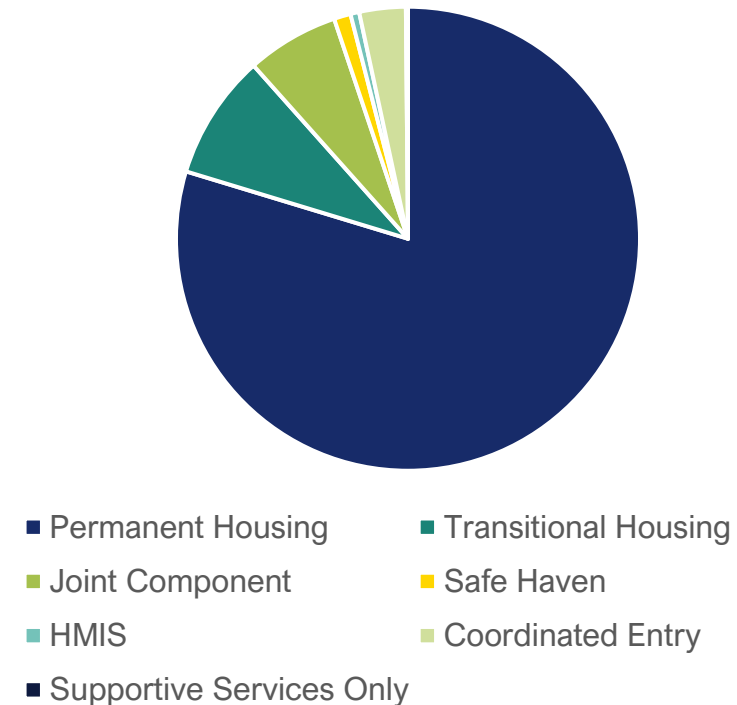# SPC Meeting

November 19, 2025

What We Know

- **Total ARD:** $65,467,923.00

- **Federal Caps and Allocations:**
  - 30 % Cap on Permanent Housing (PSH + RRH + JC) awarded funds
  - Tier 1 is 30% of our ARD

- **New Projects:**
  - Transitional Housing
  - Supportive Services Only
    - Standalone
    - Street Outreach

Current Funding by Program Type

- Permanent Housing
- Transitional Housing
- Joint Component
- Safe Haven
- HMIS
- Coordinated Entry
- Supportive Services Only

Current Portfolio

Considered Permanent
Housing by HUD

Program Types	Current Amount
Permanent Supportive Housing	$42,886,107.00
Rapid Re-Housing	$12,871,413.00
Joint Component	$4,501,370.00
Transitional Housing	$6,102,246.00
Safe Haven	$815,465.00
Supportive Services Only	$101,684
Coordinated Entry	$2,264,224.00
HMIS	$426,784.00
Total	**$65,467,923.00**

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Language in the NOFO

- The NOFO requires attestations such as:
  - Cooperation with Federal immigration enforcement
  - Attesting that governments "do not deny the sex binary of humans"

- The reported rules give HUD the right to reject applicants that "previously or currently" embraced policies that "facilitate racial preferences" or engaged in "activities that violate the sex binary in humans."

HUD Priorities (2025 NOFO)

End Homelessness on Our Streets

- Focus resources on outreach, intervention, and supports that increase self-sufficiency; collaborate with law enforcement and first responders to reduce encampments, public camping, and public drug use.

Prioritize Treatment & Recovery

- Support projects with on-site behavioral health care, robust wraparound services, and participation requirements; strengthen TH and SSO programs; leverage mainstream housing and healthcare resources.

Advance Public Safety

- Partner with law enforcement to protect unsheltered individuals and ensure safe public spaces; reduce trauma associated with street homelessness, especially for women and youth.

Promote Self-Sufficiency

- Expand partnerships with workforce agencies, employers, and childcare to increase employment and earned income; prioritize projects that support long-term economic independence.

Improve Outcomes

- Review renewal projects for effectiveness; prioritize those improving self-sufficiency, employment income, treatment, and recovery; use reallocation, expansion, and transition grants to strengthen system performance.

Minimize Trauma

- Require trauma-informed care and ensure safe, private, appropriate spaces for youth, survivors of violence, and women.

HUD Renewal Project Review (Pass/Fail)

- HUD reviews renewal projects using **eLOCCS, APRs, CPD field office info, monitoring & audit reports**.

- Projects are assessed on a **pass/fail basis**:
  - **Key Criteria:**
    - **Achievement of Goals** – Did the project meet plans and objectives from the original or amended grant?
    - **Timeliness Standards** – Were grant funds expended on time and other deadlines met?
    - **Self-Sufficiency Outcomes** – Did the project help participants achieve independent living and maintain self-sufficiency?
    - *Note: Dedicated HMIS projects are exempt from this standard.*

- **Project Management & Compliance** – No evidence of:
  - Refusal of technical assistance
  - Poor financial/accounting practices
  - Project mismanagement
  - Drastic population reduction
  - Unauthorized program changes
  - Loss of project site control

HUD Renewal Project Thresholds

- (h) evidence that the project has previously or currently conducts activities that subsidize or facilitate racial preferences or other forms of illegal discrimination or conduct activities that rely on or otherwise use a definition of sex other than as binary in humans.

