

FY 2019 San Bernardino County Continuum of Care-Letter of Intent to Renew CoC Project

Instructions: Please complete one letter for each renewal application.

Lead Agency Information

CCR #: **52P47**

DUNS #: **826034659**

Agency Name: **United States Veterans Initiative (U.S.VETS)**

Agency Address: **15305 6th Street**

City: **Moreno Valley**

State: **California**

Zip: **92518**

Phone: **(951) 704-8325**

Fax: **(951) 512-6353**

email: **drivera@usvetsinc.org**

Grant/Application Contact Person:

Name: **Jessica Rohac Bazy, MSW**

Cell Phone: **(702) 423-9283**

Office Phone: **(213) 542-2605**

Email: **jrohac@usvetsinc.org**

Agency Director:

Name: **Larry Williams, MBA**

Phone: **(702) 400-9854**

Office Phone: **(702) 947-4443**

Email: **lwilliams@usvetsinc.org**

Homeless Management Information System (HMIS) Contact Person:

Name: **Desiree Rivera**

Phone: **(951) 704-8325**

Email: **drivera@usvetsinc.org**

Project Information:

Name of Project: **Veterans Permanent Supportive Housing Program – San Bernardino**

Project Address: **15305 6th Street Moreno Valley, California 92518**

Grant amount: **\$1,028,277.00**

Grant Term: **10/1/2020**

Expiration Date: **9/30/2021**

Program Type: **Permanent Housing**

Primary Population: **Homeless or Chronically Homeless Disabled Veterans**

Annual Renewal Amount for project: **\$1,028,277.00**

Total Number of Units: **47**

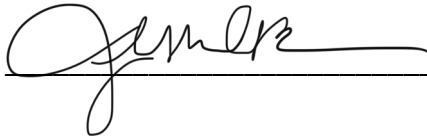
Previously approved budget amounts by activity:

Activity:	Budget Amount:
Leased Units	\$623,667.00
Leased Structures	\$0.00
Rental Assistance	\$0.00
Supportive Services	\$227,308.00
Operations	\$81,776.00
HMIS	\$4,536.00
Administration	\$90,990.00
Total:	\$1,028,277.00

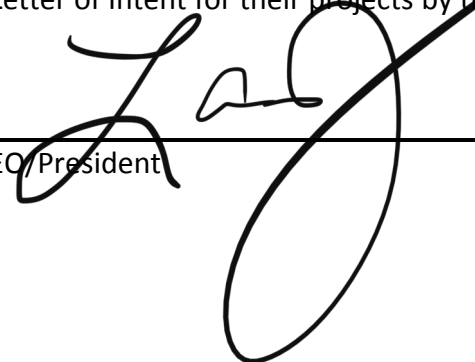
Name and Signature of Person who will complete the application:

Desiree Rivera 

Name and Signature of Person authorized to sign the HUD application:

Jessica Rohac Bazy, MSW 

I certify, on behalf of my agency that all information contained in this application is accurate and true, based on our current records for the project. I understand that falsifying information or failing to provide accurate information will have a negative impact on my overall review and may result in removal from the Continuum of Care Application to HUD. I also understand that agencies not submitting their Letter of Intent for their projects by the deadline may be reallocated.

Larry Williams, MBA  7/23/19
Executive Director/CEO/President Date

Background Information:

The Continuum of Care (CoC) will consider the need to continue funding for projects expiring in 2020 as required by the U.S. Department of Housing and Urban Development (HUD). However, as noted by HUD, renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards identified in the NOFA or they will be rejected from consideration for funding.

While considering the need to continue funding for projects expiring in 2020, the CoC Interagency Counsel on Homelessness (ICH) will review the information that HUD noted in the 2019 HUD CoC Competition NOFA which is as follows:

1. When considering renewal projects for award, HUD will review financial information; Annual Performance Reports (APRs); and information provided from the local HUD CPD Field Office, including monitoring reports and 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 those standards for the expenditure of grant funds that have been met;
 - c. The project applicant's performance in assisting program participants to achieve and maintain independent living and records of success, except HMIS-dedicated projects that 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/Monitoring finding(s) for which a response is overdue or unsatisfactory;
 - c. History of inadequate financial management accounting practices;
 - d. Evidence of untimely expenditures and unspent funds 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.¹

Project Eligibility Threshold Requirements:

The San Bernardino County ICH and the Office of Homeless Services (OHS) will review all renewal projects to determine if they meet the following eligibility threshold requirements on a pass/fail standard. If the San Bernardino County ICH determines that the applicable standards are not met for a renewal project, the project will be rejected. Renewal project threshold requirements include; a) Participation in Coordinated Entry System; b) Practicing Housing First and Low Barriers; c) Hearth Act Compliance; and d) The extent to which the proposed project fills a gap in the community’s CoC and addresses an eligible population.

