

**Public Comment Notice**  
**FFY2020/SFY2021 Goals and Action Steps**  
**for ESG and HOPWA Programs**

The State of Georgia Department of Community Affairs (DCA) is currently preparing its FFY2020/SFY2021 Annual Action Plan for the 2018-2022 Consolidated Plan for the State fiscal year beginning July 1, 2020. The application submission periods for the Emergency Solutions Grants (ESG) and the Housing Opportunities for Persons with AIDS (HOPWA) Programs will both begin in February 2020.

As a result, DCA has prepared a draft of the FFY2020 Goals and Action Steps for each project along with other project specific requirements including the proposed methods of funding distribution and the project priorities for funding. Comments regarding these and other issues will be accepted for a 30-day period for review and consideration prior to the beginning of these application submission periods.

The State encourages citizens and other interested parties to review the draft document and to submit their written comments no later than February 3, 2020, at 5:00 PM. All written comments should be emailed to [john.shereikis@dca.ga.gov](mailto:john.shereikis@dca.ga.gov) or mailed to:

FFY2020 ESG and HOPWA Goals and Action Steps  
Georgia Department of Community Affairs  
Office of Homeless and Special Needs Housing  
Attn: John Shereikis  
60 Executive Park South NE  
Atlanta, GA 30329-2231

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# **Georgia Department of Community Affairs (DCA)**

## **Proposed Federal FY2020/ State FY2021**

### **Goals and Action Steps for the**

### **Emergency Solutions Grants**

### **and**

### **Housing Opportunities for Persons With AIDS Programs**

#### ***EMERGENCY SOLUTIONS GRANTS PROGRAM (ESG)***

The Georgia Housing and Finance Authority (GHFA) is the recipient of the State's ESG allocation from the U.S. Department of Housing and Urban Development (HUD). GHFA contracts with DCA to administer the ESG program for the State of Georgia.

#### **PROCESS FOR MAKING SUB-AWARDS**

##### **Method of Distribution**

As a threshold consideration, all applicants must demonstrate how their housing or service projects directly serve persons who are homeless as defined by HUD and demonstrate how the housing and services provided will improve housing stability for those persons.

Applicants must describe homeless verification methods, and how they will track outputs and outcomes (stable housing) for persons served.

Both HUD-funded and State Housing Trust Fund for the Homeless (HTF)-funded ESG funds are available to nonprofit organizations (including community and faith-based organizations), quasi-governmental agencies like Community Service Boards, and local government entities. Housing Authorities are not eligible to apply directly for ESG funding. Agencies must demonstrate collaboration with local mainstream service providers and local provider groups that are dedicated to housing and service interventions that serve persons experiencing homelessness. Agencies must also participate in HUD-mandated continuum of care planning appropriate to the jurisdiction where their activities are located.

Funding decisions will be based on a number of factors, including but not limited to, those stated below in the "Rating and Selection" section. DCA reserves the right to fund any project application, regardless of score and/or ranking, if such project is determined to directly address DCA priorities including, but not limited to, geographic distribution of funds and furthering a systemic response to homelessness.

Thresholds for project consideration generally include the eligibility of the described population to be served; the eligibility of described activities; minimum criteria for organizational capacity, community or service area need; a two-year operating and financial history, including a completed IRS Form 990, if applicable; past or projected project performance; responsiveness to timeliness and information requested; HMIS performance; as well as other relevant factors, as determined by DCA. Threshold considerations may also include any of the “Rating and Selection” criteria named in the section below.

DCA reserves the right to distribute ESG and HTF funds outside of the annual competition process when funds are available. Funds may be distributed in this manner to supplement existing programs demonstrating high performance, for specific geographically defined Coordinated Entry efforts, for prioritized homeless services efforts, or for any other eligible activities determined by DCA to further local systemic responses to homelessness.

