
SOUTH SHORE NETWORK TO END HOMELESSNESS

SOUTH SHORE CONTINUUM OF CARE (CoC)

MA-511 – Quincy/Brockton/Weymouth/Plymouth City
and County CoC

CONTINUUM OF CARE POLICIES & PROCEDURES (COC MANUAL)

Approved by:

Executive Committee

South Shore Regional Network to End Homelessness

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Continuum of Care Policies and Procedures

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Introduction | Continuum of Care – Regional Network

The Quincy/Brockton/Weymouth/Plymouth City and County Continuum of Care (CoC) – MA-511 is the regional planning body that develops strategies and provides a coordinated response to homelessness throughout the South Shore CoC geography. It is known locally as the **South Shore Network to End Homelessness (“the Network”)**. It is defined as the Network in this Policies and Procedures Manual. The goal of the Network is to address and end homelessness in the South Shore region (see map - Appendix 1).

The Network conducts CoC activity and governance under a Governance Charter annually updated and approved by the general membership (see Appendix 2).

The Network has established an **Executive Committee** as the lead decision making entity for the Continuum of Care. It oversees the Network’s implementation of many of the Continuum of Care planning requirements outlined in the CoC HEARTH Act Interim Final Rule. The Executive Committee reviews and approves the Policies and Procedures Manual.

Section 1 | Network/CoC System

1. General Definitions

Collaborative Applicant: The City of Quincy is the Collaborative Applicant. It submits the CoC Consolidated Application to HUD on behalf of the South Shore Regional Network, which includes the application for and administration of planning grants, as they are available.

Executive Committee: The lead decision-making body responsible for planning for the use of HUD CoC-funded resources and coordinating related activities regarding homeless prevention, homeless services and homeless housing activities and programming for the Network. As per HUD CoC requirements, the Executive Committee sets CoC project performance goals, receives evaluation information, and approves the CoC application submitted to HUD. It also approves the Collaborative Applicant, HMIS Lead, and Network Support Entity. See the Governance Charter in Appendix 2 for a complete list of responsibilities.

Grantee: Term used in this document to identify an entity that operates a project either as the recipient or subrecipient to HUD of CoC or ESG funds.

HMIS Administrator: Father Bill's & Mainspring is the Administrator of the Homeless Management Information System (HMIS). The HMIS Administrator: 1) Coordinates the annual homeless Point-in-Time count and the update of the Housing Inventory Chart and submits the data to HUD. 2) Completes the Longitudinal Systems Analysis report (LSA) and submits to HUD. 3) Completes the Systems Performance Measures report (SPM) and submits to HUD. 4) Provides technical assistance to all HMIS participating agencies with HMIS data collection. 5) Leads efforts by the Network to gather and analyze regional homeless data and to create a regional data warehouse. 6) Carries out all other HMIS Administrator responsibilities outlined in the Network Governance Charter.

HMIS Lead: The City of Quincy is the HMIS Lead. It is designated by the Network to operate the region's HMIS on its behalf. It also applies for HMIS funds from the HUD CoC program on behalf of the Network in order to operate the HMIS and to cover other costs eligible under 578.57. Additionally, the HMIS Lead is responsible for selecting and monitoring the HMIS Administrator.

Recipient agency: An entity that enters into a grant agreement with HUD to obtain and administer CoC program funds. Current recipient agencies in the Network are:

- City of Quincy
 - For projects formerly part of the Quincy/Weymouth CoC and operated by Father Bill's & MainSpring;
 - For the project operated by Family and Community Resources and DOVE;
 - For planning grants
- Father Bill's & MainSpring – for projects it operates that were formerly part of MA-520, the Brockton/Plymouth CoC
- Old Colony YMCA

An ESG Recipient is an entity that receives Emergency Solutions Grant (ESG) funds from HUD as an entitlement community. ESG Recipients in the Network are: City of Quincy.

Subrecipient agency: An entity that enters into an agreement with a recipient to perform some or all of the responsibilities outlined in the recipient's grant agreement with HUD and in accordance with the CoC Interim Rule. Father Bill's & MainSpring is the subrecipient agency in the Network for projects formerly part of the Quincy/Weymouth CoC and for implementation of CoC planning grants. Family and Community Resources is the subrecipient agency for a domestic violence rapid rehousing project.

An ESG Subrecipient is an entity that provides ESG assistance through a grant agreement with an ESG Recipient. Current subrecipients are: Father Bill's & MainSpring (FBMS), Quincy Community Action Programs (QCAP), and DOVE as subrecipients of the City of Quincy, which is an ESG entitlement city. FBMS is a subrecipient of the MA Department of Housing & Community Development, which is an ESG recipient state that provides ESG funding to the Network.

Support Entity: Father Bill's & MainSpring is the Support Entity for the Network. As its resources permit, the Support Entity provides staff/consultant to assist with meeting certain HUD requirements and to assist with CoC planning. Specific responsibilities include: (1) Provide technical assistance and lead role to prepare the Collaborative Application. (2) Assist with advising and carrying out other HUD CoC requirements, and (3) Assist with CoC coordination and planning to strengthen the work of the Network in addressing and ending homelessness.

2. Components of the South Shore Network/CoC

The written standards in this Policies & Procedures Manual cover the programs in the chart below that receive CoC and/or ESG funding. Programs with "other" funding are not held to the written standards but coordinate closely with the Network/CoC. They also participate in the Coordinated Entry system.

Components of the South Shore Regional Network/CoC			
Assistance Type	Agency and Program	Funding	Target Population
Outreach, Engagement, and Assessment	Father Bill's & MainSpring (FBMS)	other	Unsheltered Individuals
	Eliot Community Human Services	other (PATH)	Unsheltered Individuals – Mental Illness
	FBMS – Front door for state Emergency Assistance (EA) - assessment, diversion	other	Families
	Veterans Affairs (VA) walk-in clinic	VA	Veterans
Emergency Shelter	FBMS – Father Bill's Place	ESG	Individuals
	FBMS – MainSpring House	ESG	Individuals
	Carolina Hill	other	Families
	Friends of the Homeless – South Shore	other	Families
	FBMS	other	Families
	NeighborWorks Housing Solutions	other	Families
	Old Colony Y	other	Families
	Plymouth Area Coalition for the Homeless	other	Families
	DOVE [ESG-CV DURING COVID CRISIS 2020 AND 2021]	ESG	Individuals & Families– Survivors of domestic violence
	Health Imperatives – Penelope's Place	other	Families – Survivors of domestic violence
Transitional Housing	FBMS - GPD	VA	Individuals - Veterans
Rapid Rehousing	Family and Community Resources	CoC	Survivors of domestic violence
	FBMS	ESG	Individuals; Non-EA Families including victims of domestic violence
	Volunteers of America	other (SSVF)	Individuals & Families - Veterans
	NeighborWorks Housing Solutions -HomeBASE	other	EA Families
Permanent Supportive Housing	FBMS – multiple PSH projects	CoC	Individuals and Families
	FBMS – multiple PSH projects	other	Individuals & Families
	Old Colony Y	CoC	Families
Homelessness Prevention	Quincy Community Action Programs (QCAP)	ESG, other	Families
	FBMS	other	Individuals, families
	NeighborWorks Housing Solutions – RAFT [INCLUDING ERMA, SHERA DURING COVID CRISIS 2020 AND 2021]	other	Families

Section 2 | Standards for Providing CoC and ESG Assistance

1. Overall Requirements

All CoC-funded projects must adhere to CoC and HUD program requirements as outlined in the CoC HEARTH Act Interim Final Rule: 24 CFR 578: [CoC Program Interim Rule](#). All ESG-funded projects must abide by written standards developed by the recipient for providing ESG assistance as outlined in the ESG Interim Rule 24 CFR 576.400: [ESG Interim Rule](#).