I. Participation in Coordinated Entry System

CoC funded projects are **required** to participate in the local Coordinated Entry System. As defined by HUD:

“Coordinated entry is a key step in assessing the needs of homeless individuals and families and prioritizing them for assistance. In addition to engaging people who are seeking assistance, Coordinated Entry processes should be integrated with communities’ outreach work to ensure that people living in unsheltered locations are prioritized for help. Coordinated Entry should achieve several goals:

- make it easier for persons experiencing homelessness or a housing crisis to access the appropriate housing and service interventions;
- prioritize persons with the longest histories of homelessness and the most extensive needs;
- lower barriers to entering programs or receiving assistance; and,
- ensure that persons receive assistance and are housed as quickly as possible.

The definition of Centralized or Coordinated Assessment can be found at 24 CFR 578.3. Provisions at 24 CFR 578.7(a)(8) detail the responsibilities of the CoC with regard to establishing and operating such a system. In addition to the definition, HUD also posted on the HUD Exchange the Coordinated Entry Policy Brief in February 2015 that helps inform local efforts to further develop CoCs’ coordinated entry processes.

1. **How many households (a household can be a single individual or family) entered your program during the past 12 months?** 18
 - a. **How many of the households that you stated in the question above entered your project through the coordinated entry system?** 18

2. If any households entered your program during the past 12 months that were not referred through the coordinated entry system, please explain why in the box below (expand box as needed).

N/A

Note: this information will be verified through HMIS.

II. Housing First and Low Barriers Approach

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold). It is an approach to: **1)** quickly and successfully connect individuals and families experiencing homelessness to permanent housing; **2)** without barriers to entry, such as sobriety, treatment or service participation requirements; or **3)** related preconditions that might lead to the program participant's termination from the project. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry; however, participation in supportive services is based on the needs and desires of program participants. For more information see the Housing First in PSH brief at: www.hudexchange.info/resource/3892/housing-first-in-permanent-supportive-housing-brief/

1. Does the project quickly move participants into permanent housing?

- Yes
 No

Select **"Yes"** to this question if your project will quickly move program participants into permanent housing without additional steps (e.g., required stay in transitional housing before moving to permanent housing). If you are a domestic violence (DV) program you should select **"Yes"** if you will quickly move program participants into permanent housing after immediate safety needs are addressed (e.g., a person who is still in danger from a violent situation and would move into PH once the dangerous situation has been addressed). Select **"No"** if the project does not work to move program participants quickly into permanent housing.

2. Has the project removed the following barriers to accessing housing and services?

- Having too little or little income

- Active or history of substance abuse
- Having a criminal record with exceptions for state-mandated restrictions
- Fleeing domestic violence (e.g., lack of a protective order, period of separation from abuser, or law enforcement involvement)
- None of the above

(Select ALL that apply): Check the box next to each item to confirm that your project has removed (or never had) barriers to program access related to each of the following: 1) Having too little or little income; 2) Active or history of substance abuse; 3) Having a criminal record with exceptions for state-mandated restrictions; and 4) Fleeing domestic violence (e.g., lack of a protective order, period of separation from abuser, or law enforcement involvement). If all of these barriers to access still exist, select “None of the above.”

3. Has the project removed the following as reasons for program termination?

- Failure to participate in supportive services
- Failure to make progress on a service plan
- Loss of income or failure to improve income
- Fleeing domestic violence
- Any other activity not covered in a lease agreement typically found in the project’s geographic area
- None of the above

Check the box next to each item to confirm that your project has removed (or never had) reasons for program participant termination related to each of the following: 1) Failure to participate in supportive services; 2) Failure to make progress on a service plan; 3) Loss of income or failure to improve income; 4) Fleeing domestic violence; and 5) Any other activity not covered in a lease agreement typically found in the project’s geographic area. If all of these reasons for program termination still exist, select “None of the above.”

Additional Required Attachments: *Please attach the following supporting documentation that shows that your agency provided staff training and policies and procedures so that staff fully understands how to implement the Housing First approach: a copy of the agency’s Policies and Procedures, staff training materials, and any forms or other related documents.*

III. HEARTH Act Compliance

This section of the Letter of Intent (LOI) asks questions of all renewal projects to ensure compliance with the requirements of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act): Continuum of Care (CoC) Program Interim Rule. (Please note, this

section does not encompass all changes under the HEARTH Act and it is recommended that all projects should review the Act in its entirety).

1. Participation of homeless individuals

The HEARTH Act CoC Program Interim Rule states that the recipient or subrecipient must document its compliance with the homeless participation requirements under § 578.75(g), which is as follows:

(g) Participation of homeless individuals.

(1) Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

(2) Each recipient and subrecipient of assistance under this part must, to the maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.

a. Does your agency provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or sub recipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or sub recipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions?

Yes

No

If not, please provide an action plan/timeline on when your agency will be compliant with this requirement in the box below (expand box as needed).

N/A

- b. Does your agency, to the maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project?**

Yes

No

If not, please provide an action plan/timeline as to when your agency will be compliant with this requirement in the box below (expand box as needed).

