



Steering Council Meeting Agenda
October 18, 2024 ▫ 8:30 – 10:30am ▫ Zoom

1. Call to Order/Introductions
2. Approval of the Agenda*
3. Approval of September 20, 2024 Meeting Minutes*
4. Public Comment on Agenda Items (Limit 3 minutes ea.)
5. Approval of Consent Agenda*
 - a. Steering Calendar
 - b. Committee & Initiatives Updates
 - c. Budget Report: Statement of Activity
 - d. Data Reports: None
6. Director's Report – *standing item*
7. Coordinated Entry – *standing item*
8. CoC Program Competition Update
 - a. Project Priority Listing
9. CoC MOUs
 - a. MOU Process
 - b. Fiduciary
 - c. HMIS Lead Agency
 - d. Coordinated Entry
10. CoC Funding Reallocation Process Draft Recommendation
11. 100 in 100 Update
12. Shelter Diversion Pilot Project
13. Governance Charter Review
14. Any other matters by Steering Council Member(s)
15. Public Comment on Any Matter (Limit 3 minutes ea.)
16. Adjournment

Next meeting: November 15, 2024

* denotes potential action item



STEERING COUNCIL MEETING MINUTES

September 20, 2024

8:30am – 10:30am

Facilitator:	Elizabeth Stoddard		
Meeting Attendees:	Elizabeth Stoddard, Adrienne Goodstal, Ryan VerWys, Tenisa Frye, Lauren VanKeulen, Lindsey Reames, Paul Smith, Gustavo Perez, Tammy Vincent, Ryan Kilpatrick, Sam Westhouse, Casey Gordon		
	Community Members: Christie White, Emily (guest of Tammy Vincent)		
	Staff: Craig Heerema, Courtney Myers-Keaton, Evan Hile, Ronan Parmenter, Alyssa Anten		
Time Convened:	8:35am	Time Adjourned:	10:26am

Approval of Agenda – standing item			
Motion by:	Lauren VanKeulen	Support from:	Adrienne Goodstal
Discussion			
Amendments			
Conclusion	Approved		
Approval of Minutes – standing item		August 23, 2024	
Motion by:	Ryan VerWys	Support from:	Lauren VanKeulen
Discussion			
Amendments			
Conclusion	Approved		
Approval of Consent Agenda – standing item			
Motion by:	Adrienne Goodstal	Support from:	Tenisa Frye
Discussion			
Amendments			
Conclusion	Approved		
Public Comment on Any Agenda Item – standing item			
Discussion:			
None			
CoC Director’s Report – standing Item			
Discussion			
Courtney provided an update to CoC Staffing, including shifts to staff responsibilities and hiring discussions.			
Action Items	Person Responsible	Deadline	
Coordinated Entry – standing item			
Discussion			



STEERING COUNCIL MEETING MINUTES

September 20, 2024

8:30am – 10:30am

<p>An update was provided for CHC 2.0, and there was discussion about challenges related to prevention calls and the CE system. This committee shared feedback and named potential solutions for further discussion.</p>		
Action Items	Person Responsible	Deadline
Funding Review Committee Appointment		
Discussion		
<p>A slate of nominees was presented for consideration for the Funding Review Committee. Lauren VanKeulen motioned to approve the slate of nominees, with support from Adrienne Goodstal. All in favor, motion carries.</p>		
Action Items	Person Responsible	Deadline
CoC Program Competition		
Discussion		
<p>Courtney noted that applications are underway and the deadline for submission was extended to allow applicants additional time to apply. She encouraged applications for the bonus funding.</p>		
Action Items	Person Responsible	Deadline
100 in 100 Updates		
Discussion		
<p>Courtney shared a presentation with updates for 100 in 100. This committee voiced their approval for the continuing supports and case management associated with this initiative.</p>		
Action Items	Person Responsible	Deadline
HUD Finalized PIT Count Data Report and Summary		
Discussion		
<p>Evan reviewed the data reports and a comparison across other years. There was discussion around sharing this data and the analysis with the community. A more detailed report will be provided at a later time to this committee.</p>		
Action Items	Person Responsible	Deadline
Any Other Matters by Steering Council Members		
Discussion		
<ul style="list-style-type: none"> - Lindsey Reames shared that project-based voucher awards have been completed and funding letters were sent out. She shared updates on continuing redevelopment efforts, and noted a public engagement event to receive community feedback. She also spoke to the timeline of the release of new vouchers. - Tenisa Frye shared that Family Promise has seen a rise in outreach numbers in the summer compared to the winter and shared a few related data points. 		



STEERING COUNCIL MEETING MINUTES

September 20, 2024

8:30am – 10:30am

- Casey Gordon updated this committee on the increases to the number of students eligible for McKinney-Vento services through Kent ISD.
- Lauren VanKeulen shared that AYA is also seeing increased numbers of youth seeking services, and spoke to some of the challenges they are facing around this.
- Elizabeth Stoddard noted that the Fair Housing Center is providing an Affordable Homeownership event on 9/21.

Action Items	Person Responsible	Deadline
Public Comment on Any Item		
Discussion		
None		
Adjourn		



GRAND RAPIDS/WYOMING/KENT COUNTY
STEERING COUNCIL ANTICIPATED TOPICS FOR DISCUSSION 2024
Updated annually. These are subject to change.

JANUARY

- Executive Officer Elections
- Point in Time Count
- Steering Council Annual Conflict of Interest Forms Completed
- Strategic Plan: Review and Update

FEBRUARY

- Steering Council Annual Membership Meeting
- City of Grand Rapids Emergency Solutions Grant Application*
- Data Review

MARCH

- Project Performance Discussion
- Data Quality Committee Report
- CoC and ESG Mid-Term Monitoring
- Budget Presentation and Approval – *dependent upon fiduciary's timeline*

APRIL

- Point in Time Count Submitted to HUD*
- Strategic Plan Review

MAY

- Governance Charter Recommended Changes to CoC Membership
- Director Evaluation Initiated by Fiduciary

JUNE

- CoC Program Funding Process Review
- Budget Review
- Open Call for New CoC Members
- Anticipated MSHDA ESG Funding Discussion*
- PIT Data Released*

JULY

- NAEH Annual Conference
- Strategic Plan Review

AUGUST

- Anticipated HUD CoC Program Funding Vote*
- System Performance Measures Reported to CoC
- MSHDA Emergency Solutions Grant Application*

SEPTEMBER

- Anticipated HUD CoC Program Application Due*
- PIT Planning Begins

OCTOBER

- Governance Charter Review
- Fiduciary MOU and HMIS Lead Agency Review
- Strategic Plan Review

NOVEMBER

DECEMBER

- Steering Council elections (*at CoC meeting*)
- Director Mid-Year Evaluation Initiated by Fiduciary
- Budget Preparation Begins
- Strategic Plan: Review & Update Annual Priorities

AS NEEDED

- LIHTC Developer Presentations to Steering
- Formation of Nominating Committee

*dependent on funder (federal, state, city) timelines

Monthly Committee Updates for Steering

October 2024

COORDINATED ENTRY COMMITTEE

- The Coordinated Entry Committee will begin reviewing quarterly CE data points.
- HAP is scheduling in-person meetings for assessments. The meetings will be scheduled after completion of the CHC and will not open for walk-ins.
- A work group from CE Committee will form to discuss and plan using multiple community-based sites as assessment sites with trained assessors to complete housing assessments. The plan would be implemented to reduce reliance on the HAP line and provide clients a direct connection with a provider.

YOUTH ACTION BOARD

- This group continues to meet biweekly. They continue to monitor and review YHDP project progress, recruit new members, and attend community events related to youth and young adult homelessness.



**MI 506 - Grand Rapids/Wyoming/Kent County CoC
Project Priority Listing
Federal FY2023 Continuum of Care Application**

Rank	Agency	Project	Project Type	App Type	Budget	Running Total
Tier 1						
1	Heart of West Michigan United Way	Housing Assessment Program	Renewal	SSO	\$228,488	\$228,488
2	Heart of West Michigan United Way	Coordinated Entry 2	Renewal	SSO	\$210,139	\$438,627
3	Heart of West Michigan United Way	Coordinated Entry 1	Renewal	SSO	\$65,950	\$504,577
4	Heart of West Michigan United Way	HMIS	Renewal	HMIS	\$138,304	\$642,881
5	Safe Haven Ministries	Housing Services for Domestic Violence Survivors	Renewal	Joint TH & PH-RRH	\$577,799	\$1,220,680
6	Community Rebuilders	Keys First	Renewal	RRH	\$1,049,370	\$2,270,050
7	Community Rebuilders	Housing Solutions	Renewal	PSH	\$674,253	\$2,944,303
8	Community Rebuilders	PACT (Partners Achieving Change Together)	Renewal	Joint TH & PH-RRH	\$1,535,835	\$4,480,138
9	Community Rebuilders	Shelter Plus Care	Renewal	PSH	\$2,209,044	\$6,689,182
10	Community Rebuilders	HEROES	Renewal	PSH	\$190,879	\$6,880,061
11	Community Rebuilders	LOFT	Renewal	PSH	\$476,144	\$7,356,205
12	Heartside Nonprofit Housing Corporation	Verne Barry Place	Renewal	PSH	\$192,418	\$7,548,623
13	Heartside Nonprofit Housing Corporation	Ferguson Apartments	Renewal	PSH	\$63,000	\$7,611,623
14	Grand Rapids Housing Commission	Hope Community	Renewal	RRH	\$159,663	\$7,771,286
15	Heartside Nonprofit Housing Corporation	Commerce Apartments	Renewal	PSH	\$325,533	\$8,096,819
16	YWCA West Central Michigan	Project HEAL TH-RRH	Renewal	Joint TH & PH-RRH	\$43,495	\$8,140,314
Tier 2						
17	YWCA West Central Michigan	Project HEAL TH-RRH	Renewal	Joint TH & PH-RRH	\$505,111	\$8,645,425
18	YWCA West Central Michigan	Project HEAL TH	Renewal	TH	\$399,368	\$9,044,793
19	Community Rebuilders	Home First	General Bonus	PSH	\$560,897	\$9,605,690
20	Safe Haven Ministries	Safe Transitions	DV Bonus	Joint TH & PH-RRH	\$487,276	\$10,092,966
Not Awarded						
21	AYA	As You Are	General Bonus	Joint TH & PH-RRH		
22	Grand Rapids Housing Commission	Antoine Court	General Bonus	PSH		



**MI 506 - Grand Rapids/Wyoming/Kent County CoC
Project Priority Listing
Federal FY2023 Continuum of Care Application**

						Not Ranked
N/A	Arbor Circle	YHDP: Host Homes	YHDP Renewal	SSO	\$125,000	\$10,217,966
N/A	Arbor Circle	YHDP: Outreach/Peer Navigator	YHDP Renewal	SSO	\$180,000	\$10,397,966
N/A	Heart of West Michigan United Way	CoC Planning	Planning	Planning	\$467,490	\$10,865,456

Grand Rapids Area Coalition to End Homelessness
Grand Rapids/Wyoming/Kent County Continuum of Care – MI 506

FY2023 CoC Program Competition – Local Ranking Policy

i. Background:

Annually, the U.S. Department of Housing and Urban Development (HUD) holds a national competition for Continuum of Care (CoC) Program Funds through the CoC Program Notice of Funding Opportunity (NOFO). This competition procures funds into the Grand Rapid/Wyoming/Kent County area to provide housing and services to individuals and families who are experiencing homelessness.

During the Program Competition, New Projects may be created through reallocation and/or eligible bonus funding. Through reallocation or bonus funding, applicants may apply to operate New Projects or expand Renewal Projects as defined by the annual NOFO.

The Grand Rapids/Wyoming/Kent County Continuum of Care (CoC) – MI 506 will competitively rank projects based on projects' improvement of system performance. The CoC seeks to facilitate a coordinated, equitable, and outcome-oriented community process for the solicitation, review, ranking, and selection of project applications, and a process by which renewal projects are reviewed for performance and compliance with 24 CFR 578.

ii. Review

All projects submitted to the Continuum of Care will be thoroughly reviewed at the local level. Deficient project applications prolong the review process for HUD, which results in delayed funding announcements, lost funding for CoCs due to rejected projects, and delays in funds to house and assist individuals and families experiencing homelessness. CoCs are expected to closely review information provided in each project application to ensure:

1. All proposed program participants will be eligible for the program component type selected;
2. The information provided in the project application and proposed activities are eligible and consistent with program requirements in 24 CFR part 578;
3. Each project narrative is fully responsive to the question being asked and that it meets all the criteria for that question as required by this NOFO;
4. The data provided in various parts of the project application are consistent; and,
5. All required attachments correspond to the list of attachments in *e-snaps* and contain accurate and complete information.