- (i) evidence that the project operates drug injection sites or "safe consumption sites," knowingly distributes drug paraphernalia on or off of property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of "harm reduction."

Project Eligibility Thresholds

HUD Pass/Fail Requirements (V.A.4.a)
Projects must meet all eligibility thresholds or HUD will reject the project.

Eligibility Requirements:

- Applicant meets statutory requirements (e.g., nonprofit status).
- Demonstrates financial & management capacity.
- Provides all required certifications.
- Serves only eligible populations.
- Participates in HMIS (or comparable database).
- Certifies:
    - **No racial preferences or discriminatory practices.**
    - **No drug injection sites, safe consumption sites, distribution of drug paraphernalia, or allowance of illicit drug use on program property.**

- **Additional HUD Conditions:**
    - Renewal projects are presumed eligible unless there is contrary evidence (e.g., monitoring findings, not drawing down funds quarterly, late APRs).
    - HUD will **not** fund new projects unless created via **reallocation** or the CoC demonstrates strong evaluation & ranking processes tied to system performance.

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Project Quality Thresholds

HUD Quality Requirements (V.A.4.b)
Used to assess applicant capacity, project design, and performance.

For Renewal Projects:
- Considered to have met quality thresholds unless there are compliance issues.
- Must show:
  - Satisfactory capacity
  - Regular eLOCCS drawdowns
  - Timely reimbursement of subrecipients
  - Timely resolution of monitoring findings

For New Project Applicants:
- Must demonstrate capacity, financial management, and readiness to operate.
- HUD may deny a new project with significant unresolved issues.

Component-Specific Threshold Notes

Transitional Housing (TH)
- Requirement: **40 hours/week of services per household** (may be operationally challenging).
- Other items can be converted into rating/ranking questions.

Permanent Supportive Housing (PSH)
- Disability definition does **not** include SUD.
- Projects **must require participation in supportive services** (e.g., case management).
- Must upload occupancy agreement/lease.
- Scoring:
  - If **100%** of PSH projects meet service participation requirement → **10 points**
  - If **50%** meet → **5 points**

Rapid Re-Housing (RRH)
- Must have the same **service participation agreement** requirement.

Program Service Emphasis

- **Treatment & Recovery Services**
  - Priority for projects offering on-site or coordinated behavioral health care.
  - Integration of wraparound supports: substance use treatment, mental health services, and recovery-focused programming.
  - Encourage participation requirements that support long-term stability and independence.

- **Employment & Economic Independence**
  - Projects should partner with:
    - Workforce development agencies
    - Employers and apprenticeship programs
    - Childcare providers
    - Transportation and other supportive services
  - Goal: Increase employment income and long-term stability.

Recommendations as we move ...

1. Develop New/Different Projects

- Create TH projects through reallocation or transition.
- Partner with housing + healthcare providers to qualify for bonus points.

2. Strengthen CoC Application

- Clearly describe goals and strategies to end homelessness.
- Highlight performance metrics: exits to PH, income gains, engagement in services, recovery supports.

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New CoC Bonus Projects

- **Eligible Projects**
  - SSO projects
    - Standalone and Outreach
  - TH projects
  - SSO-CE – expansion allowed
  - HMIS – expansion allowed

New DV Bonus Projects

- **Definition**
  - A new project that is dedicated to serving individuals and families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking.
  - Can serve survivors of human trafficking, but may not exclusively serve people fleeing or attempting to flee human trafficking.

- **Eligible Projects**
  - For **TH** projects, the application must demonstrate:
    - The project applicant's experience serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking, and their ability to house survivors and meet safety outcomes.
    - The project's inclusion of victim-centered practices.
    - Demonstration of plan to include survivors with lived expertise.

Updates to Rating

- **New Criteria:**
  - Threshold and Eligibility review in line with NOFO details (pre-review by KCRHA)
  - Extent to which participants exit to unsubsidized housing.
  - Evidence of required engagement per 24 CFR 578.75(h)
  - Onsite Substance Use Treatment Supports
  - Service Intensity – 40hrs/wk of demonstrated services
  - Coordination with Mainstream Services (Healthcare, Housing, SSDI, SNAPS)
- **Updated Criteria:**
  - Program Components: Added SSO, point allocation change
  - Exits with Earned Income: Point increase for those with 20% of exits with earned income
  - Program Population Priority: Added updated PSH disability population, increased points for "recovery-based" units
  - Cost effectiveness – explicit alignment with 2 CRF 200.404

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