### **Matching Requirements**

All applicants are expected to provide at least a 100% match for HUD funds consisting of documented non-McKinney resources. Match may include the value of any lease on a building, any salary paid to staff to carry out the program, and the value of the time and services contributed by volunteers to carry out the program at a rate determined by DCA. DCA reserves the right to decrease the required match percentage for applicants providing high priority services in areas with demonstrated need for such services. Exceptions may be considered by DCA on a case by case basis.

### **Deadlines and Award Authority**

Application documents will be available on or about March 3, 2020. The application process, including deadlines for ESG and HOPWA funding will be announced separately, on the DCA ESG and HOPWA webpages. Funding announcements will be made on or about June 30, 2020. Applications submitted after the deadline established by DCA will not be considered for funding. The Commissioner of DCA or staff designated by the Commissioner shall have the authority to make awards from funds allocated by HUD or reserved by the HTF Commission. Awards are made at the sole discretion of DCA.

### **Application Notice and Submission Requirements**

DCA will solicit information about application submission and application development workshops by email from every person on the “contacts” mailing list associated with its homeless projects. Notices will also be emailed to local government representatives, local Continuums of Care, regional commissions, DCA Office of Regional Services, and other groups with local and regional interests. Notice will be published on the DCA website, and all persons receiving notice will be asked to share the notice with others within the state, their region or their community with an interest. Application development workshops will be held in at least two (2) locations around the state. Multiple webinars will be conducted by DCA staff to provide applicants with remote assistance with the application process.

### **Rating and Selection**

A competition for funds will be implemented that will include, but not be limited to, the threshold criteria named in the “Method of Distribution” section, as well as other considerations such as project location related to demonstrated need, participation in collaborative networks and planning processes, and cost benefit analysis and recidivism rates for currently funded projects, etc. Lower scoring applications may not be funded.

General funding decisions for all agencies will be based upon:

- Geographical location;
- Past performance (outputs/outcomes);
- Past performance with DCA agreements, DCA ESG policies and rules, Federal/state/local laws, regulations, policies;
- Compliance and past performance with Homeless Management Information System (HMIS) requirements. Family violence agencies must demonstrate performance through the HMIS comparable database designated by DCA;
- Need based on data presented in the application, the local Homeless Point in Time (PIT) count, and any other relevant data, as determined by DCA;
- Project strategy;
- Organizational structure, operating processes, and capacity;
- The extent to which the organization operates under the authority of a diversified, involved, volunteer, community-based board of directors;
- Professional management;
- The consistency of the organization’s identity or its mission to the provision of homeless services;
- The consistency to which the organization utilizes networks and partnerships within the community to avoid duplication of housing and services;
- Participation in meetings and other activities of the appropriate local Continuums of Care;
- Direct cash match provided for ESG activities;
- The value of other non-cash contributions;
- The priorities established by the local Continuum of Care;
- Sound operating procedures, accounting policy and controls;
- Organizational and financial policy, stability and capacity; and,
- Location in an ESG entitlement jurisdiction which receives federal ESG funds directly from HUD. These jurisdictions include: City of Atlanta, Augusta-Richmond County, Macon-Bibb County, City of Savannah, Clayton County, Cobb County, DeKalb County, Fulton County, and Gwinnett County;
- Participation in local Coordinated Entry efforts;
- Organizations serving Domestic Violence and Youth populations;
- For Emergency Shelter Projects, bed utilization rate and enrollment dates in HMIS and DV Comparable Database
- Limiting the Case management and Housing Search and Placement line items to no more than 25% of the grant award amount.

DCA staff will use a points system during application review to ensure that the limited pool of funding received is used in the most effective way possible. Individual scores by project may

be assessed for completeness of the application; past performance relevant to the project type; implementation strategy (narrative describing need, clients served, local coordination, goals, outputs, outcomes, etc.); procurement of outside resources; the extent to which projects result in increased housing stability for clients; organizational development and experience; budgeting and financial reporting; efficient and effective use of HMIS; adherence to DCA Housing Support Standards (HSS), and other relevant factors. Applicants requesting funds for multiple projects may receive funds for some, but not all, projects.

