

HUD RFP #1524FV

Questions and Answers

June 26, 2015

Clarification related to goal: Individuals with length of stay greater than 549 days, less than 75%.

The wording of the above referenced goal was not clear. Therefore, ECDMH wants to clarify that the goal is:

- 25% of people successfully d/c will have a LOS less than 549 days. In other words, the goal is that ¼ of people successfully d/c will have a LOS less than 549 days. However, we will be reviewing utilization LOS data for all individuals d/c so that ECDMH, in collaboration with the learning community, can make any refinements to practice that may be indicated to better meet the needs of the individuals that we serve.

Q1: In the Narrative which asks, "How you intend to screen and house, at least in a suitable and safe temporary setting other than streets or a shelter, within 72 hours of receipt of a referral." Is this implying that clients should be housed in an apartment in 72 hours or are we expected to house them temporarily in a rooming house or motel? Also, if the answer is the latter (temporary housing) will there be additional monies or resources made available to allow us to do so?

A1: No, there will not be additional money/resources available. The housing environment should be one that is suitable to the individual within the HUD Housing Quality Standards (HQS). Through consultation with HUD, the CoC rental assistance grants do not allow for the use of HUD dollars for rooming houses. In addition, matching funds cannot be used for this purpose either. ECDMH does acknowledge that this is a challenging yet important goal. As part of the learning community, it is hoped that there can be increased collaborations with shelters to access emergency solutions grants (ESG). There is hope to increase the number of pre-approved landlords to improve access to rental properties thus achieving a 72 hour placement. Recommendation is the development of a shared data base of landlords that all providers can utilize.

Q2: Wondering if you could tell me where the 2.4 year average LOS for SHP came from?

A2: The 2.4 year median LOS data came from OMH Residential Program Indicator report Western Region summary for Supportive Housing Community services 04/01/2014 - 03/31/2015. In addition, according to the most recent Annual Performance Report (APR), the current LOS from all the CoC grants that are part of this HUD RFP, have an approximate median LOS of 2.75yrs.

Q3: Is this a new grant? Or is it the renewal again?

A3: Per the RFP, the CoC I-S+C (Shelter Plus Care) I, II-III, IV and V and CoC II SHP- (Supportive Housing Program) I, III, V, VI, VII and VIII are the consolidated grants for the renewal of the above mentioned expiring grants.

Q4: Is this for HUD funding and not ECDMH funding?

A4: This RFP is for the HUD funding to serve as a sub-recipient to ECDMH for HUD funding COC programing. The CoC I-S+C (Shelter Plus Care) I, II-III, IV and V and CoC II SHP- (Supportive Housing Program) I, III, V, VI, VII and VIII are the consolidated grants for the renewal of the above mentioned expiring grants. ECDMH also provides cash match funds to support program activities. Please refer to RFP.

Q5: Is it acceptable to use HUD homeless housing funds (permanent or rental assistance) to house individuals in Rooming Houses?

A5: Through consultation with HUD, the CoC rental assistance grants do not allow for the use of HUD dollars for rooming houses. In addition, matching funds cannot be used for this purpose either. As part of the learning community, it is hoped that there can be increased collaborations with shelters to access emergency solutions grants (ESG). There is hope to increase the number of pre-approved landlords to improve access to rental properties thus achieving a 72 hour placement. Recommendation is the development of a shared data base of landlords that all providers can utilize.

Q6: Can HUD homeless housing funds (permanent or rental assistance) be used to house individuals in hotels or motels while they search for apartments?

A6: Through consultation with HUD, the CoC rental assistance grants do not allow for the use of HUD dollars for hotels or motels. In addition, matching funds cannot be used for this purpose either.

Q7: What data does ECDMH have to indicate there is sufficient safe, affordable housing in Erie County to enable 75% of 450 individuals to move in 1.5 years in Erie County?

A7: As stated earlier, the goal is 25% of people successfully d/c has a LOS less than 549 days. In other words, the goal is that ¼ of people successfully d/c will have a LOS less than 549 days.