CoC-funded projects must also adhere to any additional requirements identified by HUD in the annual Continuum of Care Program Competition or in other HUD notices of rules and guidance for the CoC program.

The CoC, in consultation with recipients and sub-recipients of Emergency Solution Grant (ESG) funds within the Network, has established the written standards in this section for providing CoC and ESG assistance. All CoC- and ESG-funded projects must consistently follow these standards. Other providers of projects serving people experiencing homelessness are strongly encouraged to adopt these standards as well.

The purpose of these written standards is to apply a consistent and transparent process when assessing people for homeless resources, to match them with appropriate resources, and to make efficient use of these limited funds.

2. Key Eligibility Definitions

Homeless

Below is a chart of the HUD criteria for defining homelessness as amended by the 2009 HEARTH Act and found in the HEARTH Act Interim Final Rule ([link above](#)).

At this time, HUD limits most homeless assistance to those in Category 1 –Literally Homeless. All Network programs receiving CoC and ESG funds may serve people who are Literally Homeless only, with the exception of ESG Prevention. ESG Prevention funds may assist people eligible under Categories 2, 3, or 4.

HUD Criteria for Defining Homelessness		
Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> . (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; . (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or . (iii) Is exiting an institution where(s)hehasresidedfor90days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> . (i) Residence will be lost within 14 days of the date of application for homeless assistance; . (ii) No subsequent residence has been identified; and . (iii) The individual or family lacks the resources or support ^[SEP]networks needed to obtain other permanent housing
Category 3	Homeless under other Federal Statutes	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> . (i) Are defined as homeless under the other listed federal statutes;* . (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; . (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and . (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
Category 4	Fleeing/ Attempting to Flee DV or other dangerous conditions	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> . (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions; . (ii) Has no other residence; and . (iii) Lacks the resources or support networks to obtain other permanent housing

*For “defined as homeless under other federal statutes,” see CoC HEARTH Act Interim Final Rule: 24 CFR 578.3 Definitions: Homeless (2) and (3): [CoC Program Interim Rule](#)

Chronically Homeless

All Network programs must use the following HUD definition when assisting and/or prioritizing people who are chronically homeless. A link to the HUD Final Rule and details is here: [Defining Chronically Homeless-Final Rule](#). The definition is below:

Chronically homeless means:

(1) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who: (i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Disability

To meet the disability portion of the chronically homeless definition, an individual must meet the criteria below. A link to the definition of disability in the McKinney-Vento Homeless Assistance Act is here (Section 401.9): [McKinney-Vento Act Amended by HEARTH](#).

The definition is listed below:

(A) IN GENERAL. —The term ‘homeless individual with a disability’ means an individual who is homeless, as defined in section 103, and has a disability that—

(i) (I) is expected to be long-continuing or of indefinite duration; (II) substantially impedes the individual's ability to live independently; (III) could be improved by the provision of more

suitable housing conditions; and (IV) is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post traumatic stress disorder, or brain injury;

(ii) is a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); or

(iii) is the disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.

(B) RULE—Nothing in clause (iii) of subparagraph (A) shall be construed to limit eligibility under clause (i) or (ii) of subparagraph (A).

Household

The term used in this document for homeless or imminently homeless persons to be assisted with CoC and/or ESG resources. A household may be one or more people.

Unaccompanied Youth

Young adults not accompanied by a parent or guardian, or by dependent children, who are between the ages of 18 -24 (up to their 25th birthday).

3. Written Standards for Providing CoC and ESG Assistance

○ By Program Component Type

Prevention Assistance

The Network provides homelessness prevention assistance, funded by ESG, to help households at risk of homelessness regain stability in their current permanent housing or move to other permanent housing and achieve stability there.

The Network's ESG prevention assistance includes:

- In the City of Quincy - funded by Quincy ESG.
- Throughout the CoC - as funds are available - funded by State (DHCD) ESG.

Eligibility

- Quincy ESG: resides in Quincy
- DHCD ESG: resides anywhere in the CoC
- Income may not exceed 30% of area median income (AMI)

- Must meet one of the HUD eligible homeless or at-risk categories below
 - **Homeless** - see chart, Section 2.2, for details
 - Category 2 – Imminent Risk of Homelessness
 - Category 3 – Homeless under other Federal Statutes
 - Category 4 – Fleeing/ Attempting to Flee Domestic Violence
 - **At risk of homelessness**
 - Lacks sufficient resources or support networks to prevent them from becoming homeless; and
 - Meets one of the following:
 - Has moved two or more times during the 60 days immediately preceding the ESG application;
 - Is living in the home of another because of economic hardship;
 - Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days;
 - Lives in a hotel or motel at own expense;
 - Overcrowded - Lives in a single-room occupancy or efficiency apartment unit with more than two persons, or in larger housing unit with more than 1.5 people per room; or
 - Exiting a publicly funded institution, or system of care (such as a healthcare facility, a mental health facility, foster care or other youth facility, or correction program or institution).

Assessment

Households are assessed using a Network pre-screening tool to determine the risk of homelessness and severity of needs (e.g., housing instability, lack of income, disabilities).

Prioritization of Eligible Households

- Prioritization for ESG assistance is determined by the pre-screening tool and based on severity of need.
- Households that are literally homeless, and homelessness cannot be resolved with prevention assistance, may be assisted with diversion using ESG or CoC rapid rehousing.

Assistance Provided

- Prevention assistance is limited to the costs necessary to help households regain stability in their current permanent housing or move to other permanent housing and achieve stability there.

- Funds may cover allowable ESG financial assistance costs and/or short/medium term rental assistance (see 576.105 & 576.106 for details: [ESG interim rule](#)) These costs include:
 - Rental application fees,
 - Security deposits,
 - Last month's rent,
 - Utility deposits,
 - Utility payments,
 - Moving costs,
 - Short-term and medium-term rental assistance of up to 24 months during any 3-year period, and may include up to 6 months of rental arrears.
- Maximum amount per household is at the discretion of the case manager, based on household need and availability of funds
- Households receiving one-time financial assistance are not required to pay a percentage of rent and utility costs
- Households receiving short- or medium-term rental assistance:
 - Must pay 30% of income toward rent,
 - Receive monthly stabilization services (case management) for the duration of ESG rental assistance,
 - May receive rental assistance for up to 24 months. Duration is based on household need and available funds, with a goal of providing 12 months of equal allotments to maximize impact,
 - May have the amount adjusted on a case-by-case basis due to unusual changes in household circumstances (e.g., loss of housing, loss of income).