N/A

2. Faith-based activities

The HEARTH Act CoC Program Interim Rule states that the recipient or subrecipient must document its compliance with faith-based activities requirements under § 578.87(b), which is as follows:

(b) Faith-based activities.

(1) Equal treatment of program participants and program beneficiaries.

(i) Program participants. Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to participate in the Continuum of Care program. Neither the Federal Government nor a State or local government receiving funds under the Continuum of Care program shall discriminate against an organization on the basis of the organization's religious character or affiliation. Recipients and subrecipients of program funds shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

(ii) Beneficiaries. In providing services supported in whole or in part with federal financial assistance, and in their outreach activities related to such services, program participants shall not discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

(2) Separation of explicitly religious activities. Recipients and subrecipients of Continuum of Care funds that engage in explicitly religious activities, including activities that involve overt religious content such as worship, religious instruction, or proselytization, must perform such activities and offer such services

outside of programs that are supported with federal financial assistance separately, in time or location, from the programs or services funded under this part, and participation in any such explicitly religious activities must be voluntary for the program beneficiaries of the HUD-funded programs or services.

(3) Religious identity. A faith-based organization that is a recipient or subrecipient of Continuum of Care program funds is eligible to use such funds as provided under the regulations of this part without impairing its independence, autonomy, expression of religious beliefs, or religious character. Such organization will retain its independence from federal, State, and local government, and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct program funds to support or engage in any explicitly religious activities, including activities that involve overt religious content, such as worship, religious instruction, or proselytization, or any manner prohibited by law. Among other things, faith-based organizations may use space in their facilities to provide program-funded services, without removing or altering religious art, icons, scriptures, or other religious symbols. In addition, a Continuum of Care program-funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.

- a. Does your proposed renewal program use direct program funds to support or engage in any explicitly religious activities, including activities that involve overt religious content, such as worship, religious instruction, or proselytization, or any manner prohibited by law?**

Yes

No

3. Involuntary family separation

The HEARTH Act CoC Program Interim Rule states that the recipient or subrecipient must document its compliance with involuntary family separation requirements under § 578.93(e), which is as follows:

(e) Prohibition against involuntary family separation. The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part.

- a. Does the project accept all families with children under age 18 without regard to the age of any child? In general, under the HEARTH Act, any project sponsor receiving funds to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18.**

Note there is an exception outlined in the Act: Project sponsors of transitional housing receiving funds may target transitional housing resources to families with children of a specific age only if the project sponsor: (1) operates a transitional housing program that has a primary purpose of implementing evidence based practice that requires that housing units be targeted to families with children in a specific age group; and (2) provides assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured.

Yes. Project certifies that it accepts all families with children under age 18 without regard to the age of any child.

No. Project does not comply with this requirement. A narrative is attached explaining how the project will comply with this HEARTH Act requirement.

No. Project does not comply with this requirement but qualifies for an exception because it is implementing an evidence based practice that requires housing units targeted to families with children in a specific age group. A narrative is attached explaining how the project will comply with the exception, including identification of the evidenced based practice being utilized.

N/A. Project does not serve families.

N/A. Project is new and has not started yet.

4. Discrimination Policy

Has your agency adopted a discrimination policy? Yes (**Personal Rights Policy Attached**)

No

Federal and California State laws note that discrimination can be based on race, color, national origin or gender. Discrimination can also be based on age, religion, disability, familial status or sexual orientation.

Does your program deny services to potential recipients based on any of the following:

- Age Yes No
- Color Yes No
- Disability Yes No
- Familial Status Yes No
- Gender Yes No
- Marital Status Yes No
- National Origin Yes No
- Race Yes No
- Religion Yes No
- Sexual Orientation Yes No

If you answered “yes” to any of the above, please explain why in the box below (expand box as needed).

N/A

5. Active participation in local Continuum of Care meetings

HUD states that a successful CoC will have involvement from a variety of organizations representing the public and private sectors, as well as interested individuals within the CoC jurisdiction(s). These organizations should have an active role in the CoC.

- a. Describe what local Continuum of Care committees, subcommittees, and/or working groups that your agency participates in on a regular basis in the box below (expand box as needed). Please include the names and titles of those participating as well as their level of involvement/participation.

Homeless Veteran Committee Planning Group Committee – Desiree Rivera, Permanent Housing Coordinator
Housing Navigator – Desiree Rivera, Permanent Housing Coordinator
Homeless Action Plan Workshop – Desiree Rivera, Permanent Housing Coordinator
Homeless Provider Network Committee (West Valley), Carlos Tinoc, Permanent Housing Case Manager
Homeless Provider Network Committee (Central Valley), Jessica Vega, Permanent Housing Case Manager
Homeless Provider Network Committee (Mountain Valley), Jennifer Maxwell, Case Manager
Homeless Provider Network Committee (Desert Valley), Tess Bertani, Housing Navigator
Coordinated Entry System Committee – Desiree Rivera, Permanent Housing Coordinator

6. Housing Quality Standards (HQS)

The HEARTH Act CoC Program Interim Rule states that the recipient or subrecipient must document its compliance with housing quality standards requirements under § 578.75(b), which is as follows:

- (b) Housing quality standards. Housing leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable housing quality standards (HQS) under 24 CFR 982.401 of this title, except that 24 CFR 982.401(j) applies only to housing occupied by program participants receiving tenant-based rental assistance. For housing rehabilitated with funds under this part, the lead-based paint requirements in 24 CFR part 35, subparts A, B,

J, and R apply. For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. For residential property for which funds under this part are used for acquisition, leasing, services, or operating costs, 24 CFR part 35, subparts A, B, K, and R apply.