Again, we can acknowledge that this goal is a challenge. However, in terms of data, we estimate 50 referrals per year and of those, if 25% are successfully discharged, then this is not 450 people being moved into safe affordable housing, it's approximately 15-20 people per year. The learning community will be established to help support this goal and improve/develop enhanced practices. It is anticipated that emphasis on recovery and employment related supports will help to facilitate this transition.

Q8: A referral must be placed within 72 hours of referral. The current system does not have a prompt process for referring individuals upon request from the individual or community resource. Meeting this requirement would have to be contingent upon a prompt and timely referral from the ECDMH when the individual is locatable and accessible AND having a suitable environment available which cannot be paid for with grant funds since it needs to be a tenant based lease. It will likely take more than 72 hours to locate and assess the individual. In addition both SPOA systems (ECDMH and HAWNY) will impact the timeliness of that referral so providers will need to know when the clock starts for placement.

A8: ECDMH sends referrals to agencies upon notification that an opening is anticipated. ECDMH also utilizes the MIS referral system capacity table to identify agencies with openings. Therefore, it is

imperative that agencies maintain data quality on all electronic systems related to housing programs. The 72 hour “clock” will begin when SPOA sends out the referral to the sub recipient. ECDMH SPOA, as part of the learning community, is open to working with all community stakeholders to enhance/make improvements which positively impact upon successful engagement of referred individuals.

Q9: How do these expectations match up with HUD outcomes? We don’t see the HUD performance measures articulated in this proposal.

A9: The outcomes that are articulated in this RFP are not inconsistent with goals already identified in ECDMH grant submission to HUD.

Q10: The federal regulations define rental assistance to be of short, medium or long term duration. However, they also define Permanent Housing as being provided “without a designated length of stay”. The RFP outcomes require us to meet a target of discharging 75% or more of the participants within an 18 month time frame?

A10: There is no designated length of stay. LOS are individually determined. However, the goal is that 25% of people successfully d/c will have a LOS less than 549 days. In other words, the goal is that ¼ of people successfully d/c will have a LOS less than 549 days. However, we will be reviewing utilization LOS data for all individuals d/c so that ECDMH, in collaboration with the learning community, can make any refinements to practice that may be indicated to better meet the needs of the individuals that we serve.

Q11: Will an agency face a penalty or risk losing the program over time if this outcome is not attained and if so, how do we reconcile that with the fact that we would have utilization measures in place to justify the stay which would not meet the federal regulations that actually allow for an indefinite length of stay.”

A11: For all services performance is always a consideration in the awarding and allocation of funding. In most cases, should performance become a concern, ECDMH would provide an opportunity for evaluation and corrective action to occur.

Q12: Expected to have a no decline housing first model with a 30:1 caseload, placement guarantee within 72 hours of referral but there is no funding for immediate resources. We don’t believe HUD funds can be used for rooming houses and the provider cannot pay for a transitional apartment for new referrals - it has to be a tenant based lease. How can the 72 hour goal be reached under these circumstances?

A12: Through consultation with HUD, the CoC rental assistance grants do not allow for the use of HUD dollars for rooming houses. In addition, matching funds cannot be used for this purpose either. As part of the learning community, it is hoped that there can be increased collaborations with shelters to access emergency solutions grants (ESG). There is hope to increase the number of pre-approved landlords to improve access to rental properties thus achieving a 72 hour placement. Recommendation is the development of a shared data base of landlords that all providers can utilize.

Q13: How does this line up with Homeless Alliance expectations. If we were to reach the RFP goals is there any potential for negative review by HAWNY upon renewal. (Especially with less than 2 year lengths of stay). In addition, we only see one comment about BASNET participation. We don't see anything requiring participation in Coordinated Entry and how the ECDMH SPOA and Coordinated Entry will work together to help us reach the goal to place folks within 72 hours of referral.