Street Outreach

(NA – no ESG- or CoC-funded programs)

Emergency Shelter

The Network provides low-barrier emergency shelter for individuals who do not have alternative housing or access to other systems of care. It is partially funded by ESG. The goal of the Network is to assist participants to move as quickly as possible from shelter to housing or to other appropriate systems of care. Assessment, triage, and housing/next step planning should begin immediately upon entry to shelter.

Eligibility

- Literally Homeless or Fleeing/Attempting to flee Domestic Violence.

Admission, Assessment, Diversion, Referral, and Discharge

- **Low barrier:** Shelter is low barrier. No one is denied admission so long as they are not a danger to themselves or others. If an individual needs a level of care not provided in shelter the person is referred to a hospital or other appropriate system of care.
- **Diversion:** New shelter seekers are assessed for diversion to alternate housing or other systems of care. When diversion is not possible, shelter admission remains open and low barrier.
- **Referrals for services:** The intake with new shelter entrants also guides referrals to essential services related to emergency shelter, including health care, mental health and substance abuse treatment, veterans' services, workforce development, and housing assistance. These activities include coordination with other targeted homeless services and mainstream services as required in 24 CFR 576.400(b) and (c). PATH-funded mental health assistance and health care, and access to veterans' services are provided onsite.
- **Assessment:** Within 30 days of entry if participants are unable to resolve their homelessness, the Assessment Tool, Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT) is completed. At the discretion of case managers the VI-SPDAT may be completed sooner and may be updated periodically to reflect changes in participant circumstances. Assessment is used for housing prioritization (see below).
- **Length of stay:** There are no limits on length of stay. The goal is exit to appropriate housing/next steps within 90 days. Long stayers are defined as homeless for 180+ days.

Safeguards for Safety Needs

- Survivors of domestic violence, dating violence, sexual assault and stalking will be provided with safe shelter, including by accessing non-victim emergency shelter.
- If someone feels unsafe in a non-victim emergency shelter, a safety plan will be made. A safety plan will consist of coordination with the following to arrange for alternate placement:
 - Local domestic violence service providers for DV shelter placement or other safe options, and/or
 - MA Department of Transitional Assistance domestic violence unit to arrange for alternate safe shelter, and/or
 - CoC partners for other non-victim shelter or other safe options.

Safeguards for Special Populations

- Individuals and families with the highest barriers to housing are prioritized for the most intensive CoC-funded housing resources.
- The Network’s Coordinated Entry system is based on Housing First principles with chronically homeless persons with the greatest severity of need prioritized for permanent supportive housing.

Prioritization

The Network includes a sufficient supply of emergency shelter for those in need. In the event there is an insufficient supply of shelter beds, the Network will prioritize:

- Households that cannot be diverted
- Literally homeless or fleeing/attempting to flee domestic violence

Transitional Housing

(NA – no ESG- or CoC-funded programs)

Rapid Rehousing

The Network provides rapid rehousing assistance (RRH) to help homeless individuals and families move as quickly as possible to permanent housing and to achieve stability there.

The Network provides Rapid Rehousing assistance covered by these written standards as follows:

- ESG-RRH for homeless individuals and non-EA eligible homeless families - funded by state (DHCD) ESG.
- CoC-RRH for survivors of domestic violence (see Section 2 Key Eligibility Definitions).

Eligibility

- Category 1: Literally Homeless
- ESG-RRH:
 - Individuals – Category 1 above
 - Families – Category 1 households not eligible for Massachusetts Emergency Assistance (EA) program
 - No income requirements for initial eligibility, but once enrolled income must be reassessed annually and may not exceed 30% of area median income

- CoC-RRH: Survivors of domestic violence and fall into Categories 1 or 4 above

Prioritization

Prioritization scores are based on the VI-SPDAT for individuals and the VI-SPDAT for families.

- ESG-RRH:
 - Prioritized by a VI-SPDAT score of 9 (Individuals)/8 (families) or lower
 - Prioritized by a VI-SPDAT score greater than 9 (individuals)/8 (families), when there are factors indicating ability to sustain housing, or RRH is used as bridge funding until placement in PSH
- CoC-RRH: For survivors of domestic violence who are at-risk of chronic homelessness and those able to sustain independent housing, including:
 - Prioritized by a VI-SPDAT score of 9 or lower
 - Prioritized by a VI-SPDAT score greater than 9, when there are factors indicating ability to sustain housing or RRH is used as bridge funding until placement in PSH

Assistance Provided

- Funds may cover allowable ESG financial assistance costs and/or short/medium term rental assistance (see 576.105 & 576.106 for details: [ESG interim rule](#)) These costs include:
 - Rental application fees,
 - Security deposits,
 - Last month's rent,
 - Utility deposits,
 - Utility payments,
 - Moving costs,
 - Short-term and medium-term rental assistance of up to 24 months during any 3-year period, and may include up to 6 months of rental arrears.
- Maximum amount per household is at the discretion of the case manager, based on household need and availability of funds
- Households receiving one-time financial assistance:
 - Are not required to pay a percentage of rent and utility costs,
 - Receive quarterly check-in calls for 12 months, if DHCD ESG is funding the financial assistance.
- Household receiving ESG for short- or medium-term rental assistance:
 - Must pay 30% of income toward rent,

- Receive monthly stabilization services (case management) for the duration of ESG rental assistance,
- May receive rental assistance for up to 24 months. Duration is based on household need and available funds, with a goal of providing 12 months of equal allotments to maximize impact,
- May have the amount adjusted on a case-by-case basis due to unusual changes in household circumstances (e.g., loss of housing, loss of income).
- Households usually pay all utility costs, except in unusual circumstances when ESG or CoC RRH is used to assist with utility arrears or ongoing utility payments. These payments are determined on a case-by-case basis.

Occupancy Standards and Inspection Requirements

All CoC/ESG RRH-funded programs and housing units must meet applicable federal, state and local safety, sanitary and habitability requirements. At least annually, as long as the shelter or housing unit is assisted with CoC/ESG RRH funds, an inspection must be conducted showing that the shelter or housing unit meets the following minimum requirements:

1. Buildings must be structurally sound to protect from the elements and not pose any threat to health and safety of the residents.
2. All new construction must be accessible in accordance with Section 504 of the Rehabilitation Act, the Fair Housing Act and the Americans with Disabilities Act where applicable.
3. Must provide participants with an acceptable place to sleep and adequate space and security for themselves and their belongings.
4. Each room must have a natural or mechanical means of ventilation.
5. Must provide access to sanitary facilities that are in operating condition, private and clean.
6. Water supply must be free of contamination.
7. Heating/cooling equipment must be in working condition.
8. Must have adequate natural or artificial illumination and adequate electrical resources to permit safe use of electrical appliances.
9. Food preparation areas must have suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.
10. Building must be maintained and in a sanitary condition.