To ensure that all projects submitted to HUD for funding consideration are of a high quality, CoC staff will complete a Threshold and Project Quality review of all project applications.

iii. Scoring

The CoC Board appoints a Funding Review Committee to review and objectively score all Renewal and New Project applications. Scoring is the process of using subjective, objective, and performance-based criteria to evaluate the effectiveness of Renewal Projects and New Projects in reducing and ending homelessness. Scoring is conducted by the Funding Review Committee (FRC) after the Project Applications have been reviewed for Threshold and Project Quality by CoC staff.

Independent review and scoring of project applications must be performed with individuals who are independent of CoC-funded programs, projects, or agencies. FRC members must disclose any conflicts of interest. FRC ensures the highest level of objectivity when it comes to the scoring of project applications for CoC Program funding.

iv. Ranking Policy

During the CoC Program NOFO, HUD uses a Tier 1 and Tier 2 funding selection process. Each year, HUD will establish each CoC's Tier 1 and Tier 2 amounts based on the total amount of funds requested by eligible Renewal Project applications on the Renewal Project Listing combined with the eligible Renewal Project amount(s) that were reallocated as listed on the reallocation forms in the CoC Priority Listing. Project applications in Tier 1 will be conditionally selected from the highest scoring CoC to the lowest scoring CoC, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold. Any type of New or Renewal Project application can be placed in Tier 1, except CoC Planning. Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for, but does not include CoC planning projects, or projects selected with DV Bonus funds. Project applications placed in Tier 2 will be assessed for project eligibility and project quality threshold requirements, and if applicable, project renewal threshold requirements. Funding will be determined using the CoC Application score as well as the factors listed in the NOFO.

The Grand Rapids/Wyoming/Kent County CoC will rank all projects which have passed Threshold and Project Quality Review by CoC staff and scoring by the FRC on the Priority Listing in the following manner:

- 1) Non-competitively Ranked Projects
 - a) The CoC has deemed projects supporting HMIS and Coordinated Entry (CE) as critical to the infrastructure of the CoC. Thus the HMIS and SSO-CE Renewal and Expansion Project applications, referred to as infrastructure projects, will be non-competitively ranked above all ranked projects.
 - b) Projects that have not completed a full program year under the current CoC Program NOFO will be non-competitively ranked above competitively ranked projects and below infrastructure projects. It is expected that the project submits an Annual Performance Report for the amount of time the project has been implemented.
- 2) Renewal Projects
 - a) Renewal Projects will be ranked in descending order by score.
- 3) New Projects
 - a) New Projects will be ranked in descending order by score

viii. Ranking Procedure

CoC Staff will then populate the Priority Listing using the Ranking Policy above. The Priority Listing will be provided to Steering Council for approval prior to submission during the CoC Program Competition.



**MEMORANDUM OF UNDERSTANDING
BETWEEN
GRAND RAPIDS AREA COALITION TO END HOMELESSNESS
AND
HEART OF WEST MICHIGAN UNITED WAY**

This Memorandum of Understanding (hereinafter called MOU) sets forth the terms and understanding between the Grand Rapids Area Coalition to End Homelessness, herein after called the Coalition, which is also recognized as the Grand Rapids/Wyoming/Kent County Continuum of Care (CoC – MI 506), and the Heart of West Michigan United Way (hereinafter called United Way), regarding activities related to assuring necessary legitimacy, structure, and sustainability for an effective Continuum of Care for homelessness response system activities. The Coalition serves as the primary planning body for federal Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program funded operations.

**SECTION I: CoC SUPPORTING ORGANIZATION:
FIDUCIARY / EMPLOYER OF RECORD**

The Coalition recognizes that formal management to support operations is necessary to advance the goal of ending homelessness within Kent County. To that end, after assessment of the best combination of willingness and strategic appropriateness to provide supporting organization services, the Coalition will invite that organization to provide supporting organization services. This MOU serves as the Coalition’s formal recognition of the Coalition supporting organization.

The following will serve as the basis for the relationship between the Coalition and the supporting organization:

- As established in the fiscal year beginning July 1, 2013, Heart of West Michigan United Way has agreed to act as supporting organization and has full support of the Coalition
- Via this MOU, United Way agrees to support the Coalition by:

Acting as *Fiduciary* for the Coalition by:

- Providing “back office” functions for Coalition, including but not limited to

- Accounting services: Manage finances (revenues and expenses) for the Coalition separately in an accounting system following generally accepted accounting principles
- Processing Coalition invoices and bills approved and submitted by Coalition staff (or organizational designee)
- Providing Coalition financial statements as requested by the Coalition Steering Council, at least monthly
- Providing administrative services including:
 - Receiving and disbursing funds, as Payee, on behalf of the Coalition ensuring funds are spent in accordance with local, state, and federal regulations as well as specific purpose and budget (*this includes documenting all purchases that will remain the sole property of the Coalition*)
 - Fulfilling all fiduciary responsibilities specified in grant contracts and agreements with government and private entity funding sources for the Coalition
 - Serving as legal signatory on contracts, grants, and other legal agreements in which the Coalition is party

Acting as *Employer of Record* by:

- Providing, in consultation with the Coalition Steering Council, Coalition staff supervision services, using the following as general parameters:
 - Provide Coalition staff with compensation and benefits per United Way policies
 - Ensure that Coalition staff and operations will be conducted from and within United Way. The Coalition staff facilitates CoC operations and is responsible for grant performance, while United Way's President (or alternate designated supervisor) serves as day-to-day supervisor under United Way's personnel policies. **Written review of the Coalition staff's Director's performance (no less than annually) will be completed by United Way's President (or designated supervisor) with input from the Chair of the Coalition Steering Council (or designee)**
 - **United Way shall consult with the Coalition Steering Council Executive Committee in the creation or update to any Coalition staff job descriptions**

SECTION II: CoC COLLABORATIVE APPLICANT

Specific to the functions as the CoC, pursuant to federal rule 24 CFR Part 578.15, a core function of the Coalition is to submit an annual application for federal funding that conveys the efforts of all homeless service and housing providers across the Coalition's designated geographic service area. This application must include reviewed and ranked applications from all individual provider projects the Coalition requests HUD to fund. The Coalition must select a qualifying organization to act on its behalf as the Collaborative Applicant to carry out these activities for HUD CoC Program funding.

The following will serve as the basis for the relationship between the Coalition and the Collaborative Applicant:

- As established in the fiscal year beginning July 1, 2013, Heart of West Michigan United Way has agreed to act as Collaborative Applicant and has full support of the Coalition

- Via this MOU, United Way agrees to support the Coalition by:

Acting as *Collaborative Applicant* for the Coalition by:

- Providing CoC Program Application functions for the Coalition, including but not limited to:
 - Submission of the Grant Inventory Worksheet, CoC Registration, CoC Collaborative Application, and CoC Planning Grant (pursuant to 24 CFR 578.9)
 - Organizing the completion of the CoC Program funding process
 - Providing Coalition financial statements as requested by the Coalition, at least monthly
- Providing support to the CoC Planning Responsibilities, pursuant to 24 CFR 578.7, by employing staff to ensure:
 - The development of a plan for a coordinated housing and service system
 - A Point in Time count is conducted as required by HUD guidelines
 - An annual gaps analysis is conducted of the homeless needs and services in the Continuum
 - Coordination with Emergency Solutions Grant recipients and Consolidated Plan jurisdictions within the CoC geographic boundaries
- Providing support to the CoC System Operations Responsibilities, pursuant to 24 CFR 578.7, by employing staff to ensure
 - The establishment of performance targets, monitoring of performance, evaluation of outcomes, and action to improve poor performance
 - Evaluation and reporting of ESG and CoC outcomes
 - The establishment and operation of a coordinated entry system
 - The establishment of written standards for providing assistance
- Fulfilling the roles and responsibilities as the CoC Planning Grant recipient, including
 - Ensuring that all HUD grantee threshold requirements are met
 - Ensuring that all grant reporting and billing is completed in accordance with HUD requirements
 - All Planning and System Operations responsibilities as detailed above

SECTION III: GRAND RAPIDS AREA COALITION TO END HOMELESSNESS ROLE AND RESPONSIBILITIES

The Grand Rapids Area Coalition to End Homelessness is responsible for ensuring sufficient match funds are available and appropriated in the budget, as well as administrative dollars to cover reasonable, allocable, and allowable costs of fiduciary responsibilities.

SECTION IV: JOINT REVIEW

The Steering Council will review this MOU on an annual basis and reconfirm its effectiveness or make revisions to best meet the current needs and support the goals of the Continuum of Care.

SECTION V: DURATION

This MOU shall begin ~~May 9, 2022~~ xx/xx/2024 and end on ~~April 30, 2023~~ xx/xx/2025, at which time said contract shall be automatically renewed for successive one (1) year terms, unless a party delivers written notice of non-renewal to the Steering Council not less than sixty (60) days before the expiration of the then current term. A party may revoke this agreement at any time for non-performance, subject to other conditions as listed herein.

SECTION VI: INDEMNIFICATION

Each party to this MOU shall be responsible for any liability arising from its own conduct. No party agrees to waive, defend or indemnify any other.

SECTION VII: ENTIRE AGREEMENT

This MOU represents the entire agreement among the parties and supersedes all prior negotiations, representations and agreements, whether written or oral.

SECTION VIII: MODIFICATION

Any modification of this MOU or additional obligation assumed by any partner in connection with this MOU shall be binding only if evidenced in writing and signed by all parties or their authorized representative.

SECTION IX: GOVERNMENTAL IMMUNITY

No party waives its governmental immunity by entering into this MOU, and fully retains all immunities and defenses provided by law with respect to any action based upon or occurring as a result of this MOU.

SECTION X: ABSENCE OF WAIVER

The failure of any of the parties to this MOU to insist on the performance of any of the terms and conditions of this MOU, or the waiver of any breach of such terms and conditions, shall not be construed as thereafter waiving any such terms and conditions, which shall continue and remain in full force and effect as if no such forbearance or waiver had occurred.

SECTION XI: ASSIGNMENT OF RIGHTS

The rights and obligations of all parties under this MOU are personal to those parties and may not be assigned or transferred to any other person, firm, corporation or other entity without the prior written consent of the other parties.

SECTION XII: CONFLICT OF INTEREST

As any potential conflict is identified, affected Steering Council members will recuse themselves from decision making as agreed to by Committee consensus.

SECTION XIII: APPROVAL

We, the undersigned have read and agree with this MOU.

By: _____ Date _____
Grand Rapids Area Coalition to End Homelessness / *Chairperson*

By: _____ Date _____
Michelle VanDyke
Heart of West Michigan United Way / *President & CEO*



DRAFT HUD CONTINUUM OF CARE PROGRAM REALLOCATION POLICY GUIDANCE

Background

The Grand Rapids Area Coalition to End Homelessness [which serves as the Continuum of Care \(CoC\) for the Cities of Grand Rapids and Wyoming and Kent County](#) is committed to maximizing effectiveness of financial resources to house as many individuals and families as possible. To this end, reallocation of [US Department of Housing and Urban Development \(HUD\) Continuum of Care \(CoC\) funding](#) may be used and should be undertaken with the utmost care.

Definition

Reallocation; per Section III.B.2.w of the FY 2021 CoC Program NOFO; Reallocation is when a CoC shifts funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's Annual Renewal Demand (ARD). Each year HUD determines eligible reallocation project types in the CoC NOFO. Involuntary reallocation of funds should be considered only when projects are determined to be underperforming, obsolete, or do not contribute substantially to meeting the goals of the Continuum of Care for preventing and/or reducing homelessness.