DCA reserves the right to fund any project application, regardless of score and/or ranking, if such project is determined to directly address DCA priorities including, but not limited to, geographic distribution of funds and furthering a systemic response to homelessness.

In addition to all other federal, state and local laws and regulations, all activities must be implemented in full compliance with pertinent HUD ESG Program regulations published at 24 CFR §576.

### **Local Approval**

In accordance with Federal law governing the ESG program, all nonprofit applicants for emergency shelter projects must obtain approval(s) from appropriate local government jurisdictions. All approvals must be made in formats prescribed by DCA. Documentation of approval, or at a minimum the initiation of the approval process, must be included in the application. Applications from nonprofits for projects that do not adequately address local approval may be rejected for threshold considerations.

### **Collaboration**

Applicants must participate in Continuums of Care (CoC) appropriate to their project(s). There are nine CoCs in Georgia. Applicants must also participate in coordinated intake/assessment, referral, and case management systems established by the local CoC(s) within their service area in order to provide, in conjunction with other providers, appropriate housing and supportive services to better enable homeless persons to achieve success and end their homelessness. The expectation is that each sub-grantee or its community partner: a) assesses consumer needs and barriers to housing stability; b) seeks the prevention of homelessness for non-homeless consumers, c) works to move homeless individuals into rapid re-housing, permanent supportive housing, or other affordable housing appropriate to the needs of the consumer; d) documents and tracks referrals to housing and service providers; and e) tracks participant progress and outcomes, including post-discharge follow up contacts recorded in HMIS. Organizations will be required to document these efforts through DCA's HMIS implementation in partnership with Eccovia Solutions. Family violence agencies may not participate in HMIS, but instead, must document these efforts through an alternative method as previously described. Sub-grantees must also adhere to DCA's published Housing Support Standards (HSS). Information regarding these Standards and how to implement them can be found on the DCA website at the following link:

[https://www.dca.ga.gov/sites/default/files/housing\\_support\\_standards.pdf](https://www.dca.ga.gov/sites/default/files/housing_support_standards.pdf)

### **Coordinated Entry**

All sub-grantees are required by the ESG Interim Rule to participate in the Coordinated Entry system for the local Continuum of Care, as defined by the HEARTH Act. In areas where Coordinated Entry is still under development, sub-grantees are expected to actively participate in system development. Further requirements for participation, as determined by DCA, may be outlined in contracts for sub-grantees. Additionally, DCA may, at its discretion, define higher levels of required participation in Coordinated Entry for sub-grantees receiving funding that is specifically designed to support Coordinated Entry efforts.

### **Minimum Compliance Criteria**

Applications must be submitted electronically on forms provided by DCA and according to the schedule established by DCA. The applicant must provide required certifications and provide all supporting documentation requested by DCA. Each applicant must demonstrate to the satisfaction of DCA that it complies with Federal, State and local laws and regulations, and that it is capable of carrying out applicable programs. All returning grantees must be in substantial compliance with existing DCA agreements. DCA reserves the right to sanction individuals and organizations with a history of non-compliance.

### **Funding Guidelines**

Subject to final federal and state appropriations, approximately \$4.5 million dollars is expected to be available for projects funded under the HUD ESG program. 80% of Federal funding to be spent within the Georgia ESG Non-Entitlement area.

The following amounts have been established as guidance for funding requests. All of the "Rating and Selection" factors, including distribution by "Eligible Service Area" will be considered in evaluating funding requests. DCA will make minimum grant awards of \$30,000 for Street Outreach, Rapid Rehousing and Homeless Prevention.

