answers and documents prior to entering information into the online survey. While you will be able to save your responses, you will not be able to navigate from one section to another without answering required questions first. For a list of all required attachments, please see [List of Attachments](#). You may also view a PDF version of the Evaluation [here](#).

Intent to Renew – Project Information

The first section contains general instructions and requests basic agency and project information.

Agency Name: Please list your full agency name as it appears on your Lane County contract or grant agreement with HUD.

Agency Address: Please indicate the main address for the *agency*. If there are multiple addresses, please use the main address, admin office, or address used for contracting purposes.

Executive Director Information: Please indicate the name, email, and phone number of the Executive Director (or otherwise known as CEO, Agency Director, etc.)

HUD Project Name: Indicate the project for which you are completing the survey. Please use the approved HUD project name listed on the grant agreement.

HUD Grant Number: Indicate the FY21 or most recent HUD grant number for the project. If you are unsure of the grant number, you may find it [here](#) on the Grant Inventory Worksheet.

HMIS Project ID(s): Please indicate the project's HMIS Project ID(s). This is typically a four digit number used to identify the project in WellSky.

Do other funding sources support this project: Indicate Yes or No if you support this project with non-CoC funds. This includes funding used as match or leverage for the project. You will then be asked to identify the source for other funds that support the project. Select all that apply.

Is the agency intending to renew the above CoC project through the upcoming CoC Competition: This is where the agency is indicating whether or not there is intent to renew the project for the FY22 (HUD) year. If you indicate No, please provide an explanation. Note: If you indicate No to this question, you may not be eligible for continued funding beyond FY21 (HUD) grant year.

Contact Information

Primary Contact Information: Provide the contact information (Name, Phone Number, Email) for the person who is responsible for submitting an evaluation for this project. This should be the person primarily contacted regarding this project during the operating year.

Secondary Contact Information: Provide the contact information for a second person who should be contacted regarding this project during the operating year.

Other Contact Information (Optional): If needed, you may provide contact information for a third person who should be contacted regarding this project during the operating year.



Note: The contacts listed in the Evaluation will be used to formulate a CoC project contact list for the upcoming year. Please list the most appropriate contacts for ongoing CoC communication.

Threshold Questions (Minimum Requirements)

The questions in the Intent to Renew form indicate minimum requirements for funding. These questions must be answered affirmatively, if applicable, in order to be considered eligible for renewal funding. **If an agency cannot answer affirmatively, an explanation must be submitted within the Intent to Renew Form for review by Lane County and the RFP -Evaluation Committee.** The reviewers may request additional information and will determine if the project is eligible for a waiver of the requirement for this competition period.

Did you submit the most recent APR to HUD in Sage within 90 days of grant end date?

The Annual Performance Report is required to be submitted in Sage to HUD within 90 days of grant end date. Lane County will confirm timely submission within Sage and retain a copy with the Evaluation submission. Agencies receiving funding through Lane County may check the box to indicate that the APR is submitted by Lane County HSD. If this is a new project, for which a full grant year has not yet been completed, choose N/A.

Does the project participate in HMIS?

Participation in the Homeless Management Information System (HMIS) is mandatory, as required by HUD. Participation is defined as entering all [required data elements](#) for all persons in the project. Participation will be verified by Lane County HMIS Lead staff. Projects are expected to enter all Universal Data Elements, as well as any applicable Program-Specific Data Elements. Projects that exclusively serve victims of domestic violence should select “No- DV Exclusive Project.” Projects exclusively serving a DV population are required to utilize a comparable database.

Does this project participate in Coordinated Entry?

Participation in the locally established Coordinated Entry process is mandatory, as required by HUD. Participation is defined as filling all bed and unit vacancies through the established Central Wait List (CWL). Projects should also make efforts to refer clients seeking assistance directly to appropriate access points (Front Door Assessors). Participation in the Coordinated Entry System will be verified by Lane County staff.

Does the project serve families with at least one parent and one child (Informational)

Indicate whether or not the project serves families with at least one adult and one child. If Yes, agency must complete additional subquestions a- c., which are Threshold questions for projects that serve families.

If Yes, Answer the following questions:

a. Does the project accept all families with children 18 and under without regard to the age or gender of the child(ren)?

HUD CoC projects are prohibited from involuntary family separation. The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives HUD CoC funding (24 CFR Part 578.93).

b. Does the project have a staff person who has designated responsibility for ensuring that children are enrolled in school and are connected to appropriate services in the community?

All projects serving families are required to certify that they will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disability Education Act, and programs authorized under subtitle B of title VII of the Act (24 CFR Part 578.23).

c. Are the project policies and practices consistent with the laws related to providing education services to individuals and families?

HUD CoC projects must establish policies and practices consistent with, and do not restrict, the exercise of rights provided by subtitle B of title VII of the Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness (24 CFR Part 578.23).

Is the project able to meet the match requirements upon execution of grant agreement?

Recipients must match all grant funds, minus leasing, with *at least* 25% cash or in-kind contributions from other sources (24 CFR Part 578.73). Agencies are required to have written commitments of match for the project prior to executing the grant agreement. Agencies will be asked to submit letters of match commitments prior grant agreement.

Is the project in compliance with the Final Rule on Equal Access?

Indicate if your project has policies and procedures in place that are consistent with the requirements under the Equal Access in Accordance with Gender Identity Final Rule. In September 2016, HUD published a final rule entitled "Equal Access in Accordance with an Individual's Gender Identity" in Community Planning and Development Programs. Through this rule, HUD ensures equal access to individuals in programs funded under the HUD Office of CPD. More information about the requirements under this rule can be found [here](#).

Is the project in compliance with the Final Rule on the Violence Against Women Act (VAWA)?


Indicate if your project has policies and procedures in place that are consistent with the requirements under the Final Rule Implementing VAWA Reauthorization Act of 2013. In November 2016, HUD published the final rule regarding implementation of the housing protections authorized through VAWA. More information about the requirements under this rule can be found [here](#).

Has the project resolved all monitoring findings or concerns from HUD and/or Lane County?

Indicate if your project has resolved any monitoring findings received from either HUD or Lane County. If the project has not received any monitoring findings, please select "This project has not received any monitoring findings." If the project has received monitoring findings, but has not yet resolved one or more findings, please submit an explanation outlining the finding(s) and what steps are currently being taken to address or resolve the issue, including estimated timeline for resolution if possible.

FY22 HUD CoC Evaluation

Grant Expenditure and Match

 **Was the project able to fully expend 100% of the funds initially contracted (through HUD or LCHSD) for this project for the grant term which most recently ended?**

The expectation is that agencies expend 100% of funds provided in their HUD contract. Projects will be scored based on information in Sage Reporting System or Lane County Invoices for the most recently ended HUD grant period and initial contract amount (full contract), even if funds were reallocated to another subrecipient (Lane County) within the grant period.

If 100% of funds were not spent by the grant end date, Lane County will review the amount that was left unspent (including funds that were moved from your agency prior to grant end date) and calculate a score based on the criteria noted. The agency must also complete and submit the [Recapture Spreadsheet](#). Instructions for completing the Recapture Spreadsheet are included within the document.


Reallocation: If an agency has consistently left funds unspent over the previous three grant periods, CoC staff will review whether a recommendation should be made to reallocate any amount back to the Continuum for use in other new or renewal CoC projects.

What level of match was provided for the grant term that most recently ended (as reported in the APR)?

Recipients must match all grant funds, minus leasing, with *at least* 25% cash or in-kind contributions from other sources (24 CFR Part 578.73). Responses should reflect the most recently completed grant year. Agencies will receive full points if they provide above and beyond the minimum required level of match. If an agency was not able to provide the minimum level of match, points will be *deducted* from their score. Agencies consistently unable to provide the required level of match will be considered for reallocation.

Homeless Management Information System (HMIS) and Data Quality

Please consult with your Agency Administrator on any questions that require the use of WellSky data. If you have questions regarding reports, data quality, or WellSky, please contact the HMIS Helpdesk directly: HSDhodesk@lanecountyor.gov

 Reports you will need:

- CoC APR (Canned Report)
 - Provider: Your project name
 - Program Date Range: 1/1/2021-12/31/2021
 - Entry Exit Type: select **only** your entry type, do not select all types.

- DQ for UDE PLUS (found in CoC folder → Evaluation Reports sub-folder or DQ folder in ART)
 - Provider(s): Your project name
 - Enter Start Date: 1/1/2021
 - Enter End Date PLUS 1 Day: 1/1/2022
 - Include Services in Report Card? No
- CoC Project Evaluation (found in CoC folder → Evaluation Reports sub-folder in ART)
 - Provider: Your project name
 - Start Date: 1/1/2021
 - End Date PLUS one day: 1/1/2022

Note: Making corrections can change data in some of the reports. It is best to run the APR **first** and make corrections. Then after ART has refreshed, check the ART reports.

Has your agency administrator(s) attended Agency Admin meetings in the past calendar year?

Agency Administrator meetings are held regularly. All Agency Admins are encouraged to attend all meetings. A record of attendance is held on file at Lane County (HMIS Lead). Agencies will receive a point for attending at least three meetings in 2021.



Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021 - December 31, 2021?

Agencies will receive full points if they have 5% or less missing values (An “A” grade) on all HUD required UDEs and PSDEs for the reporting period.

Run the **DQ for UDE PLUS** report. The completeness grade can be found on the first tab of the report. Points are awarded based on the Overall score.

	HUD UDE ONLY	Additional ONLY	HUD Verification ONLY	OVERALL
GRADE BASED ON COUNT FOR EACH ELEMENT:	A	A	A	A
	100.00%	100.00%	98.98%	99.84%



What data entry timeliness grade has the project achieved in calendar year 2021 (January 1, 2021 - December 31, 2021)?

Data timeliness reports on the amount of time it took to enter entry and exit records into the database. Agencies will be scored on the project’s data entry timeliness grade achieved for the reporting period.

Run the **CoC Project Evaluation** report. The score is the cell in green on the first tab of the report (Timeliness).

What data entry timeliness grade has the project achieved in the calendar year?

Score your data timeliness using the Average Total Points score below.

2 = A

1 = B

0 = C or below

Time For Record Entry and Exit	Number of Project Start Records	Number of Project Exit Records	Total Points
0-3 days (2 pts)	8	8	20
4-6 days (1 pts)	0	1	1
7+ days (0 pts)	2	1	0
TOTAL Points			21
Total Entries and Exits	10	7	17
Average Points			2

 **Has the project completed and entered all required interim/annual reviews into WellSky?**


Agencies are required to conduct an annual assessment, entered into WellSky within 30 days of the anniversary of the person's project entry date.

Run the **APR**. Find the number of missing annual reviews in Section 6c

6c - Data Quality: Income and Housing Data Quality		
Data Element	Error Count	% of Error Rate
Destination (3.12)	0	0%
Income and Sources (4.2) at Start	0	0%
Income and Sources (4.2) at Annual Assessment	0	0%
Income and Sources (4.2) at Exit	0	0%

Divide this number by the total number of persons served in 5a

5a - Report Validations Table	
Report Validations Table	
1. Total Number of Persons Served	136
2. Number of Adults (age 18 or over)	57
3. Number of Children (under age 18)	79
4. Number of Persons with Unknown Age	0

 **Has the project completed and entered all required interim/annual reviews for the same calendar month as the entry assessment?**

Agencies are required to conduct an annual assessment, dated the same month as the entry assessment.

Run the **CoC Project Evaluation** report and look at the Annual Dates tab. The % of annual reviews dated correctly will be in green.

Entry Exit Entry Date	Entry Exit Review Date	Month of Entry matches Month of Annual	Housing Move-in Date(9-160)	Housed YN (Review)
1/16/20	1/16/21	Yes	4/9/20	Housed
6/3/19	6/3/21	Yes	7/1/19	Housed
7/24/20	7/24/21	Yes	9/3/20	Housed
10/14/19	10/14/21	Yes	2/21/20	Housed
		4		
	Average	100.00%		

Note: if you will be making corrections in this section, you may need to re-enter data. If the annual contained new information and you will be altering the date to a **later** date, no additional data entry is needed. If the annual date is being modified to an **earlier** date, you will lose the data that was entered on the original annual and will need to enter it again.

System Priorities and Housing First

Please consult with your Agency Administrator on any questions that require the use of WellSky data. If you have questions regarding reports, data quality, or WellSky, please contact the HMIS Helpdesk directly: HSDhodesk@lanecountyor.gov

Does the project serve individuals that meet HUD’s definition of chronically homeless?

The Lane County CoC continues to prioritize serving households who are most vulnerable, particularly those who are experiencing chronic homelessness. Lane County will score agencies using the CoC APR, which will indicate the total number of households served from January 1, 2021 – December 31, 2021 who met [HUD’s definition of chronic homelessness](#). Projects serving over 75% households with at least one individual who is chronically homeless will receive full points.

Run the **APR** and look at Section 26a. Divide the Total Chronically Homeless by the Total in this section.

26a - Chronic Homeless Status - Number of Households w/at least one or more CH person					
	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Chronically Homeless	12	0	12	0	0
Not Chronically Homeless	28	0	28	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	0	0	0	0	0
Total	40	0	40	0	0

Does the project serve individuals or families that meet the specialized population criteria below?

The Lane County CoC continues to prioritize additional households meeting specialized population criteria including youth, highly vulnerable, and frequent users of systems (FUSE). Lane County will score agencies using the **CoC Project Evaluation Report**, which will indicate the total number of households (Head of Household) served from January 1, 2021 – December 31, 2021 who met each of the population criteria. Projects will be scored based on the highest percentage for the populations served. Projects serving over 75% households identified as specialized population will receive full points.

Run the **CoC Project Evaluation** report and look at the Specialized Population tab. The % of clients from each priority population are highlighted in green.

Youth head of household (under 25 years old)

AGE 24 GROUP Exit (EE)	HoH
ADULT 25+	11
All Heads of Households	11
% Youth head of household (under 25 years old)	0.00%

Highly vulnerable (VI-SPDAT score 15 and above)

SPDAT SCORE GRP	HoH
0-14	1
>=15	10
% of HoH with VI-SPDAT Score 15 and above	90.91%

Frequent Users System Engagement (FUSE)

All Head of Household Clients	11
FUSE Clients (HoH)	0
% Heads of Household that are FUSE clients	0.00%

Does the project follow a Housing First approach, according to HUD guidelines?

Housing First is an approach to quickly connect individuals and families experiencing homelessness to permanent housing options without preconditions and barriers to entry that has been proven to be very effective in ending homelessness. Housing First ¹ is based on the principles that homelessness is a housing issue, all people experiencing homelessness can achieve housing stability in permanent housing, everyone is “housing ready” and that people experiencing homelessness have a right to self-determination. **All RRH and PSH projects are required to follow a Housing First approach.**

Agencies must answer each part to the question affirmatively in order to be considered Housing First. The project must quickly move participants into permanent housing, meaning there are no intermediary steps or a period of qualification before permanent housing (e.g. completion of renter’s education, successful completion of or “graduation” from other temporary housing program, etc.).

The project must have also **removed barriers** to accessing housing and services and must be able to answer affirmatively to **all** of the following:

- This project does not screen out for reasons related to income (having too little or no income)
- This project does not screen out based on active or history of substance use (including requirements for participation in treatment once enrolled, sobriety, or intention to become/remain sober.
- This project does not screen out for having a criminal record (with exceptions only for state-mandated restrictions – note you must indicate what the exception is and what the corresponding state mandate is in order to receive points)

¹ <https://www.hudexchange.info/resources/documents/Housing-First-Permanent-Supportive-Housing-Brief.pdf>

- This project does not screen out for having a history of domestic violence
- This project does not screen out based on an individual’s “housing readiness” or “motivation to change” or any other similar criteria
- This project does not screen out based on previous rental history (including eviction history, damage history, etc.)

Lastly, the project must have removed unnecessary reasons for program termination including failure to participate in services, failure to make progress on service plan, loss of income or failure to increase income, domestic violence, or any other activity not covered in a typical lease agreement.

Projects able to answer affirmatively to all of the criteria will receive full points. If a project cannot answer affirmatively, **zero points will be awarded**. Partial points are not awarded for this question. The project’s written eligibility criteria and discharge or termination policies submitted with the Evaluation must support responses to this question.

 **Does the project provide and explain the written eligibility criteria which are in alignment with Housing First principles to participants?**

Agencies should have written eligibility criteria for the project, which are in alignment with Housing First principles. If the project has written eligibility criteria which are not in alignment with Housing First principles (i.e. in order to be eligible you must have income or must complete a program, etc.) zero points will be awarded for this question. The project’s written eligibility criteria should be submitted with the Evaluation. Word or PDF files accepted.

 **Do the project’s written discharge or termination policies include all of the following:**

- An internal, due process hearing or investigation prior to discharging the participant
- Assistance with locating other housing options, if needed
- A statement that the agency will make and document all reasonable attempts to avoid discharging participants into a homeless situation or without basic needed services
- A policy allowing participants to remain in the project even if they require an absence of 90 days or less due to substance use or mental health treatment, hospitalization, or incarceration

Agencies should have written discharge or termination policies. The written discharge policies should clearly include all items listed above. If the written termination policies do not include all of the above, or are otherwise unclear within the document, zero points will be awarded. The termination policies should be included with the Evaluation. Word or PDF files accepted.

Equity and Inclusion

Indicate the steps and methods used to address equity within the agency.

All agencies should work to address equity issues within the agency and programming. Complete the chart to reflect the methods the agency has utilized to do so. If the agency utilizes any methods not listed, please indicate in the Other option. Agencies able to indicate at least two methods will receive full points. Agency should be able to provide documentation to support any responses provided, if requested, but are not required to attach supporting documentation.

Provide a description of the project’s strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?

Agencies must respond with a detailed narrative that describes the strategies used to identify and address racial disparities in programming or access to services. The response should also include successes and challenges in this work over the past year, as well as what the agency has done to address the challenges. The responses will be scored utilizing the rubric outlined in Appendix B.

Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to programming.

Agencies must respond with a detailed narrative that describes how staff are trained in cultural competence (i.e. specific training required or offered) and how the agency ensures programming is adaptable to meet the needs of diverse cultures. The response should be specific and include examples where possible. The response should also include successes and challenges in this work over the past year, as well as what substantive changes have specifically been made in this area. The responses will be scored utilizing the rubric outlined in Appendix B.

Participant Focus

Does the agency encourage participants to contribute to the day-to-day operations of the agency in any of the following ways?

Agencies should provide ways for participants to contribute to the operations of the agency or program. Check the available option if the agency has encouraged the participants to contribute through weekly “house” meetings, resident councils, on-site employment opportunities, or volunteer opportunities. If the agency provides other methods for participants to contribute, select Other and a write-in response. Participation on the Board of Directors is required of all agencies and does not count toward this contribution. Feedback processes/anonymous surveying also do not count toward this contribution.

 **Does the agency have a written notice or “Client Rights” document that is posted and provided to participants which, at a minimum, addresses and clearly describes all of the following items.**

In order to receive points, the Client Rights document must be posted and provided to participants, and must clearly and specifically include all of the listed items (confidentiality policy, non-discriminatory practices, right to refuse service, and grievance policy). The Client Rights document should be attached with the Evaluation.

Does the agency regularly receive and respond to feedback from participants?

Indicate if your agency conducts at least annual satisfaction surveys or obtains feedback through anonymous feedback methods or another method.

To receive full points for this question, the agency must provide a narrative outlining at least one recent issue that arose from feedback, how the agency responded to the issue, AND how this response was communicated back to participants. A narrative not including all three elements will receive zero points. Agencies will be scored using the rubric provided in Appendix B. Responses should be recent (within the past year) and should not repeat issues that have been noted in previous Evaluations.

Project Performance Outcomes

Please consult with your Agency Administrator on any questions that require the use of WellSky data. If you have questions regarding reports, data quality, or WellSky, please contact the HMIS Helpdesk directly: HSDhelpdesk@lanecountyor.gov

The Reporting Formulas document provides further detail on how each performance measure is calculated.

Select either Permanent Supportive Housing or Rapid Re-housing. All questions apply to all project types.

Is the project at or above 80% utilization for the previous calendar year?

Utilization is reported within WellSky based on bed inventory (number of beds at full capacity) and persons entered into the project at four points in time throughout the calendar year. See [Reporting Formulas](#) for detailed calculation formula. Projects are expected to be at or above 80% utilization for the average bed utilization rate AND each of the four point in time bed utilization rates (January, April, July, October), based on full capacity within your grant agreement. For projects that serve families, utilization will be determined based on bed and unit capacity, due to fluctuating family sizes. For RRH projects, utilization will be determined based on the bed/unit capacity noted in the grant agreement. Project should ensure the appropriate bed and unit information is entered with WellSky.

To verify 80% utilization, run the **APR** and look at Section 7b. This gives the total number of clients enrolled for the PIT of each quarter. Divide each quarter's numbers by the project capacity to determine whether 80% utilization was reached.

7b - Point-in-Time Count of Persons on the Last Wednesday					
	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	57	0	57	0	0
April	41	0	41	0	0
July	51	0	51	0	0
October	37	0	37	0	0

If the project is not at or above 80% utilization for average or *any* of the four points in time, no points will be awarded (previously a Threshold question). Projects continuously below 80% utilization multiple years in a row may be considered for reallocation.

Of the individuals who were housed through the program (move-in date), what percentage were housed within 90 days of entry?

This measure has been adjusted to 90 days (previously 60) to account for delays in housing caused by COVID-19 and low vacancy rates.

Run the **CoC Project Evaluation** report and look at the Project Performance tab. The % of clients housed is highlighted in green.

Number of days between Entry (Start) date and Move-in Date. This question is for RRH and PSH projects only. Note: look at the Annual Dates tab for client-level information about who has a Move-in Date recorded.

Days from Entry to Housing (1)	Clients
0-90	5
>90	
Total Number of Households with a Move-in Date	5
% Clients housed within 90 days of program entry	100.00%

Of the individuals who left the project (leavers), what percentage exited to a permanent destination?

Run the **APR** and look at Section 23c. The percentage of positive destinations is listed at the bottom of this section.

Total	74	0	74	0	0
Total persons exiting to positive housing destinations	69	0	69	0	0
Total persons whose destinations excluded them from the calculation	0	0	0	0	0
Percentage	93%	0%	93%	0%	0%

25a - Number of Veterans

What percentage of adults and heads of household without a source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?

Run the **APR** and look at Section 20b. Click on the number of clients with No Sources at start. You should copy/paste the ID numbers or Download Results for this group of clients

	Adults & HoHs
At Annual Assessment: # of Zero at Entry who now have NCB	
Zero NCB at Project Entry (at Start) who had Annual Assessment	
Percent who had a NCB at Annual Assessment (ZERO at entry)	


20b - Number of Non-Cash Benefit Sources			
	Benefit at Start	Benefit at Latest Annual Assessment for Stayers	Benefit at Exit for Leavers
No Sources	7	0	3
1 + Source(s)	49	4	28
Client Doesn't Know/Client Refused	0	0	0
Data Not Collected/Not stayed long enough for Annual Assessment	1	20	2
Total	57	24	33

Click on the number of clients that have a Benefit at Latest Annual Assessment for Stayers, and Benefit at Exit for Leavers.

20b - Number of Non-Cash Benefit Sources			
	Benefit at Start	Benefit at Latest Annual Assessment for Stayers	Benefit at Exit for Leavers
No Sources	7	0	3
1 + Source(s)	49	4	28
Client Doesn't Know/Client Refused	0	0	0
Data Not Collected/Not stayed long enough for Annual Assessment	1	20	2
Total	57	24	33

Count the number of clients who had No Sources at start but who are listed in one of these other sections. Divide the number of clients who appeared in a second list by the total number of clients who had no benefits at start.

Note: Loss of NCB at annual assessment will be reported as a negative number.

 **What percentage of adults maintained or increased their income through cash benefits, earned income, or both?**

Run the **APR** and look at Section 19a1 and 19a2.

Add the total number of clients who appear in the Same or Increased columns from **both sections**

	Adults & HoHs
Retained Income Category and Increased \$ at Annual Assessment/Exit	
+	Performance Measure: Adults who Gained or Increased Income from Start to Annual Assessment/Exit, Average Gain
/	Total Adults (including those with No Income)
=	Percent who had a NCB at Annual Assessment (ZERO at entry)

19a1 - Client Cash Income Change - Income Source - by Start and Latest Status									
Income Change by Income Category (Unlevered Adult Stayers with Income Information at Start and Annual Assessment)	Had Income Category at Start and Did Not Have It at Annual Assessment	Retained Income Category But Had Less \$ at Annual Assessment Than at Start	Retained Income Category and Same \$ at Annual Assessment as at Start	Retained Income Category and Increased \$ at Annual Assessment	Did Not Have the Income Category at Start and Gained the Income Category at Annual Assessment	Did Not Have the Income Category at Start or at Annual Assessment	Total Adults (including those with No Income)	Performance Measure: Adults who Gained or Increased Income from Start to Annual Assessment, Average Gain	Performance Measure: Percent of Persons who Accomplished this Measure
Number of Adults with Earned Income (i.e., Employment Income)	1	0	0	1	1	1	4	2	50%
Average Change in Earned Income	-2,000	0		534	780			661.5	
Number of Adults with Other Income	2	0	1	1	0	0	4	1	25%
Average Change in Other Income	-352.5	0		739	0			739	
Number of Adults with Any Income (i.e., Total Income)	0	1	0	3	0	0	4	3	75%
Average Change in Overall Income	0	-2,000		-452.33	0			-452.33	

PLUS

19a2 - Client Cash Income Change - Income Source - by Start and Exit									
Income Change by Income Category (Universe: Adult Leavers with Income Information at Start and Exit)	Had Income Category at Start and Did Not Have It at Exit	Retained Income Category But Had Less \$ at Exit Than at Start	Retained Income Category and Same \$ at Exit as at Start	Retained Income Category and Increased \$ at Exit	Did Not Have the Income Category at Start and Gained the Income Category at Exit	Did Not Have the Income Category at Start or at Exit	Total Adults (including those with No Income)	Performance Measure: Adults who Gained or Increased Income from Start to Exit, Average Gain	Performance Measure: Percent of Persons who Accomplished this Measure
Number of Adults with Earned Income (i.e., Employment Income)	1	0	0	5	7	20	33	12	36%
Average Change in Earned Income	-1,293	0		560.2	1,524.43			1,122.67	
Number of Adults with Other Income	4	2	7	4	1	15	33	5	15%
Average Change in Other Income	-499.25	-996		31.25	270			79	
Number of Adults with Any Income (i.e., Total Income)	3	1	6	13	3	7	33	16	48%
Average Change in Overall Income	-853.33	-800		535.54	1,661			746.56	

After you have added all of these together, divide this number by the total number of adults (line 2 in Section 5a).

5a - Report Validations Table	
Report Validations Table	
1. Total Number of Persons Served	136
2. Number of Adults (age 18 or over)	57
3. Number of Children (under age 18)	79
4. Number of Persons with Unknown Age	0

What is the program's cost per permanent exit (cost effectiveness)?

This question is informational and will not be scored. PSH or RRH projects can calculate the cost effectiveness by dividing the total project cost by the number of people of remain permanently housed for 12 months or more, plus leavers who exit to a permanent destination. Projects can find the number of stayer 12 months or longer, and the number of leavers, in the CoC APR.

Run the APR and look at Sections 5a and 23c. Add the number of Stayers (line 8 in 5a) to the total number of positive exits (found at the very bottom of 23c).

5a - Report Validations Table	
Report Validations Table	
1. Total Number of Persons Served	136
2. Number of Adults (age 18 or over)	57
3. Number of Children (under age 18)	79
4. Number of Persons with Unknown Age	0
5. Number of Leavers	74
6. Number of Adult Leavers	33
7. Number of Adult and Head of Household Leavers	33
8. Number of Stayers	62

PLUS

Total	74	0	74	0	0
Total persons ending to positive housing destinations	69	0	69	0	0
Total persons whose destinations excluded them from the calculation	0	0	0	0	0
Percentage	93%	0%	93%	0%	0%

25a - Number of Veterans

Divide your project cost by this total.

Certification and Submission

Agency should certify and submit the Intent to Renew and Evaluation when ready.

Certification: By checking the box, the agency is certifying that the information provided in this form is true and accurate to the best of your knowledge and you acknowledge that continued renewal is based on funding availability and submission of this form does not guarantee or commit any funding to our agency by the CoC.

Signature by an Authorized Representative is required to submit the Intent to Renew Form and Evaluation. The Authorized Representative should be equivalent to the Executive Director, Program Director, or similar level position.

Upon submission, the person(s) listed under Contact Information will receive a confirmation email which will include a PDF copy of your response. Please keep this email and a copy of your submission for your records.

Responses may not be edited after submission. Agencies may submit a new, complete submission before the stated deadline if necessary. The latest submission will be used for scoring purposes.

Evaluation Process and Scoring

After your agency has completed and submitted the Intent to Renew and Evaluation for each CoC-funded project, Lane County will complete preliminary scoring. All agencies will receive a preliminary score as soon as possible and by no later than July 8, 2022. See [Scoring and Ranking](#) for more information.

Agencies will then have an opportunity to review the scores, ask questions, and /or submit a formal appeal. See [Appeals](#) for more information.

Appendix A. Reporting Formulas

SYSTEM PRIORITIES		
<p>1. Does the project serve individuals and families that meet HUD’s definition of chronically homeless?</p> <p>How many households have you served from January 1, 2021-December 31, 2021?</p> <p>How many of the households met HUD’s definition of chronically homeless?</p>	<p>APR</p>	$\frac{\text{Total number of heads of households served during the reporting period who were classified as chronically homeless at program entry}}{\text{Total number of heads of households served during the reporting period}}$
<p>2. Does the project serve individuals or families that meet the specialized population criteria below? (include number of individuals served between January 1, 2021 and December 31, 2021)</p>	<p>CoC Project Eval Report</p>	$\frac{\text{Number of heads of households served during the reporting year with an age under 25}}{\text{Number of households served during reporting year}}$
	<p>CoC Project Eval Report</p>	$\frac{\text{Number of heads of households served during the reporting year with a VI – SPDAT score of 15 or higher}}{\text{Number of households served during reporting year}}$

<input type="checkbox"/> Youth head of household (under 25) <input type="checkbox"/> Highly Vulnerable (VI-SPDAT score 15 and above) <input type="checkbox"/> Frequent Users (FUSE)	<i>CoC Project Eval Report</i>	$\frac{\text{Number of heads of households served during the reporting year who were Frequent Users of Systems (FUSE)}}{\text{Number of households served during reporting year}}$
PROJECT PERFORMANCE		
1. Is the project at or above 80% utilization for the previous calendar year (2021)? <i>Must be at or above 80% for each quarter and overall average</i>	<i>APR</i>	$\frac{\text{Number of clients enrolled on each PIT date (APR)}}{\text{Number of beds available on each PIT date (APR)}}$ <i>Average bed utilization for full reporting year</i>
(All Project Types) 2. Of the individuals who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	<i>CoC Project Eval Report</i>	$\frac{\text{Number of individuals with a move – in date within 90 days of Entry date}}{\text{Number of individuals with an Entry > 90 days and no move – in date and all individuals with a move – in date}}$
(All Project Types) 3. Of the individuals who left the project (leavers), what percentage exited to a permanent destination?	<i>APR</i>	$\frac{\text{Number of individuals who exited the project to a permanent destination}}{\text{Number of individuals who exited the project during the reporting year}}$

<p>(All Project Types) 4. What percentage of adults and heads of household without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?</p>	<p>APR</p>	<p><i>Number of adults and HoH whom did not have a non – cash benefit at program entry where the HoH has been enrolled for at least 365 days or exited the project during the reporting year and has now obtained non – cash benefit</i></p> <hr/> <p><i>Number of adults or households whom did not have non – cash benefits at entry where the HoH has been enrolled for at least 365 days or has exited during the reporting year</i></p>
<p>(All Project Types) 5. What percentage of adults maintained or increased their income through cash benefits, earned income, or both?</p>	<p>APR</p>	<p><i>Number of adults which have been enrolled for at least 365 days or exited the program during the reporting year, where the total income is greater than zero and is greater than or equal to the total income at project Entry</i></p> <hr/> <p><i>Number of adults which have either been enrolled for at least 365 days or exited the program during the reporting year</i></p>

Appendix B. Narrative Question Rubric

Section	Question	Scoring Rubric
Equity and Inclusion	Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	<p>2 points – Agency has completed some level of racial disparities analysis resulting in specific strategies being identified. Agency is able to speak to successes and challenges over the past year and specific action steps taken to address these challenges.</p> <p>1 Point – Agency has plans or intentions to identify racial disparities, but has not identified specific strategies or completed the analysis needed. Agency is able to speak to successes and challenges in this work and what steps will be taken or have been taken to address the challenges.</p> <p>0 Points – Agency is unable to identify strategies or planned steps to address racial disparities in programming or access. Unable to describe specific steps taken to address challenges.</p>
Equity and Inclusion	Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to programming.	<p>2 points – Agency has a method to ensure staff are trained, clearly describes how programming is culturally responsive, including examples. Agency is able to clearly articulate successes or challenges and demonstrate adequate work in this area, including specific changes made to programming as a result.</p> <p>1 Point – Agency has identified at least some staff training or examples of ways the programming is culturally responsive, however, does not provide specific examples of successes, challenges, or changes made to programming, or has otherwise inadequate level of work in this area.</p> <p>0 Points – Agency does not identify training or specific examples of how programming is adaptable. Successes and challenges are not identified or able to be demonstrated by agency. No substantive changes identified.</p>
Participant Focus	Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants.	<p>3 Points – Agency has a method to regularly receive and respond to feedback, is able to clearly identify and detail an issue that arose from feedback in the past year (2021), provide specifics of how the issue was responded to, and specifically how this was communicated to participants with effective method(s) identified (e.g. posted publicly, newsletter, individually in case management, etc.)</p> <p>2 points – Agency has a method to regularly receive and respond to feedback, is able to identify an issue that arose from feedback, but the issue is not recent or has been used in previous evaluations. Agency provides some level of response to the issue, although inadequate or not substantive detail provided or offered. Agency made attempt to communicate the response back to the participants, but could have been more thorough, effective, or otherwise provided more substantive detail.</p>

		<p>1 Point – Agency has a method to receive and respond to feedback, but method is not regular or consistent. Agency can identify an issue, but issue is not recent or has been used in previous evaluations. Unclear if the agency responded adequately to the issue or response provided was not adequate for the issue. Little or no communication of the response back to participants, or method of communication not identified.</p> <p>0 Points – Agency may or may not have a method to receive and respond to feedback. Agency unable to identify an issue or provided inadequate detail. Agency did not respond the issue or communicate the response to participants.</p>
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Appendix C. List of Attachments

Use this reference as a checklist of required attachments. All attachments must be under 5MB.

Attachment	Applicable Questions
<input type="checkbox"/> LC CoC Project Evaluation Report (Excel format) <input type="checkbox"/> CoC APR (Excel format) <input type="checkbox"/> DQ for UDE PLUS (Excel format)	<p><u>Homeless Management Information System (HMIS) and Data Quality</u> <i>Question 3. 5% missing values (completeness)</i> <i>Question 4. Timeliness grade (timeliness)</i> <i>Question 5. Interim/Annual Reviews (completeness)</i> <i>Question 6. Interim/Annual Reviews (timeliness)</i></p> <p><u>System Priorities</u> <i>Question 1. Chronic Homelessness</i> <i>Question 2. Specialized Populations</i></p> <p><u>Project Performance Outcomes</u> <i>All Questions</i></p>
<input type="checkbox"/> Letter of Explanation (.pdf or .doc)	<p><u>Threshold</u> <i>All Questions if answer is No</i></p>
<input type="checkbox"/> Completed Recapture Spreadsheet (.pdf format)	<p><u>Grant Expenditure and Match</u> <i>Question 5. Recapture Spreadsheet, if full not 100% spent for last grant period</i></p>
<input type="checkbox"/> Client Rights document	<p><u>Participant Focus</u> <i>Question 2. Client Rights</i></p>
<input type="checkbox"/> Written Eligibility Criteria	<p><u>System Priorities and Housing First</u> <i>Question 3. Written Eligibility Criteria</i></p>
<input type="checkbox"/> Written Termination Policies	<p><u>System Priorities and Housing First</u> <i>Question 4. Written Termination/Discharge Policies</i></p>

Lane County Health & Human Services

HUD Continuum of Care Notice of Funding Opportunity (NOFO) Bonus & DV Bonus – New Projects #21225

REQUEST FOR PROPOSALS

July 1, 2023 through June 30, 2024

Renewable through June 30, 2026

Submit Proposals to:
Hillary Moran
Hillary.Moran@lanecountyor.gov

Deadline:
12:00 Noon PDT, August 18, 2022

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You are hereby requested to respond to the following Request for Proposals by 12:00 Noon, PDT on August 18, 2022. Proposals received after deadline(s) will not be accepted. Please note the timeline of this RFP is less than the Lane County usual practice. This is due to HUD Continuum of Care (COC) application requirements that dictate when application processes need to be completed and an overall condensed application period. Please note, proposal(s) recommended for funding through this process will be included in Lane County's COC application and funding will be dependent on grant funds from HUD.

PART I - GENERAL INFORMATION

Introduction

Annual anticipated funding for Transitional Housing/Rapid Rehousing or Rapid Rehousing or Permanent Supportive Housing is \$191,747 (Program: \$182,616, Admin: \$9,131). Anticipated annual funding for DV services is \$86,161 (Program: \$82,058, Admin: \$4,103) The original contract period will begin July 1, 2023 through June 30, 2024. Contracts may be renewed for two additional years based on contractor performance, funding availability and need.

Contract Requirements

- A. The contractor must operate the program independently and not as an agent of Lane County. Proposals will be accepted from one provider or a consortium of providers, for one or both of the requested service types. A proposal from a consortium must indicate who will be the lead agency contracting with Lane County for these services and responsible for subcontracting and managing the services provided by the other consortium agencies. One joint proposal from each consortium will be required.
- B. The contractor must comply with all applicable federal, state, local statutes, and rules governing the operations of the program, including, but not limited to the following:
 1. The Americans with Disabilities Act of 1990, 42 USC 12101 et seq. as well as ORS 30.670 through 30.685, ORS 659.425 and ORS 659.430, and all rules and regulations implementing those laws.
 2. Federal Code, Title 5 USCA 7201 et seq.: Anti-discrimination in employment
 3. ORS 659.010, 659.015, 659.020 and, 659.030: Enforcement of Civil Rights
 4. The CoC Interim Rule (24 CFR 578.3)

Upon request, information will be provided to assist in locating copies of these rules.

- C. Contractor must comply with the following:
 1. All contract requirements concerning the provision of insurance must be met. This may include comprehensive liability with Lane County named as additional insured, professional liability, fidelity bonding and workers' compensation coverage.
 2. Automobile insurance with Lane County named as additional insured is required if clients are transported or a vehicle is used in conducting agency business under the contract. Professional liability insurance is required if services are provided by licensed staff. Insurance requirements are outlined in Exhibit H of Lane County

contract.

- D. All furnishings, equipment and materials exceeding \$300 in value purchased with funds from this contract will belong to Lane County, and shall be returned to Lane County at the end of the contract, in as good condition as received, reasonable wear and tear excepted.

Proposal Preparation and Submission

- A. Proposers are responsible for reading and understanding all portions of the solicitation documents, including attachments and addenda, if any, and to include all requirements in their proposal. To be responsive, proposals must be made in writing, and address requests for information contained in the RFP. Proposals must be submitted in the required form and containing all required documents and responses, be signed by the proposer or its authorized representative, and submitted in the manner and number described in the RFP.