Process Overview

The process used in determining reallocation of funds should be structured in such a way that mitigates perceptions of reallocation as a threat or in a way that removes barriers to a provider thinking critically about the performance of a project. In some cases, projects in which CoC funding is reallocated may be eligible for another source of funding which might be more appropriate than HUD CoC funding. [Reallocation action will be taken with the goal of alignment with the HUD and HEARTH ACT policy guidance, performance criteria specified in the annual HUD NOFO with emphasis on local needs, data and project performance. Consideration will also be given to the potential impact that involuntary \(performance based\) reallocation may have on increasing homelessness resulting from a reduction in services caused by the reallocation.](#)

Decisions to reallocate funds shall be evidence-based. Each CoC funded project will be evaluated annually using specific information to include but not be limited to: data entered into HMIS, the HUD Annual Performance Report, [the HUD Longitudinal Systems Analysis](#), the CoC project application, cost per household served and other HUD recommended data tools. **Types of Reallocation**

Projects may be allocated in the following ways:

- Funding (in whole or part) from one project into a new project by the same provider
- [Funding \(in whole or part\) from one project into a new project by a different provider](#)
- Funding (in whole or part) from multiple projects into one new project
- Funding (in whole or part) from multiple projects into many new projects

I. VOLUNTARY REALLOCATION

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If a provider has determined that a project could better serve the community with changes made through reallocation, they may voluntarily submit the project for reallocation. If a provider elects to voluntarily reallocate a project, the provider shall notify the CoC Program Manager of their intent prior to the release of the local application. The provider has the option to submit an application for a new project utilizing the reallocated funds or they may opt not to apply which will make the funds available to all other new applicants. The reallocated project will submit as a new project and must meet deadlines established locally for new project applications. The new project must meet HUD threshold and be in alignment with the current NOFA. The new project cannot be a continuation of an old project.

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Scoring and Ranking

The provider will be able to apply through reallocation for their reallocated funds without those funds being included in the available funding to all new applications. Providing minimum threshold and NOFA requirements are met, the project will be scored and ranked against other projects in the project priority listing submitted to HUD using elements listed above under “Mandatory Scoring Elements”.

When a Project Can Reallocate

Projects should consider if the changes they wish to make would best be accomplished through requesting a grant amendment. Examples of situations that would best be handled through a grant amendment versus reallocation follow.

Grant Amendment	Reallocation
A permanent supportive housing program wishes to shift funds within its existing grant from service costs to rental assistance costs in order to create additional units.	Component changes, such as transitional housing that wants to change to permanent supportive housing.
If a transitional housing project wants to reduce the average length of time households are in their programs, they can do so without reallocating.	Major population changes, such as if a project wanted to change from serving families with children to serving individuals experiencing chronic homelessness.

II. INVOLUNTARY REALLOCATION

Renewal projects scoring below [the scoring threshold](#), not serving an identified community need, found to not meet minimum benchmark scores on performance measures (as determined by the community), not utilizing funding effectively, or not meeting HUD statutory, regulatory, threshold and compliance requirements, may be considered for reallocation. [Funding from reallocated project\(s\) will be used to fund new projects via the CoC Program Competition local funding process.](#)

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Deleted: As part of the CoC Program Competition, new project applications will be sought from interested, eligible providers. The renewal projects will be rated and compared to new project applications. New project applications may be submitted by the same provider as the project eligible for reallocation as well as any new applicant. New project applications must align with the eligibility requirements published in the HUD Notice of Funding Availability (NOFA) during that funding cycle.

Mandatory Scoring Areas (Additional Areas of Scoring May Be Considered)

- Project performance and utilization
- Cost effectiveness
- Current residents of existing project
- HMIS Data Quality
- Expenditure of grant funds
- Organization experience and capacity

- Alignment with current NOFA
- Housing First implementation
- Coordinated Entry use
 - System Performance Measures
- Alignment with HUD Notice on Prioritization
- Alignment with HUD CoC regulations and policy priorities
 - Does project meet minimum threshold [Housing First implementation](#)
 - [Coordinated Entry use](#)
 - [Alignment with HUD Notice on Prioritization](#)
 - [Alignment with HUD CoC regulations and policy priorities](#)

[This will policy be reviewed, and modified if needed, following the release of the annual CoC Program Notice of Funding Opportunity \(NOFO\).](#)

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DRAFT

Policy Approved by Steering Council:

March 20, 2015

September 9, 2016

**REALLOCATION POLICY
APPENDIX A
HUD THRESHOLDS AND REQUIREMENTS**

1. Statutory and Regulatory Requirements.

To be eligible for funding under the CoC Program Funding, project applicants must meet all statutory and regulatory requirements in the Act and 24 CFR part 578. Project applicants can obtain a copy of the Act and 24 CFR part 578 on the HUD Exchange or by contacting the NOFA Information Center at 1-800-HUD-8929 (1-800-483-8929).

2. HUD Threshold Requirements

A. Ineligible Applicants. HUD will not consider an application from an ineligible project applicant, including an application submitted for CoC planning funds or UFA Costs from an applicant other than the Collaborative Applicant.

B. DUNS Number Requirement. All project applicants seeking funding under this program must have a DUNS number and include the number in the Standard Form 424 (SF-424). The SF-424 must be submitted along with the project application in e-snaps. See Section IV.C.2. of the FY 2015 General Section for additional information.

C. Active Registration in SAM. All project applicants seeking funding under this program must have an active SAM registration. HUD will not issue a grant agreement for awarded funds to a project applicant until an active SAM registration has been verified. See Section IV.C.1. of the FY 2015 General Section for additional information.

D. Project Eligibility Threshold. HUD will review all projects to determine if they meet the following eligibility threshold requirements on a pass/fail standard. If HUD determines that the applicable standards are not met for a project, the project will be rejected from the competition. Any project requesting renewal funding will be considered as having met these requirements through its previously approved grant application unless information to the contrary is received (e.g., monitoring findings, results from investigations by the Office of Inspector General, the recipient routinely does not draw down funds from LOCCS at least once per quarter, consistently late APRs.). Approval of new and renewal projects is not a determination by HUD that a recipient is in compliance with applicable fair housing and civil requirements.

(1) Project applicants and potential subrecipients must meet the eligibility requirements of the CoC Program as described in 24 CFR part 578 and provide evidence of eligibility required in the application (e.g., nonprofit documentation).

(2) Project applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and to administer Federal funds. Demonstrating capacity may include a description of the applicant/subrecipient experience with similar projects and with successful administration of SHP, S+C, or CoC Program funds for renewing projects or other Federal funds.

(3) Project applicants must submit the required certifications as specified in this NOFA.

(4) The population to be served must meet program eligibility requirements as described in the Act, and the project application must clearly establish eligibility of project applicants. This includes the following additional eligibility criteria for certain types of projects:

- (a) The only persons who may be served by any non-dedicated permanent supportive housing beds are those who come from the streets, emergency shelters, safe havens, institutions, or transitional housing.
- i. Homeless individuals and families coming from transitional housing must have originally come from the streets or emergency shelters.
 - ii. Homeless individuals and families with a qualifying disability who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life threatening conditions and are living in transitional housing are eligible for permanent supportive housing even if they did not live on the streets, emergency shelters, or safe havens prior to entry in the transitional housing.
 - iii. Persons exiting institutions where they resided for 90 days or less and came from the streets, emergency shelter, or safe havens immediately prior to entering the institution are also eligible for permanent supportive housing.
- (b) The only persons who may be served by dedicated or 29 prioritized permanent supportive housing beds are chronically homeless individuals and families as defined in 24 CFR 578.3.
- (c) Rapid Re-housing projects originally funded to serve individuals and families coming from the streets or emergency shelters or persons meeting the criteria of paragraph (4) of the definition of homeless, must continue to do so.
- (d) New Rapid Re-housing projects created through reallocation may serve individuals, including unaccompanied youth, and families coming from the streets or emergency shelters or persons fleeing domestic violence or other persons who qualify under paragraph (4) of the definition of homeless; however, these program participants must meet the all other criteria for this type of housing (i.e., individuals and household with children who enter directly from the streets or emergency shelter).
- (e) The projects originally funded as part of the FY 2008 Rapid Re-Housing for Families Demonstration may transition in this CoC Program Competition to permanent housing: rapid rehousing. Therefore, any of these projects that want to change from transitional housing with leasing, may change the current budget line items from leasing to tenant-based rental assistance (may request actual rent or FMR) and move any operating costs to an eligible supportive services activity, an HMIS budget line item, or may be used to add additional units. If the project wants to remain as transitional housing, it must continue operating in accordance with the FY 2008 CoC Homelessness Assistance Grants Programs NOFA.
- (f) Renewal projects originally funded under the Samaritan Housing Initiative must continue to exclusively serve chronically homeless individuals and families, unless there are no chronically homeless individuals and families within the CoC geographic area that can be served by the project. CoCs should not hold units vacant, but instead should prioritize other vulnerable and eligible households as outlined in Notice CPD-14-012.
- (g) Renewal projects originally funded under the Permanent Supportive Housing Bonus in previous years must continue to serve the homeless population in accordance with the respective NOFA under which it was originally awarded.
- (h) Renewal projects that indicated they would prioritize chronically homeless persons in beds that become available through turnover in non-dedicated permanent supportive housing projects must continue to do so.
- (5) The project must be cost-effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.

(6) Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that meets the needs of the local HMIS.

(7) Project applicants must administer their programs or activities in the most integrated setting appropriate to the needs of qualified homeless with disabilities. This means that programs or activities must be offered in a setting that enables the homeless with disabilities to interact with others without disabilities to the fullest extent possible.

E. Project Quality Threshold. HUD will review all new project applications to determine if they meet the following project quality threshold requirements with clear and convincing evidence. Any project requesting renewal funding will be considered as having met these requirements through its previously approved grant application unless information to the contrary is received (e.g., monitoring findings, results from investigations by the Office of Inspector General, consistently slow draws from LOCCS, consistently late APRs) and if the renewal project has compliance issues which results in the project not operating in accordance with 24 CFR part 578. The housing and services proposed must be appropriate to the needs of the program participants and the community. A determination that a project meets the project quality threshold is not a determination by HUD that a recipient is in compliance with applicable fair housing and civil rights requirements.

(1) To be considered as meeting project quality threshold, new permanent housing—permanent supportive housing and rapid re-housing—project applications must receive at least 3 out of the 5 points available for the criteria below. New permanent housing project applications that do not receive at least 3 points will be rejected.

(a) Whether the type, scale, and location of the housing fit the needs of the program participants (1 point);

(b) Whether the type and scale of the supportive services fit the needs of the program participants—this includes all supportive services, regardless of funding source (1 point);

(c) Whether the specific plan for ensuring program participants will be individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible to apply meets the needs of the program participants (1 point);

(d) Whether program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (1 point); and,

(e) Whether at least 75 percent of the proposed program participants come from the street or other locations not meant for human habitation, emergency shelters, safe havens, or fleeing domestic violence (1 point).

(2) To be considered as meeting project quality threshold, new SSO projects for centralized or coordinated assessment systems must receive at least 2 out of the 4 points available for the criteria below. SSO projects for centralized or coordinated assessment systems that do not receive at least 2 points will be rejected.

(a) Whether the centralized or coordinated assessment system is easily accessible for all persons within the CoC's geographic area who are seeking information regarding homelessness assistance (1 point);

(b) Whether there is a strategy for advertising the program that is designed specifically to reach homeless persons with the highest barriers within the CoC's geographic area (1 point);

(c) Whether there is a standardized assessment process (1 point); and

(d) Whether the program ensures that program participants are directed to appropriate housing and services that fit their needs (1 point).

(3) To be considered as meeting project quality threshold, new HMIS project applications must receive at least 3 out of the 4 points available for the criteria below. New HMIS projects that do not receive at least 3 points will be rejected.

(a) How the HMIS funds will be expended in a way that is consistent with the CoC's funding strategy for the HMIS and furthers the CoC's HMIS implementation (1 point);

(b) Whether the HMIS collects all Universal Data Elements as set forth in the HMIS Data Standards (1 point);

(c) Whether the HMIS un-duplicates client records (1 point); and 32

(d) Whether the HMIS produces all HUD-required reports and provide data as needed for HUD reporting (e.g., APR, quarterly reports, data for CAPER/ESG reporting) (1 point).

(4) To be considered as meeting project quality threshold, the Collaborative Applicant's application for new CoC planning funds must receive at least 6 out of 10 points using the criteria below. Applications that do not receive at least 6 points will be rejected. Applications for UFA Costs are not subject to a threshold review, as UFA status was determined as part of Registration.

(a) Governance and Operations. Whether the CoC conducts meetings of the entire CoC membership that are inclusive and open to members and whether the CoC is able to demonstrate that it has a written governance charter in place that contains CoC policies (2 points).

(b) CoC Committees. Whether the CoC has CoC-wide planning committees, subcommittees, or workgroups to the address homeless needs in the CoC's geographic area that recommend and/or set policy priorities for the CoC (2 points).

(c) The proposed planning activities that will be carried out by the CoC with grant funds are compliant with the provisions of 24 CFR 578.7 (4 points); and

(d) The funds requested will improve the CoC's ability to evaluate the outcome of both CoC Program-funded and ESG-funded projects (2 points).