11. Must be at least one smoke detector in each occupied unit of the project; and where possible near sleeping areas. There must be a secondary means of exiting the building in case of fire or other emergency.

Recordkeeping Requirements

All CoC/ESG RRH-funded projects must keep the following documentation relative to their projects:

1. Agency Level: Subrecipient shall collect and retain Agency-level records related to the following: a. Documentation of Non-profit Status b. Conflicts of Interest c. Homeless Participation d. Annual Audit e. Certificate of Authority f. Accounting policy
2. Project Level: Subrecipient shall retain documentation of the following project-level policies and procedures: a. Required Policies and Procedures b. Job Descriptions c. Documentation of the reason for any ineligibility determinations d. Records of all emergency transfers requested, and the outcomes of such requests
3. Participant Level: Subrecipient must collect and keep the following records as a part of the Project Participant file: a. Homeless Status: At intake, Subrecipient must collect third party evidence-including HMIS records-that the project participant meets HUD's homeless definition immediately before enrolling in the project. If the Subrecipient is not able to obtain third party documentation it may accept written observation from an outreach worker attesting that the outreach worker observed the household lived in a situation that meets HUD's homeless definition immediately before enrolling in the project. If neither third-party documentation nor outreach worker observations are available the Subrecipient may allow the household to self-certify that it lives in a situation meeting HUD's homeless definition immediately prior to seeking enrollment in the project. b. Receipt of Program Rules c. Compliance with Termination Procedures (if applicable) d. Receipt of Confidentiality Policy e. HMIS Release of Information f. Other Releases of Information g. Assessment of Service Needs h. Connection to Mainstream Benefits and Resources
4. Participant Level: In addition to the project participant documentation listed above, RRH projects must also collect the following: a. Housing Stability Plan(s) b. Proof of Monthly Case Management c. Proof of Quarterly and/or Annual Reassessment d. Lease e. HQS Inspection f. Income (when required) g. Proof that Notice of Occupancy Rights Under the Violence Against Women Act was provided to Program Participant

Fiscal Documents: The following documents relative to the CoC/ESG RRH-funded projects must be retained: a. Documentation of all costs charged to the grant. b. Documentation that funds

were spent on allowable costs. c. Documentation of the receipt and use of program income. d. Documentation of compliance with expenditure limits-including Fair Market Rent-and deadlines.

Permanent Supportive Housing (PSH)

The Network provides CoC-funded Permanent Supportive Housing (PSH) to help homeless individuals and families with severe service needs and long-term homelessness move into permanent supportive housing and achieve stability in that housing. Most of this housing is dedicated to households experiencing chronic homelessness.

Prioritization

The Network has adopted an **Order of Priority** for all CoC Program-funded PSH that must be followed when filling CoC PSH. Below are definitions for the type of beds and eligibility, followed by the order of priority.

Type of Beds for Chronically Homeless Persons

Dedicated PSH beds: CoC-funded PSH beds, which are required through the project's grant agreement to be used only to house persons experiencing chronic homelessness unless there are no persons within the Network that meet that criterion. Dedicated beds, filled prior to the dedicated designation, that are currently occupied by persons who were not chronically homeless at entry, upon turnover will be filled by chronically homeless persons.

DedicatedPLUS PSH beds: Effective with CoC2017 project grant agreements, some projects may become DedicatedPLUS. In that case, the PSH beds may be used for a household that is:

- Experiencing chronic homelessness;
- Residing in a transitional housing project that will be eliminated and met the chronically homeless definition at entry to that transitional housing project;
- Residing in a place not meant for human habitation, emergency shelter, or safe haven, but previously had been admitted and enrolled in a permanent housing project within the last year, and had met the definition of chronically homeless, and was unable to maintain the housing placement;
- Residing in transitional housing funded by a Joint TH and PH-RRH component project and was chronically homeless prior to entering that project;
- Residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or

- Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

Eligibility

- Literally Homeless or Fleeing/Attempting to flee Domestic Violence, AND
- A household member has a disability
- For CoC-funded units: chronically homeless for dedicated units, broader definition for DedicatedPLUS units
- Some units, as per grant agreements, have a preference for veterans or for survivors of domestic violence
- Some units have other funding sources that restrict eligibility to specific populations, as follows:
 - Veterans
 - HIV+
 - Eligible for services from MA Department of Mental Health (DMH)

Order of Priority

Below is the Network's order of priority for PSH. CoC-funded PSH providers must be familiar with the complete HUD Notice and follow the recommended recordkeeping requirements: [Notice-CPD-16-11-prioritizing-persons-experiencing-chronic-homelessness.pdf](#)

For all priority categories below, service needs are determined by VI-SPDAT score and, when relevant, by additional information that indicate severity of needs. Additional information may be presented at case conferencing meetings and must be based on allowable prioritization factors.

1. **Priority 1: Chronically homeless with Severe Service Needs:** Severe service needs are determined by a score of 10 (individuals)/ 9 (families) or above and then by length of homelessness. Length of homelessness is measured by cumulative time, either continuous or combined occasions, of 12 months or more.
2. **Priority 2: Chronically homeless with Less Severe Service Needs:** Score below 10 (individuals)/ 9 (families) and then by longest length of homelessness. Length is measured as above.

Priority in other situations:

- No chronically homeless persons in Network's geography at time of vacancy, or

- Vacancy is a DedicatedPLUS bed
3. **Priority 3: Prior PSH residency:** Score of 10 (individuals)/ 9 (families) or above, had been living in PSH within the last year and had been chronically homeless prior to entry but had been unable to maintain the housing placement.
 4. **Priority 4: Child with disabilities:** Homeless household for at least 12 months with score of 9 or above for families, but household member with disabilities is a child.
 5. **Priority 5: Episodes don't equal chronic homelessness:** Score of 10 (individuals)/ 9 (families) or above and then by longest homelessness but doesn't meet chronic definition for number of occasions. Homeless for a total of at least 12 months over the last four years, but not on at least four separate occasions.
 6. **Priority 6: Long stayer, not chronic:** By assessment score and then by longest length of homelessness; no minimum length of homelessness required.

Additional Requirements for Order of Priority

- **Dedicated PSH beds:** retain this designation, even if filled by a non-chronic person due to lack of any chronic persons at the time of vacancy. When the bed becomes vacant again, a chronically homeless person must be housed based on the order above, unless there are still no persons who meet that definition within the Network's geography.
- **Target subpopulations:** When the PSH project's grant agreement targets a particular subpopulation (e.g., persons with a serious mental illness), the Network will follow the order of priority above for persons whose assessment indicate they are eligible for and need the services of the project (consistent with non-discrimination requirements).