(1) Before any assistance will be provided on behalf of a program participant, the recipient, or subrecipient, must physically inspect each unit to assure that the unit meets HQS. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.

(2) Recipients or subrecipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

a. Does your project meet applicable Housing Quality Standards?

- Yes
- No
- This is a new project and has not started yet

Please briefly explain your inspection process for HQS in the box below (expand box as needed).

U.S.VETS staff inspects all units before the clients move in. U.S.VETS also inspects all units when clients discharge from program, relocate to another unit, and annually. U.S.VETS staff work closely with property managers to make sure that Housing Quality Standards are met in all units as well as conducting monthly/quarterly inspections and resolving any maintenance issues requested by participants in program.

b. Has your project received HQS corrective action plan in the last 2 years:

- Yes
- No
- This is a new project and has not started yet

If you selected Yes, explain the nature of the concerns/issues and how it was resolved in the box below (expand the box as needed).

N/A

Renewal Rating Factors:

If a renewal project passes the Project Eligibility Threshold as noted on pages 4 – 12 of this LOI, the project will be **reviewed and scored** by ICH and OHS based on the following rating factors.

I. System Performance Measures (50 points)

The intent of the System Performance Measures (Sys PM) reports are to encourage CoCs to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD. HUD uses system-level performance information as a competitive element in its annual CoC Program Competition and to gauge the state of the homeless response system nationally.

The San Bernardino County Interagency Council on Homelessness Grant Review Committee will use project-level Sys PM information as an element to determine the effectiveness of local projects within the San Bernardino County CoC. **The OHS will collect the following project level Sys PM for each CoC funded agency directly from the Homeless Management Information System (HMIS). There is not any action required on the part of the renewing agencies to complete Section I. System Performance Measures:**

- Persons Exit Homeless to Permanent Housing Destination and Return to Homelessness
- Employment and Income Growth for Homeless Persons
- Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

System Performance Measures		Submitted FY 2017	Submitted FY 2018	Difference
1.	The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness -This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.			
2.	Percentage of Income Growth for Homeless Persons			
3.	Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing			
	Change in SO exits to temporary destinations, some institutional destinations, and permanent housing destinations			
	Change in ES, SH, TH, and PH-RRH exits to permanent housing destinations			
	Change in PH exits to permanent housing destinations or retention of permanent housing			

II. Recipient Compliance with Grants and Financial Management (25 points)

Per 24 CFR part 578 and the FY 2019 CoC Program Competition NOFA requires that Project Applicants specifically identify four benchmarks for grants and financial management that communities must reach to meet this standard, which are

1. On-time APR submission to HUD;
2. Resolved HUD/Office of Homeless Services monitoring findings, or Office of Inspector General (OIG) Audits, if applicable;
3. Monthly submission of claims, quarterly drawdowns; and
4. The full expenditure of awarded funds.

1. Has the recipient successfully submitted the APR on time for the most recently expired grant term related to this renewal project request?

APRs are due within 90 days after the grant term expires. Select **“Yes”** to indicate that an APR has been submitted for the grant term that has most recently expired (for some grants this will be the FY 2016 renewal, for others the FY 2017). Select **“No”** to indicate that an APR has not been submitted for the grant term that has most recently expired or if this is a first-time renewal for which the original grant term has not yet expired.

- Yes
 No
 This is a first-time renewal for which the original grant term has not yet expired.

If you selected **“No”** above, provide a brief explanation for why the APR was not submitted on time in the box below (expand box as needed). For those first-time renewals for which the original grant term has not yet expired, please write, **“First-time renewal and grant term has not yet expired”** and provide the date by which the APR must be submitted.

N/A

2. Does the recipient have any unresolved HUD or the Office of Homeless Services Monitoring and/or OIG Audit findings concerning any previous grant term related to this renewal project request?

- Yes
 No

Select **“Yes”** if there are any unresolved HUD Monitoring or OIG Audit findings, regardless of the funding year of the project for which they were originally identified. Select **“No”** if there are no unresolved HUD Monitoring or OIG Audit findings.

a. **Date HUD or the Office of Homeless Services or OIG issued the oldest unresolved finding(s):**

If you selected **“Yes”** above, provide the date that the oldest unresolved finding was issued.