Maximum grant amounts are as follows:

- Emergency Shelter - \$60,000 per project
- Street Outreach - \$50,000
- Supportive Services - \$25,000 per project
- Hotel/Motel Vouchers - \$60,000. Awards for agencies outside of the Georgia Non-Entitlement will vary based on reasonably necessary display of need.
- HMIS - \$40,000

**DCA reserves the right to establish maximum amounts for new applicants and returning agencies with a history of underspending.**

### **Monitoring**

In accordance with program regulations, all ESG sub-grantees will have an on-site or remote review of their homeless housing and/or service program(s). Program monitoring is an ongoing

process of reviewing a sub-grantee's performance in meeting goals, identifying program deficiencies, and enhancing management capacity through technical assistance or other corrective actions.

DCA will review the performance of each sub-grantee in carrying out its responsibilities whenever determined necessary. In conducting performance reviews, DCA will obtain financial and programmatic information from the sub-grantee's records and reports and, when appropriate, its sub-recipients, as well as information from onsite monitoring and electronic data sources, including HMIS. Where applicable, DCA may also consider relevant information pertaining to the recipient's performance gained from other sources, including the application for funding, reimbursement requests, audits, and annual reports. Reviews to determine compliance with specific requirements of the ESG program will be conducted as necessary, with prior notice to the sub-grantee.

If DCA determines that the sub-grantee, or one of its sub-recipients, has not complied with an ESG program requirement, DCA will give the sub-grantee notice of this determination and an opportunity to demonstrate, within the time prescribed by DCA and on the basis of substantial facts and data that the sub-grantee has complied with ESG requirements.

Remedial actions and sanctions for a failure to meet an ESG program requirement will be designed to prevent a continuation of the deficiency; mitigate, to the extent possible, its adverse effects or consequences; and prevent its recurrence. If the sub-grantee fails to demonstrate to DCA's satisfaction that the activities were carried out in compliance with ESG program requirements, DCA will take one or more of the remedial actions or sanctions.

### **Required Written Standards**

DCA requires that each sub-grantee establish and consistently apply policies and procedures for each ESG project according to the minimum standards set by HUD and the specific standards established by the local Continuum of Care in which the project exists. If a CoC has formally established written standards, all projects are expected to meet those standards.

The DCA ESG program has adopted the Balance of State Continuum of Care Written Standards for all projects located in that geographic area. Projects located in CoCs other than the Balance of State must still use the Balance of State Written Standards to set minimum program standards, and must also observe any local Continuum of Care written standards that are more stringent than those for the Balance of State.

Information regarding these Standards and how to implement them can be found on the DCA website at the following link:

[https://www.dca.ga.gov/sites/default/files/bos\\_coc\\_written\\_standards\\_-\\_approved\\_5-13-19.pdf](https://www.dca.ga.gov/sites/default/files/bos_coc_written_standards_-_approved_5-13-19.pdf)

## **DESCRIPTION OF COC**

The Georgia Balance of State Continuum of Care (BoS CoC) is made up of 152 counties, both urban and rural. Jurisdictions in Georgia outside of the Georgia BoS CoC include: Athens-Clarke County, City of Atlanta, Augusta-Richmond County, Cobb County, Columbus-Muscogee County, DeKalb County, Fulton County, and City of Savannah. All other jurisdictions are included within the BoS CoC.

The collaborative applicant for the BoS CoC is the Department of Community Affairs. The collaborative applicant has an established Governance Charter and is establishing a coordinated assessment system to enable homeless households to access the best fit intervention available. This has been implemented.

## **PERFORMANCE STANDARDS**

DCA has established the primary goal of reducing the number of unsheltered homeless individuals and families. The information contained below outlines goals, strategies and performance measures to be utilized for all ESG sub-recipients.

