Attestation Document for 2019 CoC NOFA Competition

During the past several years HUD and the local CoC have taken steps to define practices and create policies aimed at improving outcomes for all programs that serve households experiencing homelessness. As the 2019 CoC grant competition begins it is important to clearly define certain practices and policies to ensure that all projects understand there meaning, impact, and the responsibility projects have in abiding by these practices and policies.

Furthermore in the 2019 CoC NOFA HUD states the following:

CoC Review of Project Applications
HUD expects each CoC to implement a thorough review and oversight process at the local level for both new and renewal project applications submitted to HUD in the FY 2019 CoC Program Competition. It has been HUD's experience that many project applications contain information that results in conditions on the grant; or for more serious infractions, a project being rejected. CoCs are expected to closely review information provided in each project application in order to ensure that:

a. all proposed program participants will be eligible for the program component type selected;

b. the proposed activities are eligible under 24 CFR part 578;

c. each project narrative is fully responsive to the question being asked and that it meets all of the criteria for that question as required by this NOFA and included in the detailed instructions provided in *e-snaps*;

d. the data provided in various parts of the project application are consistent; and,

e. all required attachments correspond to the attachments list in *e-snaps* and the attachments contain accurate and complete information, and are dated between May 1, 2019 and September 30, 2019.

Therefore, Partners Ending Homelessness as the Collaborative Applicant has created **two documents** to accomplish the following purposes:

1. To ensure understanding and compliance with all HUD CoC grant requirements by project leadership. *And* someone other than the primary individual responsible for writing the project application has reviewed the contents of that application for completeness and correctness.

2. To ensure that all projects will comply with the policies adopted for NC 504 and ensure projects will operate using the best practices incorporated into the CoC and encouraged by HUD over the past several years.

Please copy and paste the following onto organizational letterhead and have the document signed by the Executive Director/CEO and Board Chair:

DOCUMENT #1

By signing below I am attesting that I have reviewed the requirements or regulations referenced, understand their impact on my organization, and will ensure these are followed throughout the duration of this grant competition and/or project grant year.

1. All proposed program participants will be eligible for the program component type selected.
    a. For Renewal PSH Projects please see 24 CFR 578.37 a.1.i
    b. For Renewal Rapid Rehousing please see 24 CFR 578.37 a.1.ii
    c. For new Rapid Rehousing Projects see 24 CFR 578.37 a.1.ii
    d. All projects see 2019 NOFA Section V.

2. All CoC projects will meet the following eligibility/threshold criteria:
    a. All PH projects (new and renewal) please see 2019 NOFA Section V.B.
    b. Any new PH project, please see 2019 NOFA Section V.

3. All proposed program activities are eligible under 24 CFR part 578

4. An employee or officer of the organization, other than the individual primarily responsible for writing the Project Application, will review the grant narrative and Detailed Instructions provided by HUD in E-Snaps to ensure the answers provided are fully responsive to the questions asked and those answers meet all of the criteria for that question as required by the NOFA.

5. All grant attachments contain accurate and complete information **and** are dated between June 1, 2019 and August 15, 2019.

6. During the grant year the project will request *at least* quarterly drawdowns of grant funds from the ELOCCS system or expend all funding within the first 6 months of the project.

7. My organization will actively monitor program expenditures to ensure that all grant funds will be expended by the end of the grant year.

_____   _____

Board Chair Signature   Date

_____

Board Chair Print Name

_____   _____

Executive Director/CEO Signature   Date

_____

Executive Director/CEO Print Name

DOCUMENT #2

By signing below I am attesting that I have read the following NC 504 CoC policies or HUD suggested best practices, understand their impact on my organization, and will ensure these are followed throughout the duration of this grant competition and/or project grant year.

1. All PH projects will receive referrals for their program exclusively through NC-504's Coordinated Assessment process as outlined in its Written Standards.

2. All submitted Projects operate Low Barrier Entrance Requirements using HUD's definition as follows:
   a. Project whose policies and procedures allow for clients to be served even if they have:
      i. Low or no income
      ii. Current or Past Substance use (no sobriety requirement)
      iii. Criminal record (with the exception of state-mandated restrictions)
      iv. History of being or currently a victim of domestic violence (e.g., requiring a protective order, period of separation from abuser, or law enforcement involvement).