Non-Discrimination Requirements

CoC-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Program implementation, including prioritization policies, are implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

4. Standards for CoC and ESG Assistance – Additional Requirements

Prohibition on Separation of Family Members

CoC- and ESG-funded programs that serve families are prohibited from denying admission to families (or any member of a family) due to age and gender of a member of the family. Specifically, providers are required to accommodate whole families, and not deny admission or separate families due to the presence of a teenage boy in the household.

Access to School and Education Supports

CoC- and ESG-funded programs must ensure that homeless children and youth are enrolled in school or early childhood education and are connected to appropriate education-related services in the community. CoC- and ESG-funded programs must distribute materials to family households that make clear that homeless children are able to remain in their school of origin or are able to enroll immediately in their new school; that homeless and children who remain in their school of origin are provided transportation to the school; and that homeless children and youth have access to all school programs and services on the same basis as other students. Further, CoC- and ESG-funded homeless assistance providers that serve families are required to have designated staff assigned to ensure adherence to federal and state statutes related to enrollment, transportation requirements and notification procedures.

Equal Access Regardless of Sexual Orientation, Gender Identity or Marital Status

All CoC- and ESG-funded programs in the Network are open to all eligible individuals and families regardless of sexual orientation, gender identify or marital status. CoC- and ESG-funded programs must abide by the HUD *2012 Equal Access Final Rule* in HUD-funded housing and/or the *2016 Final Rule*, which elaborated upon it and added HUD-funded shelters and other programs. The CoC completes training on the final rule annually for all CoC-funded providers. These final rules, as well as a HUD notice that projects may use to notify clients and residents of the Equal Access rule requirements, may be found here: [notice-on-equal-access-rights](#).

Coordination with Other Targeted Homeless Services

The Network coordinates CoC- and ESG-funded activities with other programs targeted to homeless people in order to provide a strategic, community-wide system to prevent and end homelessness. All recipients and subrecipients, to the maximum extent practicable, must

coordinate and integrate CoC- and ESG-funded activities with other programs targeted to homeless people in the Network. Programs include those in 24 CFR 576.400 (b).

Coordination with Mainstream Resources

The Network coordinates CoC- and ESG-funded activities with mainstream resources (e.g., housing, health, social services, workforce development) for which homeless or households at-risk of homelessness may be eligible. All recipients and subrecipients, to the maximum extent practicable, must coordinate and integrate CoC- and ESG-funded activities with mainstream resources for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Programs include those in 24 CFR 576.400 (c).

Participation in Coordinated Entry

ESG- and CoC-funded projects are required to participate in the South Shore Regional Network CoC coordinated entry process. Implementation has begun and continues to be phased in and refined. See *Coordinated Entry Policies & Procedures Manual*.

Participation in Homeless Management Information System (HMIS)

For CoC and ESG grantees, data on all persons served and all activities assisted under CoC or ESG are required to be entered into the Network's HMIS and in related data collection required by HUD. These grantees are defined as HMIS Partner Agencies in the Network's HMIS Policies and Procedures Manual. Partner agency roles and responsibilities at a minimum include:

- Grant HMIS access to the CoC HMIS Administrator with a signed data agreement between CoC or ESG project grantee and CoC HMIS Administrator
- Enter all HUD required data for CoC or ESG project participants
- Safeguard participant privacy through compliance with confidentiality policies
- Complete the HUD Annual Performance Report (APR) via HMIS (CoC projects only)
- Submit quarterly data quality updates to the CoC HMIS Administrator
- Update and clean up data in HMIS as requested by the CoC HMIS Administrator so the CoC may submit HUD regional required reports
- Provide all required data for the annual Point-in-Time Homeless Census Count and the Housing Inventory Chart
- Participate in the Longitudinal Systems Analysis report (LSA) by submitting accurate programmatic data via HMIS
- Participate in tracking Systems Performance Measures (SPM) by submitting accurate programmatic data via HMIS.

Subrecipients that are a DV shelter provider may use a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to the Network's HMIS.

5. Targeting of ESG and CoC Resources During COVID-19

The MA-511 CoC's Coordinated Entry system was reviewed at the start of the COVID-19 pandemic and periodically since then to evaluate the need for amended prioritization measures to aid in achieving positive health and housing outcomes for those in the homeless system. The CoC determined that the existing prioritization outlined above adequately prioritized homeless persons who were most vulnerable to COVID-19 and other negative health or housing outcomes. As such, no changes to prioritization were made, and health-related vulnerabilities continue to be considered in the prioritization process as has been the practice since its inception. The CoC continues to monitor the COVID-19 pandemic's impact on the homeless population and may determine the need for revisions to the prioritization at any time. Any changes would be formally documented in a revised CoC Policies and Procedures Manual and approved by the CoC's Executive Committee prior to implementation.

Section 3 | CoC Projects: Competitive Application and Related Requirements

1. Policy and Process to Encourage CoC Project Applications

The South Shore Network seeks the participation of multiple organizations that serve homeless populations to apply for and operate CoC projects. Recognizing the complexity of HUD CoC program administration, the Network actively assists organizations to become CoC providers. Annually as part of the CoC program competition, the Network will:

- Notify the public via the South Shore Network general mailing list and committee meetings of the availability of any new reallocation and/or bonus funds, and encourage applications from providers that do not currently receive CoC program funding;
- Make available technical assistance regarding HUD CoC rules and requirements as part of the annual proposal recruitment in order to encourage applications from organizations less familiar with CoC program funding;
- Request a letter of intent and short concept paper in order to encourage proposals, with a complete CoC Project Application not required unless a project is selected (see Project Review below);
- Actively solicit applications from providers that serve priority homeless subpopulations (e.g., unaccompanied youth, people experiencing domestic violence) that currently do not receive CoC program funding.
- Use Network general and committee meetings to continue this recruitment for CoC projects and partnerships throughout the year.

2. Project Review, Ranking, and Continued CoC Funding

The Network utilizes a Project Review Committee to annually review, score, and rank all new and renewal projects to be considered for HUD's Continuum of Care funding competition.

Project Review Committee

The Project Review Committee (Committee) is overseen by the Network's Executive Committee. That body also establishes the composition of the Committee, which includes representatives from the following: the City of Quincy (Collaborative Applicant), United Way of Greater Plymouth County, South Shore Regional Network (Coordinator), and Father Bill's & MainSpring (Support Entity).

The Committee may meet as often as necessary to complete the annual review, scoring and ranking. However, at least one meeting must take place during the CoC competition in accordance with rules established within the NOFA.

Project Review – New Applications

Applicants for new projects must submit a letter of intent and concept paper to the Collaborative Applicant by the date specified in a publicly posted notice of funding availability. The Project Review Committee will review each concept paper to ensure thresholds are met prior to inviting full New Project Applications to be completed.