(5) Additionally, HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness, and performance standards. To be considered as meeting project quality threshold, all new projects must meet all of the following criteria:

(a) Project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded under the SHP, S+C, or CoC Program, as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings;

(b) For expansion projects, project applicants must clearly articulate the part of the project that is being expanded. Additionally, the project applicants must clearly demonstrate that they are not replacing other funding sources; and

(c) Project applicants must demonstrate they will be able to meet all timeliness standards per 24 CFR 578.85. Project 33 applicants with existing projects must demonstrate that they have met all project renewal threshold requirements of this program. HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, or unresolved audit/monitoring finding related to one or more existing grants. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on the prior grant.

F. Project Renewal Threshold. A CoC must consider the need to continue funding for projects expiring in the next calendar year. Renewal projects must meet minimum project eligibility, capacity, timeliness, and

performance standards identified in this program's annual NOFA or they will be rejected from consideration for funding.

(1) When considering renewal projects for award, HUD will review information in LOCCS; Annual Performance Reports (APRs); and information provided from the local HUD CPD Field Office, including monitoring reports and A-133 audit reports as applicable, and performance standards on prior grants, and will assess projects using the following criteria on a pass/fail basis:

- (a) Whether the project applicant's performance met the plans and goals established in the initial application as amended;
- (b) Whether the project applicant demonstrated all timeliness standards for grants being renewed, including that standards for the expenditure of grant funds have been met;
- (c) The project applicant's performance in assisting program participants to achieve and maintain independent living and record of success, except HMIS-dedicated projects are not required to meet this standard; and
- (d) Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site.

(2) HUD reserves the right to reduce or reject a funding request from the project applicant for the following reasons:

- (a) Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
- (b) Audit finding(s) for which a response is overdue or unsatisfactory;
- (c) History of inadequate financial management accounting practices;
- (d) Evidence of untimely expenditures on prior award;
- (e) History of other major capacity issues that have significantly affected the operation of the project and its performance;
- (f) History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and
- (g) History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

G. Resolution of Outstanding Civil Rights Matters Threshold. In order for a project application to be eligible for rating and ranking by HUD, the project applicant and the proposed subrecipient must meet the civil rights threshold requirements in Section III.C.2.b. of the FY 2015 General Section. h. Certification of Consistency with the Consolidated Plan. For each applicant that is not a State or unit of local government, the applicant must submit a certification by the jurisdiction 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 in accordance with the provisions of the consolidated plan regulations at 24 CFR part 91, subpart F. Form HUD-2991 must be used and must list all new projects, CoC planning, UFA Costs, and renewal projects within the jurisdiction that are consistent with the Consolidated Plan. For a project applicant that is a State or unit of local government, the jurisdiction must certify that it is following its HUD-approved Consolidated Plan.

3. Other HUD Requirements. The list below highlights requirements contained in the General Section (and in other regulations) that is especially important for CoCs and project applicants to review in detail. This is not an

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exhaustive list of all HUD requirements. All of the requirements of the FY 2015 General Section apply to the CoC Program, except as otherwise specified in the current year NOFA. An applicant can access the General Section of HUD's FY 2015 NOFA http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail/2015gensec. Note that the General Section of HUD's FY 2015 NOFA is critical and must be carefully reviewed to ensure an application can be considered for funding, with the exception of reference to the www.grants.gov application process and other exceptions specifically listed in the NOFA. The CoC Program uses an electronic system outside of www.grants.gov called e-snaps. Notification of the availability of the application will be released via HUD's websites located at www.hud.gov and www.hudexchange.info. To sign up for HUD's CoC Program email-based listserv, go to www.hudexchange.info/maillinglist/.

A. Fair Housing and Equal Opportunity. See 24 CFR 578.93 for specific requirements related to Fair Housing and Equal Opportunity.

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B. Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity. See the Federal Register dated February 1, 2012, Docket No. FR 5359-F-02 and Section VI.B.2. of the General Section.

C. Debarment and Suspension. See Section III.C.4.c. of the FY 2015 General Section. Additionally, it is the responsibility of the recipient to ensure that all subrecipients are not debarred or suspended. (24 CFR 578.23((3)(c)(4)(v)).

D. Delinquent Federal Debts. See Section III.C.4.a. of the FY 2013 General Section.

E. Compliance with Fair Housing and Civil Rights. See Section III.C.3.a. of the FY 2015 General Section.

F. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (LEP)." See Section III.C.3.d. of the FY 2015 General Section.

G. Economic Opportunities for Low- and Very Low-income Persons (Section 3). See Section III.C.3.c. of the FY 2015 General Section.

H. Real Property Acquisition and Relocation. See Section VI.B.4. of the FY 2015 General Section.

I. Conducting Business in Accordance with Core Values and Ethical Standards/Code of Conduct. See Section III.C.3.f. of the FY 2015 General Section.

J. Prohibition Against Lobbying Activities. See Section III.C.3.h. of the FY 2015 General Section.

K. Participation in HUD-Sponsored Program Evaluation. See Section VI.B.6. of the FY 2015 General Section.

L. Environmental Requirements. Notwithstanding provisions at 24 CFR 578.31 and 24 CFR 578.99(a) of the CoC Program interim rule, and in accordance with Section 100261(3) of MAP-21 (Pub. L. 112-141, 126 Stat. 405), activities under this program's NOFA are subject to environmental review by a responsible entity under HUD regulations at 24 CFR part 58.

(1) For activities under a grant to a recipient other than a State or unit of general local government that generally would be subject to review under part 58, HUD may make a finding in accordance with 24 CFR 58.11(d) and may itself perform the environmental review under the provisions of 24 CFR part 50 if the recipient objects in writing to the responsible entity's performing the review under part 24 CFR part 58.

(2) Irrespective of whether the responsible entity in accordance with 24 CFR part 58 (or HUD in accordance with 24 CFR part 50) performs the environmental review, the recipient must supply all available, relevant information necessary for the responsible entity (or HUD, if applicable) to perform for each property any required environmental review. The recipient also must carry out mitigating measures required by the responsible entity (or HUD, if applicable) or select alternative property.

(3) The recipient, its project partners, and their contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this NOFA, or commit or expand HUD or local funds for such eligible activities under this NOFA, until the responsible entity (as defined by 24 CFR 58.2(a)(7)) has completed the environmental review procedures required by 24 CFR part 58 and the environmental

certification and Request for Release of Funds (RROF) have been approved or HUD has performed an environmental review under 24 CFR part 50 and the recipient has received HUD approval of the property. HUD will not release grant funds if the recipient or any other party commits grant funds (i.e., incurs any costs or expenditures to be paid or reimbursed with such funds) before the recipient submits and HUD approves its RROF (where such submission is required).

M. Drug-Free Workplace. See Section VI.B.9. of the FY 2015 General Section.

N. Safeguarding Resident/Client Files. See Section VI.B.10 of the FY 2015 General Section.

O. Compliance with the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. 209-282) (Transparency Act), as amended. See Section VI.B.11. of the FY 2015 General Section.

P. Lead-Based Paint Requirements. For housing constructed before 1978 (with certain statutory and regulatory exceptions), CoC Program recipients must comply with the requirements of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801, et seq.), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851, et seq.); and implementing regulations of HUD, at 24 CFR part 35; the Environmental Protection Agency (EPA) at 40 CFR part 745, or State/Tribal lead rules implemented under EPA authorization; and the Occupational Safety and Health Administration at 29 CFR 1926.62 and 29 CFR 1910.1025.

DRAFT



Office of Rental Assistance and Homeless Solutions

Shelter Diversion Pilot Request for Proposals (RFP)

Proposals Due: Thursday, November 7, 2024

*Made possible through the
Housing and Community Development Fund (HCDF)*

735 E Michigan Ave
P.O. Box 30044
Lansing, MI 48909



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1. Timeline

RFP Timeline	Dates
Request for Proposals (RFP) Released	Friday September 20, 2024
RFP Overview Webinar	Wednesday, September 25, 2024 Register here: https://us06web.zoom.us/webinar/register/WN_i72Ut8JERryV4pubVFDeMA
Proposals Due	By 5 p.m. Thursday, November 7, 2024
Proposal Review/Scoring	November 11-21, 2024
Awards Announced	No Later than November 21, 2024
Project Start Date	January 1, 2025

2. General Overview

In 2022, MSHDA received a state budget allocation of \$50 million for the Housing and Community Development Fund (HCDF). These funds are intended to expand housing supports for the State of Michigan through a variety of projects and services based on identified needs. Through stakeholder engagement and listening sessions, MSHDA identified shelter diversion as a priority demonstration project to test, expand, and implement in select homeless crisis response systems. Under this allocation, MSHDA is investing an additional \$1 million for a 1-year expansion of the initial \$3 million pilot through a competitive Request for Proposals (RFP) process.

Shelter diversion is a strategy that assists people experiencing a housing crisis to quickly identify and access safe alternatives to shelter where possible. Shelter diversion is most effective when implemented collaboratively at the community-level, with shared knowledge and understanding of diversion practices and goals. Through the Shelter Diversion Pilot RFP, MSHDA is seeking proposals from eligible agencies to implement or expand effective shelter diversion models. This pilot will demonstrate the impact of effective shelter diversion on homeless crisis response systems and, more importantly, the impact on households at risk of or experiencing homelessness. All selected agencies will be part of a learning cohort for this project and will engage regularly with their peers, MSHDA project staff, and selected training and technical assistance throughout the course of the project.

3. Pilot Description

The goal of shelter diversion is to end a household's experience of homelessness as quickly as possible while empowering them to regain control over their situation. The emphasis is on securing safe, appropriate options in their community – even temporary options – rather than an emergency shelter stay, whenever possible. This limits the trauma of homelessness while supporting the availability of limited shelter beds for those most in need.

Shelter diversion is an intensive, short-term intervention narrowly focused on households at the point they are at risk of, or have lost access to their housing option, but prior to or shortly following entry in emergency shelter. Households at or below 40% Area Median Income (AMI) are eligible for this funding. A shelter diversion intervention should generally take no more than 14 days. Clients may stay in shelter or in other housing during this time. Shelter diversion elevates creative problem solving and conflict

resolution to empower people experiencing a housing crisis to find an immediate alternative to shelter and return to more stable housing. Through a strengths-based conversation, facilitated by a Diversion Specialist, individuals and families seeking shelter are supported in identifying immediate alternate housing arrangements and, if necessary, connections with services and financial assistance. **Most importantly, shelter diversion does not act as a barrier to shelter.**

Projects awarded under this competitive RFP will demonstrate how these funds will build off of already existing structures of Diversion within an organization's homeless response system.

Effective shelter diversion includes staff with trained expertise in the following skills and practices:

- A trauma-informed approach to engagement focused on creating safety, transparency, and an overview of the Specialist/household partnership.
- Incorporation of motivational interviewing skills throughout the partnership, in particular active listening, open-ended questions, empathy, and a focus on goals.
- Exploration of strengths, opportunities, and resources to move from crisis to empowerment to regain confidence and identify options in addressing the housing issue.
- Collaborative identification of safe, appropriate options and next steps that can be reality-tested and validated as SMART (Specific, Measurable, Actionable, Realistic & Timed).
- Connections to other community resources and collaboration for utilization of all available resources will be essential. Mediation is valued as a worthwhile endeavor to improve relationships between households, landlords, and/or potential host households.
- Effective and timely communication that summarizes the action steps and follow-up with specifics including activities, persons responsible, timelines, and communication expectations.

Flexible financial assistance also plays a critical role by allowing Diversion Specialists the ability to provide unique supports for each household based on individually identified needs. Areas of unique support include transportation, food, education, employment, childcare, and household bill contribution, among others. Traditional financial and rental assistance, like housing application fees, mediation, and monthly rental payments, are also available through this pilot. However, households served through shelter diversion should still be considered for other housing resources as eligible, necessary, and available through the Coordinated Entry System (e.g. HUD CoC Programs, Emergency Solutions Grant (ESG) and Emergency Shelter Program (ESP))

The Shelter Diversion Pilot will require HMIS data entry to track household demographics, services provided, and housing outcomes. Awarded agencies will be responsible for completing quarterly reporting throughout the course of the project.

4. Grant Term and Award Parameters

The grant term will be one (1) year, starting January 1, 2025, through December 31, 2025.