Date the oldest unresolved finding was issued: N/A

b. **Explain why the finding(s) remains unresolved:**

If you selected **“Yes”** above, provide a brief explanation in the box below (expand box as needed) for why the monitoring or audit finding remains unresolved and the steps that have been taken towards resolution (e.g., responded to the HUD letter, but no final determination received).

N/A

3. **Has the recipient maintained timely and consistent monthly submission of claims for the most recent grant terms related to this renewal project request?**

Yes

No

CoC Program recipients are required to submit claims on a monthly basis. Select **“Yes”** to indicate that you have maintained monthly submission of claims for the most recent relevant grant term. For some grants, the standard will be applied to the FY 2017 renewal, for others the FY 2016, and for some multi-year first-time renewals a grant awarded in an earlier fiscal year. Select **“No”** to indicate that the recipient has not maintained consistent monthly claim submission for the most recent relevant grant term, or if this is a first-time renewal for which less than one quarter has passed.

a. **Explain why the recipient has not maintained timely and consistent monthly claim submission for the most recent grant terms related to this renewal project request.**

If you selected **“No”** above, provide a brief explanation in the box below (expand box as needed) for why monthly claim submissions have not been maintained. Delays in

draws due to a late HUD funding announcement and receipt of renewal grant agreement may be included in such an explanation.

N/A

4. Have any funds been recaptured by HUD for any of the three (3) most recently expired grant terms related to this renewal project request?

- Yes
- No
- Project has not yet completed a grant term

Select **“Yes”** to indicate that funds have been recaptured, meaning that not all awarded funds were expended during the three previous completed grant terms. Select **“No”** to indicate that no funds were recaptured or if this is a first-time renewal for which the original grant term has not yet expired.

- a. **If you selected “Yes” above, explain the circumstances that led to HUD recapturing funds from any of the three (3) most recently expired grant term related to this renewal project request:**

Provide a brief explanation in the box below (expand box as needed) for why the total awarded funds were not expended and were recaptured. Include the amount returned for each year.

2015-2016 – Expended 100% of awarded funds
2016-2017 – Expended 100% of awarded funds
2017-2018 – While the program did not expend the entire grant funds for 2017-2018, U.S.VETS did expend the full grant amounts for FY 2015-2016 and 2016-2017, and on target to expend the full awarded grant amount for 2018-2019, including meeting all targeted goals. The total amount returned for grant period 2017-2018 was \$10,616,27; which represents only 1% of the grant. There were no agency costs for HMIS billed to the grant and leasing was slightly under budget.

U.S.VETS is on track to fully expend the awarded grant funds for the current grant year.

III. Participation in Homeless Management Information System (HMIS) (10 Points)

The Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care (CoC) Program interim rule places a high emphasis on having a functioning and comprehensive HMIS in the CoC jurisdiction as it is critical to gathering unduplicated, aggregated data on homelessness in the community for both the CoC and Emergency Solutions Grant (ESG) Programs.

- Does this project provide client level data to HMIS at least annually? Yes No

If the project is providing participant data in the HMIS – indicate the total number of participants served by the project, and the total number of clients reported in the HMIS.

Total number of participants served by the project: 104

Total number of clients reported in the HMIS: 104

If the project is not providing participant data in the HMIS – indicate one or more of the four (4) reason(s) for non-participation:

- Federal law prohibits (please cite specific law) State law prohibits (please cite specific law)
- New project not yet in operation Other (please specify prohibition)

Also, for those participant records that were reported in the HMIS, indicate the percentage of values that were missing (“Null or Missing Values”) and/or unknown (“Don’t Know or Refused”). If there were no unknown values, note a “0” value.

Data Collection Requirements

All CoC Program funded projects are required to collect all of the Universal Data Elements and a select number of Program-Specific Data Elements.

*** Indicate the percentage of unduplicated client records with null or missing values during the last 10 days of January 2019**

Universal Data Element (Use HMIS Data Quality Report)	Records with no values (%)	Records where value is refused or unknown (%)
3.1 Name	0	0
3.2 Social Security Number	0	0
3.3 Date of Birth	0	0
3.4 Race	0	0
3.5 Ethnicity	0	0
3.6 Gender	0	0
3.7 Veteran Status	0	0
3.8 Disabling condition	0	0
3.917 Living Situation	0	0
3.10 Project entry date	0	0
3.11 Project exit date	0	0
3.12 Destination	0	0
3.15 Relationship to Head of Household	0	0
3.16 Client Location	0	0
Program Specific Data Element (From the most recent APR)	Records with no values (%)	Records where value is refused or unknown (%)
4.2 Income and Sources	0	0
4.3 Non-Cash Benefits	0	0
4.4 Health Insurance	0	0
4.5 Physical Disability	0	0
4.6 Developmental Disability	0	0
4.7 Chronic Health Condition	0	0
4.8 HIV/AIDS	0	0
4.9 Mental Health Problem	0	0
4.10 Substance Abuse	0	0
4.11 Domestic Violence	0	0
4.17 Residential Move-In Date (RRH only)	N/A	N/A

IV. Supportive Services for Participants (5 points)

Please identify whether the project includes the following activities:

1. Transportation assistance to clients to attend mainstream benefit appointments, employment training, or jobs?

- Yes
 No

Select **“Yes”** if the project provides regular or as needed transportation assistance to mainstream and community resources, including appointments, employment training, educational programs, or jobs. Select **“No”** if transportation is not regularly provided or cannot be provided consistently as requested.