If there are multiple applications and the cumulative total for new projects for Bonus or reallocation funds is greater than funds available in these categories, then the Committee will evaluate those applications based on threshold eligibility and CoC priorities and make a recommendation to the Executive Committee. The Executive Committee will decide which project(s) to include in the Network’s CoC consolidated application, ensuring all new applications are ranked according to the degree to which they improve the CoC’s system performance. Following is the threshold review tool used by the Project Review Committee to evaluate newly proposed projects:

South Shore Network (CoC MA-511)–New Project Threshold Review Tool–2021

Project Name: _____ Organization: _____

Evaluator Name: _____ Date: _____

The Project Review Committee will review Concept Papers and Budgets to rate new projects according to the measures below. All threshold requirements must be met in order for the Project Review Committee to recommend consideration of the project for the CoC application. Follow up or clarifying questions will be posed to the applicant as necessary.

New Project Threshold Rating Category	✓ Or “Not Met”
<p>1. Target Population. Concept paper specifies the target population is within either Category 1 or 4 of HUD’s definition of homeless <i>and</i> is a high-need subpopulation as defined by the CoC:</p> <ul style="list-style-type: none"> ● Chronically homeless ● Veterans ● Survivors of domestic violence ● Families with children 	

<ul style="list-style-type: none"> • Unaccompanied youth • Unsheltered • People experiencing chronic mental illness • People experiencing chronic substance use disorders • People with more than one disabling condition <p>Note: HMIS or Coordinated Entry projects must show how they will support services to all of the target populations.</p>	
<p>2. Contribution to Systems Performance Goals. Concept paper specifies which Systems Performance Measures to which it will contribute, how it proposes to contribute to them, and presents outcomes data that documents evidence of past success in the proposed area of housing. *Note: HMIS or Coordinated Entry projects must show how they will support improved systems performance.</p>	
<p>3. Service Provision. Concept paper includes a description of the proposed services to be provided that are aligned with the needs of the target population and include, at a minimum, housing placement, stabilization, and access to income and benefits. Concept papers for victim-services projects must include a description of how proposed services will improve safety. The concept paper also provides sufficient evidence of the applicant’s experience in providing all proposed services. *Note: HMIS or Coordinated Entry projects must show how they will support improved service provision for the CoC’s housing-based projects.</p>	
<p>4. Performance Measures. Concept paper specifies housing- and service-related performance measures that are in line with local and national standards and provides evidence of experience meeting similar outcomes.</p> <ul style="list-style-type: none"> • Housing stabilization: at least 80% of participants remain housed 12 months after placement • Earned income: at least 10% have earned income • Unearned income: at least 54% have unearned income • Access to mainstream benefits: at least 56% have mainstream benefits <p>*Note: HMIS or Coordinated Entry projects must include a description of how the grant will be effective and also how it will contribute to successful performance of the CoC’s housing-based projects.</p>	
<p>5. Data Collection and Reporting. Concept paper describes the data collection system that will be used and confirms the applicant’s ability to collect and report on HUD-mandated data elements. Non victim-service providers confirm their commitment to using the CoC’s HMIS, and victim-service providers confirm they will use a comparable database.</p>	
<p>6. Project Budget. Project budget has an average cost per person of no more than \$16,000, and includes reasonable staffing levels to provide a caseload appropriate for planned services. The administrative line is limited to 10% of the total budget. HMIS or Coordinated Entry projects must show cost reasonableness based on competitive prices for staffing, software, or other items. The total budget request must be within Bonus or reallocation limits as provided</p>	

by the CoC. *Note that admin on grants going through City of Quincy must be split 50% with the City.	
Met threshold: Yes or No	

Project Review – renewal Projects

The Committee utilizes the Network CoC Project Scoring Tool to review and score all renewal projects under consideration. Scores are based on key performance measures found within projects’ most recent Annual Performance Reports (APRs) and HUD compliance issues. If there are victim service providers with renewal projects, their performance data may be generated from a comparable database other than HMIS to complete the required APR. Any projects that are scored significantly lower than the others will be considered for reallocation. In such cases, those projects will then be subject to the Network’s written reallocation plan. Any projects that have launched but have not yet reached the first APR due date will be assigned an average score. In these cases, threshold criteria will be factored in and such projects could receive deductions to the average score based on challenges in meeting the threshold criteria. Renewal projects that have not yet launched will not be scored and will be ranked based on the ranking criteria below.

Project Scoring Tool

Following is the scoring tool used by the Project Review Committee to review and rank CoC renewal projects.

South Shore Network (CoC MA-511) – Renewal Project Scoring Tool – 2021

Project Name: _____ Organization: _____

Evaluator Name: _____ Date: _____

Maximum Score = 100 points

Problems meeting threshold eligibility could result in deductions.

PART 1: THRESHOLD ELIGIBILITY

Data are from the most recent APR submitted to HUD. Victim service providers may provide data from a comparable database.

Threshold Rating Category	✓ Or Deduction
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<p>2. Residence prior to entry. Head of household must meet HEARTH definition of homeless and additional restrictions below. PSH projects with 100% CH dedicated beds, skip to (e)</p>	
<p>1a. 100% came from emergency shelter and/or place not meant for human habitation. If yes, skip to (2). If no, complete (b-d)</p>	
<p>1b. If any participants came from transitional housing:</p> <ul style="list-style-type: none"> - Documentation of ES or street immediately prior - Exception if fled DV – documentation - If no documentation of either, deduct 5 points 	
<p>1c. If any participants came from institutional settings:</p> <ul style="list-style-type: none"> - Documentation resided there no more than 90 days and came from shelter or street immediately prior - If no documentation, deduct 5 points 	
<p>1d. If any participants came from other locations, deduct 5 points</p>	
<p>1e. If project is 100% CH dedicated, 100% of participants came from shelter or street, or were in TH or other institutions less than 90 days</p> <ul style="list-style-type: none"> - If not, deduct 10 points 	
<p>3. Participates in Coordinated Entry. Confirmation by City of Quincy or CoC Support Entity that 100% of vacancies are filled using the CE system, and the project complies with all CE procedures. If no, deduct 15 points</p>	
<p>4. Confirmation by City of Quincy or HUD* the project meets all expectations noted below (*if project grantee is the applicant)</p> <ul style="list-style-type: none"> - No outstanding obligations for which a payment schedule has not been agreed upon - Any audit findings have a satisfactory response - No history of inadequate financial management practices - No evidence of untimely expenditures on previous awards - No history of other major capacity challenges impacting performance - No history of not reimbursing subrecipients at least quarterly - No history of serving ineligible participants or ineligible costs <p>If problems, the project has provided a satisfactory explanation. If no or insufficient explanation, deduct 5 points</p>	
<p>5. Project Vacancies. Project is serving the proposed number of participants annually and vacancies are filled within a reasonable timeframe. If no, deduct 5 points</p>	
<p>6. Cost Efficiency. Reasonable cost per person served (defined as no more than \$16,000 per person). If no, deduct 5 points</p>	
<p>7. Match. Project has documented that necessary match is secured. If no, deduct 5 points</p>	
<p>8. CoC Participation. Applicant participates in CoC Governance Committee meetings and may participate in additional committees. If no, deduct 5 points</p>	
<p>9. Victim-Services Projects Only – Improving Safety for Survivors. Project follows HUD’s VAWA Final Rule, protects confidentiality, integrates</p>	

housing and DV services, and establishes individualized safety plans for each participant that are participant-driven and incorporate multiple facets of well-being. If no, deduct 5 points.	
Met threshold or total deduction:	

PART 2: PROJECT DETAILS AND SYSTEM PERFORMANCE OUTCOMES

Scores are based on data from the most recently submitted APR or data generated from HMIS or a comparable database when an APR has not yet been completed.