The maximum grant award is \$165,000. **MSHDA anticipates awarding six (6) proposals.** Proposals will be reviewed for geographic dispersion. CoC's currently active in the Shelter Diversion Pilot are not eligible for this round of funding:

- MI-502 – Dearborn, Dearborn Heights, Westland/Wayne County CoC

- MI-508 – Lansing, East Lansing, Ingham County CoC
- MI-509 – Washtenaw County CoC
- MI-512 – Grand Traverse, Antrim, Leelanau Counties CoC
- MI-514 – Battle Creek/Calhoun County CoC
- MI-519 – Holland/Ottawa CoC

CoC’s not listed above are eligible to apply for this round of funding.

Funds may be awarded by MSHDA through the established Fiduciaries under the Emergency Solutions Grant (ESG) in each Continuum of Care (CoC) or Local Planning Body (LPB) of the Michigan Balance of State CoC (MIBosCoC) OR may be directly awarded to the shelter providing diversion services. An IGX profile must be established in order to be awarded funds directly versus through the established ESG fiduciary. A portion of awarded administrative funds must be allocated to the Fiduciary for associated costs and responsibilities.

5. Eligible Costs and Cost Parameters

The following cost categories are eligible for the Shelter Diversion Pilot:

Budget Line	Description
Staffing	At least 40% of total proposed project costs must be allocated for new staffing (Diversion Specialists). Staff costs related to HMIS data entry may also be billed to this budget line.
Flexible Financial Assistance	At least 10% of total project costs must be allocated for flexible financial assistance.
Rental Assistance	At least 20% of total project costs must be allocated for rental assistance.
Administrative Costs	Administrative costs are limited to 10% of total project costs.

Cost Parameters

Staffing: Funds budgeted for staffing cannot be used to supplant other program funds for existing staff. Applicants must ensure new positions are posted and hire additional staff as Diversion Specialists for this funding round. Staff costs include salaries, benefits, and fringe costs such as cell phones, mileage, recognition and training. Funds may be used to promote a part-time employee to a full-time employee, but this must be defined in the application.

Flexible Financial Assistance: Households can receive up to \$2,500 in assistance. This is capped for the grant term (i.e. households can be assisted with shelter diversion more than once but cannot receive more than \$2,500 in flexible financial assistance). This cap is implemented separately from rental assistance.

- General categories for Flexible Financial Assistance
 - Food
 - Contribution to shared housing costs (e.g. Utility bills)

- Transportation
- Employment
- Education
- Childcare
- Please see the supplemental policy guide for additional uses of this funding.

NOTE: Awarded projects will not be permitted to provide monetary payments (cash) directly to households. Flexible Financial Assistance can be provided directly to households via gift cards in alignment with the general categories noted in this RFP.

Rental Assistance: Households can receive up to three (3) months of rental assistance. This is capped for the grant term (i.e. households can be assisted with rent payments more than once but cannot receive more than three months of rental assistance in total). This cap is implemented separately from the Flexible Financial Assistance. To receive rental assistance the household must be engaged in a diversion activity. These funds are not to be used as an eviction prevention program component. Funds are available through other projects to assist with eviction prevention.

Administrative Costs: Cost allocation plans are permitted in lieu of detailed administrative costs but must be provided at the point of proposal submission.

Please see the [MSHDA Shelter Diversion](#) web page for additional, supplemental information. Including the policy guide.

6. Performance Measures

To track progress toward achieving the outcome goals of this program and assess success, MSHDA and awarded projects will monitor a set of performance indicators that may include, but are not limited to:

- Percentage of households who have a diversion interaction and identify an alternative to emergency shelter.
- Percentage of households who identify an alternative to emergency shelter and do not return to the Coordinated Entry System for emergency shelter within 30, 60, and 90 days.
- Racial equity analysis of diversion outcomes.
- Analysis of diversion outcomes based on household type (i.e. adult-only households, families).

To monitor and recognize intermediate progress toward the above performance indicators, MSHDA also intends to track output metrics that may include, but are not limited to:

- Average length of emergency shelter stay following diversion interaction.
- Average amount of Flexible Funding Assistance per household served and nature of assistance provided.
- Average number of days a household is engaged in diversion services (measured from first point of contact to household graduation from or discontinuation of services).

Other performance measures and outputs will be established in partnership with MSHDA, awarded applicants, and their associated CoC/LPB as part of the Shelter Diversion Pilot implementation

process. MSHDA expects performance measures to be refined as part of an iterative approach to the diversion practice. Within this framework, MSHDA is focused on continuous improvement toward the goals of shelter diversion as previously stated. In addition to the performance indicators and output metrics listed above, MSHDA encourages applicants to propose additional indicators and metrics, including those that demonstrate early success and are indicative of household progress. All metrics should include evaluation based on race, ethnicity, gender, age, and other characteristics as appropriate to track equity in services, outcomes, and outputs. MSHDA anticipates that performance by these metrics will vary by subpopulation served. Data generated from this pilot will inform future resource allocation and support replication of effective strategies and models.

7. Role Definitions and Applicant Criteria

Responses to this RFP will confirm the support of the local Fiduciary as established under MSHDA ESG funding and, if separate, which agency or agencies will act as the Service Provider(s). Definitions for each role are outlined below.

**** Fiduciaries and/or organizations that apply for funding and generally struggle with MSHDA reporting or are currently behind in FSR submission for current programs may not be considered. This project is being heavily monitored by MSHDA and the State Budget Office; timely reporting, HMIS data entry and FSR submissions are required for this project.****

Fiduciary

The Fiduciary is an agency selected and affirmed by the CoC/LPB to receive and distribute Shelter Diversions Pilot funding. The Fiduciary agrees to the following responsibilities:

- Execute grant documents, including:
 - Completion of the Shelter Diversion Pilot Memorandum of Understanding (MOU), with signatures from all named entities.
- Assure use of funds in accordance with the grant agreement, communicating knowledge of any fraudulent activity to MSHDA and the CoC/LPB.
- Submit quarterly Financial Status Reports (FSRs) through MSHDA's grant management system (IGX).
- Submit all required data reports on behalf of the project.
- Advise the CoC/LPB of any grant expenditures concerns, including delayed or inadequate expenditures, to avoid loss of funds to the community and possible recapture by MSHDA.
- Evaluate the quality of services and provide oversight to the Service Provider(s) based upon documented outcomes and in partnership with the CoC/LPB.
- Monitor ten percent (10%) of all Shelter Diversion Pilot participant files, as well as the financial records.

Service Provider

The Service Provider(s) is an agency selected and affirmed by the CoC/LPB to implement and staff the shelter diversion model. The Service Provider(s) agrees to the following responsibilities:

- Collaborate with the CoC/LPB to ensure the shelter diversion model is integrated within the Coordinated Entry System and broader homeless crisis response system.

- Provide eligible services as defined within this pilot, MOU, and associated grant documents.
- Hire and train staff as Diversion Specialists, following outlined best practices and required skills.
- Enter client information on HMIS (Domestic Violence Agencies must use a comparable database).
- Coordinate with the HARA to ensure the required assessment tool and/or process is completed for literally homeless households.
- Routinely review and correct HMIS data quality issues and monitor outcome performance.
- Provide routine reports to the CoC/LPB on the pilot, including the number of households served and outcomes.
- Maintain financial and client level records to support billings, retaining records for five years.
- Request payment and provide necessary supportive documentation to the Fiduciary on at least a quarterly basis.
- Ensure compliance with grant terms and provide the Fiduciary and MSHDA access to financial and programmatic records when requested.

Submitted proposals must ensure that the Fiduciary and, if separate, the Service Provider(s) meet the following criteria for eligibility:

Fiduciary Eligibility

- A 501(c)3 nonprofit agency or local unit of government that operates its principal place of business in the State of Michigan (CoC/LPB, if incorporated as a 501(c)3 Entity, is eligible).
- Actively involved in the CoC/LPB planning process.
- Exhibits the financial capacity to administer funds as demonstrated through an audited federal financial statement.
- Has financial management systems in place such as cash receipts, disbursement logs, invoices, and cancelled check registers, etc.
- Employs staff who possess bachelor's degree in accounting or possess experience in accounting along with college accounting credits or a bookkeeper whose work is overseen by an accounting firm.

Service Provider Eligibility

- A 501(c)(3) nonprofit agency or local unit of government that operates its principal place of business in the State of Michigan (CoC/LPB, if incorporated as a 501(c)(3) Entity, is eligible).
- Actively involved in the CoC/LPB planning process.
- Experienced in serving homeless populations.
- Experienced in providing case management services specifically targeted to people who are experiencing homelessness.
- Experienced with successful HMIS data collection.
- Participation in a QSOBAA to allow sharing within HMIS.
- Exhibits the financial capacity to administer funds as demonstrated through an audited federal financial statement.
- Has financial management systems in place such as cash receipts and disbursement logs, invoices, and cancelled check registers, etc.

- Employs staff who possess bachelor's degree in accounting or possess experience in accounting along with college accounting credits or a bookkeeper whose work is overseen by an accounting firm.

All funded agencies must be able to provide to MSHDA evidence of eligibility, when requested.

8. Proposal Outline and Scoring

<p>Proposed Model</p>	<ol style="list-style-type: none"> 1. The proposal clearly defines the model and services to be provided. Services are appropriate for addressing the needs of and achieving the desired outcomes for the target population. <ul style="list-style-type: none"> • Detailed outline of Diversion Model • Number of proposed Diversion Specialists • Anticipated internal and external referral process • Submission of current CE workflow and the anticipated CE workflow with Diversion 2. The proposed model is supported by prior experience, demonstrated expertise, and/or aligns with the best practices and skills relevant to shelter diversion. 3. The proposal demonstrates a clear understanding of the grant target population and their needs/challenges. 4. The proposal provides estimates of deliverables that are in alignment with the proposed model's scope. 5. The Service Provider(s) has experience and/or expertise in delivering services in an expedient manner. 6. The Service Provider(s) provides a detailed outline of implementation of diversion and provides a plan for spending the entirety of the award within the grant term. 7. Proposed model outlines a plan for community outreach, interagency communication and promotion of the availability of diversion funds 8. Service provider(s) provides a detailed plan for hiring and onboarding Diversion Specialists with in the first 30 days of the grant term. 9. It is expected that the general population experiencing homelessness or at risk of homelessness (at or below 40% AMI) will be offered Diversion services. If the proposed model intends to provide targeted services to a specific population, define that in the proposal narrative. 	<p>40</p>
<p>Performance Management and Outcomes</p>	<ol style="list-style-type: none"> 1. The proposal outlines organizational utilization of HMIS for data collection and service delivery (DV agencies must use a comparable data base). 2. The proposal includes how the Service Provider(s) utilizes the By Name List to support service delivery and documentation of outcomes including tracking recidivism over 30, 60 and 90 days. 3. The proposal supports MSHDA's outcomes measurements and identifies any anticipated methods for data capture and outcomes tracking. 	<p>10</p>

Organizational Capacity	<ol style="list-style-type: none"> 1. The Fiduciary and/or Service Provider(s) has qualified staff responsible for program oversight and management. 2. Fiduciary and/or Service provider(s) provides a narrative regarding organizational experience with Shelter Diversion. 3. The Fiduciary has adequate systems and processes to support monitoring pilot expenditures and fiscal controls. 4. The Fiduciary and/or Service Provider(s) has adequate Human Resources capacity to hire and manage staff. 5. Service provider has adequate staff and workflow for HMIS data entry and controls. 6. The Fiduciary and/or Service Provider(s)'s organization reflects and engages the diverse people of the communities it serves. 7. The Fiduciary and/or Service Provider(s) is up to date with its FSR's and other reporting mandates to current MSHDA projects. Please list your current MSHDA funding sources. 8. Service Provider(s) submits the current organizational chart and a new organizational chart that identifies the new shelter diversion role(s) within the organization. 	30
Reasonable costs, Budget Justification, Leverage of Funds	<ol style="list-style-type: none"> 1. The Fiduciary and/or Service Provider(s) has the fiscal capacity to implement the proposed model as demonstrated by an audit and/or other financial documents. 2. The Fiduciary and/or Service Provider(s) indicates that they have the capacity to implement this pilot on a reimbursement basis, as necessary. 3. The Fiduciary and/or Service Provider(s) demonstrates reasonable implementation costs and funding requests relative to its financial and human resources. The proposed budget supports the proposed scope of work. 4. The Service Provider(s) and/or the fiduciary commit to collaborative utilization of funds to support positive outcomes for those clients engaged in a Diversion Activity. Describe the service providers experience with collaborative utilization of funds across organizations and across funding sources. List any anticipated funding sources that can be leveraged in support of Diversion 	10
Letter of Support	A letter of support from the CoC or LPB (for MIBoSCoC) must be included with the proposal. Proposals submitted without the CoC or LPB letter of support will not be reviewed.	10
Total		100

Basis of Award

MSHDA will rate applications using the criteria listed above and through a multidisciplinary review team. Additionally, MSHDA will consider how each project aligns with best practices and service standards set forth by national experts and federal funding partners. MSHDA will also ensure adequate balance across specialized populations and geography.