Each must be an “equal opportunity employer” willing to comply with all applicable provisions of the Civil Rights Act of 1964, as amended by the Equal Opportunity Act of 1972 (see 42 USCA 2000), all regulations there under (see 41 CFR Parts 60 and 60-1), Executive Orders 11246 and 11375 and all Oregon statutes and regulations regarding employment.

- B. Proposals submitted in response to this RFP become public records under Oregon law and, following contract award, will be subject to disclosure to any person or organization that submits a public records request. Proposers are required to acknowledge that any proposal may be disclosed in its entirety to any person or organization making a records request, except for such information as may be exempt from disclosure under the law.

Each proposer must clearly identify all information included in its proposal that is claimed to be exempt from disclosure. If the County receives a records request, including subpoena, covering information the proposer believes is covered by an applicable public records exemption, it is the proposer’s responsibility to defend and indemnify the County for any costs associated with establishing such an exemption.

- C. Proposals must be received by the time and date stated for receipt in the RFP. To be considered, proposals must be submitted in the form and manner stated in the RFP complete with a Proposer’s Certification Form signed by the proposer or its authorized representative, responses to all criteria and requirements included in the RFP, other documents required to be submitted, if any, and contain the number of copies required.
- D. By submitting a proposal, proposer acknowledges that the proposer has read and understands the terms and conditions applicable to this RFP, and accepts and agrees to be bound by the terms and conditions of the contract, including the obligation to perform the scope of work and meet the performance standards.
- E. A proposer may withdraw its proposal at any time prior to the deadline set for receipt of proposals, and may deposit a new sealed proposal in the manner stated in the RFP. The County may release an unopened proposal which has been withdrawn to the proposer or its authorized representative. The County will not consider proposals received after the time and date indicated for receipt of proposals. A proposer may not

modify its proposal after it has been deposited with Lane County, other than to address for minor informalities, unless the proposal is withdrawn and resubmitted as described above.

- F. Proposals will be received by Program Services Coordinator, Hillary Moran, until 12:00 Noon, PDT, on August 18, 2022. Proposals will be publicly opened immediately following the time proposals are due. Proposals must be submitted to Hillary.moran@lanecountyor.gov.
- G. The County may issue an addendum to modify or add to the terms of the RFP, or to change the time or date for submission of proposals. Any addendum will be issued by the County in writing not less than seventy-two (72) hours prior to the deadline for receipt of proposals, and available on the County-Wide Bid Page.

Each proposer is responsible to verify for itself if any addendum has been issued prior to submission of its proposal; the County is not responsible to notify individual prospective proposers of the issuance of an addendum. The requirements or clarifications contained in any addenda issued must be included in the proposal received and will become part of any resulting contract.

- H. The County may reject any proposal not in compliance with all prescribed procedures, requirements, rules, or laws, and may reject for good cause any and all proposals upon the County's finding that it is in the public interest to do so. The County may also:
 - 1. Issue a subsequent Request for Proposals for the same or similar goods or services
 - 2. Not award a contract for the requested services
 - 3. Waive any irregularities or informalities
 - 4. Issue more than one contract, dividing the services to be rendered and the remuneration to be paid
 - 5. Accept the proposal which the County deems to be the most beneficial to the public and to Lane County
 - 6. Negotiate with any proposer to further amend, modify, redefine or delineate its proposal.
 - 7. Further question any proposer to substantiate claims of experience, background, knowledge and/or ability
 - 8. Waive the need for reference checks, based on current or prior experience with and/or knowledge of the proposer
- I. The County will not examine any proposal prior to opening. All proposals submitted will be opened publicly at the time, date and place designated in the RFP by Hillary Moran, Program Services Coordinator. Any proposal or modification received after the designated deadline will not be opened or considered.
- J. The proposals submitted will be open to public inspection after the issuance of notice of intent to award, with the exception of certain information covered by an exemption to disclosure.

Proposal Evaluation and Award

- A. Proposals will be reviewed by the public officer for responsiveness to the minimum requirements established by RFP, which include:

1. Submission of a completed Proposer's Statements and Certifications in the form included in this RFP.
 2. Compliance with procedures, public contracting laws, and the requirements of the Lane Manual.
 3. Proposal of any applicable preferences for goods and services that have been manufactured, produced or performed in Oregon (ORS 279A.120), resident bidders (ORS 279A.120), recycled materials (ORS 279A.125), or printing performed within the State (ORS 282.210).
- B. Proposals will be reviewed for qualifications and completeness by Hillary Moran, Program Services Coordinator. Proposers must provide the following:
1. Information required by Proposal Content section of the RFP
 2. Signed Proposers' Statements and Certifications
- C. The County will make the contract award based on RFP criteria. Proposals will be screened by representatives of the Poverty and Homelessness Board (PHB) and members of the Lived Experience Advisory Group for Unhoused Engagement (LEAGUE), a lived experience advisory group of the PHB.
- D. Mistakes discovered after opening where the intended correct statement or amount is clearly evident or properly substantiated may be corrected. Where the intended correct statement or amount is not clearly evident or cannot be substantiated by accompanying documents, and where the statement or amount is material to determining compliance with the minimum requirements of the RFP, the proposal may not be accepted. The County reserves the right to waive technical defects, discrepancies and minor irregularities and to not award a contract when it finds such action to be in the public interest.
- E. The County will provide written notice of its intent to award to a given proposer or proposers by August 22, 2022.
- F. The County reserves the right to cancel a solicitation, or reject any or all proposals in whole or in part when the cancellation or rejection is in the County's best interests as determined by the County. This includes rejecting any proposal not in compliance with all prescribed public solicitation procedures and requirements, and for good cause, rejecting all proposals upon a finding that it is in the public interest to do so.

If all proposals are rejected, new proposals may be called for in a new solicitation, or the proposals received may be considered with opportunity for supplemental submission. If there is partial rejection, the County may solicit supplemental information only from those proposers who submitted proposals, on the condition that it is unlikely that re-advertising would lead to greater competition. Hillary Moran, Program Services Coordinator is delegated the authority to reject all proposals, prepare findings of best interests, and provide written notice of rejection of all proposals.

Clarification and Protest of Solicitation Documents

If a clarification is necessary, an addendum will be issued in writing not less than seventy-two (72) hours prior to the deadline for receipt of proposals, and available on the County-Wide Bid Page. The addendum may postpone the date for submission of proposals by a minimum of five (5) calendar days. The requirements or clarifications contained in any addenda so issued must be included in the proposals received and will become part of any resulting contract.

The apparent silence of the solicitation documents regarding any detail, or the apparent omission from the RFP of a detailed description concerning any point, means that only the best commercial or professional practice, material, or workmanship is to be used.

A prospective proposer may protest the competitive selection process or provisions in the RFP documents if the prospective proposer believes the solicitation process is contrary to law or that a solicitation document is unnecessarily restrictive, legally flawed, or improperly specifies a brand name pursuant to the requirements of ORS 279B.405(2). Any written protest must be submitted to Hillary Moran, Hillary.moran@lanecountyor.gov by 12:00 Noon, PDT, on August 17, 2022.

Lane County will consider the protest if the protest is timely filed and contains:

1. Sufficient information to identify the solicitation that is the subject of the protest;
2. The grounds that demonstrate how the procurement process is contrary to law or how the solicitation document is unnecessarily restrictive, is legally flawed or improperly specifies a brand name;
3. Evidence or supporting documentation that supports the grounds on which the protest is based; and
4. The relief sought.

If the protest meets these requirements, the County will consider the protest and issue a decision in writing. If the protest does not meet these requirements, the County will promptly notify the prospective proposer that the protest is untimely or that the protest failed to meet these requirements and give the reasons for the failure. The County will issue its decision on the protest not less than three (3) business days before proposals are due, unless a written determination is made by the County that circumstances exist that justify a shorter time limit. If a proposer finds discrepancies or omissions in the RFP documents, or is in doubt as to their meaning, the proposer must immediately notify Hillary Moran, Hillary.moran@lanecountyor.gov.

Protest Process

A respondent to an RFP that submitted a responsive proposal, and is not selected for award, may protest the award or recommendation for award of a contract based on RFPs submitted. Any protest must be received by the County within seven (7) days of the notice of recommendation or intent to award or, if no notice is given, of actual award.

Protests of award or intent to award will be considered by the Local Contract Review Board (LCRB), if the Board's action were required to award the contract. All other protests of intent of award will be considered by the County Administrator, or the Administrator's designee.

A. Requirements for protest:

1. A protest of award of a public improvement contract must specify the applicable grounds for protest set forth in OAR 137-049-0450(4)(c), which is hereby adopted into this rule.
2. All other protests of award must be in writing and specify the applicable grounds for the protest as set forth in ORS 279B.410(1).
3. Any protest not in compliance with these rules may be rejected.

B. Review and determination.

1. Upon receipt of a protest, the department must promptly notify both the evaluation

- committee and the proposer recommended for award that a protest has been received, and furnish each with a copy of the protest. Both the recommended proposer and the committee may, within three 3 calendar days from the date the protest was received, respond to the protest in writing.
2. After a protest has been received, the Department that issued the RFP must prepare a written analysis of the protest and make a recommendation to the decision maker as to appropriate action to be taken.
 3. Contracts Requiring Board Action to Award. If the public officer determines there is sufficient merit to reject proposals, the public officer may do so. If, following any action by the public officer, any portion of the protest remains, the LCRB must be provided with, and may consider, a complete copy of the written record, and any other evidence provided, at a public meeting. At the public meeting the LCRB may, at the LCRB's discretion, allow the department that issued the RFP and the appellant an opportunity to address the protest. The LCRB may affirm, reverse, or revise an award, or may send the matter back to the Department for further action, and must issue its decision by Board Order.
 4. Contracts Not Requiring Board Action to Award. The County Administrator has authority to reject proposals, or to affirm, reverse, or revise the award, or send the matter back to the department for further action. The Administrator must deliver this decision to the LCRB. If, within seven 7 days, the LCRB elects to review the matter, the LCRB must be provided with and may consider a complete copy of the written record, and any other evidence provided, at a public meeting. The LCRB may affirm, reverse, or revise an award, or may send the matter back to the Department for further action, and must issue its decision by Board Order. If the LCRB does not elect to review the matter within seven 7 days, the Administrator's decision will be final.
- C. The procedures in this rule are mandatory to the extent they establish the time and manner for protests to be submitted to the County, including that the protest be in writing specifying the grounds and timely filed, and that there be a written response. The other protest procedures above are directory, and failure to follow or complete the action in the manner provided will not invalidate the County's decision.

PART II - PROGRAM INFORMATION

Program Description

Background and Overview

The Lane County Homeless By Name List (HBNL) from May 2022 identifies over 4,000 individuals actively experiencing homelessness in Lane County, including over 1600 chronically homeless individuals and over 2,000 individuals with disabilities.

The Supplemental Continuum of Care (CoC) funding opportunity has been made available by the Dept. of Housing and Urban Development (HUD) specifically to target efforts to reduce unsheltered homelessness, particularly in communities with very high levels of unsheltered homelessness.

In response to the high level of need in the community, Lane County aims to prioritize and connect individuals to immediate *permanent housing* options, including Rapid Re- Housing (RRH) and Permanent Supportive Housing (PSH), as quickly as possible using a Housing First and Harm Reduction approach, while providing wraparound supports to ensure long-term stability in that housing. The following project types may be funded under this opportunity:

Permanent Supportive Housing (PSH) is a permanent, community-based, housing model in which housing assistance (e.g., long-term leasing or rental assistance) and supportive services are provided, without designated length of stay, to assist households with at least one member with a disability in achieving housing stability. PSH is generally prioritized for individuals and households who are highly vulnerable, chronically homeless, and/or have intense service needs which necessitate long-term supports.

Rapid Re-housing (RRH) is a permanent housing intervention that provides short- to medium-term tenant-based rental assistance and supportive services to assist literally homeless households in regaining stability in community-based housing as quickly as possible. RRH consists of three key components: housing relocation/stabilization services, financial assistance, and case management. Assistance is provided using a Progressive Engagement approach, providing the minimum amount of assistance needed for the household to achieve stability in housing.

Joint Transitional Housing (TH) and Permanent Housing-Rapid Rehousing (PH-RRH) is defined as a project that combines two existing program components – transitional housing and permanent housing rapid re-housing – in a single project to serve individuals and families experiencing homelessness. Program participants may only receive up to 24 months of total assistance. When enrolled in a Joint TH and PH-RRH project, the provider must be able to provide both components to all participants. A participant may choose to receive only one component, but both must be made available. They provide a safe place for people to stay – crisis housing – with financial assistance and wrap around supportive services determined by program participants to help them move to permanent housing as quickly as possible. Stays in

the crisis housing portion of these projects should be brief and without preconditions, and participants should quickly move to permanent housing.

All of the models are Housing First interventions, as assistance is offered without preconditions such as sobriety, required income or employment, or a requirement to participate in specific services. Assistance is tailored to the needs of each household, providing only what is necessary to obtain and sustain permanent housing.

Project Description

This RFP seeks to fund at least one model described above for individuals experiencing homelessness through *one or multiple* service providers. Two opportunities are available: HUD CoC Bonus Funding (Bonus) and HUD CoC Domestic Violence Bonus Funding (DV Bonus)

HUD CoC Bonus

This opportunity is anticipated to be funded up to \$191,747 (CoC) for a one year period (grant period to begin July 1, 2023). The number of individuals served will be determined based on the model and budget proposed.

PSH, RRH, or Joint TH-RRH projects may be funded under this opportunity.

HUD CoC DV Bonus

This opportunity is anticipated to be funded up to \$86,161 (CoC) for a one year period (grant period to begin July 1, 2023). The number of individuals served will be determined based on the model and budget proposed.

RRH or Joint TH-RRH projects may be funded under this opportunity.

Funding availability is contingent on HUD award after project application submission.

Eligibility and Target Population

As the models outlined seek to respond to, and/or ultimately resolve, an individual's episode of homelessness, the target population will be individuals (adult households without children) who are Literally Homeless (Category 1), or Fleeing Domestic Violence (Category 4) as defined by HUD.

"Homeless" is defined as:

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- (i) Has a primary nighttime residence that is a public or private place not meant for human habitation;
- (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels

paid for by charitable organizations or by federal, state and local government programs); or

(iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Fleeing Domestic Violence (Category 4) is defined as:

Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

See CoC Interim Rule (24 CFR 578.3) for a full explanation of definitions.

NOTE:

- Individuals or families served through the DV Bonus opportunity must meet the Category 4 (Fleeing DV) definition of homelessness.
- Individuals or families served through the CoC Bonus opportunity may meet either Category 1 (literally homeless) or Category 4 (Fleeing DV).

Victim Service Provider

Victim Service Provider (VSP) is defined as a private nonprofit organization whose *primary mission* is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Providers include rape crisis centers, domestic violence shelter and transitional housing programs, and other programs. A VSP is a designation at the *agency* level, not the project level (see 24 CFR 578.3).

Providers responding to this RFP may, but are not required to, be a Victim Service Provider.

Coordinated Entry and Homeless Management Information System

Service Provider(s) will participate in Lane County's Coordinated Entry System, as required, which will include a phased assessment approach. Phased assessment encompasses rapid resolution/diversion, housing problem solving, and Front Door Assessments with the goal of connecting clients to permanent housing. These services should be low-barrier and available to eligible clients in real-time as much as possible. Service Provider will be expected to participate in efforts to improve the Coordinated Entry System.

Service Providers that are recipients or subrecipients under HUD's Continuum of Care (CoC) Program are required to collect client-level data consistent with Homeless Management Information Systems (HMIS) data collection requirements and local policies and procedures.

The Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain confidentiality provisions that limit Victim Service Providers from sharing, disclosing, or revealing victims' personally identifying information (PII), including entering information into shared databases like HMIS. To protect clients, VSPs must enter required client-level data into a comparable database that is comparable to and complies with all HMIS requirements.

The project selected through this opportunity must participate in the established Homeless Management Information System (Wellsky), or in a comparable management information system approved by Lane County (*Victim Service Providers only*). Lane County will provide WellSky free of charge for the Victim Service Provider to use, or the service provider can purchase a different system approved by Lane County at their own expense. Participation is defined as entering all required data into the MIS in alignment with the local system policies and procedures including timeliness, completeness and accuracy. Required reporting from service provider must be provided to Lane County in a timely manner.

Required Services and Activities

The minimum, required services that must be provided include:

If proposing Rapid Rehousing:

- Housing Identification
 - o Households must be actively assisted in identifying available housing units and securing a lease with the property owner as quickly as possible while honoring client needs and choice in housing identification, as well as ensuring safety of the household.
- Landlord Partnership
 - o Program should work to recruit landlords in the community and build relationships in order to more rapidly house program participants, as well as act as liaison in addressing tenant issues once housed.
 - o Program should designate housing identification staff (e.g. Housing Locators, Housing Navigators, Landlord Liaison, etc.) who are primarily responsible for locating units and securing landlord partnerships.
- Financial Assistance
 - o Program must provide tenant-based rental assistance and ensure timely payments to landlords to assist program participants with security deposits, application fees, rent, utilities, and other associated housing costs eligible under the funding source.
 - o Program must provide assistance using a flexible, Progressive Engagement model, which aims to provide only what is needed to assist the household in regaining stability, rather than a "standard" package of assistance. No more than 18 months of rental assistance may be provided (up to 24 months with approval). Reassessment must occur at least every 3 months.

- Case Management
 - o Case management must be provided at least monthly and should focus primarily on alleviating barriers to obtaining and maintaining stability in housing. A case management ratio of no more than 25:1 is required.
 - o Case management must also connect households to community supports and mainstream benefits to assist in maintaining housing stability after the program ends.

If proposing Joint TH-RRH:

Joint TH-RRH proposed projects must provide for both components. RRH component must include all elements noted above, and the proposal must additionally include the following TH elements:

- Crisis Housing (Transitional Housing)
 - o Project should have established units to offer as transitional crisis housing for a period of time until households can be connected to permanent housing options. Units are typically project-based/facility-based, or sponsor-based (tenant based assistance is provided through the RRH portion of the project).
 - o Under Leasing, agency must have signed occupancy agreements or leases (or subleases) with program participants residing in the crisis housing.
 - o Program must provide assistance using a flexible, Progressive Engagement model, which aims to provide only what is needed to assist the household in regaining stability, rather than a “standard” package of assistance. No more than 12 months of crisis housing may be provided (up to 24 months with approval only).
- Housing Identification
 - o Households must be actively assisted in identifying available housing units and securing a lease with the property owner as quickly as possible while honoring client needs and choice in housing identification, as well as ensuring safety of the household.
- Case Management
 - o Case management must be provided at least monthly and should focus primarily on alleviating barriers to obtaining and maintaining stability in housing. A case management ratio of no more than 25:1 is required.
 - o Case management must also connect households to community supports and mainstream benefits to assist in maintaining housing stability after the program ends.

If proposing Permanent Supportive Housing:

- Housing Identification
 - o Households must be actively assisted in identifying available housing units and securing a lease with the property owner as quickly as possible while honoring client needs and choice in housing identification, as well as ensuring safety of the household.
 - o Housing may be provided through a project-based or scattered site model, using Rental Assistance or Leasing under the CoC Program, or through other sources, such as Project-Based Vouchers (PBV).
- Case Management

- Case management must be provided throughout a participant's time in the program and should be tailored to the needs of each individual, focusing primarily on alleviating barriers to maintaining stability in housing and independent living. A case management ratio of no more than 20:1 is recommended.
- Case management must also connect households to community supports to assist them in living independently, as well as mainstream benefits for which they may be eligible.
- Supportive Services
 - Services must not be directly related to a specific housing project or structure and must be necessary to assist program participants in obtaining and maintaining housing
 - Program requirements will vary depending on services proposed. Services can include:
 - housing assessment and navigation;
 - case management;
 - legal services;
 - health services, including mental or behavioral health services;
 - substance use services;
 - educational and employment training.

For all program models proposed:

- Support Services
 - Must be provided for the duration of a household's stay in the program
 - Program must provide connection to mainstream benefits and other community supports such as Senior and Disability Services, SSI/SSDI, SNAP, WIC, TANF, OHP, Veterans services, etc.
- Follow Ups
 - 6 and 12 month follow ups must be completed post-exit for participants exiting to a permanent housing destination
- Information and Referral
 - Program should provide information and referrals for other services households may need that are outside of the scope, such as substance use treatment, mental, physical, or behavioral health services, childcare, employment or education, etc.
- Participant Engagement
 - Provide opportunities for participant voices to be heard and incorporated into program development and service delivery, as well as provide opportunities for individuals with lived experience to be engaged with day to day operations
 - Creation or maintenance of a resident/tenant council preferred, if applicable

Additional General Requirements

- Program should ensure quality assurance processes are in place to evaluate effectiveness and progress toward performance goals. Fiscal monitoring to ensure efficient spend down of funds should be conducted no less than quarterly.
- All services must be implemented in accordance with locally established [Lane County](#)

Written Standards, as well as any program-specific standards based on the funding source requirements. Projects proposing PSH, Joint TH-RRH, or RRH should carefully review the established standards and ensure program model proposed is in alignment.

- Provider must develop and provide written copies of program rules, policies, and procedures, including a participant grievance policy. This includes any additional CDC COVID-19 guidelines and their application to the project (i.e. distancing, remote communication methods, use of masks or plastic barriers, etc.).
- Provider must maintain client files, either physically or electronically, that can be made available to the funder(s) for monitoring purposes.
- The proposer must make the program open to all eligible populations regardless of sexual orientation, gender identity, marital status, race, color, religion, national origin, age, or disability status.

Core Values and Standards

This project will follow Housing First, Low Barrier, Harm Reduction, and Trauma Informed Care program standards as defined below.

Housing First: Housing First programs focus on quickly moving people experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. Services are never mandatory and cannot be a condition of obtaining the housing intervention. The basic underlying principle is that persons are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. Supportive services focus on the acquisition of housing, income, health resources, skills and tools needed to: pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police.

Low Barrier: Housing First programs do not require persons to prove “housing readiness.” There are no preconditions. Persons experiencing homelessness do not have to: demonstrate sobriety, engage in treatment, have employment, or have income to obtain program entry or for continued assistance. Rules should not be imposed on participants for them to access services. Stable housing is of critical importance for participants’ health, education, employment, and other related quality of life determinants. The basic underlying principle of program standards is that access to housing is the primary need for its program participants, and as such, there should be minimal barriers to assist persons to end their homelessness. Enrollment requirements for all Coordinated Entry system components, outreach included, reflect a low-barrier philosophy.

Harm Reduction: All contracted programs must emphasize a Harm Reduction approach. In accordance with Harm Reduction principles, contracted programs must not require treatment or sobriety. Contractor must seek to work with program participants to reduce the negative consequences of the person’s continued use of alcohol and/or drugs, or non-compliance with medications. Programs utilizing a Harm Reduction approach do not terminate assistance based solely on a person’s inability to achieve sobriety or because of medication non-compliance. Efforts should include all possible approaches to assist the person to reduce or minimize their

risky behaviors, while at the same time assisting them to move into, and stabilize in, permanent housing. Harm reduction is not intended to prevent the termination of a participant whose actions or behavior constitute a threat to the safety of other participants and staff.

Trauma Informed Care: All programs must incorporate Trauma Informed Care policies and procedures into their program design and delivery of services. Trauma Informed Care is defined as: an organizational structure and treatment framework that involves understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological and emotional safety for both participant and providers, and helps participants rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Services create a culture of nonviolence, learning, and collaboration. Contractors must also develop sets of policies and procedures for educating and training staff on Trauma Informed Care practices and how trauma may adversely affect aspects of a person's development.

Equity Framework

All programs must incorporate an equity framework in development of program design, provision, and evaluation. Many services, programs, and policies systematically discriminate against people with diverse racial, ethnic, and gender inequities. An equity framework aims to address those disparities and achieve fairness for all.

Collaboration and Coordination

Providers will be expected to work in collaboration and partnership with Lane County, as well as the broader system of homeless services and Continuum of Care (CoC).

Requirements for the project may change or be adjusted as we work to improve the overall homeless service system and as we test new and emerging best practices. Providers will be expected to provide some level of flexibility as standards are developed.

Additionally, Providers should be prepared to coordinate and work collaboratively with outside service partners including, but not limited to: system access points, emergency shelters, alternative shelters, street outreach providers, and rapid rehousing/permanent supportive housing providers.

Funding Opportunity Specific Requirements and Preferences

Through this funding opportunity, HUD will award funding to communities to implement coordinated approaches -- grounded in Housing First and public health principles -- to reduce the prevalence of unsheltered homelessness, and improve services, health outcomes, and housing stability among highly vulnerable unsheltered individuals and families. HUD expects communities to partner with health and housing agencies to leverage mainstream housing and healthcare resources.

Projects able to provide additional commitments to support their project application either in providing new units in the community through non-HUD resources, or by leveraging resources from community healthcare partners will be given preference for this RFP. This includes letters

of commitment, contracts/subcontracts, or other formal written agreements demonstrating the development of new units and/or new housing opportunities for people experiencing homelessness through other resources, and/or written commitments from Hospitals, Healthcare Clinics, Insurance Agencies, Medicaid State Agencies, Public Health Departments, Mental Health Clinics, FQHC or Drug Treatment Facilities.

Additional Information may be found here:

https://www.hud.gov/program_offices/comm_planning/coc/specialCoCNOFO

Training

All staff must be trained and must have a level of expertise that is sufficient in working with highly vulnerable populations. At minimum, the following training is required for direct support workers:

- Housing First Principles
- Trauma-informed care
- Conflict resolution, mediation, and problem solving
- De-escalation techniques, mental health first aid
- Motivational interviewing, harm reduction, and related topics
- Diversity and Equity (various topics)
- Working with Victims of Domestic Violence
- Fair Housing
- Coordinated Entry Policies and Procedures, as applicable
- HMIS Privacy & Security / Data Entry

Additional Program-Specific Training Recommended based on model proposed and/or population(s) served.

Performance Outcomes and Reporting

All performance outcomes will be based on data entered into the MIS or comparable database and reported to Lane County. Service Provider will be expected to report on outcome progress no less than quarterly including, but not limited to, the total participants enrolled in the program, and demographic information of program participants. At minimum, performance outcomes will include:

Rapid Rehousing

- At least 80% of participants enrolled will exit to permanent housing.
- At least 90% of participants enrolled will be permanently housed within 90 days of Entry
- At least 85% of those exiting to a permanent destination will remain permanently housed at 6 and 12 month follow up
- At least 55% of participants (adults) without a source of income at entry will obtain cash benefits or income from any source.
- At least 25% of participants without non-cash benefits at entry will obtain non- cash benefits.

Joint TH-RRH

- At least 90% of participants enrolled in TH will exit to permanent housing within one year.
- At least 90% of participants enrolled in RRH will be permanently housed within 90 days of Entry.
- At least 80% of participants enrolled overall will exit to permanent housing.
- At least 85% of those exiting to a permanent destination will remain permanently housed at 6 and 12 month follow up
- At least 55% of participants (adults) without a source of income at entry will obtain cash benefits or income from any source.
- At least 25% of participants without non-cash benefits at entry will obtain non- cash benefits.

Permanent Supportive Housing

- At least 85% of participants enrolled will exit to permanent housing.
- At least 90% of participants enrolled will be permanently housed within 60 days of referral
- At least 85% of those exiting to a permanent destination will remain permanently housed at 6 and 12 month follow up
- At least 15% of participants (adults) without a source of income at entry will obtain cash benefits or income from any source.
- At least 25% of participants without non-cash benefits at entry will obtain non- cash benefits.

In addition to program-level outcomes noted above, Lane County will also review system-level outcomes such as:

- Reduction of overall number of people experiencing homelessness
- Reduction of length of time homeless
- Increased placement in and exit to permanent housing
- Increased income from all sources
- Increased connection to non-cash benefits

Funding

Total amount estimated to be available for the project is as follows:

1. Joint TH/RRH **or**
2. Rapid rehousing **or**
3. Permanent Supportive Housing **or**
4. Supportive Services Only (Outreach or Standalone)

HUD CoC Bonus

This opportunity is anticipated to be funded up to \$191,747 (CoC) for a one year period (grant period to begin July 1, 2023).

HUD CoC Program: \$182,616

HUD CoC Admin: \$9,131

HUD CoC DV Bonus

This opportunity is anticipated to be funded up to \$86,161 (CoC) for a one year period (grant period to begin July 1, 2023).

HUD CoC Program: \$82,058

HUD CoC Admin: \$4,103

Funding availability is contingent on HUD award after project application submission.

Eligible Costs and Activities

Funding for this project is anticipated to be provided through the HUD Continuum of Care NOFO Eligible costs are those defined under the CoC Interim Rule (24 CFR 578). **Service Providers should thoroughly review eligible costs prior to developing a proposed budget.**

General, eligible program costs for include:

- **Tenant-Based Rental Assistance** (monthly rental payments) (24 CFR 578.51)
- **Supportive Services** (24 CFR 578.53):
 - Annual Assessment of Service Needs;
 - Moving Costs;
 - Utility deposits;
 - Case management: The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of: Counseling; Developing, securing, and coordinating services; Using the centralized or coordinated assessment system; Obtaining federal, State, and local benefits; Monitoring and evaluating program participant progress; Providing information and referrals to other providers; Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking;and Developing an individualized housing and service plan, including planning a path to permanent housing stability.
 - Housing search and counseling services. Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.
 - Life skills training. The costs of teaching critical life management skills that

may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

- Mental health services
 - Outpatient health services
 - Outreach services
 - Substance Use treatment services
 - Other Supportive Services. Child care; Education services; Employment assistance and job training; Food; Mediation with property owners and landlords on behalf of eligible program participants; Credit counseling, accessing a free personal credit report, and resolving personal credit issues; rental application fees; Legal services; Transportation.
 - Direct provision of services. If the service described above are being directly delivered by the recipient or subrecipient, eligible costs for those services also include: The costs of labor or supplies, and materials incurred by the provider in directly providing supportive services to program participants; and the salary and benefit packages of the program staff who directly deliver the services.
- **Leasing.** (24 CFR 578.49) A structure or structures, or portions thereof, to provide housing or supportive services; Utilities; Security Deposits.
 - **Operations.** (24 CFR 578.55) The maintenance and repair of housing; Property taxes and insurance; Building security for a structure where more than 50 percent of the units or area is paid for with grant funds; Electricity, gas, and water; Furniture; and Equipment.
 - **HMIS.** (24 CFR 578.57) Costs associated with contributing data to the HMIS. If the agency is a VSP, it may use CoC funds to establish and operate a comparable database that complies with HUD's HMIS requirements.
 - **Administration (limited)**

	Rental Assistance	Leasing	Operations	HMIS	Supportive Services	Admin
PSH	X	X*	X*	X	X	X
RRH	X (TBRA Only)			X	X	X
TH-RRH	X	X*	X*	X	X	X
SSO		X*		X	X	X

** Projects may not use Rental Assistance with Leasing or Operations in the same budget, with the exception of Joint TH-RRH projects where one component utilizes Rental Assistance (RRH) and the other utilizes Leasing (TH). PSH projects proposing to utilize CoC funds to pay for units in the program must choose either Rental Assistance or Leasing, as appropriate.*

Leasing cannot be utilized for units that the recipient or subrecipient owns.

Provider may choose to use CoC Program funds to lease a structure or a portion of a structure that will be used for SSO projects. Individual units may not be funded under an SSO project.

Complete details on eligible costs can be found in 24 CFR 578, CoC Interim Rule. Individual program guidance should be followed when determining eligible program costs under the available funding source. Service Providers should carefully consider which cost categories are most appropriate to operate the program model being proposed (i.e. Rental Assistance vs. Leasing).

Fiscal Policies and Match

All projects are required to adhere to Lane County fiscal policies as approved by the Human Services Commission.

A **minimum** 25% match is required for the project funded through this RFP, minus any Leasing costs included. Non HUD funding within Lane County contracts (e.g. HSC funding) may be included in the match calculation. To be considered eligible for match, a cost must also be eligible under CoC regulations. Match funds should be clearly outlined in the proposed budget.

Agencies may find they need to further supplement the funding provided to ensure all requirements and client needs are met. Agencies are encouraged to secure additional match and leverage beyond the total funding provided by Lane County, as needed to implement an effective program.

Administration costs are limited by HUD to no more than 10% of the total HUD CoC amount available. Lane County reserves a portion of the administrative costs (50%) for administering the contract. Agencies should budget for no more than \$48,018 in admin under CoC funding in their proposed budget if requesting the full amount available.

Additional Program Information

If applicants need additional information about any aspect of the program, questions and requests for information should be addressed to Hillary Moran at Hillary.moran@lanecountyor.gov. Requested information to the extent it is available, will be provided to any applicant.

PART III - CALENDAR OF EVENTS

- August 10, 2022..... Request for Proposal Released
- August 17, 2022, 12:00 Noon, PDT..... Deadline for Commenting on or Protesting Specifications Believed to Limit Competition
- August 18, 2022, 12:00 Noon, PDT..... Proposals Due to hillary.moran@lanecountyor.gov
- August 22, 2022..... Notification of Review e-mailed
- August 29, 2022, 12:00 Noon, PDT ... Protests of Recommendations due to Hillary.moran@lanecountyor.gov

PART IV- GENERAL INSTRUCTIONS

1. All responders to the Request for Proposals must respond to all items requested. Proposals which are incomplete or fail to include all items may be rejected.
2. In your responses, please follow the sequence of questions or documentation requested in all sections of the Request for Proposals.
3. All proposals must be submitted as a single PDF document.
4. Responders may comment on or object to any of the specifications of the Request for Proposals which they believe limit competition as outlined in the Clarification and Protest of Solicitation Documents section of this RFP.
5. All protests of award must be filed within seven (7) calendar days after notice of the decision was mailed pursuant to LM 20.730.

PARTV – PROPOSAL CONTENT

Required Documentation

Narrative Questions

The following questions are informational and will not be scored:

Is the applicant a Victim Service Provider (not required)? Y/N

Is the applicant eligible to apply for HUD funds (required)? Y/N

Eligible project applicants: nonprofits, state, local governments, instrumentalities of state or local government, Indian Tribes and Tribally Designated Housing Entities (TDHEs), as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103), and Public Housing Agencies (PHAs) as such terms are defined in 24 CFR 5.100

Does the applicant have a Management Qualifications Packet on file with Lane County (required)? Y/N

Indicate the project type:

PH-PSH PH-RRH TH-RRH

Which categories of funding will be requested (select all that apply):

Rental Assistance Leasing Operations Supportive Services HMIS

The following questions will be scored using the rubric provided:

1. **Please describe the agency’s mission and previous experience providing housing and services to people experiencing homelessness, including experience managing Federal, State, and/or local funds. Include specific outcomes and performance metrics achieved such as percentage exits to permanent housing, average days from referral to housing, or increase in employment and non-cash benefits. If none, please describe similar, relevant experience and outcomes achieved.**
2. **Provide a description that addresses the entire scope of the proposed project. A detailed description of the scope of the project should cover all required activities for the project type being proposed, and at minimum include:**
 - a. General description of program being proposed
 - b. Number of individuals to be served, including total beds/units (if applicable) at any point in time, type of units, and target population(s), if any, to be served
 - c. Details regarding the type of housing and/or services proposed, directly by the agency and through partnerships or collaborations, including how the services provided will contribute to obtaining and maintaining permanent housing through a Housing First approach. If this project will exclusively assist victims of domestic violence, the description must include safety planning addressing the particular

needs of this target population using trauma-informed, victim centered approaches.

- i. If RRH, please include how each of the core components will be provided, case management models proposed, staffing, and landlord strategies for securing units.
- ii. If PSH, please include the model being proposed (i.e. scattered site, project-based), the type of housing assistance to be used (i.e. rental assistance or master leasing, non-CoC vouchers, etc.), case management models proposed, and staffing.
- iii. If Joint TH-RRH, please include how both models of crisis housing and rental assistance will be provided, staffing, and case management models proposed.
- d. Anticipated project outcome(s) to be achieved
- e. Coordination with other organizations
- f. How the CoC funding will be used

3. Describe the specific plan to coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible. The description should include:

- a. assisting program participants with obtaining and increasing employment income that will lead to successful exits from homelessness (e.g., local employment programs, job training opportunities, educational opportunities);
- b. the type of mainstream services you will assist program participants with obtaining to increase non-employment income (e.g., SSI; SSDI; Food Stamps)
- c. the type of social services you will provide access and help program participants obtain (e.g. childcare, food assistance, TANF, early childhood education); and
- d. access to healthcare benefits and resources (e.g., Medicaid, Medicare, healthcare for the homeless, FQHCs).

4. For all supportive services available to program participants, indicate who will provide them and how often they will be provided. (Complete Chart)

Service	Provider (Agency, Partner, Non-Partner)	Frequency (Daily, Weekly, Monthly, Annually, Semi-Annually or As Needed)
Assessment of Service Needs		
Assistance with Moving Costs		
Case Management		
Child Care		
Education Services		
Employment Assistance		
Food		
Housing/Counseling Services		
Legal Services		
Life Skills		
Mental Health Services		
Outpatient Health Services		
Outreach Services		

Substance Abuse Treatment Services		
Transportation		
Utility Deposits		

Partner indicates formal agreement or partnership in place, such as MOU.

5. **Is the project able to provide additional commitments either in the form of new units in the community through *non-HUD* resources, or by leveraging resources from community healthcare partners (preference)? If yes, please include a brief description of the commitment accompanying this proposal, along with supporting documentation (e.g letters of commitment, or other formal written agreements demonstrating the development of new units through other resources, and/or written commitments from healthcare entities).**
6. **How will the project center individuals with lived experience of homelessness? Please specify ways in which program participants and/or people with lived experience will be provided opportunities for involvement in day to day operations of the project, including leadership, volunteering or employment, as well as ways in which program participants will be able to provide input or feedback for continuous quality improvement (e.g. tenant council, anonymous surveys, focus groups, etc.).**
7. **Describe how the agency will work to reduce disparities in service accessibility and outcomes for people experiencing homelessness who may live with disabilities, have limited English proficiency, and may be part of historically marginalized groups such as LGBTQ+, immigrants and refugees, and Black, Indigenous and People of Color. Give examples of equity issues you have identified within service delivery and any changes the agency has made in order to respond to the issues identified and better meet the needs of diverse communities.**
8. **Please describe your agency’s quality assurance practices and how you will ensure outcome goals described in the scope of work will be achieved. How will the agency ensure data entry and data quality expectations are met? What experience does your agency have in conducting outcomes follow-up after participants have left a program?**
9. **Please outline a complete estimated timeline of proposed activities including hiring of staff, training, development of policies and procedures, and implementation start date (anticipated by July 1).**
10. **A brief budget narrative should be provided, which includes:**
 - **A listing of staff, including titles, utilized in the program, the specific duties of each staff person as it relates to the budget and the methodology for determining the amount of FTE charged to the program budget for each staff person.**
 - **A general explanation/justification of all non-direct service related program expenses.**
 - **A listing, including amounts, of all other non-Lane County funding that will be contributed to the project, including match and any in-kind contributions.**
 - **Identification of one-time start-up costs that will not be included annually.**
 - **Any other clarification needed for the budget provided.**

FUNDING DETAIL

ANNUAL BUDGET

AGENCY NAME:

**PROGRAM
AREA:**

Budget Item	Total Budget	Revenue	Revenue	Revenue	Revenue	Revenue	Revenue
		Source	Source	Source	Source	Source	Source
Personnel/Benefits		HUD CoC Leasing	HUD CoC RA	HUD CoC SS	HUD CoC Ops	HUD CoC Admin	All Other
Total Personnel	\$0	\$0		\$0			
Materials & Services							
Total Materials & Services	\$0	\$0		\$0			
Total Contract	\$0	\$0		\$0			

RESPONDENT STATEMENTS AND CERTIFICATIONS

(CONTRACT FORM D-2, 2020 EDITION)

NOTE: this form is for use with RFQ and RFP responses only. For Bids, use Contract Form D-1.