Criteria	Maximum Points	Points Awarded
1. Serving High Need Populations (Q13a, 14a, 15, 25a, 26a, 27a/b) a. Chronically homeless b. Veterans c. Survivors of domestic violence d. Families with children e. Unaccompanied youth f. Unsheltered g. People experiencing chronic mental illness h. People experiencing chronic substance use disorders i. People with more than one disabling condition	18 points (award 2 points for each population served)	
2. Increased Housing Stability (Q23a, Q23b)	<ul style="list-style-type: none"> • 90% or more remained housed - 20 points • 80-89% remained housed - 10 points • Less than 80% remained housed – 0 points 	
3. Participant Income from Employment (Q17 – stayers and leavers)	<ul style="list-style-type: none"> • 20% or more have earned income – 10 points • 10-19% have earned income – 5 points • Less than 10% have earned income – 0 points 	
4. Participant Unearned Income	<ul style="list-style-type: none"> • 75% or more have unearned income – 10 points 	

(Q18 – stayers and leavers)	<ul style="list-style-type: none"> • 54-74% have unearned income – 5 points • Less than 54% have unearned income – 0 points 	
5. Obtaining Mainstream Benefits (Q20b)	<ul style="list-style-type: none"> • 75% or more have non-cash mainstream benefits – 15 points • 56-74% have non-cash mainstream benefits – 8 points • Less than 56% have non-cash mainstream benefits – 0 points 	

PART 3: OTHER PROJECT INFORMATION

Data from self-report, renewal application, HMIS, and/or a comparable database.

Criteria	Maximum Points	Points Awarded
1. Housing First Approach (Project Application)	<ul style="list-style-type: none"> • Yes – 10 points • No – 0 points 	
2. HMIS Data Quality (Q6)	<ul style="list-style-type: none"> • APR data and less than 10% missing/refused data for all data elements – 10 points • APR data had more than 10% missing/refused data for one or more elements – 0 points <p>* projects from victim-service providers will receive 10 points if they can provide de-identified evidence that they collect required data in a comparable database and that it meets the same data quality standard.</p>	
3. APR Submission	<ul style="list-style-type: none"> • APR was submitted in Sage on time – 7 points • APR was submitted in Sage late – 3 points • APR was not submitted in Sage by the time of the project review – 0 points 	
TOTAL	100 points	

Project Ranking

The Committee is responsible for establishing the ranking criteria for all new and renewal projects that have been selected for inclusion in the application. The criteria may be adjusted annually as necessary. The Committee will then present a draft ranking to the Executive Committee for a final vote and adoption.

The Committee's general ranking criteria are as follows:

- Renewal projects that meet threshold eligibility will be ranked above new projects.
- Permanent housing renewals will be ranked above renewals of other project types.
- Permanent housing renewals that have not yet launched will be ranked after permanent housing renewals in operation.
- When there are multiple new projects, ranking among them will be based on the degree to which they improve the CoC's system performance, and any additional priorities.
- When projects have the same score, the project with more dedicated CH beds will be ranked higher.
- Any of the above is subject to change due to priorities and guidance in the HUD NOFA.
- The Network/CoC also reserves the right to shift project ranking in order to maximize the total projects that will fit in tier 1.

Public Notice of Scoring and Ranking

The Collaborative Applicant will provide public notice of the final approved scoring tool, ranking process, and ranking of all submitted projects in one of the following ways:

- email to the full CoC membership
- website posting
- other identified electronic notification that reaches at least the General Membership of the CoC

3. Project Reallocation Plan

The U.S. Department of Housing and Urban Development (HUD) requires that CoCs evaluate and review all renewal projects and develop a reallocation process for projects funded with CoC funds. Reallocating funds is an important tool used by CoCs to make strategic improvements to their homelessness system. Through reallocation, the CoC can create new projects that are aligned with HUD's goals, by eliminating projects that are underperforming or are more appropriately funded from other sources. Reallocation is particularly important when new resources are unavailable. The Network encourages all grantees to consider reallocation for projects under these guidelines annually at the launch of each funding cycle in a written

communication or at a Network meeting. When funds become available through reallocation, all Network members and stakeholders are notified via written communication that the Network is seeking new and existing providers to apply for new projects using the reallocation process.

Reallocation Policy

Through the reallocation process, the Network ensures that projects submitted with the CoC Consolidated Application best align with the CoC's systems performance goals, HUD CoC funding priorities, and contribute to a competitive application that secures HUD CoC funding to end homelessness in the South Shore Regional Network CoC. The Network will make reallocation decisions based on the project's score and a recommendation from the Project Review Committee. The Executive Committee will vote on the final projects to include in the Network's consolidated application.

All renewal projects are reviewed and scored annually by the Project Review Committee to determine how the project performed and if a project should be considered for reallocation in order to create a new higher performing project. This is completed either prior to or at the beginning of a new funding round. The Network CoC Project Scoring Tool, which includes threshold measures related to capacity and performance as well as measures related to systems performance, is the primary tool used to conduct the assessment. The Project Review Committee may determine it needs to meet at other times during the year to further evaluate projects.

The recommendation for reallocation is based on any one of the following HUD criteria and the overall score during the project evaluation. The Project Review Committee will consider the number of criteria that are a concern and any ongoing pattern of issues, however it retains the right to recommend reallocation for any of these issues. Reallocation recommendations are presented to the Executive Committee for a final decision.

- Project is not aligned with HUD priorities and the expected approach to address and end homelessness;
- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
- Audit finding(s) for which a response is overdue or unsatisfactory;
- History of inadequate financial management accounting practices;
- Evidence of untimely expenditures on prior award;
- History of reporting difficulties or other major capacity issues that have significantly impacted the operation of the project and its performance;

- Problems with timeliness in reimbursing subrecipients for eligible costs;
- History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes; or
- Projects did not consistently meet the performance measures or service and housing targets and/or failed to contribute to effective CoC systems performance.

Involuntary and Voluntary Reallocations:

Involuntary Reallocations are based on one or more of the above deficiencies.