9. Submission Instructions

All proposals must be submitted by the Fiduciary via email to Jennifer McNeely, MSHDA Program Specialist, at mcneelyj2@michigan.gov. Proposals are due by 5 p.m. EST Thursday, November 7, 2024. Proposals submitted after the deadline will not be considered. Questions regarding this RFP may also be emailed to Jennifer McNeely at the above email address.

Proposals must include the following:

- Letter of support from the CoC or LPB (only one application per CoC or LPB will be accepted)
- Proposal Narrative
 - **Proposed Model**
 - **Performance Management Outcomes**
 - **Organizational Capacity**
 - **Reasonable costs, Budget Justification, Leverage of Funds**

NOTE: Please review the RFP in full to ensure the narrative contains all of the information for each scored parameter.

The narrative should be formatted in at least 11-point, standard font. The top of the proposal narrative must have the CoC/LPB name and Fiduciary point of contact, including address, email, and phone number.

Each scored parameter should be identified with the appropriate heading. For example:

Proposed Model

Narrative description

Please submit documents as a PDF. Documents created in Microsoft Word can be converted to a PDF by selecting, "Save as Adobe PDF", from the File menu.

File name MUST include CoC/LPB name and document name.

For example:

CoC NAME (or LPB Name) CoC Letter of support

CoC NAME (or LPB Name) Proposal Narrative

Any other documents deemed necessary to support the proposals are permitted and MUST contain the CoC/LPB name AND document name.

Michigan State Housing Development Authority is committed to providing meaningful access. For accommodations, modifications, translation, interpretation, or other services, please contact:

MSHDA-HS@michigan.gov

(517) 335-9885

735 E. Michigan Ave

P.O. Box 30044

Lansing, MI 48909

Housing and Community Development Fund:

Shelter Diversion Expansion

Rental Assistance and Housing Solutions



RAHS Shelter Diversion Team



Christina Soulard
Homeless Solutions
Program Manager



Jennifer McNeely
Homeless Solutions
Program Specialist



Lisa Kemmis
Rental Assistance and
Homeless Solutions
Director

Agenda

Welcome and introductions

Webpage

Overview of HCDF

What is Shelter Diversion

RFP Components



**Please take time to
answer the survey
question**



Roles

Jen's Role

- Grant Management
- Technical Assistance
- Host monthly touch points
- Case conference as needed
- Keep the shelter Diversion web page up to date

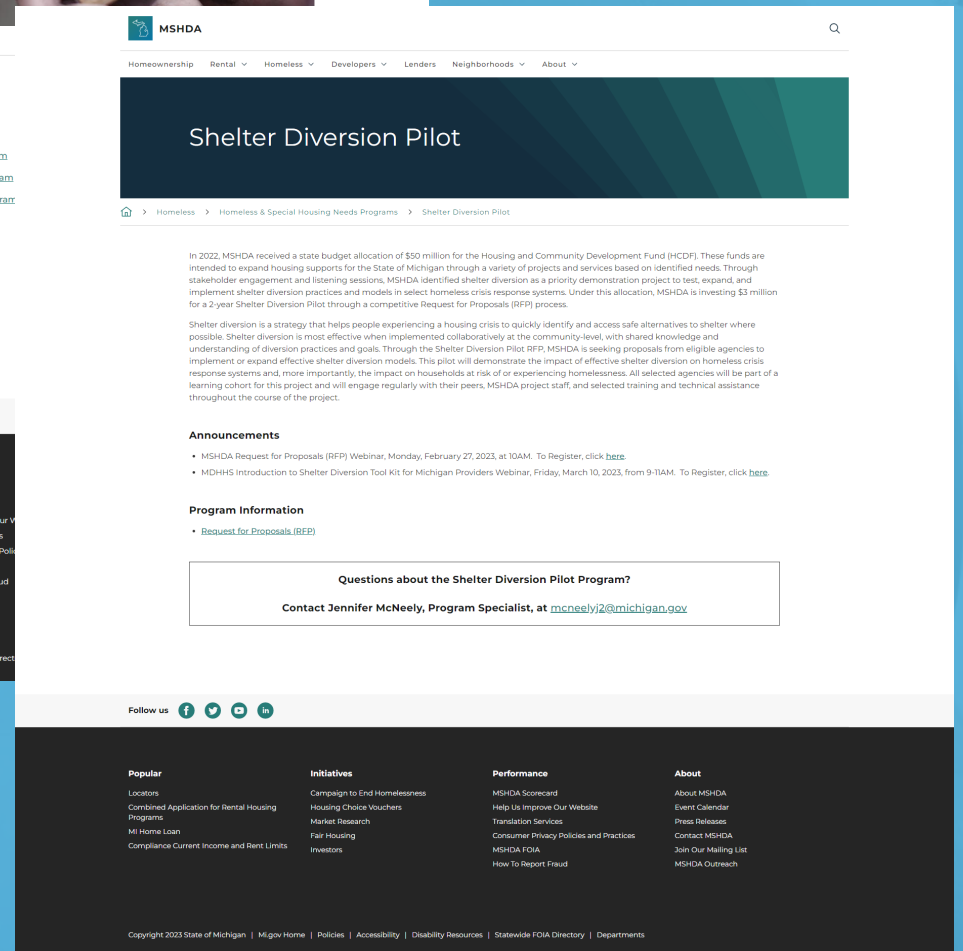
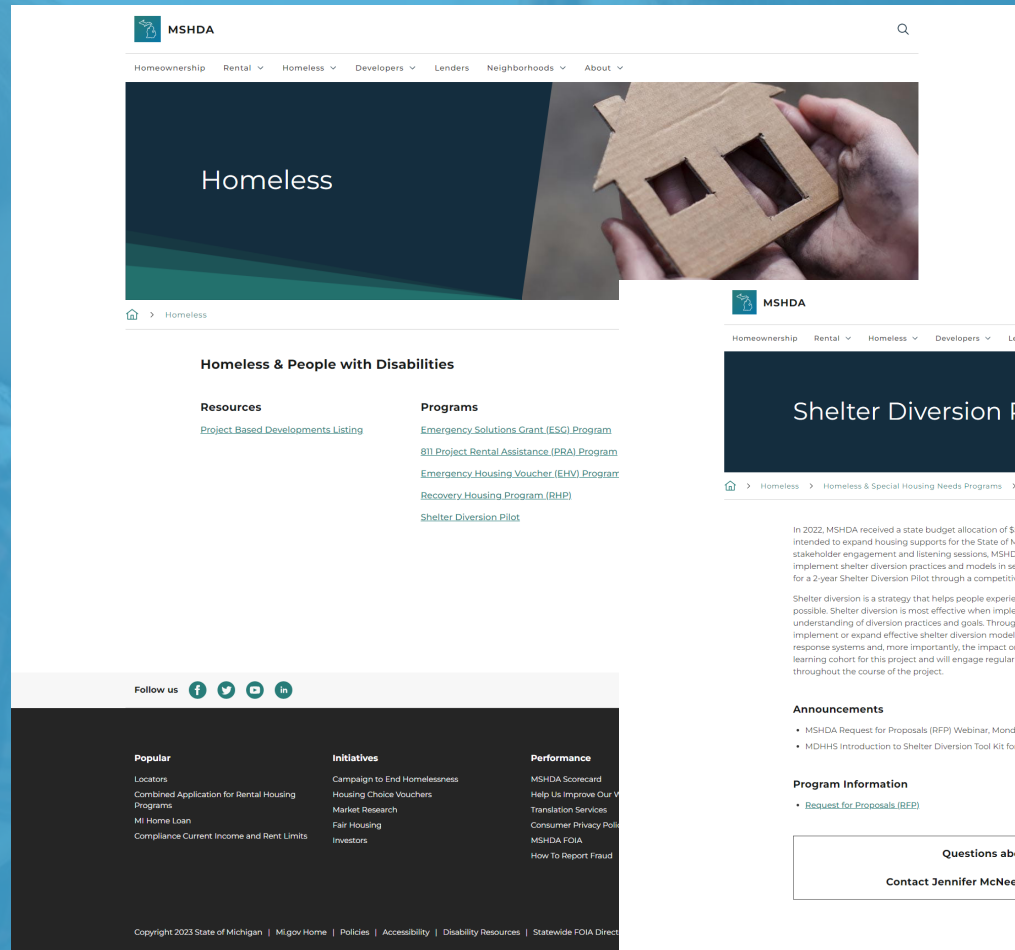
Your Role

- Effectively execute Diversion
- Attend monthly touch points
- Submit Financial Status Reports and outcome reporting on time
- Call/email when you need assistance
- Collaborate across community resources



Web Page

Shelter Diversion Pilot (michigan.gov)



Housing and Community Development Fund (HCDF)

Originally established as a part of the
MSHDA Act of 1966

\$50,000,000 state budget allocation to
expand housing supports

There are 15 eligible expense
categories in the 25-26 allocation



Shelter Diversion Timeline

RFP Released	9/19/2024
Proposals Due	11/7/2024
Application Review and Scoring	11/11 – 11/21/2024
Awards Announced	11/21/2024
Project Start Date	1/1/2024

What is Shelter Diversion

Main goals:

- Avoid entry into the shelter by identifying immediate alternative housing options
- Connect to services and/or provide short-term financial assistance
- Develop a long-term housing plan

****Diversion is not meant to be a barrier to utilization of emergency shelter****

What is Shelter Diversion

- Intensive short-term intervention – light touch case management
- Diversion can happen at several access points
 - “always be diverting”
- Creative, client centered problem solving
- Trauma reducing
- Cost effective
- The funds are flexible and used for short term purpose

What is Effective Shelter Diversion

Key Components:

- **Creates a safe space for conversation**
- **Trauma informed**
- **Focused on client centered problem solving**
- **Active empathetic listening**



What is Effective Shelter Diversion

Key Components:

- Cultural, community, and situational awareness
- Highlights client strength
- Motivational interviewing
- Discusses current living situation
- Ideally 14 days or less from intake to stabilized housing
- Light touch case management at 30, 60 and 90 days



The RFP

- 1 year expansion of the current pilot
- Max grant amount is \$165,000
- ****Up to 6 awards – awarded through a competitive process ****
- MSHDA will ensure effective geographic dispersion
- One grant per eligible Continuum of Care (CoC) or Local Planning Body (LPB)



The RFP

Proposals **MUST** contain the following

- Proposed Model
- Organizational Capacity
- Performance Management Narrative
- Budget Justification
- Letter of Support from the CoC or Local Planning Body



The RFP

Eligible Costs

- Staffing
- Flexible Financial Assistance
- Rental Assistance
- Administrative Costs



The RFP

Scoring

- Strength of proposed model
- Performance management and outcomes
- Organizational capacity
- Reasonable costs, budget justification and leverage of other funds



Measuring Outcomes

- Percent of households who have a diversion interaction and identify an alternative housing option
- Percentage of households that do not return to the CE system over 30, 60 and 90 days
- Outcomes by household type that engaged in diversion

Measuring Outcomes

Initial Output Measures

- Length of stay at an emergency shelter following a diversion interaction
- Amount of flexible funds per household and nature of assistance
- Number of days a household is engaged in diversion services

Submission Information

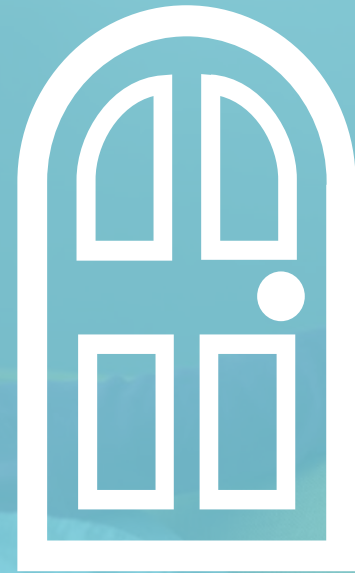
Proposals due November 7th
by 5:00 p.m. EST

Submit via email to:
Jennifer McNeely, Program Specialist
mcneelyj2@michigan.gov

Late proposals and multiple
submissions per CoC or LPB will not be
considered.