Respondent's Name: _____

RFQ or RFP Title: _____

RESPONDENT STATEMENTS

Respondent's Offer. Respondent offers to provide the required goods or services in accordance with the requirements of the Request for Proposals (RFP) or Request for Qualifications (RFQ) stated above as stated in the enclosed response. The undersigned Respondent declares that Respondent has carefully examined the above-named RFP or RFQ, and that, if an award is made, Respondent will execute a contract with the County to furnish the goods or services required under the RFP or RFQ response submitted with this form. Respondent attests that the information provided is true and accurate to the best of the personal knowledge of the person signing this document, and that the person signing has the authority to represent the individual or organization in whose name the response is submitted.

Respondent's Acceptance of Terms and Conditions. By execution of this form, the undersigned Respondent accepts all terms and conditions of the RFP or RFQ except as modified in writing in its response. Respondent agrees that the offer made herein will remain irrevocable for a period of 60 days from the date responses are due.

Respondent's Acknowledgement of Public Records Law. By execution of this Form, the undersigned Respondent acknowledges that its entire response is subject to Oregon Public Records Law (ORS 192.410–192.505), and may be disclosed in its entirety to any person or organization making a records request, except for such information as may be exempt from disclosure under the law. Respondent agrees that all information included in this bid that is claimed to be exempt from disclosure has been clearly identified either in the Respondent Statement, or in an itemization attached hereto. Respondent further acknowledges its responsibility to defend and indemnify the County for any costs associated with establishing a claimed exemption.

ADDENDA

Respondent has received and considered, in the accompanying response, the terms of the following addenda, if any: _____

CERTIFICATIONS

By signing this Respondent's Certification form, Respondent certifies that:

1. **Certification of Resident Bidder Status.** Respondent is _____ is not _____ (check one) a resident bidder, as defined in ORS 279A.120.

2. **Certification of Non-Discrimination.** Respondent has not discriminated and will not discriminate against a subcontractor in awarding a subcontract because the subcontractor is a disadvantaged business enterprise, minority-owned business, woman-owned business, a business that a service-disabled veteran owns, or an emerging small business that is certified under ORS 200.055.
3. **Certification of Non-Collusion.** This bid is made without connection or agreement with any individual, firm, partnership, corporation, or other entity making a bid for the same services, and is in all respects fair and free from collusion or collaboration with any other Respondent.
4. **Certification of Compliance with Tax Laws.** Respondent has, to the best of Respondent's knowledge, complied with Oregon tax laws in the period prior to the submission of this bid, including:
 - a. All tax laws of the State of Oregon, including but not limited to ORS 305.620 and ORS chapters 316, 317, and 318,
 - b. Any tax provisions imposed by a political subdivision of this state that applied to Respondent or its property, goods, services, operations, receipts, income, performance of or compensation for any work performed, and
 - c. Any rules, regulations, charter provisions, or ordinances that implemented or enforced any of the foregoing tax laws or provisions.

The undersigned, by signature here, acknowledges, accepts, and certifies to the statements and certifications as stated above.

RESPONDENT

Authorized signature

Respondent's legal name

Name of authorized signer

Address

Title

Date

Federal Tax ID number

CONTACT INFORMATION FOR THIS SUBMISSION

Contact name

Telephone number

Email address

PART VI – CRITERIA FOR EVALUATION OF REQUEST FOR PROPOSALS

Scoring Rubric HUD CoC NOFO BONUS OR DV BONUS

Evaluation Criteria	Poor/Unclear	Adequate	Exceptional
<p>Agency Mission and Previous Experience</p>	<p><i>This is low competency work. Response is unclear, incomplete, or inadequate.</i></p> <p>Insufficient, missing, or irrelevant discussion of performance outcomes. Agency does not address experience working with target population.</p> <p style="text-align: center;">1 2 3 4</p>	<p><i>This is medium competency work. Sufficient responses, some areas may require clarification. A few minor components may be unclear.</i></p> <p>Agency demonstrates that they have some experience providing housing services or similar relevant experience to households experiencing homelessness or fleeing DV. Demonstrates consistent tracking of performance outcomes, with moderate success.</p> <p style="text-align: center;">5 6 7</p>	<p><i>This is high competency exemplary work. Response is logical and succinct, leaving reader with no further questions.</i></p> <p>Clearly demonstrates a depth of experience providing housing and services to households who are experiencing homelessness and/or fleeing DV. Describes demonstrated successful performance outcomes that are relevant to serving this population.</p> <p style="text-align: center;">8 9 10</p>
<p>Project description, design and services provided. Number served.</p>	<p>Response does not clearly describe project design, services provided, number served, number of beds/units or type of housing. Unclear or missing significant details or information. Design does not address all required activities. Not in alignment with Housing First or</p>	<p>General overview of project design. Overall design is generally consistent with best practices and required activities for provision of housing and/or services. Follows Housing First approach. Number served, beds/units, and type of housing/services clearly specified. Some questions remain or</p>	<p>Detailed, clear, and succinct description of project design. Design includes best practices and required activities outlined and aligns with Housing First and/or trauma informed, victim centered approaches. Includes detailed list of services that will be provided that are adequate for program design. Number served clearly specified and justified. Beds and Units clearly described and type of housing/services</p>

	unclear. 1 2 3 4	details unclear. 5 6 7	identified. 8 9 10
Concept to Obtain and Remain in Permanent Housing	Does not adequately address how participants will be assisted to obtain and remain in PH, or concept seems unrealistic. Trauma, safety, and/or individual needs not sufficiently addressed in serving those fleeing DV, if applicable. 1 2 3 4	Concept generally describes plan to assist participants to obtain and remain in PH, but details are lacking. Concept does not entirely match target population or seems insufficient for populations served. Trauma, safety, and/or individual needs sufficiently addressed in serving those fleeing DV, if applicable. 5 6 7	Concept logically describes reasonable plan to assist participants to obtain and remain in permanent housing. If applicable, description of how the project will work with landlords or property owners in the community or demonstrate similar, relevant experience. If applicable, concept incorporates victim-centered approaches to obtaining PH that include safety planning. Concept matches target population. 8 9 10
Leveraging and Housing and Healthcare Resources (preference)	Project is not able to provide additional commitments either in the form of new units in the community through non-HUD resources, or by leveraging resources from community healthcare partners. 0	Project is potentially able to provide additional commitments either in the form of new units in the community through non-HUD resources, or by leveraging resources from community healthcare partners. Documentation of commitment not provided or secured. 5	Project is able to provide additional commitments either in the form of new units in the community through non-HUD resources, or by leveraging resources from community healthcare partners. Documentation of commitment provided 10
Centering Individuals with Lived Experience of Homelessness	Minimal or no description of how people with lived experience will be centered in program design. Individuals may or may not be provided opportunities for involvement or input. Details	Some level of involvement of people with lived experience is described, but their expertise is not fully centered in the project design or implementation. Minimal involvement in day to day operations or opportunities for program	Clearly describes how the project centers individuals with lived experience of homelessness. Provides specific ways in which program participants and/or people with lived experience will be provided opportunities for involvement in day to day operations of the

	lacking or missing. 1 2 3 4	input provided. 5 6 7	project, as well as ways in which program participants will be able to provide input or feedback for continuous quality improvement. 8 9 10
Plan to reduce disparities in service accessibility and outcomes.	Response does not acknowledge disparities in service accessibility and outcomes. Agency indicates an intention to address issues but has not taken steps to do so. 1 2 3 4	Describes how the agency works to reduce disparities in service accessibility and outcomes, without sufficient detail. Included examples of equity issues identified within service delivery but response or changes not yet implemented fully. Response lacks details. 5 6 7	Clearly describes how the agency will work to reduce disparities in service accessibility and outcomes for people experiencing homelessness who may live with disabilities, have limited English proficiency, and may be part of historically marginalized groups such as LGBTQ+, immigrants and refugees, and BIPOC. Included examples of equity issues identified within service delivery and any changes the agency has made in order to respond to the issues identified. 8 9 10
Quality assurance and performance measures	Does not demonstrate adequate quality assurance measures, unclear how successful outcomes will be achieved. 1 2 3 4	General but adequate description of quality assurance practices. General overview of performance outcomes, with some description of how successful outcomes will be achieved. Some description of how follow up after exit will be conducted. 5 6 7	Clear description of how quality of services will be evaluated and maintained. Clearly outlines performance measures and logical plan to achieve successful outcomes. Detailed description of how follow up after exit will be achieved. 8 9 10

<p>Timeline and Budget and</p>	<p>Budget is vague, incomplete, and/or includes unallowable costs. Does not account for match or other program support funds. Timeline is unrealistic or lacks detail.</p> <p>1 2 3 4</p>	<p>Budget adequately demonstrates overall project plan. Match funds addressed. Costs generally eligible. Timeline is realistic for project design. Missing details in budget or narrative.</p> <p>5 6 7</p>	<p>Budget clearly outlines reasonable staff time allocation and staffing structure (FTE) with cost breakdown. Budget is realistic given level of funding and consistent with allowable costs. Includes any required matching funds, anticipated additional expenses not covered by HUD, and funds that agency will commit to the project.</p> <p>8 9 10</p>
<p>Total: _____/80 Points</p>			

PART VII- ATTACHMENTS

Notice Regarding Oregon Corporate Activity Tax
Sample Contract

Notice Regarding Oregon Corporate Activity Tax

The County is providing this notice to ensure Bidders and proposers are informed of the Corporate Activity Tax (CAT), effective January 1, 2020. Bidders and proposers must consider this tax and all other applicable taxes in preparing and submitting bids and proposals; the County will pay according to the contract amount(s) as submitted in the Bid or proposal, in accordance with the contract documents.

The following information is provided from the Oregon Department of Revenue:

In 2019, the Oregon Legislature established the Corporate Activity Tax (CAT) through House Bills 3427 and 2164. The CAT is expected to generate \$1 billion of revenue per year. Although the tax is called a Corporate Activity Tax, the tax applies to all business entity types, including sole proprietorships, partnerships, type C and S corporations, and others.

The CAT is measured on a business's commercial activity-the total amount a business realizes from transactions and activity in Oregon, regardless of whether the revenue is received from private parties or contracts with government entities such as Lane County.

The new law requires businesses with Oregon commercial activity in excess of \$1 million to file a CAT return, and those businesses with taxable commercial activity in excess of \$1 million must pay the tax. The CAT imposes a \$250 tax on the first \$1 million of gross receipts, after subtractions, and a 0.57 percent tax on gross receipts greater than \$1 million, after subtractions. Please be aware the Corporate Activity Tax:

- Is effective January 1, 2020.
- Applies to any business entity that conducts business in Oregon.
- Requires returns to be filed using a calendar tax year.
- Requires registration within 30 days after exceeding the \$750,000 registration threshold.
- Requires returns to be filed annually by April 15.

For more information and to receive updates by subscribing to the Oregon Department of Revenue (ODR) email notification list, visit the ODR website at www.oregon.gov/dor and click on the Corporate Activity Tax link. Bidders may also follow ODR at @Orrevenue on Twitter.

If you have questions regarding the tax, you may call 503-945-8005 or email ODR at cat.help.dor@oregon.gov.

LANE COUNTY CONTRACT (Boilerplate)

NOW, THEREFORE, in consideration of the mutual promises and covenants hereinafter contained, and payment to CONTRACTOR by COUNTY as noted on the previous pages, for the periods of this Contract as previously designated, it is mutually agreed as follows:

1. Contract Requirements: CONTRACTOR will meet all requirements laid out in Exhibit A – Additional Terms and Conditions, including Grant Program and Compliance Requirements and Exhibit G – Federal Terms and Conditions.
2. Contractor Services: CONTRACTOR will perform as an independent contractor and not as an agent of the COUNTY the necessary services to conduct the specific program(s) described in Exhibit B – Program Plan by this reference made a part hereof at a funding level described in Exhibit C – Budget Plan by this reference made a part hereof. The project will be operated in accordance with the provisions of the McKinney-Vento Act (the Act) and all requirements under 24 CFR part 578.
3. Match: CONTRACTOR will provide non-federal match at a level indicated in Exhibit D – Match.
4. Culturally Diverse and Appropriate Services: CONTRACTOR will demonstrate, through its actions, an understanding and appreciation for diversity and difference in its clients and/or consumers. This will be demonstrated through the provision of equal access to services for all individuals. CONTRACTOR will respect and value gender, language, race, developmental ability, and socioeconomic diversity in its clients, and will respect the client’s right to privacy in such areas as religious faith, political beliefs and sexual orientation. All individuals will be treated with dignity and respect regardless of gender, language, race, developmental ability, religion, political beliefs, sexual orientation, and socioeconomic level.

All services provided will be culturally, developmentally, and gender appropriate to the individuals receiving the service and will respect the privacy of the client. COUNTY reserves the right to review information regarding efforts to deliver services that benefit a diverse population.

5. Client Confidentiality: CONTRACTOR must protect and must require and cause its subcontractors and vendors to protect the confidentiality of all information concerning clients and other applicants for and recipients of services funded by this Contract. Neither CONTRACTOR nor its subcontractors or vendors may release or disclose any such information except as necessary for the administration of the program funded under this Contract, as authorized in writing by the client, applicant or recipient of such services, or as required by law. CONTRACTOR, its subcontractors and its vendors must appropriately secure all records and files to prevent access by unauthorized persons.

CONTRACTOR must ensure and must require and cause its subcontractors and vendors to ensure that all its officers, employees, and agents are aware of and comply with this confidentiality requirement.

6. Reporting: CONTRACTOR agrees to prepare and furnish all reports and data required by COUNTY. This may include, but is not limited to the items described in 6.1 through 6.4 below. All required reports must be submitted to <https://laneco.sharefile.com/filedrop/dxcb90c1-bfdd-4886-aa60-2c12aada997f> within thirty (30) days of the end of the reporting period. If CONTRACTOR fails to provide reports within the required period, payment of monthly reimbursement may be withheld.

- 6.1. A complete report of operating revenue and expenses for contracted services submitted to COUNTY quarterly.

- 6.1.1 Separate revenue accounts must be maintained for each income source and type listed in the approved budget.
 - 6.1.2 Separate expense accounts must be maintained for each program and/or service element provided.
 - 6.1.3 This financial report must include a detailed comparison of revenues and expenses to the approved budget for the period.
 - 6.2. A copy of corporate/organizational balance sheet, submitted to COUNTY quarterly.
 - 6.3. Copies of the agenda and minutes of meetings of the board of directors submitted to COUNTY quarterly.
 - 6.4. Any additional reports specified in Exhibit E – Special Reporting Requirements.
7. Lane Manual: CONTRACTOR agrees to comply with the rules and regulations of COUNTY, marked Exhibit F – Lane Manual, by this reference incorporated herein.
8. Termination / Corrective Action:
- 8.1. This Agreement may be terminated at any time by mutual written consent of the Parties.
 - 8.2. COUNTY may terminate this Agreement as follows:
 - 8.2.1 At COUNTY's discretion, upon thirty (30) days advance written notice to CONTRACTOR;
 - 8.2.2 Immediately upon written notice to CONTRACTOR, if COUNTY fails to receive funding, or appropriations, limitations, or other expenditure authority at levels sufficient in COUNTY's reasonable and administrative discretion, to perform its obligations under this Contract;
 - 8.2.3 Immediately upon written notice to CONTRACTOR, if federal or state laws, rules, regulations or guidelines are modified or interpreted in such a way that COUNTY's performance under this Agreement is prohibited or COUNTY is prohibited from funding the Contract from the funding source;
 - 8.2.4 Immediately upon written notice to CONTRACTOR, if COUNTY determines that CONTRACTOR has endangered or is endangering the health or safety of a client or others. CONTRACTOR's failure to start service on the date specified by COUNTY in this Contract (or subsequent modifications) could, in COUNTY's sole discretion, be determined endangering to the health or safety of a client or others; or
 - 8.2.5 Immediately upon written notice if there is a denial, revocation, or non- renewal of any license, certificate, authorization or other approval required by applicable law or regulation to be held by the CONTRACTOR to provide services under this Contract.

8.2.6 Immediately upon written notice to CONTRACTOR, if CONTRACTOR is in default under this Contract and such default remains uncured fifteen (15) days after written notice thereof to CONTRACTOR.

8.2.7 Upon fourteen (14) days advance written notice to CONTRACTOR, if CONTRACTOR fails to perform or discharge any obligation that CONTRACTOR is required to provide, perform or discharge under this Contract and such failure remains uncorrected at the end of said fourteen (14) day period.

8.2.8 Upon date specified in a written notice, if CONTRACTOR fails to start service in this contract (or subsequent modifications).

8.3. CONTRACTOR may terminate this agreement as follows:

8.3.1 All or part of this Contract may be terminated by CONTRACTOR for convenience upon thirty (30) days' notice in writing, subject to the following condition: If the COUNTY has no alternative way to provide for the service, the contract may not be terminated by the CONTRACTOR for convenience.

8.3.2 CONTRACTOR may terminate this Contract upon thirty (30) days written notice if unable to perform due to substantial changes in conditions.

8.4. Upon receiving a notice of termination of this Contract, CONTRACTOR must immediately cease all activities under this Contract, unless COUNTY expressly directs otherwise in such notice. Upon termination, CONTRACTOR must deliver to COUNTY all materials or other property that are or would be required to be provided to COUNTY under this Contract or that are needed to complete the Program work that would have been performed by CONTRACTOR. Upon termination pursuant to this subsection, County will have no further obligation to Contractor except for payments for amounts earned prior to the termination date.

8.5. In cases of failure to comply with terms of this Contract, including cases of major violations, defined below, contract termination may, but is not required to be, preceded by a corrective action plan.

8.5.1 Major violations include but are not limited to:

8.5.1.1. Acts or omissions which jeopardize the health or safety of clients, staff or the public; and

8.5.1.2. Misuse of funds; and

8.5.1.3. Intentional falsification of records.

8.5.2 In cases of failure to comply, written notice of non-compliance will be given and a corrective action plan may be developed by COUNTY or by COUNTY and CONTRACTOR. The plan will include specific activities to be conducted in order to permanently correct the procedures or practices, which caused the violations. The plan will also include timelines for achieving the stated activities. If these activities do not occur according to the corrective action plan, the contract may be terminated by COUNTY immediately upon written notice.

8.5.3 In the event that non-compliance has been determined by the COUNTY to jeopardize the health and safety of clients, staff or the public COUNTY may either:

8.5.3.1. Immediately suspend performance of services pending the development and implementation of a corrective action plan; or

8.5.3.2. Immediately upon written notice, terminate the contract.

8.6. If COUNTY determines no corrective action plan is appropriate, or if COUNTY and CONTRACTOR are unable to agree on a plan, COUNTY may terminate the contract in accordance with the terms of any applicable ground stated in paragraph 8.2 through 8.2.6.

9. COUNTY Monitoring:

9.1 COUNTY and /or U.S. Department of Housing and Urban Development (HUD) may monitor the activities of each CONTRACTOR and its subcontractors as it deems necessary or appropriate, among other things, to ensure CONTRACTOR and its subcontractors comply with the terms of this Contract and that grant fund awards are used properly for authorized purposes hereunder HUD also may ensure that performance goals are achieved as specified in this Contract, including without limitation in the Scope of Work, related Program Elements, Work Plans and Budgets. Monitoring activities may include any action deemed necessary or appropriate by COUNTY and/or HUD including, but not limited to the following:

9.1.1 The review (including copying) from time to time of any and all CONTRACTOR and subcontractor(s) files, records and other information of every type arising from or related to performance under this Contract;

9.1.2 Arranging for, performing, and evaluating general and limited scope audits;

9.1.3 Conducting or arranging for on-site and field visits and inspections;

9.1.4 Review of CONTRACTOR fiscal and program reports prior approval documentation; and

9.1.5 Evaluating, training, providing technical assistance and enforcing compliance of CONTRACTOR, subcontractor(s), and their officers, employees, agents, contractors and other staff.

COUNTY and/or HUD may utilize third parties in its monitoring and enforcement activities, including monitoring by peer agencies. COUNTY and/or HUD monitoring and enforcement activities may be conducted in person, by telephone and by other means deemed appropriate by COUNTY and/or HUD and may be effected through contractors, agents or other authorized representatives. CONTRACTOR consents to such monitoring and enforcement by COUNTY and/or HUD and agrees to cooperate fully with same, including requiring by contract and causing that its subcontractors so cooperate.

COUNTY and/or HUD reserve the right, at their sole and absolute discretion, to request assistance in monitoring from outside parties including, but not limited to the Oregon Secretary of State, the Attorney General, the federal government, and law enforcement agencies.

9.2 CONTRACTOR will fully and timely cooperate with COUNTY and/or HUD in the performance of any and all monitoring and enforcement activities. Failure by CONTRACTOR or any of its subcontractors to comply with this requirement is sufficient cause for COUNTY to require special conditions and may be deemed by COUNTY and/or HUD as a failure by the CONTRACTOR to perform its obligations under this Contract.

9.3 If applicable, CONTRACTOR will perform onsite visits to monitor the activities of its subcontractors as specified by applicable grant program requirements or otherwise directed by HUD, but in no case less than at least once during the term of this contract.

10. Use of Data: CONTRACTOR agrees to, and does hereby grant COUNTY the right to reproduce use and disclose for COUNTY purposes, all or any of the reports, data and technical information furnished to COUNTY under the contract.

11. Recovery of Fund and Reallocation:

11.1. CONTRACTOR's expenditures may be charged to this Contract only if they (a) are in payment for services performed under this Contract; (b) conform to applicable state and federal regulations and statutes; (c) are in payment of an obligation incurred during the contract period; and (d) are not in excess of 100 percent of program costs. Any contract funds spent for purposes not authorized by this Contract will be deducted from payments or refunded to the COUNTY no later than thirty (30) days after the contract's expiration.

11.2. CONTRACTOR may not transfer funds provided under this Contract from one service to another without prior written approval of COUNTY.

11.3. In the event of early termination, cancellation, or suspension of this Contract, the CONTRACTOR will submit a report of expenditures to COUNTY. Any COUNTY funds on hand and not encumbered for authorized expenditures at the date of termination, cancellation, or suspension will be refunded to the COUNTY according to the instructions furnished to the CONTRACTOR by the COUNTY.

11.4. Under the following circumstance, COUNTY may recover from CONTRACTOR the financial assistance paid to CONTRACTOR under this Contract:

11.4.1 If CONTRACTOR fails to have an independent certified public accountant audit federal funds in a manner that complies with Exhibit G of this Contract, COUNTY may recover from CONTRACTOR all federal funds paid to CONTRACTOR under this Contract.

11.4.2 If federal authorities demand repayment of all or a portion of the federal funds or disallow payment of all or a portion of the federal funds to COUNTY under this Contract, COUNTY may recover from CONTRACTOR that portion of the federal funds necessary to satisfy the federal repayment demand or disallowance.

11.4.3 If an expenditure of financial assistance paid to CONTRACTOR under this Contract does not result in the delivery of a service in accordance with the terms and conditions of this Contract including, but not limited to, the grant award, any specialized service requirements and the relevant service description, COUNTY may recover the amount of the expenditure from CONTRACTOR.

12. Financial Statement: CONTRACTOR will provide COUNTY with a copy of a current financial statement, Special Federal Requirements, Exhibit G, notwithstanding, the financial statement will be provided on an annual basis; said financial statement to be completed within 150 days following completion of CONTRACTOR's fiscal year. Financial statement will be submitted to <https://laneco.sharefile.com/filedrop/dxcb90c1-bfdd-4886-aa60-2c12aada997f>. The minimal level of assurance will be determined by the amount of funds CONTRACTOR received from COUNTY, as listed below. Title XIX and Beer and Wine Tax revenue are to be included in determining the amount of funds received.

\$250,000 and over - audited financial statement;

\$100,000-\$249,999 – review statement;

Under \$100,000 - compilation statement.

The audited financial statement and the review statement will be prepared by an independent certified public accountant. The compilation statement may be prepared by either a public accountant or a certified public accountant.

The audited financial statement will include a management letter from the accounting CPA.

SPECIAL NOTE SINGLE AUDIT: Non-profit organizations that expend \$750,000 or more in a year in federal awards will have a single or program specific audit conducted for that year in accordance with the provisions of OMB's Uniform Guidance.

13. Contractor Services: The delivery of each service will comply with the terms and conditions of the Contract between COUNTY and CONTRACTOR and meet the standards for such service as set forth herein and including but not limited to, any terms, conditions, standards and requirements set forth in the Agreement (MGA) in place between COUNTY and HUD and applicable work plans. The current Agreement between COUNTY and HUD is incorporated herein by this reference. CONTRACTOR and any subcontractors will comply with all applicable provisions of the current HUD Agreement as if CONTRACTOR were the COUNTY. In addition, in regard to contracted and subcontracted services, COUNTY will have all of the rights and benefits of provisions in the current HUD Agreement to the same extent as HUD. Services under this Contract will be provided only to persons eligible for services under Federal law, Oregon law and COUNTY guidelines.

14. Notice: Any notice, demand, consent, approval, or other communication to be given under this Contract must be in writing and provided by email addressed to the party's authorized representative, except as provided below in this section. However, if, in either party's discretion, email is not the most appropriate method for providing notice, then notice may be provided by personal delivery; certified mail, postage prepaid, return receipt requested; or nationally recognized overnight courier. The effective date of notice shall be: for notice by email, the date and time sent if sent between the hours of 8 am and 5 pm, otherwise effective at 8am the following Business Day; for notice delivered in person, the date and time of delivery; for notice by U.S. mail, three days after the date of certification; and for notice by overnight courier, the next business day after deposit with the courier. If no representative is identified in this Contract, notice may be given to the person executing the Contract on behalf of that party.

15. Compliance with Coronavirus Guidelines, Laws, Rules, and Orders: The novel coronavirus (“COVID-19”) has been declared a worldwide pandemic by the World Health Organization. COVID-19 is extremely contagious and believed to spread mainly from person-to-person contact. Each of the parties is and must remain familiar with the Centers for Disease Control Prevention guidelines and with federal, state, and local laws, rules, and orders regarding COVID-19 throughout the term of this Contract. Each of the parties acknowledges that it understands the circumstances regarding COVID-19, and in carrying out its obligations under this Contract, each will take all necessary precautions, including those set out in the guidelines, laws, rules and orders described in this paragraph. The parties agree that they have anticipated the costs of compliance with the present guidelines, rules, laws, and orders in establishing their obligations under this Contract, and that no claim will be made by either party for such compliance. However, in the event that after the effective date of this Contract the referenced COVID-19 guidelines, laws, rules, and orders are changed in such a way as to adversely affect the parties’ carrying out of their obligations under this Contract, either party so affected must give notice to the other party of any potential need to modify the Contract to accommodate or respond to such changes in the guidelines, laws, rules, and orders.

16. Compliance with Law: CONTRACTOR will and will require and cause (including by contract) all subcontractors, agents and assigns to comply with this Contract, including applicable federal, state, and local laws, rules, regulations, and guidelines as well as HUD directives with respect to any of its obligations related to grant programs funded under this Contract or for which requests for funding are made, whether or not any such requirement described herein or listed within the respective Work Plan, particularly the Federal Funding Accountability and Transparency Act (FFATA) of 2006 (P.L. 109-282), provisions of which include but may not be limited to a requirement for CONTRACTOR and subcontractors to have a Unique Entity ID (UEI) number and to maintain a current registration in System for Award Management (SAM) database. CONTRACTOR will, and will require and cause its subcontractors to, comply with such requirements whether or not such requirements exist at the time this Contract is executed, or arise subsequent to the execution of this Contract. Performance by both parties of their respective obligations hereunder must be made efficiently, effectively and within applicable program timelines.

17. Multiple Counterparts: This Contract and any subsequent amendments may be executed in several counterparts, facsimile or otherwise, all of which when taken together will constitute one Contract binding on all parties, notwithstanding that all parties are not signatories to the same counterpart. Each copy of this Contract and any amendments so executed will constitute one original.

18. Proselytization: If CONTRACTOR represents that it is, or may be deemed to be, a religious or denominational institution or organization, or an organization operated for religious purposes, which is supervised or controlled by, or in connection with a religious or denominational institution or organization, then CONTRACTOR certifies that:

- 18.1. CONTRACTOR agrees to provide public services in a manner free from religious influence;
- 18.2. CONTRACTOR will not discriminate in employment practices based on religion;
- 18.3. CONTRACTOR will not discriminate against program applicants based on religion;
- 18.4. CONTRACTOR will not give preference to certain religions in the provision of services;

- 18.5. CONTRACTOR will provide no religious instructions while providing the public services;
- 18.6. CONTRACTOR will not provide religious services or other forms of proselytizing while providing the public services; and
- 18.7. CONTRACTOR will exert no other religious influence in providing services.

19. Contractor Certifications: By execution of this Contract, CONTRACTOR certifies under penalty of perjury the following:

19.1. The person signing this Contract has authority to execute this Contract on behalf of CONTRACTOR and to bind CONTRACTOR to its terms.

19.2. CONTRACTOR is in compliance with and will abide by all federal requirements described in Exhibit G of this Contract.

19.3. CONTRACTOR is not employed by or contracting with the federal government for the work covered by this Contract.

19.4. CONTRACTOR has not discriminated against minority, women or small business enterprises or a business that is controlled by or that employs a disabled veteran as defined in ORS 408.225.

19.5. CONTRACTOR has established or before starting the Program work will establish a formal statement of nondiscrimination in its employment policy and that it enforces such policy.

19.6. CONTRACTOR will, at all times during the term of this Contract, be qualified, professionally competent, and duly licensed to perform the Services.

19.7. CONTRACTOR prepared its proposal related to this Contract, if any, independently from all other proposers, and without collusion, fraud, or other dishonesty.

19.8. CONTRACTOR has, to the best of its knowledge, complied with Oregon tax laws in the period prior to the execution of this Contract, and will continue to comply with such laws during the entire term of this Contract, including:

19.8.1 All tax laws of the State of Oregon, including but not limited to ORS 305.620 and ORS chapters 316, 317, and 318;

19.8.2 Any tax provisions imposed by a political subdivision of this state that applied to CONTRACTOR or its property, goods, services, operations, receipts, income, performance of or compensation for any work performed; and

19.8.3 Any rules, regulations, charter provisions or ordinances that implemented or enforced any of the forgoing tax laws or provisions.

19.9. Pursuant to ORS 305.385(6) and OAR 150-305-0302, the person signing this Contract hereby swears and affirms under penalty of perjury that, to best of their knowledge, CONTRACTOR is not in violation of any tax laws described in ORS 305.380 (4).

19.10 Neither CONTRACTOR nor any of its principals, officers, directors, or employees:

19.10.1 Is presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from covered transactions by any federal department or COUNTY;

19.10.2 Has within a three-year period preceding this Agreement been convicted of or had a civil judgment rendered against it for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, State or local) transaction or contract related to a public transaction; violation of federal or State antitrust statutes; or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property;

19.10.3 Is presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in subsection 19.10.2 above;

19.10.4 Has within a three-year period preceding this Contract had one or more public transactions (federal, State or local) terminated for cause or default; and

19.10.5 Is included on the list titled "Specially Designated Nationals and Blocked Persons" maintained by the Office of Foreign Assets Control of the United States Department of the Treasury and currently found at: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx> .

Exhibit A

Additional Terms and Conditions

1. **Disbursement of Funds:** Based upon amount specified in Contract, COUNTY will provide payment to CONTRACTOR for rendering the services listed in this Contract. COUNTY will provide funds to CONTRACTOR only upon approved reimbursement requests for allowable costs incurred. Should CONTRACTOR fail to submit required reports when due, or fail to perform or document the performance of services hereunder, COUNTY may withhold payments under this contract to the extent allowed by law.
 - 1.1 CONTRACTOR shall maintain an accounting system which conforms with the following requirements:
 - A. Expenditures shall be segregated by line item category within the accounting system of CONTRACTOR.
 - B. Other funds or income received that is attributable to funds provided in this contract shall be identified and segregated for expenditures relating to the program(s) for which the original funds were provided. Any allocation methodology shall comply with any requirements applicable to that entity or program.

CONTRACTOR must provide to COUNTY any information or detail regarding the expenditure of funds required under the Contract or applicable Program Elements prior to disbursement as COUNTY may request.
 - 1.2 CONTRACTOR's request for funds must be supported by documentation satisfactory to COUNTY, including but not limited to: properly executed payroll and time records, invoices, contracts, vouchers, orders, canceled checks and/or any other accounting documents pertaining in whole or in part to the Contract in accordance with generally accepted accounting principles and applicable state and federal requirements, including as specified herein. COUNTY may require such other information or clarification as it deems necessary or appropriate in its sole discretion.
 - 1.3 CONTRACTOR will be paid on a cost reimbursement basis for federal and state funds. Invoices must be submitted in a timely manner as determined by COUNTY. CONTRACTOR must request expenditures against contract budget amounts by line item in a format provided by the COUNTY. Also required, is the break down by funding source and major funding categories if applicable (leasing, supportive services, direct client assistance, operation costs, administration etc.).
 - 1.4 COUNTY will only disburse funds to CONTRACTOR for activities completed or materials produced, that, if required by Contract or applicable Program Elements, are approved by COUNTY. If COUNTY determines any completed Program work is not acceptable and any deficiencies are the responsibility of CONTRACTOR, COUNTY will prepare a detailed written description of the deficiencies within fifteen (15) days of receipt of the materials or performance of the activity and will deliver such notice to CONTRACTOR. CONTRACTOR must correct any deficiencies at no additional cost to COUNTY within fifteen (15) days. CONTRACTOR may resubmit a request for disbursement that includes evidence satisfactory to COUNTY demonstrating deficiencies were corrected.

1.5 COUNTY is not responsible nor will it pay for any costs disallowed either upon a request for funds or as a result of any audit, review, site visit, or other disallowance action by OHCS or COUNTY, except for costs incurred by CONTRACTOR solely due to the willful misconduct or gross negligence of OHCS or COUNTY, its employees, officers, or agents. If a cost is disallowed by OHCS or COUNTY after reimbursement has occurred, CONTRACTOR shall repay all disallowed costs to COUNTY upon written notice within the time frame specified by COUNTY, which in no event shall exceed thirty (30) days.

COUNTY may recover such disallowed costs through repayment, withholding, offset, or other means permitted under this Contract, by law or otherwise but consistent with the applicable Program Elements and specifically requirements set forth by the federal government.

1.5.1 CONTRACTOR will, and will cause its subcontractors to, cooperate with COUNTY and all appropriate investigative agencies will assist in recovering invalid payments.

1.6 If CONTRACTOR does not expense funds in a timely manner as determined by COUNTY, COUNTY may, at its sole discretion, reduce CONTRACTOR funding and may redistribute to other contractors or retain such funds for other use.

2. **Fixed Assets:** If applicable, CONTRACTOR shall, and shall cause its subcontractors to, maintain policies and procedures for the management of property and equipment that comply with all requirements of the applicable Code of Federal Regulations, 2 CFR Subtitle B with guidance at 2 CFR Part 200, and specific requirements of the source of funds. These regulations shall apply to all equipment purchased with COUNTY funding, regardless of source of funds. The following practices are in addition to those otherwise required:

2.1. High Risk Items. Fixed assets with a high risk of loss include all computer equipment, electronic equipment, photography equipment, hand tools and any other items CONTRACTOR may identify as at risk. Fixed assets that are deemed to have a high risk of loss must be labeled, recorded on an inventory tracking system, and inventoried at least once a year.

2.2. Automobiles. CONTRACTOR is prohibited from using funds provided as part of this Contract to purchase any automobiles.

2.3. Loaned Equipment/Property Disposition. All fixed assets owned by OHCS or COUNTY and loaned to CONTRACTOR under a standard agreement will remain the property of OHCS and/or COUNTY, regardless of their value. The disposition of all loaned equipment will be readily available.

2.4. Disposal Requiring Prior Approval. When CONTRACTOR, or its subcontractor, wishes to dispose of equipment having an original cost of more than \$5,000, CONTRACTOR shall submit a written notification to the appropriate OHCS Program Coordinator with a copy to the OHCS Financial Compliance Monitor. If OHCS consents, OHCS will provide instructions regarding the method of disposition. OHCS reserves the right to refuse to consent to such disposal and the right to object to the timing of each disposition. Such

disposition, if permitted, shall be done in a manner consistent with the property management standards of equipment of OHCS from which the original funding was received. In the case of mixed funding sources, the most restrictive standards shall apply.

Items of equipment with a current per-unit, fair-market value of \$5,000 or less may be retained, sold, or otherwise disposed of upon written notification to the appropriate OCHS Program coordinator with a copy to OHCS Financial Compliance Monitor with no further obligation. The OHCS Program coordinator shall be notified of all title transfers, sales, and other methods of disposition. OHCS may review disposition records upon notification of CONTRACTOR.

- 2.5. Purchased Equipment/Capital Property. Non-expendable capital property can be acquired with grant funds only if the purchase has been specifically approved in the contract or by prior approval in writing of COUNTY. Any capital property purchased, whether a single item or cumulative of similar items totaling \$5,000 or more, needs to adhere to the terms and conditions of the contract, and will require prior signatory approval from COUNTY.
- 2.6. Equipment. The title to all equipment as defined in 2 CFR Part 200, purchased in whole or in part with funds provided under this Contract, shall rest with the CONTRACTOR. Property and equipment purchased with COUNTY grant funds shall not be used for collateral or to secure financing.
3. **Compliance:** CONTRACTOR will comply and will require and cause (including by contract) all subcontractors, vendors, contractors, and assigns to comply with this Contract, including applicable Program Requirements.
 - 3.1 Without limiting the generality of the foregoing, CONTRACTOR will comply and will require and cause its subcontractors, vendors, contractors, agents, and assigns to comply with all federal requirements, including but not limited to the Federal Funding Accounting and Transparency Act (FFATA) of 2006 (P.L. 109-282), provisions of which include, but are not limited to, a requirement for CONTRACTORS, subcontractors, and vendors to have a Data Universal Numbering System (DUNS) number and to maintain a current registration in the SAMs (System for Awards Management) database.
 - 3.2 Without limiting the generality of the foregoing, CONTRACTOR expressly agrees to comply with the following laws, regulations and executive orders to the extent they are applicable to the Agreement: (i) Titles VI and VII of the Civil Rights Act of 1964, as amended; (ii) Sections 503 and 504 of the Rehabilitation Act of 1973, as amended; (iii) the Americans with Disabilities Act of 1990, as amended; (iv) Executive Order 11246, as amended; (v) the Health Insurance Portability and Accountability Act of 1996; (vi) the Age Discrimination in Employment Act of 1967, as amended, and the Age Discrimination Act of 1975, as amended; (vii) the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended; (viii) ORS Chapter 659, as amended; (ix) all regulations and administrative rules established pursuant to the foregoing laws; and (x) all other applicable requirements of federal and state civil rights and rehabilitation statutes, rules and regulations. These laws, regulations and executive orders are incorporated by reference herein to the extent that

they are applicable to the Contract and required by law to be so incorporated. CONTRACTOR shall, to the maximum extent economically feasible in performance of this Agreement, use recycled paper (as defined in ORS 279A.010(gg)), recycled PETE products (as defined in ORS 279A.010(hh)), and other recycled products (as “recycled product” is defined in ORS 279A.010(ii)).