2. At least annual follow-ups with participants to ensure mainstream benefits are received and renewed?

- Yes
 No

Select **“Yes”** if the project regularly follows-up with program participants at least annually to ensure that they have applied for, are receiving their mainstream benefits, and renew benefits when required. Select **“No”** if there is no or irregular follow-up concerning mainstream benefits.

3. Do program participants have access to SSI/SSDI technical assistance provided by the applicant, a subrecipient, or partner agency?

- Yes
 No

Select **“Yes”** if program participants have access to SSI/SSDI technical assistance. The assistance can be provided by the applicant, a subrecipient, or a partner agency—through a formal or informal relationship. Select **“No”** if there is no or significantly limited access to SSI/SSDI technical assistance

V. Bed Utilization (5 points)

1. Permanent Supportive Housing (PSH) Only

A bed utilization rate is equal to the total number of people served on any given day divided by the total number of beds available on that day. Bed utilization rates below 65 percent are usually attributed to the project not entering all their clients into the HMIS or the project was under-utilized. Bed utilization rates above 105 means the project did not capture exit dates for all their clients and/or the project offered overflow beds.

From your most recent APR, complete the table below on the point-in-time count of households served on the last Wednesdays in

	*Total # of Beds	Total # of Clients Served	Utilization Rate
January	89	94	106%
April	89	91	102%
July	89	79	89%
October	89	92	103%

*The total number of beds should equal the number of beds submitted in your application.

2. Rapid Rehousing (RRH) Only

Rapid Re-Housing (RRH) provides short or medium term tenant-based rental assistance in community-based housing paired with necessary supportive services for homeless individuals and families (with or without a disability). RRH assistance usually begins prior to the client entering housing. Project performance is measured when client moves into permanent housing. Using data from HMIS during the past 12 months, answer the questions below:

- Proposed number of households: N/A
- Total number of households served: N/A
- Total number of households moved into permanent housing: N/A
- If the total number of households that move into permanent housing is lower than the proposed number of households, please explain why in the box below (expand box as needed).

N/A

VI. Miscellaneous Information (5 points)

1. Match requirement

Match must equal 25 percent of the total grant request including Admin costs but excluding leasing costs (i.e., any funds identified for Leased Units and Leased Structures). Match must be met on an annual basis. HUD requires match letters to be submitted with the e-snaps application. Match contributions can be cash, in-kind, or a combination of the two; and, match must be used for an eligible cost as set forth in Subpart D of CoC Program interim rule. For an in-kind match, the recipient may use the value of property, equipment, goods, or services contributed to the project, provided that, if the recipient or sub recipient had to pay for such items with grant funds, the costs would have been eligible. If third party services are to be used as match, the third party service provider that will deliver the services must enter into a memorandum of understanding (MOU) before the grant is executed documenting that the third party will provide such services and value towards the project.

- Will your agency be able to provide the match requirement for your renewal project (including a commitment letter or MOU)?

Yes

No

2. Exit Surveys

HUD encourages client surveys particularly exit surveys.

- Does your renewal program conduct exit surveys or interviews with clients?

Yes

No

This is a new project and has not started yet

Not applicable to this project

If no, please explain why in the box below (expand box as needed).

N/A



U.S.VETS Housing First Policy

Purpose

U.S.VETS uses the Housing First approach in its program in efforts to end and prevent homelessness among veterans and their families. Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry. The purpose of the Housing First Policy is also to define how U.S.VETS aligns its Supportive Services for Veteran Families (SSVF), Permanent Supportive Housing, and Transitional Housing programs with the Housing First service delivery model.

Policy

U.S.VETS follows a Housing First model in which it does not place preconditions or eligibility requirements beyond grant eligibility requirements. It is also the policy of U.S.VETS that it offers service-enriched housing to people according to the evidenced based practice of Housing First as created by Dr. Sam Tsemberis, which means loss of housing does not equate to loss of services. This policy pertains to individuals who cannot or will not accept the terms of the traditional supportive housing programs. It also ensures housing and services are offered to people who are frequent users of acute care systems, chronically homeless, psychiatric disabilities, co-occurring disorders, chronic and acute health care problems. This policy pertains primarily to the positions of Clinical Director, Program Manager, Program Coordinator, Case Manager, Peer Specialist, Benefits Counselor, and/or Housing Specialist – the positions at U.S.VETS sites vary depending on funding availability and leveraged resources.