3. All submitted Projects will not terminate a client from the program due to:
   a. Failure to participate in supportive services
   b. Failure to make progress on a service plan
   c. Loss of income or failure to improve income
   d. Being a victim of domestic violence
   e. (For PH Projects) Any other activity not covered in a lease agreement typically found in Guilford County

4. All submitted Projects will follow a Housing First Practice as defined by:
   a. Low Barrier (as defined above)
   b. No requirement of Housing Readiness
   c. No requirement to participate in services beyond Case Management
   d. Case Management goals are client driven-not pre-determined by program
   e. No requirement to follow treatment protocols
   f. Clients are not terminated from program due to lack of progress on case management goals or not following service plans
   g. Case managers and supervisors are trained in and actively employ evidence-based practices for client engagement such as motivational interviewing and harm reduction.

5. Any Rapid Rehousing Project will follow the Written Standards for operating Rapid Rehousing in NC 504 adopted April 2018.

6. All PSH programs will adopt the following Housing Case Management Practices for **all new clients** entering the program:
   a. Programs will complete a Full SPDAT on all program participants at the designated times prescribed in the SPDAT manual and trainings.

      b. Programs will use the SPDAT as the Case Management tool following the "Excellence in Housing Based Case Management" trainings provided by Orgcode Consulting

      c. PSH programs will be expected to use the following tools as taught and provided by Orgcode Consulting as evidence of following the case management curriculum:
          i. Crisis Plan
          ii. Risk Assessment Tool
          iii. Honest Monthly Budget
          iv. Personal Guest Policy
          v. Exit Plan
          vi. Individualized Service Plan (see ISP document below)

7. All PH (RRH and PSH) projects will actively seek to connect each client to all appropriate and available mainstream resources including, but not limited to:
      a. Workforce Development- http://guilfordworks.org/job-seekers/
      b. Services provided by DSS through:
          i. Family Services and Programs: (Including TANF support through Workfirst) http://www.myguilford.com/humanservices/socialservices/programs-and-services-for-families/
          ii. Adult Services and Programs: http://www.myguilford.com/humanservices/socialservices/adult-services-and-programs/
      c. Health Insurance/Medical Coverage. Either through:
          i. ACA Health Insurance Marketplace, or
          ii. Guilford Community Cares Network (Orange Card program)- http://guilfordccn.org
      d. Youth in or formerly in Foster Care-
          i. Guilford County DSS LINKS program- Contact Sheletha Stewart 336-641-3688, or
          ii. Youth Villages Life Set Program- 336-931-1800
      e. Early Child Development Programs
          i. Head Start or Early Head Start- http://guilfordchilddev.org/parents/preschool/head_start/apply/
          ii. NC Pre K (http://www.guilfordchildren.org/parents-caregivers/nc-pre-k-4-yr-olds/)

_____   _____
      Board Chair Signature   Date

_____
      Board Chair Print Name

_____   _____
Executive Director/CEO Signature   Date

_____
Executive Director/CEO Print Name

AS NOTED ON DOCUMENT #2 (6)(C)(IV)

Individualized Service Plan (ISP)

. The ISP is a written document that outlines all steps, goals, activities, actions, anticipated outcomes and timelines of the case management supports as well as identifies the primary Rapid Re-Housing program practitioner.

. The ISP can exist electronically or on paper, but must be secure at all times (either through password protection or locked filing cabinet).

. All clients will be offered a copy of their ISP.

. The client is the principal creator of the ISP, though it may be recorded by the Housing program case manager. The case manager may not include any activities, directives or requirements that the client has not consented to, in the ISP.

. The first ISP shall be written within two weeks of the client's being housed focused first and foremost on the necessary elements of Housing Stability: Relationships; Basic Needs; Supports and Safety. Subsequent ISP's shall be drafted as the needs and/or goals of the client change or become more defined, as well as when outcomes are achieved.

. At a minimum, ISP's are reviewed and updated at least once every 45 days to ensure its continued relevance and to identify goals that have been achieved and goal timelines that need to be adjusted. The client and case manager may determine that a more frequent review is appropriate.

. All clients shall be offered the opportunity to verify the intentions of their ISP by signing the document or through other means.

. ISP's shall outline the intended outcomes for each activity being undertaken. Outcomes are understood as changes in skill, knowledge, behavior, stability, sustainability, quality of life, etc.

. Housing case managers shall review all of their ISP's in detail a minimum of once per month to ensure that they are up to date, thorough, and complete as per agency requirements. Supervisors shall review a sample of ISP's from each case manager a minimum of once every three months. Documentation of the review is required.

. A final review of the ISP shall occur no later than 30 days before the client's planned graduation from services.