- 3.3 CONTRACTOR shall be responsible for programmatic integrity and compliance with the programmatic intent including but not limited to the following requirements:
 - 3.3.1 CONTRACTOR shall ensure that all staff are adequately trained to perform under this contract including, but not limited to the training in processing of eligibility determinations and authorizations or other programmatic requirements.
 - 3.3.2 CONTRACTOR shall comply with programmatic regulations and guidelines as listed in Grant Program and Compliance Requirements.
 - 3.4 CONTRACTOR shall maintain all certificates of approval and professional or clinical licenses/accreditation required by the State of Oregon to perform the work described in Exhibit B – Program Plan.
 - 3.5 Policies, regulations, guidelines, and requirements for use of State Oregon Housing and Community Services funds, including federal grants received through the state, are contained within Exhibit I – State Funding Assurances. CONTRACTOR receiving State funds must abide by the requirements contained within Exhibit I – State Funding Assurances.
 - 3.6 CONTRACTORS receiving ESG funding are required to comply with ESG Interim Rule 24 CFR 576.407(b). CONTRACTORS must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. If it is unlikely that the procedures that the CONTRACTOR intends to use to make known the availability of the facilities, assistance, and services will to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, the CONTRACTOR must establish additional procedures that ensure that those persons are made aware of the facilities, assistance, and services. The CONTRACTOR must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Consistent with Title VI and Executive Order 13166, CONTRACTORS are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons. Let it be known that the use of facilities, assistance and services are available to all on a non-discriminatory basis.
4. **Monitoring:** COUNTY, including its authorized representatives and authorized third parties, may monitor the activities and records of each CONTRACTOR and CONTRACTOR’s subcontractors and vendors as it deems necessary or appropriate to ensure: (1) compliance with this Agreement, including the Program Requirements; and (2) achievement of this Agreement’s performance goals, in COUNTY’ sole discretion.

- 4.1 COUNTY's monitoring activities may include any action deemed necessary or appropriate by COUNTY including, but not limited to the following: (1) the review (including copying) from time to time of any and all CONTRACTOR, subcontractor, and Vendor files, records, and other information of every type arising from or related to performance under this Contract; (2) arranging for, performing, and evaluating general and limited scope audits; (3) conducting or arranging for on-site and field visits and inspections; (4) review of CONTRACTOR fiscal and program reports, and requiring appropriate Request for Funds documentation as well as such other information and clarification as it deems appropriate, prior to providing a Request for Funding approval, whether in whole, in part, or otherwise; and (5) evaluating, training, providing technical assistance and enforcing compliance of CONTRACTOR, subcontractors, vendors, and their officers, employees, agents, contractors and other staff.
 - 4.1.1 COUNTY may continue to track and follow-up its monitoring findings and corrective actions with CONTRACTOR or its subcontractors through a tracking record. The tracking record may include, without limitation: findings, corrective actions, deliverables, due dates, responsible parties, actions taken, and final resolution. CONTRACTOR must resolve finding and other required corrective action actions within reasonable timeframe provided by COUNTY.
- 4.2 COUNTY monitoring and enforcement activities may be conducted in-person, by telephone, and by other means deemed appropriate by COUNTY.
- 4.3 COUNTY may, in its sole and absolute discretion, request assistance in monitoring from outside parties, including but not limited to OHCS, the Oregon Secretary of State, the Oregon Attorney General, the federal government, and law enforcement agencies.
- 4.4 COUNTY may release CONTRACTOR monitoring reports, agency audits, and any other compliance information to the State of Oregon and Community Action Partnership of Oregon.
- 4.5 CONTRACTOR agrees to fully and timely cooperate with COUNTY in performance of any and all monitoring and enforcement activities, including causing its subcontractors, vendors, and contractors to also cooperate by agreement.
5. **CONTRACTOR Default:** CONTRACTOR will be in default under this Contract upon the occurrence of any of the following events:
 - 5.1 CONTRACTOR fails to use the Grant Funds for the intended purpose described in applicable Program Elements or otherwise fails to perform, observe, or discharge any of its covenants, agreements, or obligations under this Contract;
 - 5.2 CONTRACTOR fails to comply timely with any material obligation under this Contract, including but not limited to any COUNTY directive or term of a corrective action plan;
 - 5.3 Any representation, warranty, or statement made by CONTRACTOR in this Contract or in any documents or reports relied upon by COUNTY to measure the Program work, the

expenditure of funds, or the performance by CONTRACTOR is untrue in any material respect when made; or

- 5.4 A petition, proceeding or case is filed by or against CONTRACTOR under any federal or state bankruptcy, insolvency, receivership, or other law relating to reorganization, liquidation, dissolution, winding-up, or adjustment of debts; in the case of a petition filed against CONTRACTOR, CONTRACTOR acquiesces to such petition or such petition is not dismissed within twenty (20) calendar days after such filing, or such dismissal is not final or is subject to appeal; or CONTRACTOR becomes insolvent or admits its inability to pay its debts as they become due, or CONTRACTOR makes an assignment for the benefit of its creditors.
6. **COUNTY Default:** COUNTY will be in default under this Contract if, after fifteen (15) days written notice specifying the nature of the default, COUNTY fails to perform, observe or discharge any of its covenants, agreements, or obligations under this Contract; provided, however COUNTY will not be in default if COUNTY fails to disburse funds because there is insufficient expenditure authority for, or moneys available from, the funding source. In the event COUNTY is in default under this paragraph, and whether or not CONTRACTOR elects to terminate this Contract, CONTRACTOR's sole monetary remedy will be, within any limits set forth in this Contract, reimbursement of Program work completed and accepted by COUNTY and authorized expenses incurred, less any claims COUNTY has against CONTRACTOR. In no event will COUNTY be liable to CONTRACTOR for any expenses related to termination of this Contract or for anticipated profits.
7. **Conflict of Interest:** By signature to this Contract, CONTRACTOR declares and certifies the award of this Contract and the Program work, create no potential or actual conflict of interest, as defined by ORS Chapter 244, for a director, officer, or employee of CONTRACTOR. A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the public official or the finances of a relative. If a conflict of interest exists, the public official must always give notice of the conflict, and in some situations the public official is restricted in their ability to participate in the matter that presents the conflict of interest. CONTRACTOR will timely report to COUNTY any perceived or actual conflict of interest. CONTRACTOR certifies it has established a conflict of interest policy that outlines the process for disclosing in writing any potential conflict of interest and such policy must be provided to COUNTY upon COUNTY request, or as otherwise requested during a CONTRACTOR audit.
8. **Federal Terms:** All federal terms and conditions included in this Contract at time of original Contract execution may be amended from time to time by the federal grantor or regulator of funds.
9. **Personnel Changes:** In addition to the requirements provided elsewhere in this Contract, CONTRACTOR will immediately report changes in Key Personnel including Fiscal, Program, and Executive Level Leadership.

10. **Subcontracting:** CONTRACTOR may not, without COUNTY' prior written consent, enter into any subcontracts for any of the Contract work. COUNTY's consent to any contract will not relieve CONTRACTOR of any of its duties or obligations under this Contract.
11. **Records Maintenance and Access:** CONTRACTOR must, and must require and cause its subcontractors to, maintain all financial records relating to this Contract in accordance with generally accepted accounting principles. In addition, CONTRACTOR must, and must require and cause its subcontractors to, maintain any other records, whether in paper, electronic or other form, pertinent to this Contract in such a manner as to clearly document CONTRACTOR's and subcontractors' performance. All financial records and other records, whether in paper, electronic or other form, that are pertinent to this Contract, are collectively referred to as "Records". CONTRACTOR acknowledges and agrees COUNTY, OHCS and the Oregon Secretary of State's Office and the federal government and their duly authorized representatives will have access to all Records to perform examinations and audits and make excerpts and transcripts. CONTRACTOR must retain and keep accessible all Records for a minimum of six (6) years, or such longer period as may be required by applicable law, following termination of this Contract, or until the conclusion of any audit, controversy or litigation arising out of or related to this Contract, whichever date is later. In its agreements with subcontractors, CONTRACTOR shall require and cause its subcontractors to comply with the requirements of this paragraph and to grant right of access to and ownership by COUNTY of the subcontractors' books and records related to this Contract.
12. **Publicity and Public Information:** Whenever written or verbal information related to the services provided through this contract is distributed to the media or directly to the general public, another agency or governmental audience, whether such information is solicited or unsolicited, the CONTRACTOR shall acknowledge and name the Human Services Commission, City of Eugene, City of Springfield and Lane County as sponsoring the services provided through this contract.
13. **Changes to Program Plan and Budget:** Changes to Program Plan by the CONTRACTOR require prior approval by COUNTY. Budget adjustments, within existing contract total, by CONTRACTOR which require amendments to grants or federal or state work plans need prior approval by COUNTY. Requests and justification of any change must be submitted in writing to COUNTY program staff and be approved in writing by COUNTY prior to commencement of the requested change.
14. **Coordinated Entry System:** CONTRACTOR will participate in the Lane County Coordinated Entry System. CONTRACTOR participation shall be in accordance with the Coordinated Entry System Policy and Procedure Manual, and any subsequent versions, as developed and approved by COUNTY.
15. **Consumer Satisfaction Surveys:** CONTRACTOR will participate in consumer satisfaction survey activities.
16. **Management Information System:** CONTRACTOR shall enter all data deemed appropriate and necessary by COUNTY into ServicePoint Management Information System (MIS) for all federal, state, local and private funding awarded by the COUNTY through this contract or OPUS for energy and weatherization programs. Data entry into ServicePoint or OPUS must be completed by

CONTRACTOR at the time of service or within 72 hours. The "OPUS Privacy Posting/Notice" and the "ServicePoint Privacy Notice" must be clearly displayed in all areas which clients access. CONTRACTOR must comply with the Lane County HMIS Policies and Procedures and the program guidelines for OPUS energy and weatherization programs and CONTRACTOR staff must complete training provided by COUNTY.

17. **Lane County Contracting Policies:** The Human Services Division (HSD) of Lane County Health & Human Services' contracting policies below are incorporated into this Contract.

- 17.1 Lane County's fiscal year is July 1 through June 30.
- 17.2 HSD generally determines cost eligibility using the Federal Uniform Guidance 2 CFR 200. Human Services or other funding sources may apply additional eligibility requirements depending on items of cost. More restrictive guidelines established by the funding source or Human Services supersede the Uniform Guidance.
- 17.3 Contracted revenues and expenses must be segregated by funding source and easily identified within recipient's accounting system.
- 17.4 Contract budgets must include full cost of the project regardless of funding percentage provided through Lane County contract.
- 17.5 Documentation of direct and indirect costs must be retained and available for review during fiscal monitoring. Allocable costs must be substantiated by a written, consistent and fairly applied process.
- 17.6 The amount of administrative funding provided within Human Services contracts is determined by funding type. Regardless of administrative eligible funding in contract, administrative cost reimbursements are limited to no more than 15% of contract funding.
- 17.7 There is no specific match required for Human Services contracts, except for projects funded by U.S. Housing and Urban Development (HUD). Contractors are expected to maintain the level of service indicated in the program plan throughout the contract term which may require contractor cash or in-kind contributions.
- 17.8 HUD Continuum of Care (COC), Emergency Solutions Grant (ESG) and ESG-like funded projects are subject to a 25% match. Non HUD funding within Lane County contracts may be included in the match calculation. To be considered eligible for match, a cost must also be eligible for HUD funding under CoC and ESG manuals and regulations. Match funds must be clearly identified in monthly invoices.
- 17.9 Contracts are paid through monthly invoicing on cost reimbursement basis. Invoice reimbursements must be based on documented, after the fact, actual cost rather than a percent of budget or percent of annual funding. Invoices are considered past due if submitted after the 15th of the month following the month invoicing.

- 17.10 Contract expenditure rates is 50% expended by 50% of year unless preapproved by Lane County contract administrator. Contract balances will be reviewed at mid-term. Contracts expending less than 50% at 50% of term may be subject to de-allocation.
- 17.11 Use of contract funds for capital expenditures and equipment totaling over \$5,000 are unallowable except with prior written approval from Lane County.

Grant Program and Compliance Requirements

Grant	Acronym	State Federal Private	Federal Agency	CFDA	Federal Regulations	State Regulations	Guides/Manuals
Community Development Block Grant, Community Development Block Grant Coronavirus	CDBG, CDBG-CV	F	HUD	14.218	24 CFR 570	None	None
Community Service Block Grant, Community Services Block Grant-CARES	CSBG, CSBG-CARES	F	HHS	93.569	45 CFR 96	OAR 813-210; OAR 813-230	None
Continuum of Care	COC	F	HUD	14.228	25 CFR 578	None	CoC HUD Program Interim Rule: https://www.hudexchange.info/resource/2033/heardh-coc-program-interim-rule/
Emergency Housing Assistance	EHA	S	None	None	None	OAR 813-046	https://www.oregon.gov/ohcs/providers/Pages/program-compliance-forms.aspx
Elderly Rental Assistance	ERA	S	None	None	None	OAR 813-370	https://www.oregon.gov/ohcs/providers/Pages/program-compliance-forms.aspx
Emergency Solutions Grant Program and Emergency Solutions Grant Coronavirus	ESG, ESG-CV1-3	F	HUD	14.231	24 CFR 576	OAR 813-145	https://www.oregon.gov/ohcs/providers/Pages/program-compliance-forms.aspx
HOME TBA	HTBA	F	HUD	14.239	24 CFR 92	OAR 813-120	https://www.oregon.gov/ohcs/providers/Pages/program-compliance-forms.aspx
Housing Stabilization Program	HSP	F/S	HHS	93.558	45 CFR 260	OAR 813-051	https://www.oregon.gov/ohcs/providers/Pages/program-compliance-forms.aspx
Low-Income Home Energy Assistance Program, LP CARES ACT	LIHEAP, LP-CARES	F	HHS	93.568	42 U.S.C. 8621	ORS 458.505; OAR 813-200	https://www.lanecounty.org/government/county_departments/health_and_human_services/human_services_division/energy_and_weatherization_programs/training_materials

Oregon Energy Assistance Program	OEAP	S	None	None	None	None	ORS 757.612; OAR 813-202	https://www.lanecounty.org/government/county_department/health_and_human_services/human_services_division/energy_and_weatherization_programs/training_materials
Oregon Emergency Rental Assistance Program	OERA	F	Treasury	21.023	American Rescue Plan Act of 2021 Section 3201	86 FR 1585		https://www.oregon.gov/ohcs/housing-assistance/Pages/emergency-rental-assistance.aspx
Out of the Cold	OOTC	S	None	None	None	ORS 291.375		www.oregon.gov/ohcs/providers/Pages/program-compliance-forms.aspx
State Homeless Assistance Program	SHAP	S	None	None	None	OAR 813-240		www.oregon.gov/ohcs/providers/Pages/program-compliance-forms.aspx
Supporting Tenants Accessing Rental Relief	STARR	S	None	None	None			www.oregon.gov/ohcs/providers/Pages/program-compliance-forms.aspx

7/1/21

Exhibit B
Program Plan

To be negotiated between Contractor and County.

Exhibit C

Budget

To be negotiated between Contractor and County.

FY 21-23 CFDA Information

Service Description	Service Description Name	Vendor or Sub-recipient	Federal Funding Source	CFDA #(s)
A&D 03	System Management and Coordination-AddictionServices		N/A	
A&D 60	Start-Up - Addiction Services		N/A	
A&D 61	Adult Addiction Treatment, Recovery & Prevention Residential Treatment Services	Sub-recipient	SAPT	93.959
A&D 62	Supported Capacity for Dependent Children Whose Parents are in Adult Substance Use Disorder ResidentialTreatment	Vendor	TANF	93.558
A&D 63	Peer Delivered Services		N/A	
A&D 64	HousingAssistance		N/A	
A&D 65	Intoxicated Driver Program Fund (IDPF)		N/A	
A&D 66	Community Behavioral and Addiction Treatment, Recovery & Prevention Services	Sub-recipient	SAPT	93.959
A&D 67	Addiction Treatment, Recovery & Prevention Residential & Day Treatment Capacity	Sub-recipient	SAPT	93.959
A&D 71	Youth Addiction, Recovery & Prevention Residential Treatment Services		N/A	
A&D 80	Problem Gambling Prevention Services		N/A	
A&D 81	Problem Gambling Treatment Services		N/A	
A&D 82	Problem Gambling Residential Services		N/A	
A&D 83	Problem Gambling Respite Treatment Services		N/A	
A&D 84	Problem Gambling Client Finding Outreach Services		N/A	
 				
MHS 01	System Management and Coordination		N/A	
MHS 04	Aid and Assist Client Services		N/A	
MHS 05	Assertive Community Treatment Services		N/A	
MHS 08	Crisis and Acute Transition Services (CATS)		N/A	
MHS 09	Jail Diversion		N/A	
MHS 10	Mental Health Promotion and Prevention Services		N/A	
MHS 12	Rental Assistance Program Services		N/A	
MHS 13	School Based Mental Health Services		N/A	
MHS 15	Young Adult Hub Programs (YAHP)		N/A	
MHS 16	Peer Delivered Services (PDS)		N/A	
MHS 16A	Veterans Peer Delivered Services		N/A	
MHS 20	Non Residential Adult Mental Health Services for Adults	Sub-recipient	MHBG	93.958

Service Description	Service Description Name	Vendor or Sub-recipient	Federal Funding Source	CFDA #(s)
MHS 22	Non Residential Adult Mental Health Services for Child and Youth		N/A	
MHS 24	Acute and Intermediate Psychiatric Inpatient Services		N/A	
MHS 25	Community MH Crisis Services for Adults and Children		N/A	
MHS 26	Non-Residential Mental Health Services for Youth & Young Adults in Transition		N/A	
MHS 26A	Early Assessment and Support Alliance (EASA)		N/A	
MHS 27	Residential Mental Health Treatment Services for Youth and Young Adults In Transition		N/A	
MHS 28	Residential Treatment Services		N/A	
MHS 28A	Secure Residential Treatment Facility		N/A	
MHS 30	Monitoring, Security and Supervision Services for Individuals Under the Adult and Juvenile Panels of the Psychiatric Security Review Board		N/A	
MHS 31	Enhanced Care/Enhanced Care Outreach Services		N/A	
MHS 34	Adult Foster Care Services		N/A	
MHS 35	Older/Disabled Adult Mental Health Services		N/A	
MHS 35A	Gero-Specialist		N/A	
MHS 35B	APD Residential		N/A	
MHS 36	Pre-Admission Screening and Residential Review Services (PASRR)		N/A	
MHS 37	Start-Up Community Mental Health		N/A	
MHS 38	Supported Employment Services		N/A	
MHS 39	Projects For Assistance In Transition From Homelessness Services (PATH)		N/A	
PE 01-01	State Support for Public Health (SSPH)		N/A	
PE 01-07	ELC ED Contact Tracing	Sub-recipient	CDC/Epi & Lab Capacity	93.323
PE 01-09	COVID-19 Active Monitoring - ELC	Sub-recipient	CDC/Epi & Lab Capacity	93.323
PE 01-10	CARES	Sub-recipient	Immunization and Vaccines for Children	93.268
PE 03	Tuberculosis (TB) Services		N/A	
PE 07	HIV Prevention Services	Sub-recipient	CDC/HIV AIDS Prevention Activities, Health Dpt. Based	93.940
		Sub-recipient	Integrated HIV Surveillance & Prevention for Health Depts	93.944

Service Description	Service Description Name	Vendor or Sub-recipient	Federal Funding Source	CFDA #(s)
PE 10	Sexually Transmitted Disease (STD)		N/A	
PE 12	Public Health Emergency Preparedness Program (PHEP)	Sub-recipient	CDC/Public Health Emergency Preparedness	93.069
PE 13-01	Tobacco Prevention and Education Program (TPEP)		N/A	
PE 17	Vector Control		N/A	
PE 36	Alcohol and Drug Prevention Education Program	Vendor	SAMHSA/Alcohol & Drug Prevention Education Program	93.959
PE 40-01	WIC NSA: July - September	Sub-recipient	USDA/Special Supplemental Nutrition Program for Women, Infants & Children	10.557
PE 40-02	WIC NSA: October - June	Sub-recipient	USDA/Special Supplemental Nutrition Program for Women, Infants & Children	10.557
PE 42-03	Perinatal General Funds & Title XIX	Vendor	Title XIX Medicaid Admin/Medical Assistance Program	93.778
PE 42-04	Babies First! General Funds		N/A	
PE 42-06	General Funds & Title XIX	Vendor	Title XIX Medicaid Admin/Medical Assistance Program	93.778
PE 42-11	Title V	Sub-recipient	HRSA/Maternal & Child Health Block Grants	93.994
PE 42-12	Oregon Mothers Care Title V	Sub-recipient	HRSA/Maternal & Child Health Block Grants	93.994
PE 42-14	Home Visiting		N/A	
PE 43-01	Immunization Services	Sub-recipient	CDC/Immunization Cooperative Agreements	93.268
PE 44-01	School Based Health Centers (SBHC) Base		N/A	
PE 44-02	SBHC Mental Health Expansion		N/A	
PE 46-05	Reproductive Health Community Access		N/A	
PE 50	Safe Drinking Water (SDW) Program	Vendor	EPA Public Water System Supervision	66.432
		Vendor	EPA/Safe Drinking Water State Revolving Fund	66.468
PE 51-01	Leadership, Governance & Program Implementation		N/A	

Service Description	Service Description Name	Vendor or Sub-recipient	Federal Funding Source	CFDA #(s)
PE 51-02	Regional Partnership Implementation		N/A	
PE 60	Suicide Prevention, Intervention & Postvention	Sub-recipient	SAMHSA/Substance Abuse & MH Services Projects of Regional & National Significance	93.243
PE 62	Overdose Prevention	Sub-recipient	SAMHSA/State Targeted Response to the Opioid Crisis Grants	93.788
		Sub-recipient	CDC/Injury Prevention & Control Research and State & Community Based Programs	93.136
HS	Healthy Start		N/A	
HSGF	Healthy Start General Fund		N/A	
MIECHV	Nurse Family Partnership	Sub-recipient	HRSA	93.870
SPF PFS	Strategic Prevention Framework Partnership for Success	Sub-recipient	SAMHSA	92.243
SAPT	Substance Abuse Treatment Block Grant	Sub-recipient	SAMHSA	93.959
CARES- CRF	Coronavirus Relief Fund	Sub-recipient	TBD/ Coronavirus Relief Fund	21.109
CDBG	Community Development Block Grant	Sub-recipient	HUD	14.218
PE01 CSBG	Community Services Block Grant	Sub-recipient	HHS	93.569
CARES CSBG	Community Services Block Grant (Coronavirus Relief)	Sub-recipient	HHS	93.569
COC	Continuum of Care	Sub-recipient	HUD	14.288
PE02 ESG	Emergency Solutions Grant	Sub-recipient	HUD	14.231
PE03 EHA	Emergency Housing Assistance		State Funding	
ERA	Elderly Rental Assistance		State Funding	
PE04 SHAP	State Homeless Assistance Program		State Funding	
SNAP 50/50	Supplemental Nutrition Assistance Program	Sub-recipient	Department of Agriculture	10.561
HSC	Human Services Commission		Local Funding	
PE05 HSP	Housing Stabilization Program	Sub-recipient	HHS	93.558
PE06 HTBA	HOME Tenant Based Assistance Program	Sub-recipient	HUD	14.239
HUD	Housing and Urban Development Continuum of Care Grants	Sub-recipient	HUD	14.267
LIRHF	Low Income Rental Housing Fund		State Funding	
PE08 LIHEAP	Low Income Home Energy Assistance Program	Sub-recipient	HHS	93.568
PE09 LIHEAP WX	Low Income Home Energy Assistance Program Weatherization	Sub-recipient	HHS	93.568

Service Description	Service Description Name	Vendor or Sub-recipient	Federal Funding Source	CFDA #(s)
PE10 OEAP	Oregon Energy Assistance Program		State Funding	
PE11 BPA	Bonneville Power Administration Weatherization Program		State Funding	
CARES-EA	Coronavirus Energy Assistance and Weatherization	Sub-recipient	HHS	93.568
PE12 DOE WAP	Department of Energy Weatherization Assistance Program	Sub-recipient	DOE	81.042
PE13 ECHO	Energy Conservation Helping Oregonians Weatherization Assistance Program		State Funding	
SAMHSA	Substance Abuse and Mental Health Services Administration	Sub-recipient	SAMHSA	93.243
CARES	Coronavirus Relief Fund			
PE15 EAS/CRF	PE 15 Energy Assistance Stability (EAS) Program - CRF		State Funding	
PE14 CRF RR	Coronavirus Relief Fund (CRF)		State Funding	
 				
BRS	Behavioral Rehabilitation Services	Vendor	HHS MAP	93.778 93.767
JCP	Juvenile Crime Prevention		State	
JCP BASIC	Juvenile Crime Prevention Basic Services		State	
JCP DIVER	Juvenile Crime Prevention Diversion Services		State	
OYA FLEX	Oregon Youth Authority Individualized Services		State	
Serbu	Serbu Foundation		Private	
TITLE II	Title II Formula Grant		OJJDP	16.54
BLM	Bureau of Land Management		Secure Rural Schools	15.234
 				
FEMA	Federal Emergency Management Agency	Contractor	FEMA	97.036
CARES	Coronavirus Relief Fund	Subrecipient	H&HS	20.019

FY 21-23 CFDA

Exhibit D

Match

Not Applicable

Exhibit E

Special Reporting Requirements

EXHIBIT E

ADDITIONAL REPORTING AND FISCAL REQUIREMENTS

CONTRACTOR shall submit required reports on or before the due dates specified. Unless otherwise specified, all reports are to be submitted electronically. Reports shall be complete and accurate and in the format required by COUNTY. Should CONTRACTOR fail to submit required reports when due, COUNTY may withhold payments under this contract to the extent allowed by law, or use as a basis for reduction, suspension, or termination of funding of any or all funds under this agreement.

- 1. Annual Housing Confirmation Report:** CONTRACTOR receiving any/all funds under this agreement must complete and submit information requested upon request to COUNTY Human Services Division and enter all ServicePoint data as per Lane County HMIS Policies and Procedures for the State of Oregon Health Authority Addictions and Mental Health Division's Annual Housing Confirmation Report.
- 2. Community Services Block Grant (CSBG) Reports:** CONTRACTOR receiving any/all funds under this agreement must complete a fiscal worksheet detailing other monies used to support this contract for the calendar year within 30 days of the end of the calendar year and enter all ServicePoint data as per Lane County HMIS Policies and Procedures.
- 3. Emergency Housing Assistance (EHA) Reports:** CONTRACTOR receiving any/all funds under this agreement must enter all ServicePoint data as per Lane County HMIS Policies and Procedures and submit invoices by the 15th of the month for the previous month.
- 4. Emergency Solutions Grant (ESG) Reports:** CONTRACTOR receiving any/all funds under this agreement must enter all ServicePoint data as per Lane County HMIS Policies and Procedures and submit invoices by the 15th of the month for the previous month.
- 5. Housing Stabilization Program (HSP) Reports:** CONTRACTOR receiving any/all funds under this agreement must submit all required documentation to Lane County HHS Admin, enter all ServicePoint data as per Lane County HMIS Policies and Procedures, and submit invoices by the 15th of the month for the previous month.
- 6. State Homeless Assistance Program (SHAP) Reports:** CONTRACTOR receiving any/all funds under this agreement must enter all ServicePoint data as per Lane County HMIS Policies and Procedures and submit invoices by the 15th of the month for the previous month.
- 7. Home Tenant-Based Assistance (HTBA) Reports:** CONTRACTOR receiving any/all funds under this agreement must submit all required documentation to Lane County HHS Admin, enter all ServicePoint data as per Lane County HMIS Policies and Procedures, and submit invoices by the 15th of the month for the previous month.
- 8. HUD- Annual Performance Report (APR):** CONTRACTOR receiving U.S. Housing and Urban Development Continuum of Care Grant funding must complete and submit the fiscal worksheet for the Housing and Urban Development Annual Performance Report (HUD-APR) to COUNTY Human Services Division within thirty (30) days following the end of the HUD project year and enter all ServicePoint data as per Lane County HMIS Policies and Procedures.

- 9. HUD Annual Homeless Assessment Report (AHAR):** CONTRACTORS with a project in the Lane County Housing Inventory Count (HIC) must enter all ServicePoint data as per Lane County HMIS Policies and Procedures and inform COUNTY Human Services Division of any change in the inventory within 72 hours.
- 10. Point in Time (PIT) Count:** CONTRACTORS receiving any/all funds under this agreement must participate in the Point in Time Sheltered and Unsheltered Count.
- 11. Community Development Block Grant:** CONTRACTOR receiving Community Development Block Grant (CDBG) funding must enter all ServicePoint data as per Lane County HMIS Policies and Procedures and complete and confirm data in the CDBG Service Report to COUNTY Human Services Division within thirty (30) days following quarters ending on September 30th, December 31st, March 31st and June 30th. CDBG funded agencies are encouraged to expend CDBG funding in the first three quarters of the grant period. Regardless of the number of billing months, agencies are expected to report full year project activity for which CDBG contributes to the support.
- 12. Other Reports:** CONTRACTOR shall provide other reports as requested by COUNTY.

ANNUAL FINANCIAL REPORT SUBMISSION COVERSHEET

Lane County Health & Human Services
Lane County Department of Children & Families

AGENCY NAME: _____

FISCAL YEAR: _____

Audit

- Audit
- Communication of Internal Control Matters
OR
- Statement that such a communication was not issued
- Communication with Those Charged with Governance
OR
- Statement that such a communication was not issued
- Proof of submission of Single Audit to Federal Audit Clearinghouse
OR
- Certification that a Single Audit is not required
- Management Advisory Letter & Board Response to Management Letter
OR
- Certification that a Management Advisory Letter was not provided
- Revenue recognized from Lane County awards \$ _____

Review Statement

- Review Statement
- Certification that a Single Audit is not required
- Revenue recognized from Lane County awards \$ _____

Compilation Statement

- Compilation Statement – including
 - Identification of Lane County funding in the financial statements (where is it presented and how much has been recognized)
 - Provide the following ratios: current, debt to net assets, A/R turnover, days expenditures in unrestricted net assets
 - Identification of any adjustments the accounting records made as part the compilation statement
- Certification that a Single Audit is not required
- Revenue recognized from Lane County awards \$ _____

Definitions

Management Advisory Letter (advice): The auditor often observes less significant internal control-related matters, as well as opportunities for the client to improve or strengthen operational and administrative controls. Although the auditor is not required to communicate such matters to the client, he or she may decide to do so to better serve the client. As a matter of good practice, most auditors will issue a letter of recommendations to management. Usually, such a letter is separate from, and not combined with, the letter communicating significant deficiencies or material weaknesses, even though combining these matters is not specifically precluded. Communication of other such matters related to internal control may be made either orally or in writing.

Communication of Internal Control Matters: This document requires the auditor to communicate in writing no later than 60 days following the report release date to management and those charged with governance significant deficiencies and material weaknesses in internal control.

Significant Deficiency: A deficiency, or a combination of deficiencies, in internal control over financial reporting that is less severe than a material weakness yet important enough to merit attention by those charged with governance.

Material Weakness: A deficiency, or a combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis.

The Auditor's Communication with Those Charged with Governance (AU-C Section 260):

Recognizing the importance of effective two-way communication in an audit of financial statements, this section provides an overarching framework for the auditor's communication with those charged with governance and identifies some specific matters to be communicated. The auditor should communicate with those charged with governance the following: (a) an overview of the planned scope and timing of the audit; (b) the auditor's views about qualitative aspects of the entity's significant accounting practices, including accounting policies, accounting estimates, and financial statement disclosures; (c) significant difficulties, if any, encountered during the audit; (d) disagreements with management, if any; (e) other findings or issues, if any, arising from the audit that are, in the auditor's professional judgment, significant and relevant to those charged with governance regarding their responsibility to oversee the financial reporting process; (f) uncorrected misstatements accumulated by the auditor and the effect that they, individually or in the aggregate, may have on the opinion in the auditor's report; (g) material, corrected misstatements that were brought to the attention of management as a result of audit procedures; (h) the auditor's views about significant matters that were the subject of management's consultations with other accountants on accounting or auditing matters when the auditor is aware that such consultation has occurred; and, (i) written representations the auditor is requesting.

**Certification That Agency Is
Not Required to Submit A Single Audit**

(to be submitted by any agency not submitting a Single Audit)

I hereby certify that _____(name of agency) did not receive over \$500,000 in federal funds during FY_____ and therefore is not required to receive a Single Audit.

Signature

Date

Name of Agency Official

Certification That Agency Did Not Receive A Communication of Internal Control Matters as A Part of Their Audit

(to be submitted by any agency not submitting a Communication of Internal Control Matters)

I hereby certify that _____(name of agency) did not receive a Communication of Internal Control Matters as a part of the FY_____ audit.

Signature

Date

Name of Agency Official

**Certification That Agency Did Not Receive
A Management Advisory Letter as Part of Their Audit**

(to be submitted by any agency not submitting Management Advisory Letter and Board Response)

I hereby certify that _____(name of agency) did not receive a management advisory letter as a part of the FY_____ audit.

Signature

Date

Name of Agency Official

**Certification That Agency Did Not Receive
A Communication with Those Charged with Governance Letter
As Part of Their Audit**

(to be submitted by any agency not submitting a Communication with Those Charged with Governance Letter and Board Response)

I hereby certify that _____(name of agency) did not receive a Communication with Those Charged with Governance letter as a part of the FY_____ audit.

Signature

Date

Name of Agency Official

Exhibit F

Lane County Standard Provisions

STANDARD COUNTY CONTRACT CONDITIONS

1. CONTRACTOR'S STATUS

- 1.1 Independent Contractor.** The performance of this Contract is at Contractor's sole risk. The service or services to be rendered under this Contract are those of an independent contractor that is not an officer, employee or agent of the County as those terms are used in ORS 30.265. Notwithstanding the Oregon Tort Claims Act or the provisions of any other contract, Contractor is acting as and assumes liability of an independent contractor as to any claims between County and Contractor. Contractor is solely liable for any workers' compensation coverage; social security, unemployment insurance or retirement payments; and federal or state taxes due as a result of payments under this Contract, whether due on account of Contractor or Contractor's subcontractor, if any.
- 1.2 Contractor Not Employee.** Contractor is not currently employed by County and will not be under County's direct control, and will not be eligible for any Federal Social Security, State Workers' Compensation, unemployment insurance or Public Employees Retirement System benefits from this Contract.

2. INSURANCE AND INDEMNIFICATION

- 2.1 Contractor's Required Insurance.** Contractor must provide and maintain all insurance called for in Exhibit H - "Insurance Coverages Required" and must notify Lane County of any material reduction or exhaustion of aggregate limits. Contractor may not commence any work until Contractor furnishes evidence of all required insurance specified by the County, and has obtained the County's approval as to limits, form, and amount. Commercial General Liability and Auto Liability coverage must include an Additional Insured Endorsement that includes completed operations, and which is primary and non-contributory with any other insurance and self-insurance.
- 2.2 Contractor to Maintain Insurance.** Contractor may not cancel, materially change, or not renew insurance coverages. If any policy is canceled before final payment by County to Contractor, Contractor must immediately procure other insurance meeting the requirements. Any insurance bearing on adequacy of performance must be maintained after completion of the Contract for the full guarantee period. If Contractor fails to maintain any required insurance, County reserves the right to procure such insurance and to charge the cost to Contractor.
- 2.3 Workers' Compensation.** Contractor, its subcontractors, and all employers working under this Contract are subject employers under Oregon Workers' Compensation Law, and must comply with ORS 656.017 and provide Workers' Compensation coverage for all their subject workers unless exempt under ORS 656.126.
- 2.4 No Limitation.** Nothing contained in these insurance requirements limits the extent of Contractor's responsibility for payment of damages resulting from Contractor's operation under this Contract.
- 2.5 Contractor's Indemnification.** To the fullest extent permitted by law, and to the extent otherwise provided for in private contracts of insurance, Contractor shall indemnify, defend, and hold harmless the County and its officers, agents, employees, and volunteers from all damages, losses and expenses, including but not limited to attorney fees and costs related to litigation, and to defend all claims, proceedings, lawsuits, and judgments arising out of or resulting from Contractor's performance of or failure to perform under this Contract. The provisions of the foregoing notwithstanding, Contractor will not be required to indemnify County for any liability arising solely out of wrongful acts of County's own officers, agents, or employees.
- 2.5.1** If the Work of this Contract includes work product or any tangible or intangible items delivered to County under the Contract that may be the subject of protection under any state or federal intellectual property law or doctrine, this indemnification shall extend to any claim that the County's use thereof infringes any patent, copyright, trade secret, trade mark, or other proprietary right of any third party.

3. CONTRACTOR'S OBLIGATIONS

- 3.1** Except as provided in the bidding or procurement documents, Contractor must meet the highest standards prevalent in the industry or business most closely involved in providing the goods or services required by this Contract.
- 3.2** Contractor must make all provisions of the Contract applicable to any subcontractor performing work under the contract.
- 3.3** Contractor agrees that County will not be responsible for any losses or unanticipated costs suffered by Contractor as a result of the contractor's failure to obtain full information in advance in regard to all conditions pertaining to the work.
- 3.4** Contractor certifies that Contractor has all necessary licenses, permits, or certificates of registration necessary to perform the Contract and further certifies that all subcontractors will likewise have all necessary licenses, permits or certificates before performing any work. The failure of Contractor to have or maintain such licenses, permits, or certificates is grounds for rejection of a bid or immediate termination of the Contract.
- 3.5** Contractor may not permit any lien or claim to be filed or prosecuted against the County on account of any labor or material furnished, shall assume responsibility for satisfaction of any lien so filed or prosecuted and shall defend against, indemnify and hold the County harmless from any such lien or claim.
- 3.6** Unless otherwise provided by the Contract or law, Contractor agrees that County and its duly authorized representatives may have access to the books, documents, papers, and records of Contractor which are directly pertinent to this Contract

for the purpose of making audits, examinations, excerpts, copies and transcripts. Contractor shall retain and keep accessible such books, documents, papers, and records for a minimum of 6 years after County makes final payment on the Contract. Copies of applicable records must be made available upon request, and payment of copy costs is reimbursable by County.

3.7 Contractor must, in the course of carrying out Contractor's Work, comply at all times with the then-current "Mandatory County Policies for Vendors" published on County's Procurement and Purchasing webpage at: www.lanecountyor.gov/bids.

3.8 Contractor must report to Lane County, either verbally or in writing, if they have reason to believe that a principal, employee, agent, subcontractor, vendor, program applicant and/or program participant may have committed fraud, misrepresentation, falsifying data system input; made a false claim or committed a prohibited act under the Oregon False Claims Act; has committed an ethical violation; has committed criminal or civil violation of laws pertaining to bribery, gratuity, conflict of interest; or has committed other acts of misrepresentation or conspiracy to engage in misrepresentation in connection with this Contract or any moneys paid under this Contract.

Such reporting may be made through one of the following mechanisms:

- **Lane County Fraud, Waste, and Abuse Toll-Free Telephone Hotline**
 - English Speaking 844-290-0008
 - Spanish Speaking 800-216-1288
- **Lane County Fraud, Waste, and Abuse Website**
 - www.lighthouse-services.com/lanecounty
- **Lane County Fraud, Waste, and Abuse Email**
 - reports@lighthouse-services.com
- **Lisa Nichols, Quality & Compliance Manager**
 - Lisa.Nichols@lanecountyor.gov

Contractor will make available the above listed reporting information to all employees, agents, and subcontractors in connection with this Contract. Reporting will not result in retaliation or retribution. The information reported may be the basis of an internal and/or external investigation and will be protected to the extent possible by law. Contractor has the option of remaining anonymous though, by doing so, Lane County's ability to conduct an investigation may be limited.