A13: ECDMH has had consultation with HAWNY and they are in support of goals outlined in this RFP. ECDMH vets all referrals for HUD openings through the coordinated entry system. Due to serving individuals with mental illness specifically, we work with the coordinated entry to identify those consumers who have been identified as MI or appear to be so. ECDMH will refer the individual with the highest Vulnerability Index Score with MI first from the chronically homeless list through coordinated entry. If there are no chronic homeless with MI on the list, ECDMH will identify the individual with the highest SPOA risk score and longest length of homelessness. ECDMH will work to make all referrals in a timely and efficient manner. The goal of 72 hours begins once you received the referral from SPOA. ECDMH SPOA, as part of the learning community, is open to working with all community stakeholders to enhance/make improvements which positively impact upon successful engagement of referred individuals.

Q14: What limitations do we have on A&OH in terms of eligible expenses, use of matching funds for this purpose or limits on total request?

A14: § 578.59 Project administrative costs. (a) Eligible costs. The recipient or subrecipient may use up to 7 percent of any grant awarded under this part, excluding the amount for Continuum of Care Planning Activities and UFA costs, for the payment of project administrative costs related to the planning and execution of Continuum of Care activities. This does not include staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57, because those costs are eligible as part of those activities.

Eligible administrative costs include: (1) General management, oversight, and coordination, costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following: (i) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following: (A) Preparing program budgets and schedules, and amendments to those budgets and schedules; (B) Developing systems for assuring compliance with program requirements; (C) Developing agreements with subrecipients and contractors to carry out program activities; (D) Monitoring program activities for progress and compliance with program requirements; (E) Preparing reports and other documents directly related to the program for submission to HUD; (F) Coordinating the resolution of audit and monitoring findings; (G) Evaluating program results against stated

objectives; and (H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section. (ii) Travel costs incurred for monitoring of subrecipients;

(iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and (iv) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

Matching funds can be used for any eligible program activity.

Q15: RFP says leasing funds do NOT have to be matched. By regulation these funds are classified as rental assistance and do require a cash or services match. That statement in the RFP makes this confusing.

A15: This section from the CoC HUD RFP was taken directly from HUD regulation. However because, the programs are Rental assistance, matching requirements are 25% cash and/or in-kind service donation of the entire HUD grant allocation.

Q16: The RFP reads the results of agency interviews MAY be factored into a qualitative evaluation. Will all agencies be interviewed? How will this play out?

A16: Agency interviews, if necessary, will be determined by the Scoring Committee.

Q17: Bonus points?? Scoring sheet for employment section reads as follows: "2 bonus points if a strong letter of support and/or MOU exists from a community resource that will support goal achievement". What does that mean and from whom?

A17: May apply to existing MOU for housing programs with Health Homes, treatment Providers, etc. that support the operations of your housing program in a manner that in the reviewer's opinion improves the facilitation of the achievement of the specified goal.

Q18: How does this housing strategy fit with those proposed by OMH Supported housing and DSRIP strategies? Seems inconsistent with strategies proposed by other entities.

A18: This is HUD funding. DSRIP has not identified the role of HUD supportive housing for its purposes. It is our belief that enhancing recovery supports and successful discharges is consistent with reducing preventable hospitalizations. We remain open to discussing services with all community stakeholders.

Q19: Our understanding is that the HUD review triggered some of these concerns. Is there any reason the housing community was not allowed an opportunity for input into these changes to afford some conversation on the challenges this proposal presents?

A19: The providers have been aware of the results of the review for the past two years. There have been multiple meetings in which HAWNY and housing providers were present discussing the results of the

HUD review. Going forward, maintaining an active learning community is a critical piece of improving/enhancing HUD and other housing services. The Community voiced challenges, this RFP tried to mitigate some of the challenges. ECDMH acknowledges that challenges exist. We are hopeful that the learning community will address these challenges. We look forward to all stakeholders coming together in a focused, targeted, solution oriented environment where successful practices are shared and adopted.