Post webinar poll



Shelter Diversion Expansion

Q & A



Contact Information

Jennifer McNeely
Program Specialist

mcneelyj2@michigan.gov





Grand Rapids Area Coalition to End Homelessness¹ Governance Charter

The Grand Rapids Area Coalition to End Homelessness is a community collaborative that is actively working on systems change in the area of homelessness. The goal of the Coalition is to prevent and end systemic homelessness in Kent County, guided by the values and philosophy set forth in the original 10-year community developed plan, the *Vision to End Homelessness*.

The Grand Rapids Area Coalition to End Homelessness, also known as the Kent County Continuum of Care (CoC), is an independent, non-incorporated membership entity comprised of numerous organizations and individuals. It was formed in response to federal requirements in the McKinney-Vento Homeless Assistance Act of 1987 reauthorization in 1994 and amended in the Homeless Emergency Assistance and Rapid Transition (HEARTH) Act of 2009 for administration of US Department of Housing and Urban Development (HUD) funding to address homelessness as described in 24 CFR Part 578.5. The CoC Governance Charter and subsequent amendments are approved, consistent with 24 CFR Part 578.5, by the CoC membership. Governance decisions on behalf of the CoC are made by a Steering Council elected from the membership, in accordance with the CoC Governance charter. Annually the Continuum of Care applies to the HUD Continuum of Care (CoC) Program for funding to address homelessness.

The CoC is committed to collaboration where ever possible to accomplish its stated goals to end homelessness. The Essential Needs Task Force (ENTF), a broader community effort to coordinate the response to basic needs and strengthen communications across systems in Kent County is one such effort that the CoC is committed to participation in. (To learn more about ENTF, see entfkent.org). The ENTF functions with subcommittees that include Housing, Energy Efficiency, Economic & Workforce Development, Transportation, Food & Nutrition.

I. Continuum of Care (CoC)

A. Role

The Continuum of Care champions the *Vision to End Homelessness*, convening to determine local priorities, strengthen communication, encourage best practices, and promote collaboration to achieve goals.

As a community collaborative, the Continuum of Care:

- Promotes community commitment to the goal of ending homelessness,
- Gathers and analyzes information to determine local needs of individuals experiencing homelessness,
- Provides a comprehensive, well-coordinated, and clear planning process,
- Promotes access to and effective use of existing programs,
- Implements strategic responses and measures results,
- Applies for funding from the U.S. Department of Housing and Urban Development (HUD) and other funding sources based on local priorities.

¹ Resource documents: Coalition Structure, March 2010; *Establishing and Operating a Continuum of Care*, 2012, US Department of Housing and Urban Development

B. Responsibilities

The major responsibilities that must be carried out by the CoC to comply with HUD expectations are as follows:

1. Convene regular meetings of the full membership, with published agendas, at least semi-annually
2. Issue a public invitation for new members within Kent County at least annually
3. Adopt and follow a written process to select a board to act on behalf of the CoC (identified as the Steering Council for Continuum of Care) and review that process at least once every 5 years
4. Appoint additional committees, subcommittees, or work groups comprised of provider representatives and community advocates; and action boards comprised of consumers, as needed.
5. Designate the Homeless Management Information System (HMIS) lead for the CoC
6. In consultation with the collaborative applicant for HUD funds and the HMIS lead, develop, follow and update annually:
 - a. A governance charter
 - b. A code of conduct and recusal process for the board, its chairperson and any person acting on behalf of the board
7. Establish and operate a centralized or coordinated entry system
8. Develop a plan for a coordinated housing and service system that meets the needs of individuals, unaccompanied youth, and families experiencing homelessness
9. Plan and conduct an annual Point-in-Time count of sheltered and unsheltered persons that meets HUD guidelines
10. Establish performance targets appropriate for population and program type in consultation with recipients and sub-recipients
11. Monitor recipient and sub-recipient performance and address concerns of poor performance
12. Work with Emergency Solutions Grants recipients and Consolidated Plan jurisdictions within the geographic boundaries of the CoC to allocate, report and evaluate use of funds, and inform the plan
13. In consultation with recipients of Emergency Solutions Grants program funds, establish and consistently follow written standards for providing CoC assistance with those funds

The CoC is responsible for carrying out all activities listed above. In Kent County, the CoC delegates these responsibilities to its Steering Council which may, in turn, delegate some of these responsibilities to other organizations. Because the Kent County CoC is not incorporated, Memorandums of Understanding (MOU)s rather than contracts are used whenever any of these responsibilities are delegated to other entities. These MOUs are reviewed on an annual basis by the CoC Steering Council against performance expectations outlined in the MOU. Under the current Governance Charter three particular tasks are delegated to other entities through MOUs. These include:

- Fiscal Agent (Entity that provides paid staff support for the CoC)
- HMIS Lead Agency (entity holding responsibility for Homeless Management Information System (HMIS) management and maintenance)
- Collaborative Applicant (entity formally completing the HUD CoC Competition application)

C. Members & Term of Service

The Continuum of Care is comprised of agencies and organizations that provide direct services to households experiencing a housing crisis, other related service organizations that engage directly or indirectly with households that experience a housing crisis, and homeless or formerly homeless individuals, and is open to:

1. nonprofit homelessness assistance providers,
2. victim services providers,
3. faith-based organizations,
4. government entities,
5. businesses,

6. advocates,
7. public housing authorities,
8. school districts,
9. social services providers,
10. mental health agencies,
11. hospitals,
12. universities,
13. affordable housing developers,
14. law enforcement,
15. organizations serving veterans,
16. homeless or formerly homeless individuals.

A public invitation must be issued for new members from Kent County a minimum of once each year. While membership is voluntary, organizations and homeless or formerly homeless individuals are required to formally sign-up as members and affirm their commitment to the mission of the Coalition to End Homelessness in order to have voting and other privileges with the group. Member organizations or entities must designate one person to serve as the voting representative. Annually, members of the Continuum of Care must renew their membership and confirm the designation of their voting representative.

A roster of voting representatives is maintained and updated at least annually. A voting representative from an organization or agency may assign their proxy to another individual from their organization; however, at no time will any organization be provided with multiple votes. The voting representative must provide a 24 hour notice to CoC staff via email indicating which pre-registered alternate voter (of which there can be no more than two) will be voting for their organization. Additionally, any voting representative can only vote once and cannot represent more than one organization or person.

Continuum of Care members may continue to participate indefinitely. Members are expected to attend CoC meetings a minimum of twice a year and are strongly encouraged to participate in committees and work groups.

D. Meetings

The Continuum of Care must meet a minimum of twice a year although more meetings may be held as needed.

1. Steering Council Chairperson presides at Continuum of Care meetings.
2. Meeting agenda are developed by the Steering Council and published in advance of the Continuum of Care meeting.
3. Continuum of Care members have the right to suggest additional agenda items for a Continuum of Care meeting, but additional agenda items must be approved by a majority vote of those in attendance at that Continuum of Care meeting.
4. Meetings may include opportunities to share information about local partners, best practices from the field, progress toward achieving the goals of the Coalition, and Coalition activities.
5. Attendance records must be maintained, and the records must include the names of all individuals, with organizations noted as appropriate.

II. Steering Council

A. Role

The Coalition Continuum of Care represents many community stakeholders in carrying out the mission of leading the community in finding solutions for preventing and ending homelessness. To facilitate effective execution of Coalition goals, a Steering Council performs the functions of a CoC board, with certain specific responsibilities assigned by the Continuum of Care through this Governance Charter.

B. Responsibilities

The Steering Council is responsible for ensuring that the seven major HUD defined responsibilities in Section I.B. are carried out. In addition, the Steering Council is authorized by the Continuum of Care to:

1. Serve as the primary decision-making entity for the Continuum of Care according to the approved governance structure,
2. Set the agenda for the Continuum of Care meetings,
3. Establish policies, principles and priorities and select the Collaborative Applicant for the HUD NOFA process,
4. Determine project priorities and monitor the outcomes of those projects,
5. Oversee the competitive process for annual CoC application submissions to HUD and other funding sources and provide final approval for those application submissions,
6. Establish policies for data release and monitor HMIS Standard Operating Procedures either through direct administration of or designation of an HMIS implementing agency,
7. Direct system planning activities that engage CoC members,
8. Direct analysis of system-wide data to identify community needs and gaps and report to the CoC

C. Participants and Terms of Service

The Steering Council is comprised of up to twenty-one (21) seats representing the broad array of interests within the Coalition and must:

1. Include at least **two homeless or formerly homeless individuals**
2. At a minimum, represent the relevant organizations and projects serving homeless subpopulations, such as persons with substance use disorders; persons with HIV/AIDS; veterans; the chronically homeless; facilities with children; unaccompanied youth; the seriously mentally ill; formerly incarcerated; and victims of domestic violence, dating violence, sexual assault, and stalking. One member may represent the interest of more than one homeless subpopulation, and the Steering Council must represent all subpopulations within the Coalition to the extent that someone is available and willing to represent the subpopulation.

The seats referenced above are rotating seats with alternating, three-year terms, elected by the Continuum of Care annually. Steering Council members whose terms are expiring are allowed to campaign for re-election for continuing terms.

Six seats are considered permanent, non-rotating seats assigned to the following entities:

- a. Units of local government that are HUD Grantees:
 1. City of Grand Rapids
 2. City of Wyoming
 3. Kent County
- b. HARA (Housing Assessment and Resource Agency)/Central Intake
- c. Action Boards
 1. Youth Action Board
 2. Veteran Action Board

These entities are responsible for designating their representative to the Coalition Steering Council.

Steering Council members must serve on committees and work groups, including those organized by the CoC, those organized by external groups, or other existing community forums with relevant objectives. Service on committees and work groups is critical to ensuring effective liaison and coordination of activities.

Steering Council members serve for three-year terms, staggered so that approximately one-third of all terms end in any given year. The Continuum of Care shall determine the specific fiscal year period for terms on the Steering Council.

The selection process for Steering Council members is described under the Nominating Committee. This process is subject to review and alteration on an annual basis by Continuum of Care but no less frequently than every five years.

D. Meetings and Attendance

The Steering Council meets a minimum of six times annually.

The Steering Council responsibilities are such that at each meeting the group should be capable of voting on an issue. This requires members to be present for the vote and involved to make an informed decision. Therefore, Steering Council members should maintain a minimum attendance rate of 75% of all Steering Council meetings. If any member falls below this amount, they will be asked to re-evaluate and ensure they are able to maintain their commitment. If at least 50% of meetings have been missed in the twelve-month period of October –September, the seat will be considered open in the next Steering Council election.

E. Officers

1. Chairperson, vice chairperson, secretary, and treasurer;
2. Elected by the Steering Council annually during a specific month as determined by the Steering Council but no longer than 60 days following the annual election by the Continuum of Care of new members to that Council;
3. Officer terms are one year and can be renewed;
4. Steering Council chairperson, or vice-chairperson in the absence of the chairperson, presides at meetings of the Steering Council, the Executive Committee, and CoC Continuum of Care;
5. In absence of a sitting Chairperson, ENTF staff will Chair the Steering Council meeting with the sole purpose of executing officer elections;
6. All Steering Council members are expected to observe the Code of Conduct and the Conflict of Interest Policy.

F. Decision Making

The presence of a majority of Steering Council members then holding office shall constitute a quorum at all meetings. If a quorum is not present, no voting will occur. A simple majority of those in attendance and eligible to vote is necessary for any resolution to be passed.

Within elected seats of the Steering Council, no alternate representative will be given a proxy vote. For appointed seats, those six held by the HUD Participating Jurisdictions, the HARA, and action boards an alternate representative is able to vote. Advance notice of which member will be attending and voting should be provided in writing to CoC staff.

In the matter of approving funding recommendations made by the Funding Review Committee, the Steering Council will give final approval. Once approval is secured, CoC staff shall inform applicants of the outcome of their application in writing. Included in this notice should be the Funding Decision Appeal policy of the CoC, informing applicants of their right to appeal and the process in which to do so.

There may be instances when a decision is needed by the Steering Council between regularly scheduled meetings. When this happens, electronic voting may be completed. A simple majority of current Steering Council members is necessary for any resolution to be passed. Members who do not subscribe to an email service must have contact attempted to allow them to vote verbally.

III. Committees

In the interest of transparency and community involvement, all committees except those requiring election, shall be open to all CoC members.