4. CONTRACTOR'S OBLIGATIONS REQUIRED BY LAW

4.1 Contractor must promptly make payments for labor and material, and pay all contributions due to the Industrial Accident Fund, in accordance with ORS 279B.220 or ORS 279C.505, as applicable.

4.2 Contractor must promptly make payments for any costs described in ORS 279B.230 and 279C.530, as applicable.

4.3 Contractor must comply with requirements related to employed persons' hours of work and payment for overtime work, in accordance with ORS 279B.235, 279C.520, and 279C.540, as applicable.

4.4 If Contractor is a nonresident bidder and the Contract price exceeds \$10,000, Contractor must promptly report to the Department of Revenue on forms provided by that Department the total contract price, terms of payment, length of contract and such other information as the Department may require before the County will make final payment on the contract, in accordance with ORS 279A.120.

4.5 Contractor and any subcontractor must pay to the Department of Revenue all sums withheld from employees, in accordance with ORS 316.167.

4.6 Contractor acknowledges that, pursuant to ORS 210.190, no payment may be made by County on account of this Contract if Contractor is indebted to Lane County in any manner, except for taxes not delinquent. Contractor expressly grants County the right to deduct from any payments due on this Contract the amount necessary to satisfy such indebtedness until any such debt has been satisfied.

4.7 Equal Employment Opportunity. During the performance of this Contract, Contractor will not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, gender identity, or national origin. Contractor will comply with all applicable requirements of 29 CFR Part 471, Appendix A to Subpart A (copy available at: www.dol.gov/olms/regs/compliance/EO13496.htm), and will include the terms of these requirements in all subcontracts entered into under this Contract.

4.8 Americans with Disabilities Act Compliance. During the performance of this Contract, Contractor will comply with all applicable provisions of the Americans with Disabilities Act of 1990, 42 USC Section 12101 et seq. and Section 504 of the Rehabilitation Act of 1973.

4.9 Compliance with Law. In connection with its activities under this Agreement, Contractor must comply with all applicable federal, state, and local laws.

5. MODIFICATION AND TERMINATION

5.1 Modification. No modification or amendment to this Contract will bind either party unless in writing and signed by both parties. In lieu of termination pursuant to subsection 5.2.4 below, County may propose modifications to the Contract sufficient to allow County to perform its obligations.

5.2 Termination:

5.2.1 County certifies that it has sufficient funds currently authorized for expenditure to finance the costs of this Contract for the period within the current budget. However, Contractor understands and agrees that: (1) if County fails to appropriate funds for any successive budget year, the Contract will terminate at the end of the last fiscal year for which payments have been appropriated, and (2) if County's funding, appropriations, or expenditure authority are reduced to a level insufficient, in County's reasonable administrative discretion, to perform its obligations under this Contract, County may terminate this Contract immediately upon notice to Contractor.

5.2.2 Upon termination pursuant to this subsection, County will have no further obligation to Contractor except for payments for amounts earned prior to the termination date.

5.3 Remedies and Default. County may exercise any of the following remedies for Contractor's failure to perform the scope of work or failure to meet established performance standards: reduce or withhold payment; require Contractor to perform, at Contractor's expense, additional work necessary to perform the identified scope of work or meet the established performance standards; or declare a default, terminating the Contract and seeking damages and other relief available under the terms of the Contract or applicable law.

5.4 Force Majeure. Neither County nor Contractor will be held responsible for delay or default due to Force Majeure acts, events or occurrences, including but not limited to fires, riots, wars, and epidemics, unless such delay or default could have been avoided by the exercise of reasonable care, prudence, foresight, and diligence by that party. If delays or nonperformance are caused by a subcontractor of Contractor, Contractor will be liable for such supplies or services if the supplies or services were obtainable from other sources in sufficient time to permit Contractor to meet the required schedule. County may terminate this Contract upon written notice after determining that a delay or default caused by Force Majeure acts, events, or occurrences will reasonably prevent successful performance of the Contract.

6. DISPUTES

6.1 Dispute Resolution. The parties are required to exert every effort to cooperatively resolve any disagreements that may arise under this Contract. This may be done at any management level, including at a level higher than the persons directly responsible for administration of the Contract. In the event that the parties alone are unable to resolve any conflict under this Contract, they are encouraged to resolve their differences through mediation or other cooperative dispute resolution process.

6.2 Attorney Fees, Law, and Forum. In the event an action, suit or proceeding, including appeals, is brought for failure to observe any of the terms of this Contract, each party shall be responsible for that party's own attorney fees, expenses, costs and disbursements for the action, suit, proceeding or appeal. All matters in dispute between the parties to this contract arising from or relating to the Contract, including without limitation alleged tort or violation, are governed by, construed, and enforced in accordance with the laws of the State of Oregon without regard to principles of conflict of laws. This section does not constitute a waiver by County of any form of defense or immunity, whether governmental immunity or otherwise, from any claim or from the jurisdiction of any court. All disputes and litigation arising out of this Contract will be decided by the state or federal courts of Oregon. Venue for all disputes and litigation will be in Lane County, Oregon.

7. MISCELLANEOUS PROVISIONS

7.1 Compliance with Public Records Law. The parties acknowledge that this Contract and all records held by County are public records and subject to public disclosure unless a statutory exemption applies, and agrees that County shall have no liability for the disclosure of any confidential information in response to a public records request where such disclosure is required by court or district attorney order, or by County's good faith interpretation of its statutory requirements.

7.2 Merger. This Contract contains the entire agreement of County and Contractor with respect to the subject matter of this Contract, and supersedes all prior negotiations, agreements and understandings.

7.3 Waiver. Failure of County to enforce any provision of this Contract does not constitute a waiver or relinquishment by County of the right to such performance in the future nor of the right to enforce that or any other provision of this Contract.

7.4 Severability. If any provision of this Contract is declared by a court to be illegal or in conflict with any law, the validity of the remaining terms and provisions are not affected; and the rights and obligations of the parties are to be construed and enforced as if the Contract did not contain the particular provision held to be invalid.

7.5 Survival. The provisions of this Contract with respect to governing law, indemnity, insurance for completed products and operations, warranties, guarantees and, if included in the Contract, attorney fee provisions and limitations, will survive termination or completion of the Contract.

7.6 Time is of the Essence. The parties agree that time is of the essence with respect to all provisions of this Contract.

7.7 Non-Assignment. Contractor may not assign or transfer its interest in this Contract without prior written approval of County.

- 7.8 Binding on Successors and Assigns.** The provisions of this Contract are binding upon and inure to the benefit of the parties to this Contract, their respective successors, and permitted assigns.
- 7.9 No Third-Party Beneficiaries.** County and Contractor are the only parties to this Contract and are the only parties entitled to enforce its terms. Nothing in this Contract gives or may be construed to give or provide any benefit or right to third persons, either directly or indirectly, that is greater than the rights and benefits enjoyed by the general public, unless that party is identified by name in this Contract.
- 7.10 Headings.** The headings and captions in this Contract are for reference and identification purposes only and may not be used to construe the meaning or to interpret the Contract.

Exhibit G

Federal Requirements

Ofc. of Asst. Secy., Comm. Planning, Develop., HUD

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(iv) Reprogramming ESG funds that have not yet been expended from affected activities to other eligible activities;

(v) Suspending disbursement of ESG funds for some or all activities;

(vi) Reducing or terminating the remaining grant of a subrecipient and reallocating those funds to other subrecipients; and

(vii) Making matching contributions before or as draws are made from the recipient's ESG grant.

(2) HUD may change the method of payment to a reimbursement basis.

(3) HUD may suspend payments to the extent HUD deems it necessary to preclude the further expenditure of funds for affected activities.

(4) HUD may remove the recipient from participation in reallocations of funds under subpart D of this part.

(5) HUD may deny matching credit for all or part of the cost of the affected activities and require the recipient to make further matching contributions to make up for the contribution determined to be ineligible.

(6) HUD may require the recipient to reimburse its line of credit in an amount equal to the funds used for the affected activities.

(7) HUD may reduce or terminate the remaining grant of a recipient and reallocate those funds to other recipients in accordance with subpart D of this part.

(8) HUD may condition a future grant.

(9) HUD may take other remedies that are legally available.

(c) *Recipient sanctions.* If the recipient determines that a subrecipient is not complying with an ESG program requirement or its subgrant agreement, the recipient must take appropriate actions, as prescribed for HUD in paragraphs (a) and (b) of this section. If the recipient is a State and funds become available as a result of an action under this section, the recipient must reallocate those funds to other subrecipients as soon as practicable. If the recipient is a unit of general purpose local government of territory, it must either reallocate those funds to other subrecipients or reprogram the funds for other activities to be carried out by the recipient as soon as practicable. The re-

ipient must amend its Consolidated Plan in accordance with its citizenship participation plan if funds become available and are reallocated or reprogrammed under this section. The reallocated or reprogrammed funds must be used by the expenditure deadline in §576.203.

PART 578—CONTINUUM OF CARE PROGRAM

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AUTHORITY: 42 U.S.C. 11371 *et seq.*, 42 U.S.C. 3535(d).

SOURCE: 77 FR 45442, July 31, 2012, unless otherwise noted.

Subpart A—General Provisions

§ 578.1 Purpose and scope.

(a) The Continuum of Care program is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381–11389).

(b) The program is designed to:

- (1) Promote communitywide commitment to the goal of ending homelessness;
- (2) Provide funding for efforts by non-profit providers, States, and local governments to quickly rehouse homeless individuals (including unaccompanied youth) and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;

(3) Promote access to and effective utilization of mainstream programs by homeless individuals and families; and

(4) Optimize self-sufficiency among individuals and families experiencing homelessness.

§ 578.3 Definitions.

As used in this part:

Act means the McKinney-Vento Homeless Assistance Act as amended (42 U.S.C. 11371 *et seq.*).

Annual renewal amount means the amount that a grant can be awarded on an annual basis when renewed. It includes funds only for those eligible activities (operating, supportive services, leasing, rental assistance, HMIS, and administration) that were funded in the original grant (or the original grant as amended), less the unrenewable activities (acquisition, new construction, rehabilitation, and any administrative costs related to these activities).

Applicant means an eligible applicant that has been designated by the Continuum of Care to apply for assistance under this part on behalf of that Continuum.

At risk of homelessness. (1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid

by charitable organizations or by federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Centralized or coordinated assessment system means a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.

Chronically homeless. (1) An individual who:

(i) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

(ii) Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and

(iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Collaborative applicant means the eligible applicant that has been designated by the Continuum of Care to apply for a grant for Continuum of Care planning funds under this part on behalf of the Continuum.

Consolidated plan means the HUD-approved plan developed in accordance with 24 CFR 91.

Continuum of Care and Continuum means the group organized to carry out the responsibilities required under this part and that is composed of representatives of organizations, including non-profit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school

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districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.

Developmental disability means, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002):

(1) A severe, chronic disability of an individual that—

(i) Is attributable to a mental or physical impairment or combination of mental and physical impairments;

(ii) Is manifested before the individual attains age 22;

(iii) Is likely to continue indefinitely;

(iv) Results in substantial functional limitations in three or more of the following areas of major life activity:

(A) Self-care;

(B) Receptive and expressive language;

(C) Learning;

(D) Mobility;

(E) Self-direction;

(F) Capacity for independent living;

(G) Economic self-sufficiency.

(v) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

(2) An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of the definition of "developmental disability" in this section if the individual, without services and supports, has a high probability of meeting these criteria later in life.

Eligible applicant means a private nonprofit organization, State, local government, or instrumentality of State and local government.

Emergency shelter is defined in 24 CFR part 576.

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Emergency Solutions Grants (ESG) means the grants provided under 24 CFR part 576.

Fair Market Rent (FMR) means the Fair Market Rents published in the FEDERAL REGISTER annually by HUD.

High-performing community (HPC) means a Continuum of Care that meets the standards in subpart E of this part and has been designated as a high-performing community by HUD.

Homeless means:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637

of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, *e.g.*, family, friends, and faith-based or other social networks, to obtain other permanent housing.

Homeless Management Information System (HMIS) means the information system designated by the Continuum of

Care to comply with the HMIS requirements prescribed by HUD.

HMIS Lead means the entity designated by the Continuum of Care in accordance with this part to operate the Continuum's HMIS on its behalf.

Permanent housing means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid rehousing. To be permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.

Permanent supportive housing means permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Point-in-time count means a count of sheltered and unsheltered homeless persons carried out on one night in the last 10 calendar days of January or at such other time as required by HUD.

Private nonprofit organization means an organization:

(1) No part of the net earnings of which inure to the benefit of any member, founder, contributor, or individual;

(2) That has a voluntary board;

(3) That has a functioning accounting system that is operated in accordance with generally accepted accounting principles, or has designated a fiscal agent that will maintain a functioning accounting system for the organization in accordance with generally accepted accounting principles; and

(4) That practices nondiscrimination in the provision of assistance.

A private nonprofit organization does not include governmental organizations, such as public housing agencies.

Program participant means an individual (including an unaccompanied youth) or family who is assisted with Continuum of Care program funds.

Project means a group of eligible activities, such as HMIS costs, identified as a project in an application to HUD for Continuum of Care funds and includes a structure (or structures) that is (are) acquired, rehabilitated, constructed, or leased with assistance provided under this part or with respect to which HUD provides rental assistance

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or annual payments for operating costs, or supportive services under this subtitle.

Recipient means an applicant that signs a grant agreement with HUD.

Safe haven means, for the purpose of defining chronically homeless, supportive housing that meets the following:

- (1) Serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services;
- (2) Provides 24-hour residence for eligible persons for an unspecified period;
- (3) Has an overnight capacity limited to 25 or fewer persons; and
- (4) Provides low-demand services and referrals for the residents.

State means each of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, American Samoa, Guam, the Commonwealth of the Northern Marianas, and the Virgin Islands.

Subrecipient means a private nonprofit organization, State, local government, or instrumentality of State or local government that receives a subgrant from the recipient to carry out a project.

Transitional housing means housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary. The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended.

Unified Funding Agency (UFA) means an eligible applicant selected by the Continuum of Care to apply for a grant for the entire Continuum, which has the capacity to carry out the duties in § 578.11(b), which is approved by HUD and to which HUD awards a grant.

Victim service provider means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic vio-

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lence transitional housing programs, and other programs.

Subpart B—Establishing and Operating a Continuum of Care

§ 578.5 Establishing the Continuum of Care.

(a) *The Continuum of Care.* Representatives from relevant organizations within a geographic area shall establish a Continuum of Care for the geographic area to carry out the duties of this part. Relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals.

(b) *The board.* The Continuum of Care must establish a board to act on behalf of the Continuum using the process established as a requirement by § 578.7(a)(3) and must comply with the conflict-of-interest requirements at § 578.95(b). The board must:

- (1) Be representative of the relevant organizations and of projects serving homeless subpopulations; and
- (2) Include at least one homeless or formerly homeless individual.

(c) *Transition.* Continuums of Care shall have 2 years after August 30, 2012 to comply with the requirements of paragraph (b) of this section.

§ 578.7 Responsibilities of the Continuum of Care.

(a) *Operate the Continuum of Care.* The Continuum of Care must:

- (1) Hold meetings of the full membership, with published agendas, at least semi-annually;
- (2) Make an invitation for new members to join publicly available within the geographic area at least annually;
- (3) Adopt and follow a written process to select a board to act on behalf of the Continuum of Care. The process must be reviewed, updated, and approved by the Continuum at least once every 5 years;

(4) Appoint additional committees, subcommittees, or workgroups;

(5) In consultation with the collaborative applicant and the HMIS Lead, develop, follow, and update annually a governance charter, which will include all procedures and policies needed to comply with subpart B of this part and with HMIS requirements as prescribed by HUD; and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board;

(6) Consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers;

(7) Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report to HUD;

(8) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and operate either a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. The Continuum must develop a specific policy to guide the operation of the centralized or coordinated assessment system on how its 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. This system must comply with any requirements established by HUD by Notice.

(9) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

(i) Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;

(ii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;

(iii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;

(iv) Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;

(v) Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and

(vi) Where the Continuum is designated a high-performing community, as described in subpart G of this part, policies and procedures set forth in 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and (e)(3)(ix).

(b) *Designating and operating an HMIS.* The Continuum of Care must:

(1) Designate a single Homeless Management Information System (HMIS) for the geographic area;

(2) Designate an eligible applicant to manage the Continuum's HMIS, which will be known as the HMIS Lead;

(3) Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS.

(4) Ensure consistent participation of recipients and subrecipients in the HMIS; and

(5) Ensure the HMIS is administered in compliance with requirements prescribed by HUD.

(c) *Continuum of Care planning.* The Continuum must develop a plan that includes:

(1) Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system encompasses the following:

(i) Outreach, engagement, and assessment;

(ii) Shelter, housing, and supportive services;

(iii) Prevention strategies.

(2) Planning for and conducting, at least biennially, a point-in-time count of homeless persons within the geographic area that meets the following requirements:

(i) Homeless persons who are living in a place not designed or ordinarily

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used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons.

(ii) Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons.

(iii) Other requirements established by HUD by Notice.

(3) Conducting an annual gaps analysis of the homeless needs and services available within the geographic area;

(4) Providing information required to complete the Consolidated Plan(s) within the Continuum's geographic area;

(5) Consulting with State and local government Emergency Solutions Grants program recipients within the Continuum's geographic area on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of Emergency Solutions Grants program recipients and subrecipients.

§ 578.9 Preparing an application for funds.

(a) The Continuum must:

(1) Design, operate, and follow a collaborative process for the development of applications and approve the submission of applications in response to a NOFA published by HUD under § 578.19 of this subpart;

(2) Establish priorities for funding projects in the geographic area;

(3) Determine if one application for funding will be submitted for all projects within the geographic area or if more than one application will be submitted for the projects within the geographic area;

(i) If more than one application will be submitted, designate an eligible applicant to be the collaborative applicant that will collect and combine the required application information from all applicants and for all projects within the geographic area that the Continuum has selected funding. The collaborative applicant will also apply for Continuum of Care planning activities. If the Continuum is an eligible applicant, it may designate itself;

(ii) If only one application will be submitted, that applicant will be the collaborative applicant and will collect and combine the required application

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information from all projects within the geographic area that the Continuum has selected for funding and apply for Continuum of Care planning activities;

(b) The Continuum retains all of its responsibilities, even if it designates one or more eligible applicants other than itself to apply for funds on behalf of the Continuum. This includes approving the Continuum of Care application.

§ 578.11 Unified Funding Agency.

(a) *Becoming a Unified Funding Agency.* To become designated as the Unified Funding Agency (UFA) for a Continuum, a collaborative applicant must be selected by the Continuum to apply to HUD to be designated as the UFA for the Continuum.

(b) *Criteria for designating a UFA.* HUD will consider these criteria when deciding whether to designate a collaborative applicant a UFA:

(1) The Continuum of Care it represents meets the requirements in § 578.7;

(2) The collaborative applicant has financial management systems that meet the standards set forth in 24 CFR 84.21 (for nonprofit organizations) and 24 CFR 85.20 (for States);

(3) The collaborative applicant demonstrates the ability to monitor subrecipients; and

(4) Such other criteria as HUD may establish by NOFA.

(c) *Requirements.* HUD-designated UFAs shall:

(1) Apply to HUD for funding for all of the projects within the geographic area and enter into a grant agreement with HUD for the entire geographic area.

(2) Enter into legally binding agreements with subrecipients, and receive and distribute funds to subrecipients for all projects within the geographic area.

(3) Require subrecipients to establish fiscal control and accounting procedures as necessary to assure the proper disbursement of and accounting for federal funds in accordance with the requirements of 24 CFR parts 84 and 85 and corresponding OMB circulars.

(4) Obtain approval of any proposed grant agreement amendments by the

Continuum of Care before submitting a request for an amendment to HUD.

§ 578.13 Remedial action.

(a) If HUD finds that the Continuum of Care for a geographic area does not meet the requirements of the Act or its implementing regulations, or that there is no Continuum for a geographic area, HUD may take remedial action to ensure fair distribution of grant funds within the geographic area. Such measures may include:

- (1) Designating a replacement Continuum of Care for the geographic area;
- (2) Designating a replacement collaborative applicant for the Continuum's geographic area; and
- (3) Accepting applications from other eligible applicants within the Continuum's geographic area.

(b) HUD must provide a 30-day prior written notice to the Continuum and its collaborative applicant and give them an opportunity to respond.

Subpart C—Application and Grant Award Process

§ 578.15 Eligible applicants.

(a) *Who may apply.* Nonprofit organizations, States, local governments, and instrumentalities of State or local governments are eligible to apply for grants.

(b) *Designation by the Continuum of Care.* Eligible applicant(s) must have been designated by the Continuum of Care to submit an application for grant funds under this part. The designation must state whether the Continuum is designating more than one applicant to apply for funds and, if it is, which applicant is being designated as the collaborative applicant. If the Continuum is designating only one applicant to apply for funds, the Continuum must designate that applicant to be the collaborative applicant.

(c) *Exclusion.* For-profit entities are not eligible to apply for grants or to be subrecipients of grant funds.

§ 578.17 Overview of application and grant award process.

(a) *Formula.* (1) After enactment of the annual appropriations act for each fiscal year, and issuance of the NOFA, HUD will publish, on its Web site, the

Preliminary Pro Rata Need (PPRN) assigned to metropolitan cities, urban counties, and all other counties.

(2) HUD will apply the formula used to determine PPRN established in paragraph (a)(3) of this section, to the amount of funds being made available under the NOFA. That amount is calculated by:

(i) Determining the total amount for the Continuum of Care competition in accordance with section 413 of the Act or as otherwise directed by the annual appropriations act;

(ii) From the amount in paragraph (a)(2)(i) of this section, deducting the amount published in the NOFA as being set aside to provide a bonus to geographic areas for activities that have proven to be effective in reducing homelessness generally or for specific subpopulations listed in the NOFA or achieving homeless prevention and independent living goals established in the NOFA and to meet policy priorities set in the NOFA; and

(iii) Deducting the amount of funding necessary for Continuum of Care planning activities and UFA costs.

(3) PPRN is calculated on the amount determined under paragraph (a)(2) of this section by using the following formula:

(i) Two percent will be allocated among the four insular areas (American Samoa, Guam, the Commonwealth of the Northern Marianas, and the Virgin Islands) on the basis of the ratio of the population of each insular area to the population of all insular areas.

(ii) Seventy-five percent of the remaining amount will be allocated, using the Community Development Block Grant (CDBG) formula, to metropolitan cities and urban counties that have been funded under either the Emergency Shelter Grants or Emergency Solutions Grants programs in any one year since 2004.

(iii) The amount remaining after the allocation under paragraphs (a)(1) and (2) of this section will be allocated, using the CDBG formula, to metropolitan cities and urban counties that have not been funded under the Emergency Solutions Grants program in any year since 2004 and all other counties in the United States and Puerto Rico.

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(4) If the calculation in paragraph (a)(2) of this section results in an amount less than the amount required to renew all projects eligible for renewal in that year for at least one year, after making adjustments proportional to increases in fair market rents for the geographic area for leasing, operating, and rental assistance for permanent housing, HUD will reduce, proportionately, the total amount required to renew all projects eligible for renewal in that year for at least one year, for each Continuum of Care. HUD will publish, via the NOFA, the total dollar amount that every Continuum will be required to deduct from renewal projects Continuum-wide.

(b) *Calculating a Continuum of Care's maximum award amount.* (1) *Establish the PPRN amount.* First, HUD will total the PPRN amounts for each metropolitan city, urban county, other county, and insular area claimed by the Continuum as part of its geographic area, excluding any counties applying for or receiving funding from the Rural Housing Stability Assistance program under 24 CFR part 579.

(2) *Establishing renewal demand.* Next, HUD will determine the renewal demand within the Continuum's geographic area. Renewal demand is the sum of the annual renewal amounts of all projects within the Continuum eligible to apply for renewal in that fiscal year's competition, before any adjustments to rental assistance, leasing, and operating line items based on FMR changes.

(3) *Establishing FPRN.* The higher of PPRN or renewal demand for the Continuum of Care is the FPRN, which is the base for the maximum award amount for the Continuum.

(4) *Establishing the maximum award amount.* The maximum award amount for the Continuum is the FPRN amount plus any additional eligible amounts for Continuum planning; UFA costs; adjustments to leasing, operating and rental assistance line items based on changes to FMR; and available bonuses.

§ 578.19 Application process.

(a) *Notice of Funding Availability.* After enactment of the annual appropriations act for the fiscal year, HUD

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will issue a NOFA in accordance with the requirements of 24 CFR part 4.

(b) *Applications.* All applications to HUD, including applications for grant funds and requests for designation as a UFA or HPC, must be submitted at such time and in such manner as HUD may require, and contain such information as HUD determines necessary. At a minimum, an application for grant funds must contain a list of the projects for which it is applying for funds; a description of the projects; a list of the projects that will be carried out by subrecipients and the names of the subrecipients; a description of the subpopulations of homeless or at risk of homelessness to be served by projects; the number of units to be provided and/or the number of persons to be served by each project; a budget request by project; and reasonable assurances that the applicant, or the subrecipient, will own or have control of a site for the proposed project not later than the expiration of the 12-month period beginning upon notification of an award for grant assistance.

§ 578.21 Awarding funds.

(a) *Selection.* HUD will review applications in accordance with the guidelines and procedures provided in the NOFA and will award funds to recipients through a national competition based on selection criteria as defined in section 427 of the Act.

(b) *Announcement of awards.* HUD will announce awards and notify selected applicants of any conditions imposed on awards. Conditions must be satisfied before HUD will execute a grant agreement with the applicant.

(c) *Satisfying conditions.* HUD will withdraw an award if the applicant does not satisfy all conditions imposed on it. Correcting all issues and conditions attached to an award must be completed within the time frame established in the NOFA. Proof of site control, match, environmental review, and the documentation of financial feasibility must be completed within 12 months of the announcement of the award, or 24 months in the case of funds for acquisition, rehabilitation, or new construction. The 12-month deadline may be extended by HUD for up to 12 additional months upon a showing of

compelling reasons for delay due to factors beyond the control of the recipient or subrecipient.

§ 578.23 Executing grant agreements.

(a) *Deadline.* No later than 45 days from the date when all conditions are satisfied, the recipient and HUD must execute the grant agreement.

(b) *Grant agreements.* (1) *Multiple applicants for one Continuum.* If a Continuum designates more than one applicant for the geographic area, HUD will enter into a grant agreement with each designated applicant for which an award is announced.

(2) *One applicant for a Continuum.* If a Continuum designates only one applicant for the geographic area, after awarding funds, HUD may enter into a grant agreement with that applicant for new awards, if any, and one grant agreement for renewals, Continuum of Care planning, and UFA costs, if any. These two grants will cover the entire geographic area. A default by the recipient under one of those grant agreements will also be a default under the other.

(3) *Unified Funding Agencies.* If a Continuum is a UFA that HUD has approved, then HUD will enter into one grant agreement with the UFA for new awards, if any, and one grant agreement for renewals, Continuum of Care planning and UFA costs, if any. These two grants will cover the entire geographic area. A default by the UFA under one of those grant agreements will also be a default under the other.

(c) *Required agreements.* Recipients will be required to sign a grant agreement in which the recipient agrees:

(1) To ensure the operation of the project(s) in accordance with the provisions of the McKinney-Veto Act and all requirements under 24 CFR part 578;

(2) To monitor and report the progress of the project(s) to the Continuum of Care and HUD;

(3) To ensure, to the maximum extent practicable, that individuals and families experiencing homelessness are involved, through employment, provision of volunteer services, or otherwise, in constructing, rehabilitating, maintaining, and operating facilities for the project and in providing supportive services for the project;

(4) To require certification from all subrecipients that:

(i) Subrecipients will maintain the confidentiality of records pertaining to any individual or family that was provided family violence prevention or treatment services through the project;

(ii) The address or location of any family violence project assisted under this part will not be made public, except with written authorization of the person responsible for the operation of such project;

(iii) Subrecipients will establish policies and practices that are consistent with, and do not restrict, the exercise of rights provided by subtitle B of title VII of the Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness;

(iv) In the case of projects that provide housing or services to families, that subrecipients will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act;

(v) The subrecipient, its officers, and employees are not debarred or suspended from doing business with the Federal Government; and

(vi) Subrecipients will provide information, such as data and reports, as required by HUD; and

(5) To establish such fiscal control and accounting procedures as may be necessary to assure the proper disbursement of, and accounting for grant funds in order to ensure that all financial transactions are conducted, and records maintained in accordance with generally accepted accounting principles, if the recipient is a UFA;

(6) To monitor subrecipient match and report on match to HUD;

(7) To take the educational needs of children into account when families are placed in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education;

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(8) To monitor subrecipients at least annually;

(9) To use the centralized or coordinated assessment system established by the Continuum of Care as set forth in § 578.7(a)(8). A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system, provided that victim service providers in the area use a centralized or coordinated assessment system that meets HUD's minimum requirements and the victim service provider uses that system instead;

(10) To follow the written standards for providing Continuum of Care assistance developed by the Continuum of Care, including the minimum requirements set forth in § 578.7(a)(9);

(11) Enter into subrecipient agreements requiring subrecipients to operate the project(s) in accordance with the provisions of this Act and all requirements under 24 CFR part 578; and

(12) To comply with such other terms and conditions as HUD may establish by NOFA.

§ 578.25 Site control.

(a) *In general.* When grant funds will be used for acquisition, rehabilitation, new construction, operating costs, or to provide supportive services, the recipient or subrecipient must demonstrate that it has site control within the time frame established in section § 578.21 before HUD will execute a grant agreement. This requirement does not apply to funds used for housing that will eventually be owned or controlled by the individuals or families served or for supportive services provided at sites not operated by the recipient or subrecipient.

(b) *Evidence.* Acceptable evidence of site control is a deed or lease. If grant funds will be used for acquisition, acceptable evidence of site control will be a purchase agreement. The owner, lessee, and purchaser shown on these documents must be the selected applicant or intended subrecipient identified in the application for assistance.

(c) *Tax credit projects.* (1) Applicants that plan to use the low-income housing tax credit authorized under 26 U.S.C. 42 to finance a project must prove to HUD's satisfaction that the

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applicant or subrecipient identified in the application is in control of the limited partnership or limited liability corporation that has a deed or lease for the project site.

(i) To have control of the limited partnership, the applicant or subrecipient must be the general partner of the limited partnership or have a 51 percent controlling interest in that general partner.

(ii) To have control of the limited liability company, the applicant or subrecipient must be the sole managing member.

(2) If grant funds are to be used for acquisition, rehabilitation, or new construction, the recipient or subrecipient must maintain control of the partnership or corporation and must ensure that the project is operated in compliance with law and regulation for 15 years from the date of initial occupancy or initial service provision. The partnership or corporation must own the project site throughout the 15-year period. If grant funds were not used for acquisition, rehabilitation, or new construction, then the recipient or subrecipient must maintain control for the term of the grant agreement and any renewals thereof.

§ 578.27 Consolidated plan.

(a) *States or units of general local government.* An applicant that is a State or a unit of general local government must have a HUD-approved, complete or abbreviated, consolidated plan in accordance with 24 CFR part 91. The applicant must submit a certification that the application for funding is consistent with the HUD-approved consolidated plan(s) for the jurisdiction(s) in which the proposed project will be located. Funded applicants must certify in a grant agreement that they are following the HUD-approved consolidated plan.

(b) *Other applicants.* Applicants that are not States or units of general local government must submit a certification by the jurisdiction(s) in which the proposed project will be located that the applicant's application for funding is consistent with the jurisdiction's HUD-approved consolidated plan. The certification must be made by the unit of general local government or the

State, in accordance with the consistency certification provisions under 24 CFR part 91, subpart F. If the jurisdiction refuses to provide a certification of consistency, the applicant may appeal to HUD under § 578.35.

(c) *Timing of consolidated plan certification submissions.* The required certification that the application for funding is consistent with the HUD-approved consolidated plan must be submitted by the funding application submission deadline announced in the NOFA.

§ 578.29 Subsidy layering.

HUD may provide assistance under this program only in accordance with HUD subsidy layering requirements in section 102 of the Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545) and 24 CFR part 4, subpart A. An applicant must submit information in its application on other sources of governmental assistance that the applicant has received, or reasonably expects to receive, for a proposed project or activities. HUD's review of this information is intended to prevent excessive public assistance for proposed project or activities by combining (layering) assistance under this program with other governmental housing assistance from federal, State, or local agencies, including assistance such as tax concessions or tax credits.

§ 578.31 Environmental review.

(a) Activities under this part are subject to environmental review by HUD under 24 CFR part 50. The recipient or subrecipient shall supply all available, relevant information necessary for HUD to perform, for each property, any environmental review required by 24 CFR part 50. The recipient or subrecipient must carry out mitigating measures required by HUD or select an alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement.

(b) The recipient or subrecipient, its project partners, and their contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this part, or commit or expend HUD or local funds for such eligible activities under this part, until HUD has per-

formed an environmental review under 24 CFR part 50 and the recipient or subrecipient has received HUD approval of the property.

§ 578.33 Renewals.

(a) *In general.* Awards made under this part and title IV of the Act, as in effect before August 30, 2012 (the Supportive Housing Program and the Shelter Plus Care program), may be renewed to continue ongoing leasing, operations, supportive services, rental assistance, HMIS, and administration beyond the initial funding period. To be considered for funding, recipients must submit a request in a form specified by HUD, must meet the requirements of this part, and must submit the request within the time frame established by HUD.

(b) *Length of renewal.* HUD may award up to 3 years of funds for supportive services, leasing, HMIS, and operating costs. Renewals of tenant-based and sponsor-based rental assistance may be for up to one year of rental assistance. Renewals of project-based rental assistance may be for up to 15 years of rental assistance, subject to availability of annual appropriations.

(c) *Assistance available.* (1) Assistance during each year of a renewal period may be for:

(i) Up to 100 percent of the amount for supportive services and HMIS costs in the final year of the prior funding period;

(ii) Up to 100 percent of the amount for leasing and operating in the final year of the prior funding period adjusted in proportion to changes in the FMR for the geographic area; and

(iii) For rental assistance, up to 100 percent of the result of multiplying the number and unit size(s) in the grant agreement by the number of months in the renewal grant term and the applicable FMR.

(d) *Review criteria.* (1) Awards made under title IV of the Act, as in effect before August 30, 2012 are eligible for renewal in the Continuum of Care program even if the awardees would not be eligible for a new grant under the program, so long as they continue to serve the same population and the same number of persons or units in the same type of housing as identified in their

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most recently amended grant agreement signed before August 30, 2012. Grants will be renewed if HUD receives a certification from the Continuum that there is a demonstrated need for the project, and HUD finds that the project complied with program requirements applicable before August 30, 2012. For purposes of meeting the requirements of this part, a project will continue to be administered in accordance with 24 CFR 582.330, if the project received funding under the Shelter Plus Care program, or 24 CFR 583.325, if the project received funding under the Supportive Housing Program.

(2) *Renewal of awards made after August 30, 2012.* Review criteria for competitively awarded renewals made after August 30, 2012 will be described in the NOFA.

(e) *Unsuccessful projects.* HUD may renew a project that was eligible for renewal in the competition and was part of an application that was not funded despite having been submitted on time, in the manner required by HUD, and containing the information required by HUD, upon a finding that the project meets the purposes of the Continuum of Care program. The renewal will not exceed more than one year and will be under such conditions as HUD deems appropriate.

(f) *Annual Performance Report condition.* HUD may terminate the renewal of any grant and require the recipient to repay the renewal grant if:

(1) The recipient fails to timely submit a HUD Annual Performance Report (APR) for the grant year immediately prior to renewal; or

(2) The recipient submits an APR that HUD deems unacceptable or shows noncompliance with the requirements of the grant and this part.

§ 578.35 Appeal.

(a) *In general.* Failure to follow the procedures or meet the deadlines established in this section will result in denial of the appeal.

(b) *Solo applicants.* (1) *Who may appeal.* Nonprofits, States, and local governments, and instrumentalities of State or local governments that attempted to participate in the Continuum of Care planning process in the geographic area in which they operate,

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that believe they were denied the right to participate in a reasonable manner, and that submitted a solo application for funding by the application deadline established in the NOFA, may appeal the decision of the Continuum to HUD.

(2) *Notice of intent to appeal.* The solo applicant must submit a written notice of intent to appeal, with a copy to the Continuum, with their funding application.

(3) *Deadline for submitting proof.* No later than 30 days after the date that HUD announces the awards, the solo applicant shall submit in writing, with a copy to the Continuum, all relevant evidence supporting its claim, in such manner as HUD may require by Notice.

(4) *Response from the Continuum of Care.* The Continuum shall have 30 days from the date of its receipt of the solo applicant's evidence to respond to HUD in writing and in such manner as HUD may require, with a copy to the solo applicant.

(5) *Decision.* HUD will notify the solo applicant and the Continuum of its decision within 60 days of receipt of the Continuum's response.

(6) *Funding.* If HUD finds that the solo applicant was not permitted to participate in the Continuum of Care planning process in a reasonable manner, then HUD may award a grant to the solo applicant when funds next become available and may direct the Continuum of Care to take remedial steps to ensure reasonable participation in the future. HUD may also reduce the award to the Continuum's applicant(s).

(c) *Denied or decreased funding.* (1) *Who may appeal.* Eligible applicants that are denied funds by HUD, or that requested more funds than HUD awarded to them, may appeal the award by filing a written appeal, in such form and manner as HUD may require by Notice, within 45 days of the date of HUD's announcement of the award.

(2) *Decision.* HUD will notify the applicant of its decision on the appeal within 60 days of HUD's receipt of the written appeal. HUD will reverse a decision only when the applicant can show that HUD error caused the denial or decrease.

(3) *Funding.* Awards and increases to awards made upon appeal will be made from next available funds.

(d) *Competing Continuums of Care.* (1) *In general.* If more than one Continuum of Care claims the same geographic area, HUD will award funds to the Continuum applicant(s) whose application(s) has the highest total score. No projects will be funded from the lower scoring Continuum. No projects that are submitted in two or more competing Continuum of Care applications will be funded.

(2) *Who may appeal.* The designated applicant(s) for the lower scoring Continuum may appeal HUD's decision to fund the application(s) from the competing Continuum by filing a written appeal, in such form and manner as HUD may require by Notice, within 45 days of the date of HUD's announcement of the award.

(3) *Decision.* HUD will notify the applicant(s) of its decision on the appeal within 60 days of the date of HUD's receipt of the written appeal. HUD will reverse a decision only upon a showing by the applicant that HUD error caused the denial.

(e) *Consolidated plan certification.* (1) *In general.* An applicant may appeal to HUD a jurisdiction's refusal to provide a certification of consistency with the Consolidated Plan.

(2) *Procedure.* The applicant must submit a written appeal with its application to HUD and send a copy of the appeal to the jurisdiction that denied the certification of consistency. The appeal must include, at a minimum:

(i) A copy of the applicant's request to the jurisdiction for the certification of consistency with the Consolidated Plan;

(ii) A copy of the jurisdiction's response stating the reasons for denial, including the reasons the proposed project is not consistent with the jurisdiction's Consolidated Plan in accordance with 24 CFR 91.500(c); and

(iii) A statement of the reasons why the applicant believes its project is consistent with the jurisdiction's Consolidated Plan.