Procedure

U.S.VETS practices the Core Components of Housing First as Defined by HUD. The core features of Housing First in the context of permanent supportive housing models are as follows:

1. U.S.VETS has few to no programmatic prerequisites to transitional housing entry to practice low barrier admission processes. Clients are offered a permanent housing option prior to entering transitional housing. When transitional housing is chosen, it is utilized as a bridge to permanent housing. Clients are given the choice of the program track in transitional housing that best meets their needs and the level of services they would like to participate in.
2. U.S.VETS has no programmatic prerequisites to permanent housing entry: Clients experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, or agreeing to comply with a treatment regimen upon entry into the program. Clients are also not required to first enter a transitional housing program in order to enter permanent housing.



3. Low barrier admission policy: U.S.VETS admission policy for transitional, permanent supportive housing, and other housing programs “screens-in” rather than screens-out applicants with the greatest barriers to housing, such as having no or very low income, poor rental history and past evictions, or criminal histories. Housing programs may have tenant selection policies that prioritize clients who have been homeless the longest or who have the highest service needs as evidenced by vulnerability assessments or the high utilization of crisis services.
4. Rapid and streamlined entry into housing: Many clients experiencing chronic homelessness may experience anxiety and uncertainty during a lengthy housing application and approval process. In order to ameliorate this, U.S.VETS offers temporary housing options if needed and uses the Housing First model for its permanent supportive housing to help clients experiencing homelessness move into permanent housing as quickly as possible, streamlining application and approval processes, and reducing wait times.
5. Supportive services are voluntary, but are used to persistently engage clients/tenants to ensure housing stability: Supportive services are proactively offered to help client/tenants achieve and maintain housing stability, but clients/tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing are utilized. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information.
6. Clients who are tenants of permanent housing programs have full rights, responsibilities, and legal protections: The ultimate goal of the Housing First approach is to help clients experiencing homelessness achieve long-term housing stability in permanent housing. Permanent housing is defined as housing where tenants have leases that confer the full rights, responsibilities, and legal protections under Federal, state, and local housing laws. Tenants are educated about their lease terms, given access to legal assistance, and encouraged to exercise their full legal rights and responsibilities. Landlords and providers in Housing First models abide by their legally defined roles and obligations. For instance, landlords and providers do not enter tenants’ apartments without tenants’ knowledge and permission except under legally-defined emergency circumstances. U.S.VETS also offers the option for tenants to participate in a veteran council to review program policies and provide feedback, and formal processes for tenants to submit suggestions or grievances.
7. U.S.VETS makes every effort to work with clients/tenants to prevent lease violations and evictions from its permanent housing programs or to prevent discharge from its transitional programs without a permanent housing placement opportunity. U.S.VETS does not consider alcohol or drug use in and of itself to be lease violations, unless such use results in disturbances to neighbors or is associated with illegal activity (e.g. selling illegal substances.) U.S.VETS gives tenants some flexibility and recourse in the rent payment, which in many subsidized housing programs is 30% of the participant’s income. Rather than moving towards eviction proceedings immediately due to missed



rent payments, U.S.VETS may allow clients/tenants to enter into payment installment plans for rent arrearages and offers money management skills training and assistance.

Supportive Services for Veterans Families (SSVF) Program

1. Screening and assessment is conducted utilizing an appropriate assessment tool to determine vulnerability and eligibility for housing placement.
2. Clients that meet the eligibility requirements will be placed in housing regardless of any existing barriers.
3. Comprehensive supportive services will be provided or facilitated to eligible clients to include but is not limited to 24/7 on-call access and case management.
4. If the client experiences housing loss prior to exit of the program, U.S.VETS will continue to serve the client until an appropriate housing path has been determined accompanied by supportive services by U.S.VETS or external agency.

Permanent Supportive Housing Program

1. Screening and assessment is conducted utilizing an appropriate assessment tool to determine vulnerability and eligibility for housing placement.
2. Clients that meet the eligibility requirements will be placed in housing regardless of any existing barriers.
3. Comprehensive supportive services will be provided according to the Intensive Case Management (ICM) model including: intensive case management services are offered daily if necessary and usually a minimum of 1x/week or 1x/month for clients who have achieved more stability, community-based services, and 24/7 on-call access.
4. If the client experiences housing loss due to lease termination, U.S.VETS will continue to serve the client until an appropriate housing path has been determined accompanied by supportive services by U.S.VETS or external agency.

Responsibility/Governance

The Clinical Director, Program Manager, and Operations Manager and/or designees are responsible for ensuring the policy and procedure is implemented, monitored, and regularly reviewed.



U.S.VETS Fair Housing & Equal Opportunity Policy

Purpose

The Fair Housing & Equal Opportunity Policy confirms that U.S.VETS follows required laws and regulations in serving its clients in regards to the Fair Housing Act and Equal Opportunity.

Policy

U.S.VETS operates various programs to include housing programs funded by federal, state, county, and city government grants. U.S.VETS adheres to the required Fair Housing and Equal Opportunity regulations as required to include the applicable Code of Federal Regulations (CFR). U.S.VETS also adheres to Other Federal Requirements in regards to Nondiscrimination and Equal Opportunity.