A. Executive Committee

Role and Responsibilities

In accordance with resolutions passed from time to time by the Steering Council delegating specific tasks to the committee, the Executive Committee may meet as needed to:

1. Consider and recommend the annual budget,
2. Consider staffing needs and make recommendations on fulfilling necessary functions,
3. Review financial reports and present them to the Steering Council,
4. Consider and recommend policy,
5. Prepare annual work plan and calendar including required CoC functions,
6. Plan Steering Council meeting agenda,
7. Plan Continuum of Care meeting agenda,
8. Appoint members to serve in the case of a vacancy to the Steering Council or nominating committee,
9. Make recommendations on committees, task forces, or work groups and recommend members,
10. Lead the process to create a strategic plan that advances the goal of ending homelessness.

Limitations

Unless otherwise specifically delegated by Steering Council resolution for Executive Committee action, all Executive Committee determinations are presented to the Steering Council for final review and/or decision-making.

Participants and Terms of Service

The executive committee of the Steering Council is made up of the four officers plus a minimum of one other Steering Council member.

Meetings

The executive committee meets as needed between meetings of the Steering Council.

In the event of a resignation from the Steering Council, the Executive Committee shall appoint a member to serve on the Council until the next election. Priority for the appointment shall be given to the organization or population area the resigning member had represented, with consideration given to any population areas unrepresented in the current Steering Council membership.

B. Nominating Committee

Role and Responsibilities

The Nominating Committee is responsible for proposing election or re-election of the **fifteen rotating seats** of Steering Council members whose terms are coming to an end or to fill positions that have been vacated. Nominating Committee members serve staggered two-year terms.

Members of the Nominating Committee must:

1. Review the current composition of the Steering Council to determine satisfactory systemic representation in accordance with the approved policy of the Continuum of Care;
2. Evaluate attendance of members who are completing a term and, if eligible for reappointment, determine their willingness to continue;
3. Seek recommendations from the Continuum of Care membership for qualified candidates;
4. Deliberate and compile a list of eligible candidates to present to the Continuum of Care for election;
5. Provide for an open process allowing nominations from the floor at the Continuum of Care meeting convened for the annual election.

Officers

The Nominating Committee also is responsible for preparing a slate of officers for presentation to the Steering Council for annual election to take place no later than 60 days after the beginning of the annual term for Steering Council members. To carry out this responsibility, the Nominating Committee will review officers' participation and term end dates, recruit candidates, and prepare a slate to present to the Steering Council for election.

Participants and Terms of Service

The Nominating Committee is comprised of five individuals, including three CoC members and two members of the Steering Council who are not currently serving as officers. Nominating Committee members must have a working knowledge of CoC responsibilities and structure, the Coalition, and the *Vision to End Homelessness*.

The Nominating Committee is formed to serve for two years.

1. The Steering Council selects a Steering Council member to chair the Nominating Committee and selects one additional Steering Council member to serve on the committee
2. The Continuum of Care members elect Nominating Committee members by the following process:
 - a. A minimum of three weeks in advance of a scheduled Continuum of Care meeting, candidates to serve on the Nominating Committee are sought through distribution of a message to all Continuum of Care' voting representatives of record;
 - b. A written ballot is distributed to voting representatives at the Continuum of Care meeting; each qualified voting representative can vote for three candidates;
 - c. Votes are tallied and the three candidates receiving the highest number of votes serve on the Nominating Committee;
 - d. In the event of a resignation from the committee, the Executive Committee shall appoint a member to serve until the next election.

Meetings

Six months prior to the end of the fiscal year: Nominating Committee formed based on process above

Four/five months prior to the end of the fiscal year: Nominating Committee meets

One month prior to the end of the fiscal year: Continuum of Care elects new or renewing Steering members

First month of the fiscal year: New Steering Council members join and within sixty days the Steering Council elects officers from a slate prepared by the Nominating Committee

C. Funding Review Committee

Role and Responsibilities

The Funding Review Committee is responsible for reviewing applications and making prioritized project funding recommendations to the Steering Council for action. Funding sources include the Homeless Emergency Assistance

and Rapid Transition to Housing (HEARTH Act) grant funds under the Continuum of Care Program administered by HUD.

The Funding Review Committee develops the scoring criteria for rating and ranking applications based on local needs and priorities and HUD priorities for program services as outlined in the Notice of Funding Availability (NOFA). The committee is responsible for understanding the NOFA, considering local priorities, and evaluating applicant agencies' program performance based on evidence and data.

Participants and Terms of Service

The Funding Review Committee is comprised of community members who represent systems that fund or interface with the homeless system, are knowledgeable about homelessness and housing, but are not applicants. This includes individuals from the various homeless sub-populations; homeless service providers (e.g., prevention, emergency housing, transitional housing, permanent and permanent supportive housing); municipalities and governmental units that fund the Coalition; and community representatives (e.g., business, foundations, United Way). Members of the Funding Review Committee need not be Coalition members.

The Steering Council is responsible for appointing the Funding Review Committee members. In selecting committee members, the Steering Council will attempt to avoid even the appearance of impropriety. All committee members will review the Conflict of Interest policy and complete the disclosure form prior to beginning their service on the committee. Potential conflicts of interest could include: participation in the planning of a project or providing technical assistance in the preparation of a project application in either a paid or volunteer capacity or active involvement as a board or staff member of any agency that has a proposal for funding pending. Perceived advocacy for a project can also disqualify an individual from serving on the committee.

Meetings

The Funding Review Committee meets as needed to carry out its duties. Typically, this includes an orientation session, a meeting to consider priorities, one or more meetings to evaluate applications, and one or more meetings to score and rank applications. New members will also be required to meet as necessary to complete the committee training curriculum as approved by the Steering Council. Meetings are scheduled to provide sufficient time to complete the work, forward recommendations for Steering Council action, and submit the completed application to meet HUD deadlines.

Appeals

An Appeals Panel shall be assembled for each funding round consistent with the Appeals Policy for funding recommendations that is adopted and updated by the Steering Council.

D. HMIS Data Quality Committee

Role and Responsibilities

The Homeless Management Information System (HMIS) is a tool for the community and HUD to develop better information on the nature of homelessness, the number of people experiencing homelessness, the existing patterns in housing programs and services, and the effectiveness of programs and services in addressing homelessness. HMIS must be used by the CoC and all recipients of HUD program funds.

The HMIS Data Quality Committee performs several important functions: insuring that the HMIS is administered in compliance with requirements prescribed by HUD, reviewing, revising, and recommending adoption of an HMIS privacy plan, security plan, and data quality plan, and ensuring the consistent participation of recipients and sub recipients in the HMIS.

The HMIS Data Quality Committee is responsible for on-going system wide analysis to identify strengths and gaps in the data system and for preparing and/or updating data quality standards for consideration by the Steering Council.

A subcommittee, the HMIS Users Group, is responsible for ensuring that all agency and program staff with responsibility for data entry are appropriately trained on system use and for assisting with formulation and periodic review of policy and procedures, such as the privacy plan.

Participants and Terms of Service

Members of the HMIS Data Quality Committee are selected based on their knowledge of data systems, standards for data quality, and relevant policy and procedures, for example, policy related to data privacy. Members must commit to understanding basic HUD requirements in relation to data collection and reporting.

Committee members are drawn from Coalition CoC member agencies and include representation from HUD-funded agencies and non-HUD-funded agencies. Other individuals may be appointed to the committee based on specific expertise.

The HMIS Users Group, a subcommittee of the Data Quality Committee, is open to all member agency staff members with direct, hands-on, responsibility for entering data and using the data system.

E. Coordinated Entry Committee

Role and Responsibilities

The primary role of the Coordinated Entry Committee is to provide oversight and review to the Coordinated Entry system for households experiencing homelessness to be served by both temporary and permanent housing, according to eligibility and service standards of the community.

Participants and Terms of Service

The Coordinated Assessment Entry is made up of representatives of those Coalition CoC member agencies that participate in the Coordinated Entry system. Coordinated Entry Committee should likewise include representation from community systems level and other CoC members not directly participating in the Coordinated Entry system.

F. Data Analysis Committee

Role and Responsibilities

The Data Analysis committee is responsible for regular review of multi-level data to evaluate system level progress toward ending homelessness. The work of this committee shall inform the work of other committees to ensure activities are contributing to improved system level outcomes. This committee is specifically charged with preparation and review of annual HUD System Performance Measures reports, Point-in-Time and Housing Inventory reports. The committee is responsible for reporting to the Steering Council on a regular basis regarding the effectiveness of the comprehensive system to address homelessness. This should include specific attention to system level performance measures established by the CoC (see Sec I. A, Continuum of Care: Implements strategic responses and measures results).

Participation and Terms of Service

Members of the Data Analysis Committee are drawn from the Coalition CoC membership and wider community and should have a basic understanding of data and its use in evaluation.

G. Ad-Hoc Workgroups

Workgroups are time-limited, task-oriented groups that are recruited and assigned responsibility for addressing a specific issue or challenge, including achieving the strategic plan objectives. Such groups will be formed as need is determined by Steering Council, or upon recommendation of one of the standing committees. A representative of each workgroup shall be appointed to report to one of the standing committees to ensure communication and coordination of work. Workgroups also may form organically as a result of individuals coming together around a shared concern or interest. When such work groups form organically, there should be brief written statement of purpose, focus, including expected time span of work and expected outcome. Such statement is to be submitted to Steering Council for reference.

H. Action Boards

Action Boards are established to ensure that the effort to end homelessness in Kent County incorporates the expertise of those experiencing homelessness or who are formerly homeless. The Action Boards shall have voting representation on the CoC's Steering Council and as necessary shall independently advise the CoC.

Designees, elected by a majority of the Action Board, shall serve as a single voting member of the Steering Council. Action Board members are also encouraged to serve on subcommittees and workgroups.

Role and Responsibilities

1. Provide feedback to the CoC on prevention, crisis response, and housing solutions to end homelessness
2. Recommend policies and practices to prevent and respond to homelessness
3. Assist in project development and funding decisions
 - Action Boards shall inform planning efforts
 - To review and recommend funding priorities and applications in addressing homelessness for specific applications as required by funding application.
4. Advise on and support education and advocacy efforts for systems reform on the local, state and federal levels to support the plans to end homelessness.

Participation and Terms of Service

Action Boards shall consist of no fewer than three (3) members and no more than eight (8) members of the designated population group. Members must have experienced homelessness previously or currently be experiencing homelessness. The Action Board shall meet a minimum of quarterly. The Action Boards will seek to ensure cross-representation among over-represented sub-populations. Individuals may fulfill cross-representation of categories.

Current Action Boards

1. Youth Action Board
2. Veteran Action Board

IV. Conflict of Interest

No Steering Council member may vote on matters concerning the award of a grant or other financial benefits if it might affect the organization that member represents. In addition, members will avoid conflicts of interest between the Coalition and any personal, professional, and business interests.

In any vote that might create a conflict of interest for the voting member, it is their responsibility to state that they recuse themselves from the vote. In written records of the vote, these members should be noted as having abstained.

At the beginning of each fiscal year, Steering Council members are expected to sign the Conflict of Interest policy document and to abide by the provisions regarding disclosure at all meetings. The signed policy documents are kept on file with meeting minutes and other records.

V. Code of Conduct

The Coalition prohibits the solicitation and acceptance of gifts or gratuities (anything of monetary value) by officers, employees and agents for their personal benefit.

The Coalition promotes impartiality in performing official duties and prohibits any activity representing a conflict of interest. Individual members should not act on a matter if a reasonable person who knew the circumstances of the situation could legitimately question that individual's fairness.

The Coalition prohibits the misuse of position for personal gain or for the benefit of family or friends.

Officers and employees shall put forth honest effort in the performance of their duties. They shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Coalition without previous Steering Council approval.

Officers and employees shall disclose waste, fraud, abuse, and corruption to appropriate authorities.

VI. Schedule of Review

This Governance Charter for the Grand Rapids Area Coalition to End Homelessness CoC is subject to annual review. All responsibilities required of a Continuum of Care must be thoroughly documented in the CoC's governance charter.

Specifically, the Continuum of Care "in consultation with the collaborative applicant and the Homeless Management Information System (HMIS) lead, must develop, follow, and update annually (1) a governance charter that includes all procedures and policies needed to comply with 24 CFR Part 578.5(b) and with HMIS requirements as prescribed by HUD and (2) a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board." (2012, *Establishing and Operating a Continuum of Care*, US Department of Housing and Urban Development, page 4)

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October 23, 2014
October 22, 2015
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