(3) *Jurisdiction response.* The jurisdiction that refused to provide the certification of consistency with the jurisdiction's Consolidated Plan shall have 10

days after receipt of a copy of the appeal to submit a written explanation of the reasons originally given for refusing to provide the certification and a written rebuttal to any claims made by the applicant in the appeal.

(4) *HUD review.* (i) HUD will issue its decision within 45 days of the date of HUD's receipt of the jurisdiction's response. As part of its review, HUD will consider:

(A) Whether the applicant submitted the request to the appropriate political jurisdiction; and

(B) The reasonableness of the jurisdiction's refusal to provide the certificate.

(ii) If the jurisdiction did not provide written reasons for refusal, including the reasons why the project is not consistent with the jurisdiction's Consolidated Plan in its initial response to the applicant's request for a certification, HUD will find for the applicant without further inquiry or response from the political jurisdiction.

Subpart D—Program Components and Eligible Costs

§ 578.37 Program components and uses of assistance.

(a) Continuum of Care funds may be used to pay for the eligible costs listed in § 578.39 through § 578.63 when used to establish and operate projects under five program components: permanent housing; transitional housing; supportive services only; HMIS; and, in some cases, homelessness prevention. Although grant funds may be used by recipients and subrecipients in all components for the eligible costs of contributing data to the HMIS designated by the Continuum of Care, only HMIS Leads may use grant funds for an HMIS component. Administrative costs are eligible for all components. All components are subject to the restrictions on combining funds for certain eligible activities in a single project found in § 578.87(c). The eligible program components are:

(1) *Permanent housing (PH).* Permanent housing is community-based housing, the purpose of which is to provide housing without a designated length of

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stay. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services. PH includes:

(i) *Permanent supportive housing for persons with disabilities (PSH)*. PSH can only provide assistance to individuals with disabilities and families in which one adult or child has a disability. Supportive services designed to meet the needs of the program participants must be made available to the program participants.

(ii) *Rapid rehousing*. Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing. When providing short-term and/or medium-term rental assistance to program participants, the rental assistance is subject to § 578.51(a)(1), but not § 578.51(a)(1)(i) and (ii); (a)(2); (c) and (f) through (i); and (1)(1). These projects:

(A) Must follow the written policies and procedures established by the Continuum of Care for determining and prioritizing which eligible families and individuals will receive rapid rehousing assistance, as well as the amount or percentage of rent that each program participant must pay.

(B) May set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, and/or a maximum number of times that a program participant may receive rental assistance. The recipient or subrecipient may also require program participants to share in the costs of rent. For the purposes of calculating rent for rapid rehousing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

(C) Limit rental assistance to no more than 24 months to a household.

(D) May provide supportive services for no longer than 6 months after rental assistance stops.

(E) Must re-evaluate, not less than once annually, that the program participant lacks sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing. The recipient or subrecipient may require each program participant receiving assistance to notify the recipient or subrecipient of changes in the program participant's income or other circumstances (*e.g.*, changes in household composition) that affect the program participant's need for assistance. When notified of a relevant change, the recipient or subrecipient must reevaluate the program participant's eligibility and the amount and types of assistance that the program participant needs.

(F) Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) prohibits the recipient carrying out the project from making its housing conditional on the participant's acceptance of services.

(2) *Transitional Housing (TH)*. Transitional housing facilitates the movement of homeless individuals and families to PH within 24 months of entering TH. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services.

(3) *Supportive Service Only (SSO)*. Funds may be used for acquisition, rehabilitation, relocation costs, or leasing of a facility from which supportive services will be provided, and supportive services in order to provide supportive services to unsheltered and sheltered homeless persons for whom the recipient or subrecipient is not providing housing or housing assistance. SSO includes street outreach.

(4) *HMIS*. Funds may be used by HMIS Leads to lease a structure in which the HMIS is operated or as operating funds to operate a structure in which the HMIS is operated, and for other costs eligible in § 578.57.

(5) *Homelessness prevention*. Funds may be used by recipients in Continuums of Care-designated high-performing communities for housing relocation and stabilization services, and short- and/or medium-term rental assistance, as described in 24 CFR 576.105 and 24 CFR 576.106, that are necessary to prevent an individual or family from becoming homeless.

(b) *Uses of assistance*. Funds are available to pay for the eligible costs listed in § 578.39 through § 578.63 when used to:

(1) Establish new housing or new facilities to provide supportive services;

(2) Expand existing housing and facilities in order to increase the number of homeless persons served;

(3) Bring existing housing and facilities into compliance with State and local government health and safety standards, as described in § 578.87;

(4) Preserve existing permanent housing and facilities that provide supportive services;

(5) Provide supportive services for residents of supportive housing or for homeless persons not residing in supportive housing;

(6) Continue funding permanent housing when the recipient has received funding under this part for leasing, supportive services, operating costs, or rental assistance;

(7) Establish and operate an HMIS or comparable database; and

(8) Establish and carry out a Continuum of Care planning process and operate a Continuum of Care.

(c) *Multiple purposes*. Structures used to provide housing, supportive housing, supportive services, or as a facility for HMIS activities may also be used for other purposes. However, assistance under this part will be available only in proportion to the use of the structure for supportive housing or supportive services. If eligible and ineligible activities are carried out in separate portions of the same structure or in separate structures, grant funds may not be used to pay for more than the actual cost of acquisition, con-

struction, or rehabilitation of the portion of the structure or structures used for eligible activities. If eligible and ineligible activities are carried out in the same structure, the costs will be prorated based on the amount of time that the space is used for eligible versus ineligible activities.

§ 578.39 Continuum of Care planning activities.

(a) *In general*. Collaborative applicants may use up to 3 percent of their FPRN, or a maximum amount to be established by the NOFA, for costs of:

(1) Designing and carrying out a collaborative process for the development of an application to HUD;

(2) Evaluating the outcomes of projects for which funds are awarded in the geographic area under the Continuum of Care and the Emergency Solutions Grants programs; and

(3) Participating in the consolidated plan(s) for the geographic area(s).

(b) *Continuum of Care planning activities*. Eligible planning costs include the costs of:

(1) Developing a communitywide or regionwide process involving the coordination of nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve veterans, and homeless and formerly homeless individuals;

(2) Determining the geographic area that the Continuum of Care will serve;

(3) Developing a Continuum of Care system;

(4) Evaluating the outcomes of projects for which funds are awarded in the geographic area, including the Emergency Solutions Grants program;

(5) Participating in the consolidated plan(s) of the jurisdiction(s) in the geographic area; and

(6) Preparing and submitting an application to HUD on behalf of the entire Continuum of Care membership, including conducting a sheltered and unsheltered point-in-time count and other data collection as required by HUD.

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(c) *Monitoring costs.* The costs of monitoring recipients and subrecipients and enforcing compliance with program requirements are eligible.

§ 578.41 Unified Funding Agency costs.

(a) *In general.* UFAs may use up to 3 percent of their FPRN, or a maximum amount to be established by the NOFA, whichever is less, for fiscal control and accounting costs necessary to assure the proper disbursement of, and accounting for, federal funds awarded to subrecipients under the Continuum of Care program.

(b) *UFA costs.* UFA costs include costs of ensuring that all financial transactions carried out under the Continuum of Care program are conducted and records are maintained in accordance with generally accepted accounting principles, including arranging for an annual survey, audit, or evaluation of the financial records of each project carried out by a subrecipient funded by a grant received through the Continuum of Care program.

(c) *Monitoring costs.* The costs of monitoring subrecipients and enforcing compliance with program requirements are eligible for costs.

§ 578.43 Acquisition.

Grant funds may be used to pay up to 100 percent of the cost of acquisition of real property selected by the recipient or subrecipient for use in the provision of housing or supportive services for homeless persons.

§ 578.45 Rehabilitation.

(a) *Use.* Grant funds may be used to pay up to 100 percent of the cost of rehabilitation of structures to provide housing or supportive services to homeless persons.

(b) *Eligible costs.* Eligible rehabilitation costs include installing cost-effective energy measures, and bringing an existing structure to State and local government health and safety standards.

(c) *Ineligible costs.* Grant funds may not be used for rehabilitation of leased property.

§ 578.47 New construction.

(a) *Use.* Grant funds may be used to:

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(1) Pay up to 100 percent of the cost of new construction, including the building of a new structure or building an addition to an existing structure that increases the floor area by 100 percent or more, and the cost of land associated with that construction, for use as housing.

(2) If grant funds are used for new construction, the applicant must demonstrate that the costs of new construction are substantially less than the costs of rehabilitation or that there is a lack of available appropriate units that could be rehabilitated at a cost less than new construction. For purposes of this cost comparison, costs of rehabilitation or new construction may include the cost of real property acquisition.

(b) *Ineligible costs.* Grant funds may not be used for new construction on leased property.

§ 578.49 Leasing.

(a) *Use.* (1) Where the recipient or subrecipient is leasing the structure, or portions thereof, grant funds may be used to pay for 100 percent of the costs of leasing a structure or structures, or portions thereof, to provide housing or supportive services to homeless persons for up to 3 years. Leasing funds may not be used to lease units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership, where the partnership owns the structure, unless HUD authorized an exception for good cause.

(2) Any request for an exception must include the following:

(i) A description of how leasing these structures is in the best interest of the program;

(ii) Supporting documentation showing that the leasing charges paid with grant funds are reasonable for the market; and

(iii) A copy of the written policy for resolving disputes between the landlord and tenant, including a recusal for officers, agents, and staff who work for both the landlord and tenant.

(b) *Requirements.* (1) *Leasing structures.* When grants are used to pay rent for all or part of a structure or structures, the rent paid must be reasonable

in relation to rents being charged in the area for comparable space. In addition, the rent paid may not exceed rents currently being charged by the same owner for comparable unassisted space.

(2) *Leasing individual units.* When grants are used to pay rent for individual housing units, the rent paid must be reasonable in relation to rents being charged for comparable units, taking into account the location, size, type, quality, amenities, facilities, and management services. In addition, the rents may not exceed rents currently being charged for comparable units, and the rent paid may not exceed HUD-determined fair market rents.

(3) *Utilities.* If electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds. If utilities are not provided by the landlord, these utility costs are an operating cost, except for supportive service facilities. If the structure is being used as a supportive service facility, then these utility costs are a supportive service cost.

(4) *Security deposits and first and last month's rent.* Recipients and subrecipients may use grant funds to pay security deposits, in an amount not to exceed 2 months of actual rent. An advance payment of the last month's rent may be provided to the landlord in addition to the security deposit and payment of the first month's rent.

(5) *Occupancy agreements and subleases.* Occupancy agreements and subleases are required as specified in § 578.77(a).

(6) *Calculation of occupancy charges and rent.* Occupancy charges and rent from program participants must be calculated as provided in § 578.77.

(7) *Program income.* Occupancy charges and rent collected from program participants are program income and may be used as provided under § 578.97.

(8) *Transition.* Beginning in the first year awards are made under the Continuum of Care program, renewals of grants for leasing funds entered into under the authority of title IV, subtitle D of the Act as it existed before May 20, 2009, will be renewed either as grants for leasing or as rental assistance, depending on the characteristics

of the project. Leasing funds will be renewed as rental assistance if the funds are used to pay rent on units where the lease is between the program participant and the landowner or sublessor. Projects requesting leasing funds will be renewed as leasing if the funds were used to lease a unit or structure and the lease is between the recipient or subrecipient and the landowner.

§ 578.51 Rental assistance.

(a) *Use.* (1) Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

(i) The rental assistance may be short-term, up to 3 months of rent; medium-term, for 3 to 24 months of rent; or long-term, for longer than 24 months of rent and must be administered in accordance with the policies and procedures established by the Continuum as set forth in § 578.7(a)(9) and this section.

(ii) The rental assistance may be tenant-based, project-based, or sponsor-based, and may be for transitional or permanent housing.

(2) Grant funds may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of first month's rent.

(b) *Rental assistance administrator.* Rental assistance must be administered by a State, unit of general local government, or a public housing agency.

(c) *Tenant-based rental assistance.* Tenant-based rental assistance is rental assistance in which program participants choose housing of an appropriate size in which to reside. When necessary to facilitate the coordination of supportive services, recipients and subrecipients may require program participants to live in a specific area for their entire period of participation, or in a specific structure for the first year and in a specific area for the remainder

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of their period of participation. Program participants who are receiving rental assistance in transitional housing may be required to live in a specific structure for their entire period of participation in transitional housing.

(1) Up to 5 years worth of rental assistance may be awarded to a project in one competition.

(2) Program participants who have complied with all program requirements during their residence retain the rental assistance if they move within the Continuum of Care geographic area.

(3) Program participants who have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence), if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and move to a different Continuum of Care geographic area if they move out of the assisted unit to protect their health and safety.

(d) *Sponsor-based rental assistance.* Sponsor-based rental assistance is provided through contracts between the recipient and sponsor organization. A sponsor may be a private, nonprofit organization, or a community mental health agency established as a public nonprofit organization. Program participants must reside in housing owned or leased by the sponsor. Up to 5 years worth of rental assistance may be awarded to a project in one competition.

(e) *Project-based rental assistance.* Project-based rental assistance is provided through a contract with the owner of an existing structure, where the owner agrees to lease the subsidized units to program participants. Program participants will not retain rental assistance if they move. Up to 15 years of rental assistance may be awarded in one competition.

(f) *Grant amount.* The amount of rental assistance in each project will be based on the number and size of units proposed by the applicant to be assisted over the grant period. The amount of rental assistance in each project will be calculated by multiplying the number and size of units proposed by the FMR of each unit on the date the application is submitted to HUD, by the term of the grant.

(g) *Rent reasonableness.* HUD will only provide rental assistance for a unit if the rent is reasonable. The recipient or subrecipient must determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units.

(h) *Payment of grant.* (1) The amount of rental assistance in each project will be reserved for rental assistance over the grant period. An applicant's request for rental assistance in each grant is an estimate of the amount needed for rental assistance. Recipients will make draws from the grant funds to pay the actual costs of rental assistance for program participants.

(2) For tenant-based rental assistance, on demonstration of need:

(i) Up to 25 percent of the total rental assistance awarded may be spent in any year of a 5-year grant term; or

(ii) A higher percentage if approved in advance by HUD, if the recipient provides evidence satisfactory to HUD that it is financially committed to providing the housing assistance described in the application for the full 5-year period.

(3) A recipient must serve at least as many program participants as shown in its application for assistance.

(4) If the amount in each grant reserved for rental assistance over the grant period exceeds the amount that will be needed to pay the actual costs of rental assistance, due to such factors as contract rents being lower than FMRs and program participants being able to pay a portion of the rent, recipients or subrecipients may use the

excess funds for covering the costs of rent increases, or for serving a greater number of program participants.

(i) *Vacancies.* If a unit assisted under this section is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person. No additional assistance will be paid until the unit is occupied by another eligible person. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.

(j) *Property damage.* Recipients and subrecipients may use grant funds in an amount not to exceed one month's rent to pay for any damage to housing due to the action of a program participant. This shall be a one-time cost per participant, incurred at the time a participant exits a housing unit.

(k) *Resident rent.* Rent must be calculated as provided in §578.77. Rents collected from program participants are program income and may be used as provided under §578.97.

(1) *Leases.* (1) *Initial lease.* For project-based, sponsor-based, or tenant-based rental assistance, program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

(2) *Initial lease for transitional housing.* Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

§ 578.53 Supportive services.

(a) *In general.* Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security,

furniture, utilities, and equipment are eligible as a supportive service.

(1) Supportive services must be necessary to assist program participants obtain and maintain housing.

(2) Recipients and subrecipients shall conduct an annual assessment of the service needs of the program participants and should adjust services accordingly.

(b) *Duration.* (1) For a transitional housing project, supportive services must be made available to residents throughout the duration of their residence in the project.

(2) Permanent supportive housing projects must provide supportive services for the residents to enable them to live as independently as is practicable throughout the duration of their residence in the project.

(3) Services may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.

(4) Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month as set forth in §578.37(a)(1)(ii)(F), to assist the program participant in maintaining long-term housing stability.

(c) *Special populations.* All eligible costs are eligible to the same extent for program participants who are unaccompanied homeless youth; persons living with HIV/AIDS; and victims of domestic violence, dating violence, sexual assault, or stalking.

(d) *Ineligible costs.* Any cost that is not described as an eligible cost under this section is not an eligible cost of providing supportive services using Continuum of Care program funds. Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible costs.

(e) *Eligible costs.*

(1) *Annual Assessment of Service Needs.* The costs of the assessment required by §578.53(a)(2) are eligible costs.

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(2) *Assistance with moving costs.* Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.

(3) *Case management.* The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:

- (i) Counseling;
- (ii) Developing, securing, and coordinating services;
- (iii) Using the centralized or coordinated assessment system as required under § 578.23(c)(9).
- (iv) Obtaining federal, State, and local benefits;
- (v) Monitoring and evaluating program participant progress;
- (vi) Providing information and referrals to other providers;
- (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(4) *Child care.* The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.

(i) The children must be under the age of 13, unless they are disabled children.

(ii) Disabled children must be under the age of 18.

(iii) The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(5) *Education services.* The costs of improving knowledge and basic educational skills are eligible.

(i) Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).

(ii) Component services or activities are screening, assessment and testing;

individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

(6) *Employment assistance and job training.* The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

(i) Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.

(ii) Services that assist individuals in securing employment consist of:

- (A) Employment screening, assessment, or testing;
- (B) Structured job skills and job-seeking skills;
- (C) Special training and tutoring, including literacy training and pre-vocational training;
- (D) Books and instructional material;
- (E) Counseling or job coaching; and
- (F) Referral to community resources.

(7) *Food.* The cost of providing meals or groceries to program participants is eligible.

(8) *Housing search and counseling services.* Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.

(i) Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.

(ii) Other eligible costs are:

(A) Mediation with property owners and landlords on behalf of eligible program participants;

(B) Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and

(C) The payment of rental application fees.

(9) *Legal services.* Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision

of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.

(i) Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.

(ii) Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.

(iii) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(iv) Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.

(10) *Life skills training.* The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

(11) *Mental health services.* Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interven-

tions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(12) *Outpatient health services.* Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:

(i) Providing an analysis or assessment of an individual's health problems and the development of a treatment plan;

(ii) Assisting individuals to understand their health needs;

(iii) Providing directly or assisting individuals to obtain and utilize appropriate medical treatment;

(iv) Preventive medical care and health maintenance services, including in-home health services and emergency medical services;

(v) Provision of appropriate medication;

(vi) Providing follow-up services; and

(vii) Preventive and noncosmetic dental care.

(13) *Outreach services.* The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.

(i) Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.

(ii) Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.

(14) *Substance abuse treatment services.* The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

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(15) *Transportation.* Eligible costs are:

(i) The costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section.

(ii) Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;

(iii) The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;

(iv) The cost of gas, insurance, taxes, and maintenance for the vehicle;

(v) The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and

(vi) If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

(A) Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);

(B) Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and

(C) The recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

(16) *Utility deposits.* This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.

(17) *Direct provision of services.* If the service described in paragraphs (e)(1) through (e)(16) of this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:

(i) The costs of labor or supplies, and materials incurred by the recipient or

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subrecipient in directly providing supportive services to program participants; and

(ii) The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.

§ 578.55 Operating costs.

(a) *Use.* Grant funds may be used to pay the costs of the day-to-day operation of transitional and permanent housing in a single structure or individual housing units.

(b) *Eligible costs.* (1) The maintenance and repair of housing;

(2) Property taxes and insurance;

(3) Scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost);

(4) Building security for a structure where more than 50 percent of the units or area is paid for with grant funds;

(5) Electricity, gas, and water;

(6) Furniture; and

(7) Equipment.

(c) *Ineligible costs.* Program funds may not be used for rental assistance and operating costs in the same project. Program funds may not be used for the operating costs of emergency shelter- and supportive service-only facilities. Program funds may not be used for the maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease.

§ 578.57 Homeless Management Information System.

(a) *Eligible costs.* (1) The recipient or subrecipient may use Continuum of Care program funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care, including the costs of:

(i) Purchasing or leasing computer hardware;

(ii) Purchasing software or software licenses;

(iii) Purchasing or leasing equipment, including telephones, fax machines, and furniture;

(iv) Obtaining technical support;

(v) Leasing office space;

(vi) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;

(vii) Paying salaries for operating HMIS, including:

(A) Completing data entry;

(B) Monitoring and reviewing data quality;

(C) Completing data analysis;

(D) Reporting to the HMIS Lead;

(E) Training staff on using the HMIS; and

(F) Implementing and complying with HMIS requirements;

(viii) Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;

(ix) Paying staff travel costs to conduct intake; and

(x) Paying participation fees charged by the HMIS Lead, as authorized by HUD, if the recipient or subrecipient is not the HMIS Lead.

(2) If the recipient or subrecipient is the HMIS Lead, it may also use Continuum of Care funds to pay the costs of:

(i) Hosting and maintaining HMIS software or data;

(ii) Backing up, recovering, or repairing HMIS software or data;

(iii) Upgrading, customizing, and enhancing the HMIS;

(iv) Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems;

(v) Administering the system;

(vi) Reporting to providers, the Continuum of Care, and HUD; and

(vii) Conducting training on using the system, including traveling to the training.

(3) If the recipient or subrecipient is a victim services provider, or a legal services provider, it may use Continuum of Care funds to establish and operate a comparable database that complies with HUD's HMIS requirements.

(b) *General restrictions.* Activities funded under this section must comply with the HMIS requirements.

§ 578.59 Project administrative costs.

(a) *Eligible costs.* The recipient or subrecipient may use up to 10 percent of any grant awarded under this part, excluding the amount for Continuum of Care Planning Activities and UFA costs, for the payment of project administrative costs related to the planning and execution of Continuum of Care activities. This does not include staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57, because those costs are eligible as part of those activities. Eligible administrative costs include:

(1) *General management, oversight, and coordination.* Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:

(i) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

(A) Preparing program budgets and schedules, and amendments to those budgets and schedules;

(B) Developing systems for assuring compliance with program requirements;

(C) Developing agreements with subrecipients and contractors to carry out program activities;

(D) Monitoring program activities for progress and compliance with program requirements;

(E) Preparing reports and other documents directly related to the program for submission to HUD;

(F) Coordinating the resolution of audit and monitoring findings;

(G) Evaluating program results against stated objectives; and

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(H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section.

(ii) Travel costs incurred for monitoring of subrecipients;

(iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and

(iv) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

(2) *Training on Continuum of Care requirements.* Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings.

(3) *Environmental review.* Costs of carrying out the environmental review responsibilities under § 578.31.

(b) *Sharing requirement.* (1) *UFAs.* If the recipient is a UFA that carries out a project, it may use up to 10 percent of the grant amount awarded for the project on project administrative costs. The UFA must share the remaining project administrative funds with its subrecipients.

(2) *Recipients that are not UFAs.* If the recipient is not a UFA, it must share at least 50 percent of project administrative funds with its subrecipients.

§ 578.61 Relocation costs.

(a) *In general.* Relocation costs under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 are eligible.

(b) *Eligible relocation costs.* Eligible costs are costs to provide relocation payments and other assistance to persons displaced by a project assisted with grant funds in accordance with § 578.83.

§ 578.63 Indirect costs.

(a) *In general.* Continuum of Care funds may be used to pay indirect costs in accordance with OMB Circulars A-87 or A-122, as applicable.

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(b) *Allocation.* Indirect costs may be allocated to each eligible activity as provided in subpart D, so long as that allocation is consistent with an indirect cost rate proposal developed in accordance with OMB Circulars A-87 or A-122, as applicable.

(c) *Expenditure limits.* The indirect costs charged to an activity subject to an expenditure limit under §§ 578.39, 578.41, and 578.59 must be added to the direct costs charged for that activity when determining the total costs subject to the expenditure limits.

Subpart E—High-Performing Communities

§ 578.65 Standards.

(a) *In general.* The collaborative applicant for a Continuum may apply to HUD to have the Continuum be designated a high-performing community (HPC). The designation shall be for grants awarded in the same competition in which the designation is applied for and made.

(b) *Applying for HPC designation.* The application must be submitted at such time and in such manner as HUD may require, must use HMIS data where required to show the standards for qualifying are met, and must contain such information as HUD requires, including at a minimum:

(1) A report showing how the Continuum of Care program funds received in the preceding year were expended;

(2) A specific plan for how grant funds will be expended; and

(3) Information establishing that the Continuum of Care meets the standards for HPCs.

(c) *Standards for qualifying as an HPC.* To qualify as an HPC, a Continuum must demonstrate through:

(1) Reliable data generated by the Continuum of Care's HMIS that it meets all of the following standards:

(i) *Mean length of homelessness.* Either the mean length of episode of homelessness within the Continuum's geographic area is fewer than 20 days, or the mean length of episodes of homelessness for individuals or families in similar circumstances was reduced by at least 10 percent from the preceding federal fiscal year.

(ii) *Reduced recidivism.* Of individuals and families who leave homelessness, less than 5 percent become homeless again at any time within the next 2 years; or the percentage of individuals and families in similar circumstances who become homeless again within 2 years after leaving homelessness was decreased by at least 20 percent from the preceding federal fiscal year.

(iii) *HMIS coverage.* The Continuum's HMIS must have a bed coverage rate of 80 percent and a service volume coverage rate of 80 percent as calculated in accordance with HUD's HMIS requirements.

(iv) *Serving families and youth.* With respect to Continuums that served homeless families and youth defined as homeless under other federal statutes in paragraph (3) of the definition of homeless in § 576.2:

(A) 95 percent of those families and youth did not become homeless again within a 2-year period following termination of assistance; or

(B) 85 percent of those families achieved independent living in permanent housing for at least 2 years following termination of assistance.

(2) Reliable data generated from sources other than the Continuum's HMIS that is provided in a narrative or other form prescribed by HUD that it meets both of the following standards:

(i) *Community action.* All the metropolitan cities and counties within the Continuum's geographic area have a comprehensive outreach plan, including specific steps for identifying homeless persons and referring them to appropriate housing and services in that geographic area.

(ii) *Renewing HPC status.* If the Continuum was designated an HPC in the previous federal fiscal year and used Continuum of Care grant funds for activities described under § 578.71, that such activities were effective at reducing the number of individuals and families who became homeless in that community.

§ 578.67 Publication of application.

HUD will publish the application to be designated an HPC through the HUD Web site, for public comment as to whether the Continuum seeking des-

ignation as an HPC meets the standards for being one.

§ 578.69 Cooperation among entities.

An HPC must cooperate with HUD in distributing information about its successful efforts to reduce homelessness.

§ 578.71 HPC-eligible activities.

In addition to using grant funds for the eligible costs described in subpart D of this part, recipients and subrecipients in Continuums of Care designated as HPCs may also use grant funds to provide housing relocation and stabilization services and short- and/or medium-term rental assistance to individuals and families at risk of homelessness as set forth in 24 CFR 576.103 and 24 CFR 576.104, if necessary to prevent the individual or family from becoming homeless. Activities must be carried out in accordance with the plan submitted in the application. When carrying out housing relocation and stabilization services and short- and/or medium-term rental assistance, the written standards set forth in § 578.7(a)(9)(v) and recordkeeping requirements of 24 CFR 576.500 apply.

Subpart F—Program Requirements

§ 578.73 Matching requirements.

(a) *In general.* The recipient or subrecipient must match all grant funds, except for leasing funds, with no less than 25 percent of funds or in-kind contributions from other sources. For Continuum of Care geographic areas in which there is more than one grant agreement, the 25 percent match must be provided on a grant-by-grant basis. Recipients that are UFAs or are the sole recipient for their Continuum, may provide match on a Continuum-wide basis. Cash match must be used for the costs of activities that are eligible under subpart D of this part, except that HPCs may use such match for the costs of activities that are eligible under § 578.71.

(b) *Cash sources.* A recipient or subrecipient may use funds from any source, including any other federal sources (excluding Continuum of Care program funds), as well as State, local, and private sources, provided that

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funds from the source are not statutorily prohibited to be used as a match. The recipient must ensure that any funds used to satisfy the matching requirements of this section are eligible under the laws governing the funds in order to be used as matching funds for a grant awarded under this program.

(c) *In-kind contributions.* (1) The recipient or subrecipient may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible under Subpart D, or, in the case of HPCs, eligible under § 578.71.

(2) The requirements of 24 CFR 84.23 and 85.24 apply.

(3) Before grant execution, services to be provided by a third party must be documented by a memorandum of understanding (MOU) between the recipient or subrecipient and the third party that will provide the services. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

(i) The MOU must establish the unconditional commitment, except for selection to receive a grant, by the third party to provide the services, the specific service to be provided, the profession of the persons providing the service, and the hourly cost of the service to be provided.

(ii) During the term of the grant, the recipient or subrecipient must keep and make available, for inspection, records documenting the service hours provided.

§ 578.75 General operations.

(a) *State and local requirements.* (1) Housing and facilities constructed or rehabilitated with assistance under this part must meet State or local building codes, and in the absence of State or local building codes, the International Residential Code or International Building Code (as applicable

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to the type of structure) of the International Code Council.

(2) Services provided with assistance under this part must be provided in compliance with all applicable State and local requirements, including licensing requirements.

(b) *Housing quality standards.* Housing leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable housing quality standards (HQS) under 24 CFR 982.401 of this title, except that 24 CFR 982.401(j) applies only to housing occupied by program participants receiving tenant-based rental assistance. For housing rehabilitated with funds under this part, the lead-based paint requirements in 24 CFR part 35, subparts A, B, J, and R apply. For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. For residential property for which funds under this part are used for acquisition, leasing, services, or operating costs, 24 CFR part 35, subparts A, B, K, and R apply.

(1) Before any assistance will be provided on behalf of a program participant, the recipient, or subrecipient, must physically inspect each unit to assure that the unit meets HQS. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.

(2) Recipients or subrecipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

(c) *Suitable dwelling size.* The dwelling unit must have at least one bedroom or living/sleeping room for each two persons.

(1) Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room.

(2) If household composition changes during the term of assistance, recipients and subrecipients may relocate the household to a more appropriately sized unit. The household must still

have access to appropriate supportive services.

(d) *Meals.* Each recipient and subrecipient of assistance under this part who provides supportive housing for homeless persons with disabilities must provide meals or meal preparation facilities for residents.

(e) *Ongoing assessment of supportive services.* To the extent practicable, each project must provide supportive services for residents of the project and homeless persons using the project, which may be designed by the recipient or participants. Each recipient and subrecipient of assistance under this part must conduct an ongoing assessment of the supportive services needed by the residents of the project, the availability of such services, and the coordination of services needed to ensure long-term housing stability and must make adjustments, as appropriate.

(f) *Residential supervision.* Each recipient and subrecipient of assistance under this part must provide residential supervision as necessary to facilitate the adequate provision of supportive services to the residents of the housing throughout the term of the commitment to operate supportive housing. Residential supervision may include the employment of a full- or part-time residential supervisor with sufficient knowledge to provide or to supervise the provision of supportive services to the residents.

(g) *Participation of homeless individuals.* (1) Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

(2) Each recipient and subrecipient of assistance under this part must, to the

maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.

(h) *Supportive service agreement.* Recipients and subrecipients may require the program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. Notwithstanding this provision, if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program.

(i) *Retention of assistance after death, incarceration, or institutionalization for more than 90 days of qualifying member.* For permanent supportive housing projects surviving, members of any household who were living in a unit assisted under this part at the time of the qualifying member's death, long-term incarceration, or long-term institutionalization, have the right to rental assistance under this section until the expiration of the lease in effect at the time of the qualifying member's death, long-term incarceration, or long-term institutionalization.

§ 578.77 Calculating occupancy charges and rent.

(a) *Occupancy agreements and leases.* Recipients and subrecipients must have signed occupancy agreements or leases (or subleases) with program participants residing in housing.

(b) *Calculation of occupancy charges.* Recipients and subrecipients are not required to impose occupancy charges on program participants as a condition of residing in the housing. However, if occupancy charges are imposed, they may not exceed the highest of:

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(1) 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses);

(2) 10 percent of the family's monthly income; or

(3) If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs.

(4) *Income.* Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Recipients and subrecipients must examine a program participant's income initially, and if there is a change in family composition (*e.g.*, birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.

(c) *Resident rent.* (1) *Amount of rent.* (i) Each program participant on whose behalf rental assistance payments are made must pay a contribution toward rent in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 (42 U.S.C. 1437a(a)(1)).

(ii) Income of program participants must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a).

(2) *Review.* Recipients or subrecipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified.

(3) *Verification.* As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income. Program participants must provide the recipient or subrecipient with information at any time regarding changes in income or other circumstances that may result in changes to a program participant's

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contribution toward the rental payment.

§ 578.79 Limitation on transitional housing.

A homeless individual or family may remain in transitional housing for a period longer than 24 months, if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living. However, HUD may discontinue assistance for a transitional housing project if more than half of the homeless individuals or families remain in that project longer than 24 months.

§ 578.81 Term of commitment, repayment of grants, and prevention of undue benefits.

(a) *In general.* All recipients and subrecipients receiving grant funds for acquisition, rehabilitation, or new construction must operate the housing or provide supportive services in accordance with this part, for at least 15 years from the date of initial occupancy or date of initial service provision. Recipient and subrecipients must execute and record a HUD-approved Declaration of Restrictive Covenants before receiving payment of grant funds.

(b) *Conversion.* Recipients and subrecipients carrying out a project that provides transitional or permanent housing or supportive services in a structure may submit a request to HUD to convert a project for the direct benefit of very low-income persons. The request must be made while the project is operating as homeless housing or supportive services for homeless individuals and families, must be in writing, and must include an explanation of why the project is no longer needed to provide transitional or permanent housing or supportive services. The primary factor in HUD's decision on the proposed conversion is the unmet need for transitional or permanent housing or supportive services in the Continuum of Care's geographic area.

(c) *Repayment of grant funds.* If a project is not operated as transitional or permanent housing for 10 years following the date of initial occupancy,

HUD will require repayment of the entire amount of the grant used for acquisition, rehabilitation, or new construction, unless conversion of the project has been authorized under paragraph (b) of this section. If the housing is used for such purposes for more than 10 years, the payment amount will be reduced by 20 percentage points for each year, beyond the 10-year period in which the project is used for transitional or permanent housing.

(d) *Prevention of undue benefits.* Except as provided under paragraph (e) of this section, upon any sale or other disposition of a project site that received grant funds for acquisition, rehabilitation, or new construction, occurring before the 15-year period, the recipient must comply with such terms and conditions as HUD may prescribe to prevent the recipient or subrecipient from unduly benefiting from such sale or disposition.

(e) *Exception.* A recipient or subrecipient will not be required to comply with the terms and conditions prescribed under paragraphs (c) and (d) of this section if:

(1) The sale or disposition of the property used for the project results in the use of the property for the direct benefit of very low-income persons;

(2) All the proceeds are used to provide transitional or permanent housing that meet the requirements of this part;

(3) Project-based rental assistance or operating cost assistance from any federal program or an equivalent State or local program is no longer made available and the project is meeting applicable performance standards, provided that the portion of the project that had benefitted from such assistance continues to meet the tenant income and rent restrictions for low-income units under section 42(g) of the Internal Revenue Code of 1986; or

(4) There are no individuals and families in the Continuum of Care geographic area who are homeless, in which case the project may serve individuals and families at risk of homelessness.

§ 578.83 Displacement, relocation, and acquisition.

(a) *Minimizing displacement.* Consistent with the other goals and objectives of this part, recipients and subrecipients must ensure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of projects assisted under this part. "Project," as used in this section, means any activity or series of activities assisted with Continuum of Care funds received or anticipated in any phase of an undertaking.

(b) *Temporary relocation.* (1) *Existing Building Not Assisted under Title IV of the McKinney-Vento Act.* No tenant may be required to relocate temporarily for a project if the building in which the project is being undertaken or will be undertaken is not currently assisted under Title IV of the McKinney-Vento Act. The absence of such assistance to the building means the tenants are not homeless and the tenants are therefore not eligible to receive assistance under the Continuum of Care program. When a tenant moves for such a project under conditions that cause the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), 42 U.S.C. 4601-4655, to apply, the tenant must be treated as permanently displaced and offered relocation assistance and payments consistent with paragraph (c) of this section.

(2) *Existing Transitional Housing or Permanent Housing Projects Assisted Under Title IV of the McKinney-Vento Act.* Consistent with paragraph (c)(2)(ii) of this section, no program participant may be required to relocate temporarily for a project if the person cannot be offered a decent, safe, and sanitary unit in the same building or complex upon project completion under reasonable terms and conditions. The length of occupancy requirements in § 578.79 may prevent a program participant from returning to the property upon completion (See paragraph (c)(2)(iii)(D) of this section). Any program participant who has been temporarily relocated for a period beyond one year

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must be treated as permanently displaced and offered relocation assistance and payments consistent with paragraph (c) of this section. Program participants temporarily relocated in accordance with the policies described in this paragraph must be provided:

(i) Reimbursement for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including the cost of moving to and from the temporarily occupied housing and any increase in monthly rent/occupancy charges and utility costs; and

(ii) Appropriate advisory services, including reasonable advance written notice of:

(A) The date and approximate duration of the temporary relocation;

(B) The location of the suitable, decent, safe, and sanitary dwelling to be made available for the temporary period;

(C) The reasonable terms and conditions under which the program participant will be able to occupy a suitable, decent, safe, and sanitary dwelling in the building or complex upon completion of the project; and

(D) The provisions of paragraph (b)(2)(i) of this section.

(c) *Relocation assistance for displaced persons.* (1) *In general.* A displaced person (defined in paragraph (c)(2) of this section) must be provided relocation assistance in accordance with the requirements of the URA and implementing regulations at 49 CFR part 24. A displaced person must be advised of his or her rights under the Fair Housing Act. Whenever possible, minority persons must be given reasonable opportunities to relocate to decent, safe, and sanitary replacement dwellings, not located in an area of minority concentration, that are within their financial means. This policy, however, does not require providing a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling. See 49 CFR 24.205(c)(2)(i)(D).

(2) *Displaced person.* (i) For the purposes of paragraph (c) of this section, the term “displaced person” means any person (family, individual, business, nonprofit organization, or farm) that moves from real property, or moves personal property from real property,

permanently, as a direct result of acquisition, rehabilitation, or demolition for a project. This includes any permanent, involuntary move for a project, including any permanent move from the real property that is made:

(A) After the owner (or person in control of the site) issues a notice to move permanently from the property, or refuses to renew an expiring lease, if the move occurs after the date of the submission by the recipient or subrecipient of an application for assistance to HUD (or the recipient, as applicable) that is later approved and funded and the recipient or subrecipient has site control as evidenced in accordance with § 578.25(b); or

(B) After the owner (or person in control of the site) issues a notice to move permanently from the property, or refuses to renew an expiring lease, if the move occurs after the date the recipient or subrecipient obtains site control, as evidenced in accordance with § 578.25(b), if that occurs after the application for assistance; or

(C) Before the date described under paragraph (c)(2)(i)(A) or (B) of this section, if the recipient or HUD determines that the displacement resulted directly from acquisition, rehabilitation, or demolition for the project; or

(D) By a tenant of a building that is not assisted under Title IV of the McKinney-Vento Act, if the tenant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition of the property for the project; or

(ii) For the purposes of paragraph (c) of this section, the term “displaced person” means any person (family, individual, business, nonprofit organization, or farm) that moves from real property, or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project. This includes any permanent, involuntary move for a project that is made by a program participant occupying transitional housing or permanent housing assisted under Title IV of the McKinney-Vento Act, if any one of the following three situations occurs:

(A) The program participant moves after execution of the agreement covering the acquisition, rehabilitation, or

demolition of the property for the project and is either not eligible to return upon project completion or the move occurs before the program participant is provided written notice offering the program participant an opportunity to occupy a suitable, decent, safe, and sanitary dwelling in the same building or complex upon project completion under reasonable terms and conditions. Such reasonable terms and conditions must include a lease (or occupancy agreement, as applicable) consistent with Continuum of Care program requirements, including a monthly rent or occupancy charge and monthly utility costs that does not exceed the maximum amounts established in § 578.77; or

(B) The program participant is required to relocate temporarily, does not return to the building or complex, and any one of the following situations occurs:

(1) The program participant is not offered payment for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation;

(2) The program participant is not eligible to return to the building or complex upon project completion; or

(3) Other conditions of the temporary relocation are not reasonable; or

(C) The program participant is required to move to another unit in the same building or complex, and any one of the following situations occurs:

(1) The program participant is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move;

(2) The program participant is not eligible to remain in the building or complex upon project completion; or

(3) Other conditions of the move are not reasonable.