### **Overall Goals**

1. Reduce the number of unsheltered individuals and families, as established in the Homeless Point in Time Count, within the BoS ESG Entitlement. Since 2011, the number of unsheltered homeless in the Balance of State Continuum of Care, including individuals and those in families, has decreased by 74%. This goal will continue to be achieved by placing emphasis on high utilization of emergency shelters beds. This will be measured in HMIS. In addition, the Entitlement will:
  - a) Right-size length of stay for clients in emergency shelters. Length of stay should generally be no longer than 90 days for shelters.
  - b) Increase placements into permanent housing for homeless individuals and families from Emergency Shelter each year. This factor will be measured in HMIS.
2. Prevent individuals and families from becoming homeless – either unsheltered or sheltered. Follow-up checks will be made at three months and six months’ post-discharge to ensure that households assisted do not become homeless. This will be documented in HMIS.
3. Maintain or increase the percentage of individuals and families remaining housed for three months. In SFY 2019, 98% of prevention and 90% of rapid re-housing participants exit the program with permanent housing. This will be measured in HMIS by using our recidivism methodology.

### **Performance Measurements**

ESG projects with different eligible activities will require different assessment standards. DCA diligently works with sub-recipients to ensure a level of HMIS data completeness by which an accurate evaluation of project performance can continually be measured. DCA has established baselines for performance measure criteria, such as increases in cash income and non-cash



benefits during project enrollment. DCA will review all available data annually to evaluate performance.

For Emergency Shelter projects, overall performance will be measured based on the following standards\*:

1. An overall bed utilization rate of 80%.
2. The average length of stay of the households served should be no longer than 90 days.
3. An increase in the percentage of discharged households that secure permanent housing at exit each year.
4. An increase in the percentage of households that increase cash and non-cash income during project enrollment.

For Rapid Re-Housing projects, overall performance will be measured based on the following standards:

1. An increase in the percentage of discharged households that secured permanent housing at project exit each year.
2. An increase in the percentage of discharged households permanently housed three months after exit.
3. An increase in the percentage of households that increase cash and non-cash income during project enrollment.

For Homelessness Prevention projects, overall performance will be measured based on the following standards:

1. An increase in the percentage of discharged households that maintained permanent housing at project exit each year.
2. An increase in the percentage of discharged households permanently housed three months after exit.
3. An increase in the percentage of households that increase cash and non-cash income during project enrollment.

For Street Outreach projects, overall performance will be measured based on the following standards:

1. An increase in the number of contacts with unduplicated individuals made during outreach.
2. An increase in the percentage of discharged households that access permanent housing.
3. An increase in the percentage of households that increase cash and non-cash income during project enrollment.

\*Projects serving the chronically homeless, or chemically dependent clients, or shelters with minimal barriers to entry may be held to different standards than projects providing other levels of assistance.

## **CONSULTATION WITH COC**

### **Allocation of ESG funds each year**

The Georgia Non-Entitlement staff hosts annual discussions with the Continuums of Care (CoCs) concerning the needs of each Continuum. The Continuums are asked to rank the eligible activities according to their local need and submit these to the Georgia Non-Entitlement. This local priority ranking is reflected in the Georgia Non-Entitlement's scoring of applications and award recommendations.

In addition, Georgia Non-Entitlement stakeholders - such as the CoC leads, local government officials and non-profit organizations serving the homeless - will meet with Non-Entitlement staff to review the Non-Entitlement's vision and plans for the forthcoming year.

### **Developing funding, policies, and procedures for the operation and administration of the HMIS**

The Georgia HMIS Implementation is a regional collaborative effort to implement HMIS across eight of the nine Georgia Continuums of Care. The Georgia Housing and Finance Authority (GHFA) serves as the Lead Agency for the Georgia HMIS Implementation that has designated DCA to administer the homeless assistance programs.

The governing body for the GA HMIS Implementation is the GA HMIS Steering Committee. This Committee is made up of representatives from each of the eight Continuums of Care and the DCA HMIS Project Manager. The role of this committee is to oversee the HMIS implementation and ensure compliance with the HUD CoC Program Interim Rule 578.51.

As the administrative agent of the HMIS Lead Agency, DCA is responsible for soliciting feedback from agencies and stakeholders and communicating that feedback to the Steering Committee.

The funding for HMIS includes a Data Quality Analyst specifically focused on identifying, training and improving data quality for programs for funded CoC Programs including the DCA ESG program. This funding and these efforts have been integral in providing a baseline for evaluation of the ESG project.