The Project Review Committee will evaluate and determine if projects will have a full or partial reallocation of funding. All funds freed through involuntary reallocations may be made available for one or more new projects. If no new project applications are submitted, funds will remain available for the original renewal projects. Any new or existing grantee may apply for a new project using the reallocated funds, including the original grantee whose project is being reallocated.

Project grantees that are subject to partial involuntary reallocation must develop a plan to continue with their renewal project, with the reduced level of funding. This includes HUD contract compliance for numbers of persons served and the types of services provided. It may be possible to seek a contract amendment from HUD for some changes; applications should contact their HUD representative to discuss any options for amendment. If the reduction in funding will result in loss of assistance for persons currently served by the project, the grantee must develop a transition plan for these persons.

Voluntary Reallocation: For projects not listed above for involuntary reallocation, a grantee may choose to reallocate funds from an existing renewal project, to free additional funds for one or more new projects. The grantee may choose to reallocate all or a portion of their renewal funds to create the new project. Any new or existing grantee may apply for a new project using the reallocated funds, including the original grantee whose project is being reallocated.

The grantee may also choose to compete for a portion or all of the funds available to the Network through involuntary reallocation of other projects or bonus funds.

Process for Reallocating Identified Funds:

Once the CoC has determined that an existing project will be either voluntarily or involuntarily reallocated, a standard process ensues to seek new applicants and select projects. The process includes the following steps:

1. The Collaborative Applicant notifies new and existing providers via email of the potential availability of reallocation funds and the application process.
2. Interested applicants must submit a Notice of Intent to the Collaborative Applicant that provides a brief description of the project they intend to propose.
3. Interested applicants must submit a concept paper to the Collaborative Applicant that outlines the scope of the project, including the target population, services to be offered, and a budget.
4. The Collaborative Applicant conducts a threshold review of concept papers to ensure compliance with HUD and CoC rules and priorities. Applicants are then informed whether they can proceed with completing a full project application in e-snaps.
5. The CoC's Support Entity provides technical assistance to support potential applicants.
6. The Project Review Committee reviews projects and makes a recommendation to the Executive Committee for final decisions on projects to include with the Consolidated Application and the ranking.

Note: the same process is followed to seek and select new projects using HUD CoC bonus funds, when available.

4. Participation in the South Shore Regional Network/CoC

The Network and HUD expect CoC grantees to be active members in the planning work of the CoC to address and end homelessness. Grantees are expected to participate in the South Shore Regional Network CoC through regular attendance at meetings of the general membership, Executive Committee, and other relevant committees or working groups.

The Network and HUD also expect CoC grantees to participate in the annual CoC application process. The Collaborative Applicant is required by HUD to submit the following CoC consolidated application components to HUD annually:

- CoC Application
- Project Applications
- Project Priority Listing

The Collaborative Applicant prepares this application package working with the Network Support Entity and/or other designees. Network project grantees also have responsibilities in this process as outlined in next section.

5. Project Applications, Contracts, and HUD Reporting

CoC grantees are responsible for the annual submission of renewal Project Applications and for related tasks as part of the Network's consolidated application.

Specifically, project grantees must:

- Submit project applications compliant with all HUD requirements by the deadlines specified by the Collaborative Applicant or its designee. Applications are to be submitted in HUD's online *e-snaps* system
- Submit documentation or additional information necessary for completion of any CoC consolidated application components by the deadlines specified by the Collaborative Applicant or its designee
- Address project issues with contracts, HMIS, and the like in a timely manner especially when they affect the competitive score of the CoC Application
- Participate in meetings related to the annual CoC Program Competition.

Grantees that are the direct recipient of HUD CoC funds are responsible for executing contracts with HUD, submitting Annual Performance Reports (APR) in e-snaps by the required deadlines, and complying with any other HUD contract responsibilities. CoC recipients are also expected to keep the Collaborative Applicant or its designee informed of any plans it is arranging with HUD to consolidate, reduce, eliminate, or otherwise significantly alter its projects.

Sub-recipients of the Collaborative Applicant must comply with the contract and APR reporting requirements and deadlines outlined in their contracts with the City of Quincy.

6. Financial and Other Recordkeeping Requirements

CoC funded projects are expected to meet all HUD requirements for grants administration and recordkeeping and to be in good financial standing. Problems with grants administration and recordkeeping identified through the annual review and/or identified by HUD must be addressed by the grantee. Whenever possible, projects will be given the opportunity to implement a remediation plan to address identified issues. The Network reserves the right to reduce or eliminate project funding and to reallocate funds for other Network priorities when there are such problems.

Section 4 | Coordination with Institutional Systems of Care (Discharge Planning)

The Network coordinates with institutional systems of care to avoid the direct discharge of people who have resided in institutions for more than 90 days to emergency shelters, the streets, or other homeless programs. This section concerns the policies and procedures of the Network with the relevant institutional systems of care.

1. Foster Care

The MA Department of Children and Families (DCF) establishes a Transition Plan with each youth in foster care age 18 and over. It identifies available resources, steps to meet targeted goals, the individual(s) responsible to assist, and the appropriate discharge housing arrangements. DCF is responsible for ensuring that its policy that youth not be discharged into homelessness is followed.

Regional DCF Directors are members of the South Shore Network and participate in the Unaccompanied Homeless Youth Committee where systemic problems with discharges are tracked and addressed. The Network's shelters for individuals track discharges from Foster Care as well as homeless young adults with recent foster care histories in order to raise systems issues with DCF for resolution.

2. Health Care

The MA Operational Services Division (OSD) oversees all state procurements and contracts and has standard contracting language that it is inappropriate to discharge consumers to shelters or places not meant for human habitation. The MA Department of Public Health (DPH) ensures all healthcare and substance abuse facility contracts include this language, and monitors compliance.

The South Shore Network includes stakeholders from local hospitals and substance abuse facilities who participate in coordination of care. The Network's shelters for individuals track discharges from hospitals and substance abuse facilities to raise system issues and resolve discharge issues.

3. Mental Health

The MA Department of Mental Health (DMH) is responsible for ensuring that people are not discharged from mental health systems into homelessness. DMH policy states that in no instance shall a person be discharged from an in-patient facility with directions to seek emergency shelter, and that every effort must be made through careful discharge planning to work with the client and area resources to seek adequate, permanent housing.

Regional DMH Directors and housing staff are members of the South Shore Network and participate in Network committees where systemic problems with discharges are tracked and addressed. The Network's shelters for individuals track discharges from DMH in-patient and contracted housing facilities in order to raise system issues and resolve discharge issues.

4. Corrections

The MA Department of Corrections (DOC) is responsible for ensuring people leaving state correctional institutions are not discharged to homelessness. DOC also coordinates with MA Department of Veterans Services and with Mass Health to ensure persons released have veteran benefits (when relevant) and medical coverage upon discharge. The Network's shelters for individuals track discharges from Correctional institutions, both DOC and county Houses of Correction (HOC), in order to raise system issues with DOC and HOC and resolve discharge issues.