(iii) Notwithstanding the provisions of paragraph (c)(2)(i) or (ii) of this section, a person does not qualify as a “displaced person” if:

(A) The person has been evicted for serious or repeated violation of the terms and conditions of the lease or occupancy agreement; the eviction complied with applicable federal, State, or local requirements (see § 578.91); and the recipient or subrecipient determines that the eviction was not undertaken for the purpose of evading the

obligation to provide relocation assistance;

(B) The person moved into the property after the submission of the application but, before signing a lease or occupancy agreement and commencing occupancy, was provided written notice of the project’s possible impact on the person (*e.g.*, the person may be displaced, temporarily relocated, or incur a rent increase) and the fact that the person would not qualify as a “displaced person” (or for any relocation assistance provided under this section), as a result of the project;

(C) The person is ineligible under 49 CFR 24.2(a)(9)(ii);

(D) The person is a program participant occupying transitional housing or permanent housing assisted under Title IV of the Act who must move as a direct result of the length-of-occupancy restriction under § 578.79; or

(E) HUD determines that the person was not displaced as a direct result of acquisition, rehabilitation, or demolition for the project.

(iv) The recipient may request, at any time, HUD’s determination of whether a displacement is or would be covered under this section.

(3) *Initiation of negotiations.* For purposes of determining the formula for computing replacement housing payment assistance to be provided to a displaced person pursuant to this section, if the displacement is a direct result of privately undertaken rehabilitation, demolition, or acquisition of the real property, “initiation of negotiations” means the execution of the agreement between the recipient and the subrecipient, or between the recipient (or subrecipient, as applicable) and the person owning or controlling the property. In the case of an option contract to acquire property, the initiation of negotiations does not become effective until execution of a written agreement that creates a legally enforceable commitment to proceed with the purchase, such as a purchase agreement.

(d) *Real property acquisition requirements.* Except for acquisitions described in 49 CFR 24.101(b)(1) through (5), the URA and the requirements of 49 CFR part 24, subpart B apply to any acquisition of real property for a project

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where there are Continuum of Care funds in any part of the project costs.

(e) *Appeals.* A person who disagrees with the recipient's (or subrecipient's, if applicable) determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance for which the person is eligible, may file a written appeal of that determination with the recipient (see 49 CFR 24.10). A low-income person who is dissatisfied with the recipient's determination on his or her appeal may submit a written request for review of that determination to the local HUD field office.

§ 578.85 Timeliness standards.

(a) *In general.* Recipients must initiate approved activities and projects promptly.

(b) *Construction activities.* Recipients of funds for rehabilitation or new construction must meet the following standards:

(1) Construction activities must begin within 9 months of the later of signing of the grant agreement or of signing an addendum to the grant agreement authorizing use of grant funds for the project.

(2) Construction activities must be completed within 24 months of signing the grant agreement.

(3) Activities that cannot begin until after construction activities are completed must begin within 3 months of the date that construction activities are completed.

(c) *Distribution.* A recipient that receives funds through this part must:

(1) Distribute the funds to subrecipients (in advance of expenditures by the subrecipients);

(2) Distribute the appropriate portion of the funds to a subrecipient no later than 45 days after receiving an approvable request for such distribution from the subrecipient; and

(3) Draw down funds at least once per quarter of the program year, after eligible activities commence.

§ 578.87 Limitation on use of funds.

(a) *Maintenance of effort.* No assistance provided under this part (or any State or local government funds used to supplement this assistance) may be used to replace State or local funds

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previously used, or designated for use, to assist homeless persons.

(b) *Faith-based activities.* (1) *Equal treatment of program participants and program beneficiaries.* (i) *Program participants.* Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to participate in the Continuum of Care program. Neither the Federal Government nor a State or local government receiving funds under the Continuum of Care program shall discriminate against an organization on the basis of the organization's religious character or affiliation. Recipients and subrecipients of program funds shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

(ii) *Beneficiaries.* In providing services supported in whole or in part with federal financial assistance, and in their outreach activities related to such services, program participants shall not discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

(2) *Separation of explicitly religious activities.* Recipients and subrecipients of Continuum of Care funds that engage in explicitly religious activities, including activities that involve overt religious content such as worship, religious instruction, or proselytization, must perform such activities and offer such services outside of programs that are supported with federal financial assistance separately, in time or location, from the programs or services funded under this part, and participation in any such explicitly religious activities must be voluntary for the program beneficiaries of the HUD-funded programs or services.

(3) *Religious identity.* A faith-based organization that is a recipient or subrecipient of Continuum of Care program funds is eligible to use such funds as provided under the regulations of this part without impairing its independence, autonomy, expression of religious beliefs, or religious character. Such organization will retain its independence from federal, State, and local

government, and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct program funds to support or engage in any explicitly religious activities, including activities that involve overt religious content, such as worship, religious instruction, or proselytization, or any manner prohibited by law. Among other things, faith-based organizations may use space in their facilities to provide program-funded services, without removing or altering religious art, icons, scriptures, or other religious symbols. In addition, a Continuum of Care program-funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.

(4) *Alternative provider.* If a program participant or prospective program participant of the Continuum of Care program supported by HUD objects to the religious character of an organization that provides services under the program, that organization shall, within a reasonably prompt time after the objection, undertake reasonable efforts to identify and refer the program participant to an alternative provider to which the prospective program participant has no objection. Except for services provided by telephone, the Internet, or similar means, the referral must be to an alternate provider in reasonable geographic proximity to the organization making the referral. In making the referral, the organization shall comply with applicable privacy laws and regulations. Recipients and subrecipients shall document any objections from program participants and prospective program participants and any efforts to refer such participants to alternative providers in accordance with the requirements of § 578.103(a)(13). Recipients shall ensure that all subrecipient agreements make organizations receiving program funds aware of these requirements.

(5) *Structures.* Program funds may not be used for the acquisition, construc-

tion, or rehabilitation of structures to the extent that those structures are used for explicitly religious activities. Program funds may be used for the acquisition, construction, or rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under this part. When a structure is used for both eligible and explicitly religious activities, program funds may not exceed the cost of those portions of the acquisition, new construction, or rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to the Continuum of Care program. Sanctuaries, chapels, or other rooms that a Continuum of Care program-funded religious congregation uses as its principal place of worship, however, are ineligible for Continuum of Care program-funded improvements. Disposition of real property after the term of the grant, or any change in the use of the property during the term of the grant, is subject to governmentwide regulations governing real property disposition (see 24 CFR parts 84 and 85).

(6) *Supplemental funds.* If a State or local government voluntarily contributes its own funds to supplement federally funded activities, the State or local government has the option to segregate the federal funds or commingle them. However, if the funds are commingled, this section applies to all of the commingled funds.

(c) *Restriction on combining funds.* In a single structure or housing unit, the following types of assistance may not be combined:

(1) Leasing and acquisition, rehabilitation, or new construction;

(2) Tenant-based rental assistance and acquisition, rehabilitation, or new construction;

(3) Short- or medium-term rental assistance and acquisition, rehabilitation, or new construction;

(4) Rental assistance and leasing; or

(5) Rental assistance and operating.

(d) *Program fees.* Recipients and subrecipients may not charge program participants program fees.

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§ 578.89 Limitation on use of grant funds to serve persons defined as homeless under other federal laws.

(a) *Application requirement.* Applicants that intend to serve unaccompanied youth and families with children and youth defined as homeless under other federal laws in paragraph (3) of the homeless definition in § 576.2 must demonstrate in their application, to HUD's satisfaction, that the use of grant funds to serve such persons is an equal or greater priority than serving persons defined as homeless under paragraphs (1), (2), and (4) of the definition of homeless in § 576.2. To demonstrate that it is of equal or greater priority, applicants must show that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth.

(b) *Limit.* No more than 10 percent of the funds awarded to recipients within a single Continuum of Care's geographic area may be used to serve such persons.

(c) *Exception.* The 10 percent limitation does not apply to Continuums in which the rate of homelessness, as calculated in the most recent point-in-time count, is less than one-tenth of one percent of the total population.

§ 578.91 Termination of assistance to program participants.

(a) *Termination of assistance.* The recipient or subrecipient may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same individual or family.

(b) *Due process.* In terminating assistance to a program participant, the recipient or subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

(1) Providing the program participant with a written copy of the program rules and the termination process be-

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fore the participant begins to receive assistance;

(2) Written notice to the program participant containing a clear statement of the reasons for termination;

(3) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and

(4) Prompt written notice of the final decision to the program participant.

(c) *Hard-to-house populations.* Recipients and subrecipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.

§ 578.93 Fair Housing and Equal Opportunity.

(a) *Nondiscrimination and equal opportunity requirements.* The nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) are applicable.

(b) *Housing for specific subpopulations.* Recipients and subrecipients may exclusively serve a particular homeless subpopulation in transitional or permanent housing if the housing addresses a need identified by the Continuum of Care for the geographic area and meets one of the following:

(1) The housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex;

(2) The housing may be limited to a specific subpopulation, so long as admission does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR 5.105 (*e.g.*, the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless persons and families).

(3) The housing may be limited to families with children.

(4) If the housing has in residence at least one family with a child under the age of 18, the housing may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the project so long as the child resides in the housing.

(5) Sober housing may exclude persons who refuse to sign an occupancy agreement or lease that prohibits program participants from possessing, using, or being under the influence of illegal substances and/or alcohol on the premises.

(6) If the housing is assisted with funds under a federal program that is limited by federal statute or Executive Order to a specific subpopulation, the housing may be limited to that subpopulation (*e.g.*, housing also assisted with funding from the Housing Opportunities for Persons with AIDS program under 24 CFR part 574 may be limited to persons with acquired immunodeficiency syndrome or related diseases).

(7) Recipients may limit admission to or provide a preference for the housing to subpopulations of homeless persons and families who need the specialized supportive services that are provided in the housing (*e.g.*, substance abuse addiction treatment, domestic violence services, or a high intensity package designed to meet the needs of hard-to-reach homeless persons). While the housing may offer services for a particular type of disability, no otherwise eligible individuals with disabilities or families including an individual with a disability, who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

(c) *Affirmatively furthering fair housing.* A recipient must implement its programs in a manner that affirmatively furthers fair housing, which means that the recipient must:

(1) Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;

(2) Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and

(3) Provide program participants with information on rights and remedies available under applicable federal, State and local fair housing and civil rights laws.

(d) *Accessibility and integrative housing and services for persons with disabilities.* Recipients and subrecipients must comply with the accessibility requirements of the Fair Housing Act (24 CFR part 100), Section 504 of the Rehabilitation Act of 1973 (24 CFR part 8), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR parts 35 and 36). In accordance with the requirements of 24 CFR 8.4(d), recipients must ensure that their program's housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities.

(e) *Prohibition against involuntary family separation.* The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part.

§ 578.95 Conflicts of interest.

(a) *Procurement.* For the procurement of property (goods, supplies, or equipment) and services, the recipient and its subrecipients must comply with the codes of conduct and conflict-of-interest requirements under 24 CFR 85.36 (for governments) and 24 CFR 84.42 (for private nonprofit organizations).

(b) *Continuum of Care board members.* No Continuum of Care board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.

(c) *Organizational conflict.* An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or subrecipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under

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this part, or when a covered person's, as in paragraph (d)(1) of this section, objectivity in performing work with respect to any activity assisted under this part is or might be otherwise impaired. Such an organizational conflict would arise when a board member of an applicant participates in decision of the applicant concerning the award of a grant, or provision of other financial benefits, to the organization that such member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations under § 578.49(b)(2) and § 578.51(g) and housing quality inspections of property under § 578.75(b) that the recipient, subrecipient, or related entity owns.

(d) *Other conflicts.* For all other transactions and activities, the following restrictions apply:

(1) No covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, sub-contract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.

(2) *Exceptions.* Upon the written request of the recipient, HUD may grant an exception to the provisions of this section on a case-by-case basis, taking into account the cumulative effects of the criteria in paragraph (d)(2)(ii) of this section, provided that the recipient has satisfactorily met the threshold requirements of paragraph (d)(2)(ii) of this section.

(i) *Threshold requirements.* HUD will consider an exception only after the recipient has provided the following documentation:

(A) Disclosure of the nature of the conflict, accompanied by a written assurance, if the recipient is a government, that there has been public disclosure of the conflict and a description of how the public disclosure was made; and if the recipient is a private nonprofit organization, that the conflict has been disclosed in accordance with their written code of conduct or other conflict-of-interest policy; and

(B) An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law, or if the subrecipient is a private nonprofit organization, the exception would not violate the organization's internal policies.

(ii) *Factors to be considered for exceptions.* In determining whether to grant a requested exception after the recipient has satisfactorily met the threshold requirements under paragraph (c)(3)(i) of this section, HUD must conclude that the exception will serve to further the purposes of the Continuum of Care program and the effective and efficient administration of the recipient's or subrecipient's project, taking into account the cumulative effect of the following factors, as applicable:

(A) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;

(B) Whether an opportunity was provided for open competitive bidding or negotiation;

(C) Whether the affected person has withdrawn from his or her functions, responsibilities, or the decision-making process with respect to the specific activity in question;

(D) Whether the interest or benefit was present before the affected person was in the position described in paragraph (c)(1) of this section;

(E) Whether undue hardship will result to the recipient, the subrecipient, or the person affected, when weighed against the public interest served by avoiding the prohibited conflict;

(F) Whether the person affected is a member of a group or class of persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as

are being made available or provided to the group or class; and

(G) Any other relevant considerations.

§ 578.97 Program income.

(a) *Defined.* Program income is the income received by the recipient or subrecipient directly generated by a grant-supported activity.

(b) *Use.* Program income earned during the grant term shall be retained by the recipient, and added to funds committed to the project by HUD and the recipient, used for eligible activities in accordance with the requirements of this part. Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to grant funds.

(c) *Rent and occupancy charges.* Rents and occupancy charges collected from program participants are program income. In addition, rents and occupancy charges collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing.

§ 578.99 Applicability of other federal requirements.

In addition to the requirements set forth in 24 CFR part 5, use of assistance provided under this part must comply with the following federal requirements:

(a) *Environmental review.* Activities under this part are subject to environmental review by HUD under 24 CFR part 50 as noted in § 578.31.

(b) *Section 6002 of the Solid Waste Disposal Act.* State agencies and agencies of a political subdivision of a state that are using assistance under this part for procurement, and any person contracting with such an agency with respect to work performed under an assisted contract, must comply with the requirements of Section 6003 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. In accordance with Section 6002, these agencies and persons must:

(1) Procure items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part

247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired in the preceding fiscal year exceeded \$10,000;

(2) Procure solid waste management services in a manner that maximizes energy and resource recovery; and

(3) Must have established an affirmative procurement program for the procurement of recovered materials identified in the EPA guidelines.

(c) *Transparency Act Reporting.* Section 872 of the Duncan Hunter Defense Appropriations Act of 2009, and additional requirements published by the Office of Management and Budget (OMB), requires recipients to report subawards made either as pass-through awards, subrecipient awards, or vendor awards in the Federal Government Web site *www.fdrs.gov* or its successor system. The reporting of award and subaward information is in accordance with the requirements of the Federal Financial Assistance Accountability and Transparency Act of 2006, as amended by section 6202 of Public Law 110-252 and in OMB Policy Guidance issued to the federal agencies on September 14, 2010 (75 FR 55669).

(d) *The Coastal Barrier Resources Act of 1982* (16 U.S.C. 3501 *et seq.*) may apply to proposals under this part, depending on the assistance requested.

(e) *Applicability of OMB Circulars.* The requirements of 24 CFR part 85—Administrative Requirements for Grants and Cooperative Agreements to State, Local, and Federally Recognized Indian Tribal Governments and 2 CFR part 225—Cost Principles for State, Local and Indian Tribal Governments (OMB Circular A-87)—apply to governmental recipients and subrecipients except where inconsistent with the provisions of this part. The requirements of 24 CFR part 84—Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations; 2 CFR part 230—Cost Principles for Non-Profit Organizations (OMB Circular A-122); and 2 CFR part

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220—Cost Principles for Education Institutions apply to the nonprofit recipients and subrecipients, except where inconsistent with the provisions of the McKinney-Vento Act or this part.

(f) *Lead-based paint.* The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to activities under this program.

(g) *Audit.* Recipients and subrecipients must comply with the audit requirements of OMB Circular A-133, “Audits of States, Local Governments, and Non-profit Organizations.”

(h) *Davis-Bacon Act.* The provisions of the Davis-Bacon Act do not apply to this program.

(i) *Section 3 of the Housing and Urban Development Act.* Recipients and subrecipients must, as applicable, comply with Section 3 of the Housing and Urban Development Act of 1968 and its implementing regulations at 24 CFR part 135, as applicable.

Subpart G—Grant Administration

§ 578.101 Technical assistance.

(a) *Purpose.* The purpose of Continuum of Care technical assistance is to increase the effectiveness with which Continuums of Care, eligible applicants, subrecipients, and UFAs implement and administer their Continuum of Care planning process; improve their capacity to prepare applications; prevent the separation of families in projects funded under the Emergency Solutions Grants, Continuum of Care, and Rural Housing Stability Assistance programs; and adopt and provide best practices in housing and services for persons experiencing homelessness.

(b) *Defined.* Technical assistance means the transfer of skills and knowledge to entities that may need, but do not possess, such skills and knowledge. The assistance may include, but is not limited to, written information such as papers, manuals, guides, and brochures; person-to-person exchanges; web-based curriculums, training and Webinars, and their costs.

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(c) *Set-aside.* HUD may set aside funds annually to provide technical assistance, either directly by HUD staff or indirectly through third-party providers.

(d) *Awards.* From time to time, as HUD determines the need, HUD may advertise and competitively select providers to deliver technical assistance. HUD may enter into contracts, grants, or cooperative agreements, when necessary, to implement the technical assistance. HUD may also enter into agreements with other federal agencies for awarding the technical assistance funds.

§ 578.103 Recordkeeping requirements.

(a) *In general.* The recipient and its subrecipients must establish and maintain standard operating procedures for ensuring that Continuum of Care program funds are used in accordance with the requirements of this part and must establish and maintain sufficient records to enable HUD to determine whether the recipient and its subrecipients are meeting the requirements of this part, including:

(1) *Continuum of Care records.* Each collaborative applicant must keep the following documentation related to establishing and operating a Continuum of Care:

(i) Evidence that the Board selected by the Continuum of Care meets the requirements of § 578.5(b);

(ii) Evidence that the Continuum has been established and operated as set forth in subpart B of this part, including published agendas and meeting minutes, an approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least once every 5 years, evidence required for designating a single HMIS for the Continuum, and monitoring reports of recipients and subrecipients;

(iii) Evidence that the Continuum has prepared the application for funds as set forth in § 578.9, including the designation of the eligible applicant to be the collaborative applicant.

(2) *Unified funding agency records.* UFAs that requested grant amendments from HUD, as set forth in § 578.105, must keep evidence that the

grant amendment was approved by the Continuum. This evidence may include minutes of meetings at which the grant amendment was discussed and approved.

(3) *Homeless status.* Acceptable evidence of the homeless as status is set forth in 24 CFR 576.500(b).

(4) *At risk of homelessness status.* For those recipients and subrecipients that serve persons at risk of homelessness, the recipient or subrecipient must keep records that establish “at risk of homelessness” status of each individual or family who receives Continuum of Care homelessness prevention assistance. Acceptable evidence is found in 24 CFR 576.500(c).

(5) *Records of reasonable belief of imminent threat of harm.* For each program participant who moved to a different Continuum of Care due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking under § 578.51(c)(3), each recipient or subrecipient of assistance under this part must retain:

(i) Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the program participant’s case file. This may be written observation of the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; court records or law enforcement records; or written certification by the program participant to whom the violence occurred or by the head of household.

(ii) Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking, which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence. This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other pro-

fessional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program participant to whom the violence occurred or the head of household.

(6) *Annual income.* For each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant, the recipient or subrecipient must keep the following documentation of annual income:

(i) Income evaluation form specified by HUD and completed by the recipient or subrecipient; and

(ii) Source documents (*e.g.*, most recent wage statement, unemployment compensation statement, public benefits statement, bank statement) for the assets held by the program participant and income received before the date of the evaluation;

(iii) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, employer, government benefits administrator) or the written certification by the recipient’s or subrecipient’s intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period; or

(iv) To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

(7) *Program participant records.* In addition to evidence of “homeless” status or “at-risk-of-homelessness” status, as applicable, the recipient or subrecipient must keep records for each program participant that document:

(i) The services and assistance provided to that program participant, including evidence that the recipient or subrecipient has conducted an annual

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assessment of services for those program participants that remain in the program for more than a year and adjusted the service package accordingly, and including case management services as provided in § 578.37(a)(1)(ii)(F); and

(ii) Where applicable, compliance with the termination of assistance requirement in § 578.91.

(8) *Housing standards.* The recipient or subrecipient must retain documentation of compliance with the housing standards in § 578.75(b), including inspection reports.

(9) *Services provided.* The recipient or subrecipient must document the types of supportive services provided under the recipient's program and the amounts spent on those services. The recipient or subrecipient must keep record that these records were reviewed at least annually and that the service package offered to program participants was adjusted as necessary.

(10) *Match.* The recipient must keep records of the source and use of contributions made to satisfy the match requirement in § 578.73. The records must indicate the grant and fiscal year for which each matching contribution is counted. The records must show how the value placed on third party in-kind contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

(11) *Conflicts of interest.* The recipient and its subrecipients must keep records to show compliance with the organizational conflict-of-interest requirements in § 578.95(c), the Continuum of Care board conflict-of-interest requirements in § 578.95(b), the other conflict requirements in § 578.95(d), a copy of the personal conflict-of-interest policy developed and implemented to comply with the requirements in § 578.95, and records supporting exceptions to the personal conflict-of-interest prohibitions.

(12) *Homeless participation.* The recipient or subrecipient must document its compliance with the homeless participation requirements under § 578.75(g).

(13) *Faith-based activities.* The recipient and its subrecipients must document their compliance with the faith-

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based activities requirements under § 578.87(b).

(14) *Affirmatively Furthering Fair Housing.* Recipients and subrecipients must maintain copies of their marketing, outreach, and other materials used to inform eligible persons of the program to document compliance with the requirements in § 578.93(c).

(15) *Other federal requirements.* The recipient and its subrecipients must document their compliance with the federal requirements in § 578.99, as applicable.

(16) *Subrecipients and contractors.* (i) The recipient must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable.

(ii) The recipient must retain documentation of monitoring subrecipients, including any monitoring findings and corrective actions required.

(iii) The recipient and its subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 24 CFR 85.36 and 24 CFR part 84.

(17) *Other records specified by HUD.* The recipient and subrecipients must keep other records specified by HUD.

(b) *Confidentiality.* In addition to meeting the specific confidentiality and security requirements for HMIS data, the recipient and its subrecipients must develop and implement written procedures to ensure:

(1) All records containing protected identifying information of any individual or family who applies for and/or receives Continuum of Care assistance will be kept secure and confidential;

(2) The address or location of any family violence project assisted with Continuum of Care funds will not be made public, except with written authorization of the person responsible for the operation of the project; and

(3) The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of

the recipient or subrecipient and consistent with State and local laws regarding privacy and obligations of confidentiality;

(c) *Period of record retention.* All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

(1) Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served; and

(2) Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants.

(d) *Access to records.* (1) *Federal Government rights.* Notwithstanding the confidentiality procedures established under paragraph (b) of this section, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of the recipient and its subrecipients that are pertinent to the Continuum of Care grant, in order to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period, but last as long as the records are retained.

(2) *Public rights.* The recipient must provide citizens, public agencies, and other interested parties with reasonable access to records regarding any uses of Continuum of Care funds the recipient received during the preceding 5 years, consistent with State and local laws regarding privacy and obligations of confidentiality and confidentiality requirements in this part.

(e) *Reports.* In addition to the reporting requirements in 24 CFR parts 84 and 85, the recipient must collect and report data on its use of Continuum of

Care funds in an Annual Performance Report (APR), as well as in any additional reports as and when required by HUD. Projects receiving grant funds only for acquisition, rehabilitation, or new construction must submit APRs for 15 years from the date of initial occupancy or the date of initial service provision, unless HUD provides an exception under § 578.81(e).

§ 578.105 Grant and project changes.

(a) *For Unified Funding Agencies and Continuums having only one recipient.* (1) The recipient may not make any significant changes without prior HUD approval, evidenced by a grant amendment signed by HUD and the recipient. Significant grant changes include a change of recipient, a shift in a single year of more than 10 percent of the total amount awarded under the grant for one approved eligible activity category to another activity and a permanent change in the subpopulation served by any one project funded under the grant, as well as a permanent proposed reduction in the total number of units funded under the grant.

(2) Approval of substitution of the recipient is contingent on the new recipient meeting the capacity criteria in the NOFA under which the grant was awarded, or the most recent NOFA. Approval of shifting funds between activities and changing subpopulations is contingent on the change being necessary to better serve eligible persons within the geographic area and ensuring that the priorities established under the NOFA in which the grant was originally awarded, or the most recent NOFA, are met.

(b) *For Continuums having more than one recipient.* (1) The recipients or subrecipients may not make any significant changes to a project without prior HUD approval, evidenced by a grant amendment signed by HUD and the recipient. Significant changes include a change of recipient, a change of project site, additions or deletions in the types of eligible activities approved for a project, a shift of more than 10 percent from one approved eligible activity to another, a reduction in the number of units, and a change in the subpopulation served.

§ 578.107

(2) Approval of substitution of the recipient is contingent on the new recipient meeting the capacity criteria in the NOFA under which the grant was awarded, or the most recent NOFA. Approval of shifting funds between activities and changing subpopulations is contingent on the change being necessary to better serve eligible persons within the geographic area and ensuring that the priorities established under the NOFA in which the grant was originally awarded, or the most recent NOFA, are met.

(c) *Documentation of changes not requiring a grant amendment.* Any other changes to an approved grant or project must be fully documented in the recipient's or subrecipient's records.

§ 578.107 Sanctions.

(a) *Performance reviews.* (1) HUD will review the performance of each recipient in carrying out its responsibilities under this part, with or without prior notice to the recipient. In conducting performance reviews, HUD will rely primarily on information obtained from the records and reports from the recipient and subrecipients, as well as information from on-site monitoring, audit reports, and information generated from HUD's financial and reporting systems (e.g., LOCCS and e-snaps) and HMIS. Where applicable, HUD may also consider relevant information pertaining to the recipient's performance gained from other sources, including citizen comments, complaint determinations, and litigation.

(2) If HUD determines preliminarily that the recipient or one of its subrecipients has not complied with a program requirement, HUD will give the recipient notice of this determination and an opportunity to demonstrate, within the time prescribed by HUD and on the basis of substantial facts and data that the recipient has complied with the requirements. HUD may change the method of payment to require the recipient to submit documentation before payment and obtain HUD's prior approval each time the recipient draws down funds. To obtain prior approval, the recipient may be required to manually submit its payment requests and supporting documentation

24 CFR Ch. V (4-1-13 Edition)

to HUD in order to show that the funds to be drawn down will be expended on eligible activities in accordance with all program requirements.

(3) If the recipient fails to demonstrate to HUD's satisfaction that the activities were carried out in compliance with program requirements, HUD may take one or more of the remedial actions or sanctions specified in paragraph (b) of this section.

(b) *Remedial actions and sanctions.* Remedial actions and sanctions for a failure to meet a program requirement will be designed to prevent a continuation of the deficiency; to mitigate, to the extent possible, its adverse effects or consequences; and to prevent its recurrence.

(1) HUD may instruct the recipient to submit and comply with proposals for action to correct, mitigate, and prevent noncompliance with program requirements, including:

(i) Preparing and following a schedule of actions for carrying out activities and projects affected by the noncompliance, including schedules, timetables, and milestones necessary to implement the affected activities and projects;

(ii) Establishing and following a management plan that assigns responsibilities for carrying out the remedial actions;

(iii) Canceling or revising activities or projects likely to be affected by the noncompliance, before expending grant funds for them;

(iv) Reprogramming grant funds that have not yet been expended from affected activities or projects to other eligible activities or projects;

(v) Suspending disbursement of grant funds for some or all activities or projects;

(vi) Reducing or terminating the remaining grant of a subrecipient and either reallocating those funds to other subrecipients or returning funds to HUD; and

(vii) Making matching contributions before or as draws are made from the recipient's grant.

(2) HUD may change the method of payment to a reimbursement basis.

(3) HUD may suspend payments to the extent HUD determines necessary

to preclude the further expenditure of funds for affected activities or projects.

(4) HUD may continue the grant with a substitute recipient of HUD's choosing.

(5) HUD may deny matching credit for all or part of the cost of the affected activities and require the recipient to make further matching contributions to make up for the contribution determined to be ineligible.

(6) HUD may require the recipient to reimburse the recipient's line of credit in an amount equal to the funds used for the affected activities.

(7) HUD may reduce or terminate the remaining grant of a recipient.

(8) HUD may condition a future grant.

(9) HUD may take other remedies that are legally available.

(c) *Recipient sanctions.* If the recipient determines that a subrecipient is not complying with a program requirement or its subrecipient agreement, the recipient must take one of the actions listed in paragraphs (a) and (b) of this section.

(d) *Deobligation.* HUD may deobligate funds for the following reasons:

(1) If the timeliness standards in § 578.85 are not met;

(2) If HUD determines that delays completing construction activities for a project will mean that the funds for other funded activities cannot reasonably be expected to be expended for eligible costs during the remaining term of the grant;

(3) If the actual total cost of acquisition, rehabilitation, or new construction for a project is less than the total cost agreed to in the grant agreement;

(4) If the actual annual leasing costs, operating costs, supportive services costs, rental assistance costs, or HMIS costs are less than the total cost agreed to in the grant agreement for a one-year period;

(5) Program participants have not moved into units within 3 months of the time that the units are available for occupancy; and

(6) The grant agreement may set forth in detail other circumstances under which funds may be deobligated and other sanctions may be imposed.

§ 578.109 Closeout.

(a) *In general.* Grants will be closed out in accordance with the requirements of 24 CFR parts 84 and 85, and closeout procedures established by HUD.

(b) *Reports.* Applicants must submit all reports required by HUD no later than 90 days from the date of the end of the project's grant term.

(c) *Closeout agreement.* Any obligations remaining as of the date of the closeout must be covered by the terms of a closeout agreement. The agreement will be prepared by HUD in consultation with the recipient. The agreement must identify the grant being closed out, and include provisions with respect to the following:

(1) Identification of any closeout costs or contingent liabilities subject to payment with Continuum of Care program funds after the closeout agreement is signed;

(2) Identification of any unused grant funds to be deobligated by HUD;

(3) Identification of any program income on deposit in financial institutions at the time the closeout agreement is signed;

(4) Description of the recipient's responsibility after closeout for:

(i) Compliance with all program requirements in using program income on deposit at the time the closeout agreement is signed and in using any other remaining Continuum of Care program funds available for closeout costs and contingent liabilities;

(ii) Use of real property assisted with Continuum of Care program funds in accordance with the terms of commitment and principles;

(iii) Use of personal property purchased with Continuum of Care program funds; and

(iv) Compliance with requirements governing program income received subsequent to grant closeout.

(5) Other provisions appropriate to any special circumstances of the grant closeout, in modification of or in addition to the obligations in paragraphs (c)(1) through (4) of this section.

Exhibit H
Insurance

INSURANCE COVERAGES REQUIRED

Contractor shall not commence any work until Contractor obtains, at Contractor's own expense, all required insurance as specified below. Such insurance must have the approval of Lane County as to limits, form and amount. The types of insurance Contractor is required to obtain or maintain for the full period of the contract will be:

Commercial General Liability

MINIMUM POLICY LIMITS

- | | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | \$2 million per occurrence/\$4 million aggregate |
| <input type="checkbox"/> | Amount required by funding source |
| <input type="checkbox"/> | Other - Amount approved by Risk Manager or required by contract |

Policy must include:

- . Commercial General Liability
- . Damage to Rented Property (\$50,000)
- . Medical Expenses (\$5,000)
- . Personal and Advertising (Same as per occurrence)
- . Products/Completed Operations (Same as per occurrence)

All policies must be of the occurrence form with combined single limit for bodily injury and property damage. Any deviation from this must be approved by Risk Management. All claims-made forms must be approved by Risk Management in advance and provide tail/continuous coverage for 24 months from the end of the project.

Aggregate Limits: Per Policy

Automobile Liability

MINIMUM POLICY LIMITS

- | | |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | \$2 million combined single limit per accident for bodily injury and property damage |
| <input type="checkbox"/> | Statutory Amount |
| <input type="checkbox"/> | Amount required by funding source |
| <input type="checkbox"/> | Other - Amount approved by Risk Manager and required by contract |

Insurance with limits as specified below. Coverage shall include owned, hired and non-owned autos and include Lane County and its divisions, commissioners, officers, agents, and employees as additional designated insureds (CA 20 48 02 99 or equivalent).

Workers' Compensation and Employer's Liability

MINIMUM POLICY LIMITS

- | | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Statutory amount (currently \$500,000 in Oregon, other states may vary) |
| <input type="checkbox"/> | Other: minimum of \$1,000,000 when not regulated by statute |

As statutorily required for persons performing work under this contract. Any subcontractor hired by Contractor shall also carry Workers' Compensation and Employers' Liability coverage. Sole proprietors not subject to Workers' Compensation coverage must complete, execute, and submit the Workers' Compensation Coverage Exemption Statement.

- Additional Insured Clause** The liability insurance coverage's required for performance of this contract shall be endorsed to name Lane County and its divisions, its commissioners, officers, agents and employees as additional insureds on any insurance policies required herein with respect to Provider's activities being performed under the Contract. The additional insureds must be named as an additional insured by endorsement, and the policy must be endorsed to show cancellation notices to the Lane County department who originated the contract. Coverage shall be primary and non-contributory with any other insurance and self-insurance.

DIRECT ALL INSURANCE RELATED DOCUMENTS FOR YOUR CONTRACT TO YOUR CONTACT AT LANE COUNTY; DO NOT DIRECT YOUR DOCUMENTS TO RISK MANAGEMENT AS THIS WILL RESULT IN DELAYS.

Attachment 1E-2a: Scored Forms for One Project

Included:

- Final Scorecard for One Project – SVdP LIFT

August 5, 2022

Dear **Terrance McDonald**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	78.00	Total Points Received	66.00	
	Preliminary Score	84.62%		
	Final Score	84.62%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	St. Vincent de Paul Society of Lane County, Inc.			
Project Name	Lift			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible Points Received
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	Yes	\$ -	8 8
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	26-50% match	26-50% match	4 3
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible Points Received
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1 1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2 2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2 2
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3 3
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	0	3 3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	60-74.9%	60-74.9%	4	3
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Youth Head of Household (under 25)	72%	4	3
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	Yes	1	1
Do the project's written discharge and termination policies include all of the following?	due process hearing or	All	1	1
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	Through this provider is aware of disparities in race within	Through this provider is aware of disparities in race within	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	encourages staff to attend St. Vincent de Paul's monthly	encourages staff to attend St. Vincent de Paul's monthly	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	c. On-site employment opportunities	c. On-site employment opportunities	1	1
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	All	2	2
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	concerned that their case	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	88%	Above 80%	6	6
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	100%	100%	6	6
Of the households who left the project (leavers) what percentage exited to a permanent destination?	0%	0%	6	0
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	100%	100%	5	5
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	72%	54%	5	2
Totals	Total Points Possible		Total Points Received	
	78.00		66.00	

Overall Comments:

Appeals:

System Priorities Q1: Not approved. The project received points that reflect the extent they serve the populations outlined. The question is for ranking purposes and to provide additional points to projects serving higher percentages of individuals who are CH to offset performance impacts. Project score was appropriate.

System Priorities Q2: Not approved. The project received points that reflect the extent they serve the populations outlined. The question is for ranking purposes and to provide additional points to projects serving higher percentages of individuals who are higher vulnerability to offset performance impacts. Project score was appropriate.

Reviewer: Amanda Borta

Attachment 1E-5: Projects Rejected or Reduced Notification

Included:

- Explanation re: Projects Rejected/Reduced



Lane County Human Services Division
Housing and Community Action Programs
1132 Lawrence Street
Eugene, OR 97401

541.682.4688 phone
541.682.3760 fax

September 15, 2022

For Public Posting

Re: CoC Notification of Rejected or Reduced Applicants

This is to notify all interested parties that **no projects or applications were rejected or reduced** in the FY22 HUD CoC Competition process.

The CoC is required to notify all project applicants no later than 15 days before the application deadline regarding whether project applications will be submitted and ranked within the Priority Listing submitted as part of the CoC Consolidated Application. Any project applicants rejected by the CoC must be notified in writing outside of e-snaps, with an explanation for the decision. All projects were notified of the final ranking on September 15, 2022.

Amanda Borta, MSW
Sr. Program Services Coordinator, CoC Lead
Lane County Human Services Division

Attachment 1E-5a: Projects Accepted

Included:

- Final Coc approved Ranking document
- Screenshot of public posting
- Email to accepted applicants and subrecipients

BORTA Amanda L

From: BORTA Amanda L
Sent: Thursday, September 15, 2022 2:36 PM
To: cdaniel@sheltercare.org; 'Chris Pickering'; 'Foster Martinez'; Jaclyn LaRue; Jacob Fox; Maleigha Myers; MCDONALD Terry (SMTP); 'mhankes@sheltercare.org'; OPPERMAN Craig (SMTP); Scott Eastburn; sfendler@sheltercare.org; Dana Petersen-Crabb; Tim Cling; Alyssa Hoekman; Daniel Dickens; Karen Etter; Suzanne Turner; Kathleen Broadhurst; Wakan Alferes; Rebecca Murphy Lyons; Jessica Shafer; Tracey Eppler; MURPHY Shawn (SMTP); Kathy Bootes; Gwen Barnes; Amy Wilson; Cameron Sigler; Dianne Keller; Jennifer Reyes; cmccowen@mainstreamhousing.org
Cc: BUDD Kate A
Subject: NOTICE: Final CoC Ranking is Now Posted
Attachments: Final Ranking OR-500 CoC.pdf
Importance: High



To: CoC Project Applicants (Lane County, St. Vincent de Paul, Homes for Good) and Lane County Subrecipients (Catholic Community Services, Looking Glass, ShelterCare, Mainstream Housing, Laurel Hill Center)

Re: FY2022 CoC Program Competition Final Ranking and Priority Listing

The FY22 HUD CoC NOFO requires that the CoC notify applicants if their application(s) were either rejected or accepted and ranked on the Priority Listing, in writing, outside of e-snaps.

On September 7, 2022, a committee Poverty and Homelessness Board (PHB) and LEAGUE members met to determine the final project ranking for all renewal and new CoC funded projects. Members present were Brittany Quick-Warner (PHB Vice Chair), Sheriff Cliff Harrold (PHB Member), Katharine Ryan (PHB Member), Richard Self (LEAGUE) and Martha Bryson (LEAGUE).