Procedure

1. U.S.VETS adheres to 24 CFR 578.93 - Fair Housing and Equal Opportunity which states:

§ 578.93 Fair Housing and Equal Opportunity.

(a) *Nondiscrimination and equal opportunity requirements.* The nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) are applicable.

(b) *Housing for specific subpopulations.* Recipients and sub recipients may exclusively serve a particular homeless subpopulation in transitional or permanent housing if the housing addresses a need identified by the Continuum of Care for the geographic area and meets one of the following:

(1) The housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex;

(2) The housing may be limited to a specific subpopulation, so long as admission does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR 5.105 (*e.g.*, the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless persons and families).

(3) The housing may be limited to families with children.

(4) If the housing has in residence at least one family with a child under the age of 18, the housing may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the project so long as the child resides in the housing.

(5) Sober housing may exclude persons who refuse to sign an occupancy agreement or lease that prohibits program participants from possessing, using, or being under the influence of illegal substances and/or alcohol on the premises.



(6) If the housing is assisted with funds under a federal program that is limited by federal statute or Executive Order to a specific subpopulation, the housing may be limited to that subpopulation (e.g., housing also assisted with funding from the Housing Opportunities for Persons with AIDS program under 24 CFR part 574 may be limited to persons with acquired immunodeficiency syndrome or related diseases).

(7) Recipients may limit admission to or provide a preference for the housing to subpopulations of homeless persons and families who need the specialized supportive services that are provided in the housing (e.g., substance abuse addiction treatment, domestic violence services, or a high intensity package designed to meet the needs of hard-to-reach homeless persons). While the housing may offer services for a particular type of disability, no otherwise eligible individuals with disabilities or families including an individual with a disability, who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

(c) *Affirmatively furthering fair housing.* A recipient must implement its programs in a manner that affirmatively furthers fair housing, which means that the recipient must:

(1) Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;

(2) Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and

(3) Provide program participants with information on rights and remedies available under applicable federal, State and local fair housing and civil rights laws.

(d) *Accessibility and integrative housing and services for persons with disabilities.* Recipients and sub recipients must comply with the accessibility requirements of the Fair Housing Act (24 CFR part 100), Section 504 of the Rehabilitation Act of 1973 (24 CFR part 8), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR parts 35 and 36). In accordance with the requirements of 24 CFR 8.4(d), recipients must ensure that their program's housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities.

(e) *Prohibition against involuntary family separation.* The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part.

2. U.S.VETS adheres to 24 CFR 5.105 - Other Federal requirements in regards to Nondiscrimination and Equal Opportunity which states:

§ 5.105 Other Federal requirements.



The requirements set forth in this section apply to all HUD programs, except as may be otherwise noted in the respective program regulations in title 24 of the CFR, or unless inconsistent with statutes authorizing certain HUD programs:

(a) *Nondiscrimination and equal opportunity.*

(1) The Fair Housing Act (42 U.S.C. 3601-19) and implementing regulations at 24 CFR part 100*et seq.*; Executive Order 11063, as amended by Executive Order 12259 (3 CFR, 1959-1963 Comp., p. 652 and 3 CFR, 1980 Comp., p. 307) (Equal Opportunity in Housing Programs) and implementing regulations at 24 CFR part 107; title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d- 2000d-4) (Nondiscrimination in Federally Assisted Programs) and implementing regulations at 24 CFR part 1; the Age Discrimination Act of 1975 (42 U.S.C. 6101- 6107) and implementing regulations at 24 CFR part 146; section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at part 8 of this title; title II of the Americans with Disabilities Act, 42 U.S.C. 12101*et seq.*; 24 CFR part 8; section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135; Executive Order 11246, as amended by Executive Orders 11375, 11478, 12086, and 12107 (3 CFR, 1964-1965 Comp., p. 339; 3 CFR, 1966-1970 Comp., p. 684; 3 CFR, 1966-1970 Comp., p. 803; 3 CFR, 1978 Comp., p. 230; and 3 CFR, 1978 Comp., p. 264, respectively) (Equal Employment Opportunity Programs) and implementing regulations at 41 CFR chapter 60; Executive Order 11625, as amended by Executive Order 12007 (3 CFR, 1971-1975 Comp., p. 616 and 3 CFR, 1977 Comp., p. 139) (Minority Business Enterprises); Executive Order 12432 (3 CFR, 1983 Comp., p. 198) (Minority Business Enterprise Development); and Executive Order 12138, as amended by Executive Order 12608 (3 CFR, 1977 Comp., p. 393 and 3 CFR, 1987 Comp., p. 245) (Women's Business Enterprise).

(2) *Equal access to HUD-assisted or -insured housing.* A determination of eligibility for housing that is assisted by HUD or subject to a mortgage insured by HUD shall be made in accordance with the eligibility requirements provided for such program by HUD, and such housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.

Responsibility/Governance

The Executive Director and/or designee is responsible for ensuring the policy and procedure is implemented, monitored, and regularly reviewed.