On September 15, 2022, the full CoC Board (PHB) approved the committee's ranking and prioritization. All projects accepted have been ranked and are included in the Priority Listing.

Please see email attachment that details the final PHB approved Ranking to be included in the Priority Listing for submission with the CoC Application.

The Final Priority Listing, Notification of Projects Rejected, and all Project Applications are now posted to the Lane County website:

https://www.lanecounty.org/government/county_departments/health_and_human_services/human_services_division/plans_publications_reports

2022 HUD CoC Application PROJECT RANKING

GRANTEE	Project Name	Project Type	Description	2020 Performance	2021 Performance	2022 Performance	Three Year Average	Current Grant Amount	FINAL RANK	
TIER 1	LC	HMIS	HMIS	Homeless Management Information System (HMIS) is local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Lane County uses Wellsky.	n/a	n/a	n/a	n/a	\$ 135,995.00	1
	LC	THE NEL	PSH	45 units of Permanent Supportive Housing project for CH adults prioritizing FUSE participants			-	n/a	\$ 232,381.00	2
	SVDP	Vet LIFT	PSH	18 Chronically Homeless Male and Female Veteran Households (Adult only and Households with Children) with long term disabling condition (Dual Diagnosis of Mental Illness With Substance Abuse).	92.86%	76.67%	84.85%	84.79%	\$ 241,005.00	3
	SVDP	LIFT	PSH	18 Chronically Homeless Adults & Homeless Households with Children With Co-occurring Mental illness and Substance Use history	89.55%	80.00%	84.62%	84.72%	\$ 311,537.00	4
	LC	SHANKLE/MLK	PSH	62 Chronically Homeless Adults prioritizing FUSE (51 project based and 11 scattered site units).	82.86%	76.36%	63.39%	74.20%	\$ 541,979.00	5
	LC	CAMAS	PSH	14 Chronically Homeless Households (Adult only and Households with Children) with long term disabling condition (severe mental illness) and acute medical needs.	76.39%	73.08%	70.83%	73.43%	\$ 212,810.00	6
	Homes for Good	MADRONE/SPC CONSOLIDATED	PSH	73 Homeless and Chronically Homeless Households (Adult only and Households with Children) with long term disabling condition (mental health/substance abuse, medical or developmental).	90.28%	61.67%	60.26%	70.74%	\$ 829,786.00	7
	LC	EMERALD	PSH	15 Homeless Households (Adult only and Households with Children) with long term disabling condition (developmental).	88.89%	56.67%	57.69%	67.75%	\$ 219,485.00	8
	LC	MCKENZIE	RRH	51 Homeless Households (Adult only households, Households with Children, Households of Children only)	72.17%	65.83%	56.71%	64.90%	\$ 809,618.00	9
	SVDP	CONNECTIONS	RRH	21 Homeless Households With Children	69.44%	61.11%	58.97%	63.17%	\$ 243,084.00	10
LC	SAHALIE	PSH	13 units of Permanent Supportive Housing for CH individuals prioritizing FUSE participants	73.90%	51.67%	56.41%	60.66%	\$39,002.00	11	
Tier 2	LC	SAHALIE	PSH	13 units of Permanent Supportive Housing for CH individuals prioritizing FUSE participants	73.90%	51.67%	56.41%	60.66%	\$ 200,878.00	11
	LC	Coordinated Entry (BONUS)	CE-SSO					\$ 200,878.00	12	
	LC	Coordinated Entry -DV (DV BONUS)	CE-SSO DV				n/a	\$ 90,263.00	13	
			All Projects listed in this ranking have been accepted and ranked by the CoC in the Priority Listing.				Bonus	\$ 200,878		
							DV Bonus	\$ 90,263		
							ANNUAL RENEWAL AMOUNT	\$ 4,017,560		
							Tier 1	\$ 3,816,682		
						Tier 2	\$ 492,019			
PLANNING	LC	PLANNING	Planning	Staffing to support the HUD CoC Program application, administer ranking and prioritizing of renewals and new projects, evaluate the outcomes of individual CoC and ESG program projects, compliance activities for the CoC re: environmental reviews and coordinated entry system for homeless services				\$ 120,527.00	NOT RANKED	
							Planning Grant (not ranked)	\$ 120,527		
						Application Totals (Renewals, New, and Planning)	\$ 4,429,228.00			

FINAL RANKING SCENARIO

- Capacity Projects (not scored)
- New Projects (first year of operation; not scored)
- Renewals by Performance (Three Year Average)
- Bonus Projects

HUMAN SERVICES DIVISION

Plans, Publications & Reports

PLANS, PUBLICATIONS & REPORTS

🔄 🖨️ A- A+

- Lane County ▾
- Youth Homelessness Demonstration Program 2022 ▾
- HUD FY22 Continuum of Care Application ▲
 - [HUD CoC Competition Policies - Approved](#)
 - [HUD CoC Competition Timelines](#)
 - [Final CoC Priority Listing FY22](#)
 - [Public Posting - Projects Rejected/Reduced](#)
- HUD FY22 Continuum of Care Projects ▾
- HUD 2021 Continuum of Care Application ▾
- HUD 2021 Continuum of Care Projects ▾

Attachment 1E-5b: Scored Forms for All Projects Accepted

Included:

- Final Scorecards for the following Renewal Projects:
 - McKenzie (Includes 4 subrecipient projects: LG, SC, CCS, and SC Cascades; final score averaged)
 - Shankle/MLK (Includes two subrecipient projects: Shankle and MLK; final score averaged)
 - Camas
 - Sahalie
 - The Nel
 - Madrone/SPC
 - Connections
 - LIFT
 - VetLIFT
- Explanation re: New Projects Accepted (CE-SSO, CE-SSO DV)
- Final Ranking of Accepted Projects with
 - Applicant
 - Project
 - Score
 - Amount
 - Status

2022 HUD CoC Application PROJECT RANKING

GRANTEE	Project Name	Project Type	Description	2020 Performance	2021 Performance	2022 Performance	Three Year Average	Current Grant Amount	FINAL RANK	
TIER 1	LC	HMIS	HMIS	Homeless Management Information System (HMIS) is local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Lane County uses Wellsky.	n/a	n/a	n/a	n/a	\$ 135,995.00	1
	LC	THE NEL	PSH	45 units of Permanent Supportive Housing project for CH adults prioritizing FUSE participants			-	n/a	\$ 232,381.00	2
	SVDP	Vet LIFT	PSH	18 Chronically Homeless Male and Female Veteran Households (Adult only and Households with Children) with long term disabling condition (Dual Diagnosis of Mental Illness With Substance Abuse).	92.86%	76.67%	84.85%	84.79%	\$ 241,005.00	3
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	LC	Coordinated Entry (BONUS)	CE-SSO					\$ 200,878.00	12	
	LC	Coordinated Entry -DV (DV BONUS)	CE-SSO DV				n/a	\$ 90,263.00	13	
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							DV Bonus	\$ 90,263		
							ANNUAL RENEWAL AMOUNT	\$ 4,017,560		
							Tier 1	\$ 3,816,682		
							Tier 2	\$ 492,019		
PLANNING	LC	PLANNING	Planning	Staffing to support the HUD CoC Program application, administer ranking and prioritizing of renewals and new projects, evaluate the outcomes of individual CoC and ESG program projects, compliance activities for the CoC re: environmental reviews and coordinated entry system for homeless services					\$ 120,527.00	NOT RANKED
								Planning Grant (not ranked)	\$ 120,527	
							Application Totals (Renewals, New, and Planning)	\$ 4,429,228.00		

FINAL RANKING SCENARIO

- Capacity Projects (not scored)
- New Projects (first year of operation; not scored)
- Renewals by Performance (Three Year Average)
- Bonus Projects

August 5, 2022

Dear **Tim Cling**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	78.00	Total Points Received	44.00	
	Preliminary Score	56.41%		
	Final Score	56.41%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	Catholic Community Services of Lane County			
Project Name	McKenzie Rapid ReHousing			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible Points Received
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	No - Complete 1A-1B	\$ 3,901.83	8 4
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	25% (minimum match required)	Minimum match	4 2
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible Points Received
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1 1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2 2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2 2
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3 3
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	75%	3 0

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	45-59.9%	45-59.9%	4	2
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Youth Head of Household (under 25)	21%	4	0
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	No	1	0
Do the project's written discharge and termination policies include all of the following?	due process hearing or	All	1	1
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	The agency is working on plans to identify racial disparities within	The agency is working on plans to identify racial disparities within	2	0
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	been able to partner with Oregon Department of	been able to partner with Oregon Department of	2	0
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	c. On-site employment opportunities	c. On-site employment opportunities	1	1
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	All	2	2
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	Community Services CoC	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	58%	Below 80%	6	0
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	100%	100%	6	6
Of the households who left the project (leavers) what percentage exited to a permanent destination?	88%	88%	6	4
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	33%	33%	5	2
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	51%	51%	5	2
Totals	Total Points Possible		Total Points Received	
	78.00		44.00	

Overall Comments:

GE&M: Project should work on spend down and ensure 100% of HUD funds are spent in next grant period.
SP&HF: document attached for written eligibility does not specify the eligibility criteria of the program
HMIS: timeliness of interim reviews can be improved.
E&I: Responses did not meet the requirements for full points based on the rubric provided.
Performance: Project needs to maintain above 80% capacity at all times.

No Appeals Submitted.

Reviewer:	Amanda	Borta
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August 5, 2022

Dear **Jacob Fox**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	78.00	Total Points Received	47.00	
	Preliminary Score	60.26%		
	Final Score	60.26%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	Homes for Good Housing Agency			
Project Name	ShelterPlusCare/Madrone			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible Points Received
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	No - Complete 1A-1B	\$ 21,022.76	8 0
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	25% (minimum match required)	Minimum match	4 2
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible Points Received
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1 1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2 2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2 2
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3 3
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	96%	3 3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	>75%	>75%	4	4
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Highly Vulnerable (VI-SPDAT Score 15)	76%	4	4
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	No	1	0
Do the project's written discharge and termination policies include all of the following?	that the agency will make and	Not All	1	0
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	Currently Homes for Good has a Strategic Equity Plan, and we	Currently Homes for Good has a Strategic Equity Plan, and we	2	0
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	took trainings through Hollaback, that went over de-	took trainings through Hollaback, that went over de-	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	b. Resident/tenant council or	b. Resident/tenant council or	1	1
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	c. Right to refuse services and have consequences	Not all	2	0
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	asked for more assistance with	3	0
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	96%	Above 80%	6	6
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	50%	0%	6	2
Of the households who left the project (leavers) what percentage exited to a permanent destination?	85%	85%	6	4
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	20%	36%	5	2
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	50%	50%	5	2
Totals	Total Points Possible		Total Points Received	
	78.00		47.00	

Overall Comments:

GE&M: Project should work on spend down and ensure 100% of HUD funds are spent in next grant period.

SP & HF: application attached as written eligibility document- does not state eligibility criteria and has language that is not in alignment with Housing First; Termination policies missing required items

E&I: Agency did not identify strategies to address racial disparities within programming or access, any significant successes and challenges that the project experienced in this work over the past year, or what the agency has done to effectively address challenges.

PF: Client Rights document did not include all required items; response to feedback did not reply to the full requirements of the question based on the rubric provided.

System Priorities Q4: Not approved. Policy attached at time of Evaluation did not meet requirements. Agency is encouraged to have an outward facing written eligibility criteria policy for participants that clearly outlines the written eligibility criteria that is also in alignment with Housing First, as required.

Reviewer: Amanda Borta

August 5, 2022

Dear **Craig Opperman**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	73.00	Total Points Received	43.00	
	Preliminary Score	50.68%		
	Final Score	58.90%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	Looking Glass Community Services			
Project Name	McKenzie RRH			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible Points Received
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	No - Complete 1A-1B	\$ 5,020.32	8 0
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	51% or greater match	Less than full expenditure, minimum match met	4 2
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible Points Received
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, less than 3 meetings	Yes, less than 3 meetings	1 1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2 2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2 2
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	No	27%	3 0
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	50%	3 0

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	60-74.9%	60-74.9%	4	3
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Youth Head of Household (under 25)	100%	4	4
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	No	1	0
Do the project's written discharge and termination policies include all of the following?	due process hearing or	Not All	1	0
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	The whole Looking Glass agency incorporates a committee with	The whole Looking Glass agency incorporates a committee with	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	community services has formed a committee	community services has formed a committee	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	a. Weekly "house" meetings or	a. Weekly "house" meetings or	1	1
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	All	2	2
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	values youth voices, and	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	70%	Below 80%	6	0
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	50%	100%	6	6
Of the households who left the project (leavers) what percentage exited to a permanent destination?	100%	100%	6	6
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	0%	N/A	0	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	0%	0%	5	0
Totals	Total Points Possible		Total Points Received	
	73.00		43.00	

Overall Comments:

GE&M: Project should work on spend down and ensure 100% of HUD funds are spent in next grant period.
SP &HF: written eligibility and termination policies are copied from the program plan language provided - are these agency policies and are these shared with participants? Stating the requirement to have a policy does not meet the requirements outlined.
Performance: Project needs to maintain above 80% capacity at all times; one measure did not apply as there were no participants for which the measure was applicable.

Appeals:

HMIS Q4: Resolved with corrected report submitted. Score adjusted.
System Priorities Q4: Not approved - document submitted at time of Evaluation did not meet requirements. Recommended agency improve for next year.
System Priorities Q5: Not approved - document submitted at time of Evaluation did not meet requirements. Recommended agency improve for next year.
Performance Q2: Resolved with corrected report submitted. Score adjusted.
Performance Q3: Resolved with corrected report submitted. Score adjusted.

Reviewer: Amanda Borta

August 5, 2022

Dear **Shawn Murphy**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
 Amanda Borta, MSW
 Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	0.00	Total Points Received	0.00	
Preliminary Score		N/A		
Final Score		N/A		
Average Final Score	63.64%			
Agency & Project Information				
Agency Name	Laurel Hill Center			
Project Name	The Nel			
Threshold Questions				
		ALL THRESHOLDS MET?	Yes	
Grant Expenditure (12 points)				
Question	Data Submitted	Verified	Points Possible	Points Received
Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)		\$ -	0	0
What level of match was provided for the grant term that most recently ended (as reported in the APR)?		\$0.00	0	0
HMIS and Data Quality (11 Points)				
Question	Data	Verified	Points Possible	Points Received
Has your agency administrator(s) attended Agency Admin meetings in the past year?			0	0
Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?			0	0
What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?			0	0
Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)			0	0
Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-		0	0

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?			0	0
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?		0%	0	0
Does the project follow a Housing First Approach, according to HUD guidelines?			0	0
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?		0	0	0
Do the project's written discharge and termination policies include all of the following?		0	0	0
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency			0	0
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?			0	0
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to			0	0
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?			0	0
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items: Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants		0%	0	0
			0	0
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	0%	0%	0	0
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	0%	0%	0	0
Of the households who left the project (leavers) what percentage exited to a permanent destination?	0%	0%	0	0
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	0%	0%	0	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	0%	0%	0	0
Totals	Total Points Possible		Total Points Received	
	0.00		0.00	

Overall Comments:

Project has met minimum thresholds for renewal. Not scored in FY22 as project has not yet started/completed first year of programming.

Reviewer: Amanda

Borta

August 5, 2022

Dear **Jaelyn LaRue**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	78.00	Total Points Received	45.00	
	Preliminary Score	57.69%		
	Final Score	57.69%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	Mainstream Housing Incorporated			
Project Name	Emerald Options			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible Points Received
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	Yes	\$ -	8 8
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	25% (minimum match required)	Minimum match	4 2
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible Points Received
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1 1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2 2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2 2
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3 3
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	0	3 0

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	60-74.9%	60-74.9%	4	3
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Highly Vulnerable (VI-SPDAT Score 15)	38%	4	1
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	No	1	0
Do the project's written discharge and termination policies include all of the following?	due process hearing or	All	1	1
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has internal structures to	Agency has internal structures to	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	All programs within Mainstream Housing pay close attention	All programs within Mainstream Housing pay close attention	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	Housing seeks training opportunities and encourages	Housing seeks training opportunities and encourages	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	b. Resident/tenant council or	b. Resident/tenant council or	1	1
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	a. Confidentiality policy, b. Non-discriminatory	Not all	2	0
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	anonymous feedback	participant who lived on a	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	74%	Below 80%	6	0
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	100%	-	6	0
Of the households who left the project (leavers) what percentage exited to a permanent destination?	100%	100%	6	6
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	27%	0%	5	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	45%	45%	5	1
Totals	Total Points Possible		Total Points Received	
	78.00		45.00	

Overall Comments:

TECHNICAL DEFICIENCY - incorrect Evaluation report attached. Unable to score HMIS Q5 and project performance Q1. Submit corrected report with appeal to receive a corrected score and ensure all pages are included. Written Eligibility criteria not attached to submission.

SP&HF: written eligibility criteria not attached.

PF: client rights document includes no mention of grievance process

Performance: Project needs to maintain above 80% capacity at all times.

No Appeals Submitted. Technical Deficiency not able to be corrected.

Reviewer: Amanda

Borta

August 5, 2022

Dear **Michelle Hankes**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	72.00	Total Points Received	51.00	
	Preliminary Score	70.83%		
	Final Score	70.83%		
Average Final Score	63.64%			
Agency & Project Information				
Agency Name	ShelterCare			
Project Name	Camas PSH			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
Question	Data Submitted	Verified	Points Possible	Points Received
Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	No - Complete 1A-1B	\$ 3,034.28	8	4
What level of match was provided for the grant term that most recently ended (as reported in the APR)?	26-50% match	Less than full expenditure, minimum match met	4	2
HMIS and Data Quality (11 Points)				
Question	Data	Verified	Points Possible	Points Received
Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1	1
Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2	2
What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2	2
Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3	3
Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	0	3	3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	>75%	>75%	4	4
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Youth Head of Household (under 25)	40%	4	1
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	Yes	1	1
Do the project's written discharge and termination policies include all of the following?	due process hearing or	All	1	1
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	In the last year, all ShelterCare staff completed a training on identifying	In the last year, all ShelterCare staff completed a training on identifying	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	ShelterCare reformed the Diversity, Equity, and	ShelterCare reformed the Diversity, Equity, and	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	No, the project does not have ways for	No, the project does not have ways for	1	0
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	Not all	2	0
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	uses Ongoing anonymous	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	95%	Above 80%	6	6
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	89%	N/A	0	0
Of the households who left the project (leavers) what percentage exited to a permanent destination?	100%	100%	6	6
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	13%	0%	5	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	44%	44%	5	1
Totals	Total Points Possible		Total Points Received	
	72.00		51.00	

Overall Comments:

PF: document provided mentions the participant rights document - is this not the client rights document? Non-discrimination not mentioned in this document; Agency encouraged to incorporate ways for participants to contribute to day to day operations of the program; would encourage agency to utilize feedback specifically received for the Camas project in next Evaluation.

Performance: one measure did not apply as there were no participants for which the measure was applicable.

No Appeals Submitted.

Reviewer: Amanda Borta

August 5, 2022

Dear **Michelle Hankes**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	78.00	Total Points Received	38.00	
	Preliminary Score	48.72%		
	Final Score	48.72%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	ShelterCare			
Project Name	Cascades Rapid Re-Housing			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
Question	Data Submitted	Verified	Points Possible	Points Received
Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	No - Complete 1A-1B	\$ 46,411.37	8	0
What level of match was provided for the grant term that most recently ended (as reported in the APR)?	51% or greater match	Minimum match	4	2
HMIS and Data Quality (11 Points)				
Question	Data	Verified	Points Possible	Points Received
Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1	1
Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2	2
What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	B+ to B-	B+ to B-	2	1
Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3	3
Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	0	3	3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	>75%	>75%	4	4
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	No	0%	4	0
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	Yes	1	1
Do the project's written discharge and termination policies include all of the following?	due process hearing or	Not All	1	0
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	In the last year, all ShelterCare staff completed a training on identifying	In the last year, all ShelterCare staff completed a training on identifying	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	ShelterCare reformed the Diversity, Equity, and	ShelterCare reformed the Diversity, Equity, and	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	No, the project does not have ways for	No, the project does not have ways for	1	0
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	Not all	2	0
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	anonymous feedback	uses Ongoing anonymous	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	50%	Below 80%	6	0
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	28%	28%	6	0
Of the households who left the project (leavers) what percentage exited to a permanent destination?	91%	91%	6	6
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	100%	0%	5	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	35%	35%	5	1
Totals	Total Points Possible		Total Points Received	
	78.00		38.00	

Overall Comments:

GE & M: no points are awarded for additional match with less than 100% of funds spent, minimum match met;

SP & HF: is the written eligibility criteria document provided to participants?; Not all items noted in the termination policies

PF: confidentiality not mentioned in client rights document; would encourage agency to provide an issue that arose from feedback specific to the Cascades program in next evaluation.

Performance: Project needs to maintain above 80% capacity at all times.

No Appeals Submitted

Reviewer: Amanda Borta

August 5, 2022

Dear **Michelle Hanks**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	78.00	Total Points Received	49.00	
	Preliminary Score	62.82%		
	Final Score	62.82%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	ShelterCare			
Project Name	McKenzie Rapid Rehousing			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible Points Received
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	Yes	\$ -	8 8
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	Below 25% match	Below Minimum Match	4 -2
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible Points Received
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1 1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2 2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	B+ to B-	B+ to B-	2 1
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3 3
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	0	3 3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	60-74.9%	60-74.9%	4	3
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Youth Head of Household (under 25)	10%	4	0
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	Yes	1	1
Do the project's written discharge and termination policies include all of the following?	due process hearing or	Not All	1	0
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has internal structures to	Agency has internal structures to	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	2. In the last year, all ShelterCare staff completed a training on	2. In the last year, all ShelterCare staff completed a training on	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	ShelterCare reformed the Diversity, Equity, and	ShelterCare reformed the Diversity, Equity, and	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	No, the project does not have ways for	No, the project does not have ways for	1	0
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	Not all	2	0
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	ShelterCare uses Ongoing	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	88%	Above 80%	6	6
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	71%	71%	6	4
Of the households who left the project (leavers) what percentage exited to a permanent destination?	87%	87%	6	4
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	57%	0%	5	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	48%	48%	5	1
Totals	Total Points Possible		Total Points Received	
	78.00		49.00	

Overall Comments:

GE &M: project was below minimum match required in previous grant period - corrective action issued.

PF: document provided for Client Rights mentions the participant rights document - is this not the client rights document? Non-discrimination not mentioned in this document; Agency encouraged to incorporate ways for participants to contribute to day to day operations of the program.

No Appeals Submitted.

Reviewer: Amanda Borta

August 5, 2022

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Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	72.00	Total Points Received	44.00	
Preliminary Score		61.11%		
Final Score		61.11%		
Average Final Score	63.64%			
Agency & Project Information				
Agency Name	ShelterCare			
Project Name	MLK			
Threshold Questions				
		ALL THRESHOLDS MET?	Yes	
Grant Expenditure (12 points)				
Question	Data Submitted	Verified	Points Possible	Points Received
Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	No - Complete 1A-1B	\$ 16,727.48	8	0
What level of match was provided for the grant term that most recently ended (as reported in the APR)?	51% or greater match	Less than full expenditure, minimum match met	4	2
HMIS and Data Quality (11 Points)				
Question	Data	Verified	Points Possible	Points Received
Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1	1
Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2	2
What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2	2
Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3	3
Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	0	3	3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	>75%	>75%	4	4
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Youth Head of Household (under 25)	90%	4	4
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	Yes	1	1
Do the project's written discharge and termination policies include all of the following?	due process hearing or	All	1	1
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has internal structures to	Agency has internal structures to	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	in the last year, all ShelterCare staff completed a training on identifying	in the last year, all ShelterCare staff completed a training on identifying	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	ShelterCare reformed the Diversity, Equity, and	ShelterCare reformed the Diversity, Equity, and	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	b. Resident/tenant council or	b. Resident/tenant council or	1	1
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	a. Confidentiality policy, b. Non-discriminatory	Not all	2	0
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	uses Ongoing anonymous	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	0%	Below 80%	0	0
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	97%	97%	6	6
Of the households who left the project (leavers) what percentage exited to a permanent destination?	13%	13%	6	0
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	29%	0%	5	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	13%	13%	5	0
Totals	Total Points Possible		Total Points Received	
	72.00		44.00	

Overall Comments:

GE&M: Project should work on spend down and ensure 100% of HUD funds are spent in next grant period.

PF: document provided for Client Rights mentions the participant rights document - is this not the client rights document? Non-discrimination not mentioned in this document

Performance: Utilization measure was removed (N/A) as it was the first year of the project and ramp up of utilization is expected. Project will be expected to be at or above 80% at all points going forward; Project should work to improve exits to permanent housing.

No Appeals Submitted.

Reviewer: Amanda Borta

August 5, 2022

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Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	78.00	Total Points Received	44.00	
	Preliminary Score	56.41%		
	Final Score	56.41%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	ShelterCare			
Project Name	Sahalie			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
Question	Data Submitted	Verified	Points Possible	Points Received
Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	No - Complete 1A-1B	\$ 8,631.21	8	0
What level of match was provided for the grant term that most recently ended (as reported in the APR)?	51% or greater match	Less than full expenditure, minimum match met	4	2
HMIS and Data Quality (11 Points)				
Question	Data	Verified	Points Possible	Points Received
Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1	1
Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2	2
What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2	2
Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3	3
Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	0	3	3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	45-59.9%	45-59.9%	4	2
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Highly Vulnerable (VI-SPDAT Score 15)	100%	4	4
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	Yes	1	1
Do the project's written discharge and termination policies include all of the following?	due process hearing or	All	1	1
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	In the last year, all ShelterCare staff completed a training on identifying	In the last year, all ShelterCare staff completed a training on identifying	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	ShelterCare reformed the Diversity, Equity, and	ShelterCare reformed the Diversity, Equity, and	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	No, the project does not have ways for	No, the project does not have ways for	1	0
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	Not all	2	0
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	uses Ongoing anonymous	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	47%	Below 80%	6	0
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	75%	75%	6	4
Of the households who left the project (leavers) what percentage exited to a permanent destination?	80%	80%	6	4
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	50%	0%	5	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	39%	39%	5	1
Totals	Total Points Possible		Total Points Received	
	78.00		44.00	

Overall Comments:

GE&M: Project should work on spend down and ensure 100% of HUD funds are spent in next grant period.

PF: document provided for Client Rights mentions the participant rights document - is this not the client rights document? Non-discrimination not mentioned in this document; would encourage agency to utilize feedback specifically received for the Sahalie project in next Evaluation.

Performance: Project needs to maintain above 80% capacity at all times.

No Appeals Submitted.

Reviewer: Amanda Borta

August 5, 2022

Dear **Michelle Hanks**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	67.00	Total Points Received	44.00	
	Preliminary Score	65.67%		
	Final Score	65.67%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	ShelterCare			
Project Name	Safe Haven Shankle			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible Points Received
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	No - Complete 1A-1B	\$ 11,407.30	8 0
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	51% or greater match	Less than full expenditure, minimum match met	4 2
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible Points Received
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1 1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2 2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2 2
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	No	100	3 3
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	-	3 3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	<25%	<25%	4	0
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Highly Vulnerable (VI-SPDAT Score 15)	91%	4	4
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	No	1	0
Do the project's written discharge and termination policies include all of the following?	due process hearing or	All	1	1
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	In the last year, all ShelterCare staff completed a training on identifying	In the last year, all ShelterCare staff completed a training on identifying	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	ShelterCare reformed the Diversity, Equity, and	ShelterCare reformed the Diversity, Equity, and	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	No, the project does not have ways for	No, the project does not have ways for	1	0
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	Not all	2	0
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	uses Ongoing anonymous	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	92%	Above 80%	6	6
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	100%	100%	6	6
Of the households who left the project (leavers) what percentage exited to a permanent destination?	0%	N/A	0	0
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	9%	N/A	0	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	8%	8%	5	0
Totals	Total Points Possible		Total Points Received	
	67.00		44.00	

Overall Comments:

GE&M: Project should work on spend down and ensure 100% of HUD funds are spent in next grant period.

SP & HF: written eligibility document attached does not include Shankle program.

PF: document provided for Client Rights mentions the participant rights document - is this not the client rights document? Non-discrimination not mentioned in this document; Agency encouraged to incorporate ways for participants to contribute to day to day operations of the program; would encourage agency to utilize feedback specifically received for the Shankle project in next Evaluation.

No Appeals Submitted.

Performance: two measures did not apply as there were no participants for which the measure was applicable.

Reviewer: Amanda Borta

August 5, 2022

Dear **Terrence McDonald**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	78.00	Total Points Received	46.00	
	Preliminary Score	58.97%		
	Final Score	58.97%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	St. Vincent de Paul Society of Lane County, Inc.			
Project Name	Connections			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible Points Received
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	Yes	\$ -	8 8
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	25% (minimum match required)	26-50% match	4 3
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible Points Received
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1 1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2 2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2 2
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3 3
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	93%	3 2

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	25-44.9%	25-44.9%	4	1
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Highly Vulnerable (VI-SPDAT Score 15)	15%	4	0
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	No	1	0
Do the project's written discharge and termination policies include all of the following?	due process hearing or	Not All	1	0
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	The agency has brought on an outside DEI consulting team to implement	The agency has brought on an outside DEI consulting team to implement	2	1
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	have provided training to our employees surrounding	have provided training to our employees surrounding	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	b. Resident/tenant council or	b. Resident/tenant council or	1	1
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	a. Confidentiality policy, b. Non-discriminatory	Not all	2	0
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	dynamic feedback and	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	58%	Below 80%	6	0
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	17%	75%	6	4
Of the households who left the project (leavers) what percentage exited to a permanent destination?	64%	93%	6	5
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	57%	0%	5	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	44%	44%	5	1
Totals	Total Points Possible		Total Points Received	
	78.00		46.00	

Overall Comments:

PF: client rights document attached seems more like policies and procedures, unable to find a client rights document within what was provided that specifies all items clearly and appears to be distributed to participants; feedback not related to the connections RRH program - would recommend including an issue that arose out of feedback specific to this program in the future.

SP&HF: document attached for written eligibility does not specify the eligibility criteria of the program;

Performance: Project needs to maintain above 80% capacity at all times.

Appeals:

System Priorities Q1: Not approved. The project received points that reflect the extent they serve the populations outlined. The question is for ranking purposes and to provide additional points to projects serving higher percentages of individuals who are CH to offset performance impacts. Project score was appropriate.

System Priorities Q2: Not approved. The project received points that reflect the extent they serve the populations outlined. The question is for ranking purposes and to provide additional points to projects serving higher percentages of individuals who are higher vulnerability to offset performance impacts. Project score was appropriate.

Project Performance Q4: Not approved. The measure applied to 3 individuals who did not have non-cash benefits at entry. All three individuals had not received non-cash benefits either by annual assessment or by time of exit. The score is correct. Project did not provide any other information in appeal to clarify the data (i.e. specific client IDs who did not receive benefits and why it is not appropriate for them to do so).

Reviewer: Amanda Borta

August 5, 2022

Dear **Terrance McDonald**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

These scores and information submitted with your Evaluation may be used by the committee for the purposes of ranking, as required, for the upcoming CoC Competition. Agencies will be notified of their final ranking prior to submission to HUD.

Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	78.00	Total Points Received	66.00	
	Preliminary Score	84.62%		
	Final Score	84.62%		
<i>Average Final Score</i>	63.64%			
Agency & Project Information				
Agency Name	St. Vincent de Paul Society of Lane County, Inc.			
Project Name	Lift			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible Points Received
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	Yes	\$ -	8 8
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	26-50% match	26-50% match	4 3
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible Points Received
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1 1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2 2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2 2
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3 3
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	0	3 3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	60-74.9%	60-74.9%	4	3
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Youth Head of Household (under 25)	72%	4	3
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	Yes	1	1
Do the project's written discharge and termination policies include all of the following?	due process hearing or	All	1	1
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	Through this provider is aware of disparities in race within	Through this provider is aware of disparities in race within	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	encourages staff to attend St. Vincent de Paul's monthly	encourages staff to attend St. Vincent de Paul's monthly	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	c. On-site employment opportunities	c. On-site employment opportunities	1	1
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	All	2	2
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	concerned that their case	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	88%	Above 80%	6	6
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	100%	100%	6	6
Of the households who left the project (leavers) what percentage exited to a permanent destination?	0%	0%	6	0
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	100%	100%	5	5
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	72%	54%	5	2
Totals	Total Points Possible		Total Points Received	
	78.00		66.00	

Overall Comments:

Appeals:

System Priorities Q1: Not approved. The project received points that reflect the extent they serve the populations outlined. The question is for ranking purposes and to provide additional points to projects serving higher percentages of individuals who are CH to offset performance impacts. Project score was appropriate.

System Priorities Q2: Not approved. The project received points that reflect the extent they serve the populations outlined. The question is for ranking purposes and to provide additional points to projects serving higher percentages of individuals who are higher vulnerability to offset performance impacts. Project score was appropriate.

Reviewer: Amanda Borta

August 5, 2022

Dear **Terrence McDonald**

Below is the Final Scorecard for the 2022 HUD CoC Competition Evaluation. The scores below were calculated using the final data from Wellsky and are based on the scoring criteria approved by the Evaluation Committee of the Poverty and Homelessness Board (PHB). The final scores incorporate any changes based on corrected errors or appeals, and final decisions are noted at the bottom of your scorecard, if applicable. If you have any questions or concerns about your scores, you may contact me at amanda.borta@lanecountyor.gov

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Sincerely,
Amanda Borta, MSW
Sr. Program Services Coordinator

FINAL Score				
Total Points Possible	66.00	Total Points Received	56.00	
	Preliminary Score	84.85%		
	Final Score	84.85%		
Average Final Score	63.64%			
Agency & Project Information				
Agency Name	St. Vincent de Paul Society of Lane County, Inc.			
Project Name	VetLift			
Threshold Questions				
	ALL THRESHOLDS MET?	Yes		
Grant Expenditure (12 points)				
	Question	Data Submitted	Verified	Points Possible
	Was the project able to draw down from HUD and/or expend 100% of the funds for this project for the grant term that most recently ended? (amount unspent)	Yes	\$ -	8
	What level of match was provided for the grant term that most recently ended (as reported in the APR)?	26-50% match	26-50% match	4
				3
HMIS and Data Quality (11 Points)				
	Question	Data	Verified	Points Possible
	Has your agency administrator(s) attended Agency Admin meetings in the past year?	Yes, at least 3 meetings	Yes, at least 3 meetings	1
	Does the project have 5% or less missing values (data completeness) on all HUD required Universal Data Elements and Program Specific Data Elements in HMIS for the reporting period of January 1, 2021-December 31, 2021?	Yes	Yes	2
	What data entry timeliness grade has the project achieved in calendar year 2021 (01/01/2021-12/31/2021) ?	A to A+	A to A+	2
	Has the project completed and entered all required interim/annual reviews into ServicePoint? (verified_percentage missing review)	Yes	0	3
	Has the project completed and entered all required interim/annual reviews for the same calendar month as the assessment (data timeliness)?	-	0	3

System Priorities: 15 Points				
Question	Data	Verified	Points Possible	Points Received
Does the project serve individuals or families that meet HUD's definition of chronically homeless?	>75%	>75%	4	4
Does the project serve individuals or families that meet the priority population criteria below (Priority Populations)?	Highly Vulnerable (VI-SPDAT Score 15)	56%	4	2
Does the project follow a Housing First Approach, according to HUD guidelines?	Yes	Yes	5	5
Does the project provide and explain the written eligibility criteria which are in alignment with Housing First to participants?	Yes	Yes	1	1
Do the project's written discharge and termination policies include all of the following?	due process hearing or	All	1	1
Equity and Inclusion: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Complete the checklist to indicate the steps and methods used to address equity within the agency	Agency has made a public written	Agency has made a public written	2	2
Provide a description of the project's strategies for identifying and addressing racial disparities within programming or access, and any significant successes and challenges that the project experienced in this work over the past year. What has the agency done to effectively address challenges?	Through this provider is aware of disparities in race within	Through this provider is aware of disparities in race within	2	2
Provide a description of how the project ensures that staff is trained in cultural competence and that programming is adaptable to meet the needs of participants from diverse cultures. What are significant successes or challenges that the project experienced providing these services over the past year? Use specific examples where possible, including any substantive changes to	encourages staff to attend St. Vincent de Paul's monthly	encourages staff to attend St. Vincent de Paul's monthly	2	2
Participant Focus: 6 Points				
All Projects	Data	Verified	Points Possible	Points Received
Does the agency provide opportunities for participants to contribute directly to the day-to-day operations or programming of the agency beyond typical feedback processes?	c. On-site employment opportunities	c. On-site employment opportunities	1	1
Does the agency have a written notice or "Client Rights" document that is posted and distributed to participants which, at a minimum, addresses and clearly describes all of the following items:	Confidentiality policy, b. Non-discriminatory	All	2	2
Must provide at least one issue that arose from feedback, how the agency responded, AND how this response was communicated back to participants	least annual satisfaction	the pandemic and cancelling	3	3
Project Performance Outcomes: 28 Points				
All Projects	Data	Verified	Points Possible	Points Received
Project Utilization: Is your project at or above 80% capacity at all PIT AND overall average for CY2021?	88%	Above 80%	6	6
Of the households who were housed through the program (move-in date), what percentage were housed within 90 days of entry?	100%	N/A	0	0
Of the households who left the project (leavers) what percentage exited to a permanent destination?	100%	N/A	0	0
What percentage of households without source of non-cash benefits at entry, obtained non-cash benefits through mainstream resources?	100%	0%	5	0
What percentage of households maintained or increased their income through cash benefits, earned income, or combination of both?	61%	61%	5	3
Totals	Total Points Possible		Total Points Received	
	66.00		56.00	

Overall Comments:

Performance: two measures did not apply as there were no participants for which the measure was applicable.

Appeals:

System Performance Q2: Not approved. The project did not meet criteria for scoring additional points.

Project Performance Q4: Not approved. The project was scored only on individuals who did not have benefits at entry. Measure applied to one individual who did not have benefits at entry and did not at annual or exit. 0/1 = 0% and the score provided was accurate. Project did not provide any other information in appeal to clarify the data (i.e. specific client IDs who did not receive benefits and why it is not appropriate for them to do so).

Reviewer: Amanda Borta



Lane County Human Services Division
Housing and Community Action Programs
1132 Lawrence Street
Eugene, OR 97401

541.682.4688 phone
541.682.3760 fax

9/8/22

MEMO Re: New Projects Final Scores

For the FY22 HUD CoC Competition, Lane County (CoC Collaborative Applicant and Lead Agency) released a Request for Proposals (#21225) to solicit applications for the New Bonus funding available (Bonus and Domestic Violence Bonus). **No applications or proposals were received for the RFP 21225.**

In the event no applications or proposals are received, it has been established that Lane County, as Lead Applicant, may submit a project on behalf of the Continuum of Care, with acceptance by the CoC Board. This item was brought to the CoC Board (Poverty and Homelessness Board) on August 18th after the RFP submission period closed. Lane County offered the recommendation to submit Coordinated Entry SSO projects for both opportunities and this decision was supported by the CoC Board.

The CE-SSO projects, therefore, were not scored using the standard rubric provided for proposals submitted in the RFP process. Members of the Coordinated Entry Stakeholder group were consulted in the development of the proposal for submission.

Amanda Borta, MSW
Sr. Program Services Coordinator, CoC Lead
Lane County Human Services Division