### **ESG Housing and Service Goals**

Through the ESG program, the State expects to be able to provide assistance to a number of persons through the following types of assistance:

<b>Federal FY2020 ESG GOALS</b>	
<b>Activities</b>	<b>Persons Assisted</b>
Outreach assistance	460
Rapid Re-Housing assistance	1,919
Homeless Prevention assistance	647
Housing assistance (emergency shelter)	9,528

## ***HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)***

### **Method of Distribution**

The Georgia Housing and Finance Authority (GHFA) is the recipient of the State's HOPWA allocation. GHFA contracts with the Department of Community Affairs (DCA) to administer the programs funded by the HOPWA allocation. The HOPWA Program provides resources and incentives to devise long-term comprehensive strategies for meeting the housing needs of low-income Persons living with HIV/AIDS (PLWHA). HOPWA funding is sub-awarded to regional Project Sponsors including nonprofit agencies or health departments directly working with PLWHA within their communities. To the extent determined under State law, DCA may also accept applications from private, secular or faith-based nonprofit organizations. These agencies are responsible for designing their own rules for programs, however their program policies and design must be within the scope of HOPWA regulations and guidance from HUD.

"HOTMA" is the Housing Opportunity Through Modernization Act, or the short title of the bill and subsequent Public Law 114-201. HOTMA included modernization of the HOPWA formula, which was rolled into the law with other provisions related to HUD. HOTMA was signed into law July 29, 2016. The law provides that HOPWA modernization, based on "living with HIV" data, was effective for the 2017 allocation year. Previously, HOPWA funds were allocated to eligible states and Eligible Metropolitan Statistical Areas (EMSAs) that meet the minimum number of cumulative AIDS Cases. The HOPWA Modernization Act has shifted the focus to the changing scenario where, with HIV treatment and care, an increasing number of people are living with HIV and not developing AIDS. States and metropolitan areas coordinate the use of HOPWA funds with their respective Consolidated Plans, a collaborative process, which establishes a unified vision for community development actions. In Georgia, HUD provides HOPWA formula funds to 3 jurisdictions, DCA for 125 counties, City of Atlanta for the Atlanta Eligible Metropolitan Statistical Area (EMSA) including 29 counties, and Augusta-Richmond County government for 5 Augusta MSA counties and 2 South Carolina counties.

The State of Georgia currently funds twelve (12) regional programs. Sponsors and areas covered are listed below.

### **Georgia HOPWA Project Sponsors and Area of Coverage**

<u>Sponsor Name</u>	<u>Regional Location</u>	<u>Contact Name</u>	<u>Phone</u>
AID Atlanta, Inc.	LaGrange	Nicole Roebuck nicole.roebuck@aidatlanta.org	(404) 870-7720
AIDS Athens dba Live Forward, Inc.	Athens	Ms. Cassandra Bray cassandra@liveforward.org	(706) 549-3730

CSRA Economic Opportunity Authority, Inc.	Augusta	Gail Derby gdarby@csra.org	(706)722-0493
East Augusta Community Development Corporation, Inc.	Augusta	Charlene Watkins watkinscharlene1@gmail.com	(706)722-7969
Homeless Resource Network, Inc.	Columbus	Ms. Elizabeth Dillard liz@homelessresourcenetwork.org	(706) 571.3399
Laurens County Board of Health	Dublin	Ms. Sarah Collins sarah.collins@dph.ga.gov	(478) 274.7605
Lowndes Co. Board of Health (a/k/a South Health District 8-1)	Valdosta	Ms. Terri Ball terri.ball@dph.ga.gov	(229) 245.8711 x207
North Georgia Health District	Dalton 1-2	Jeff Vollman Jeffery.Vollman@dph.ga.gov	(706) 281-2360 x 19500
The HOPE Center	Macon-Bibb	Ms. Cyndi Johns Cyndi.johns@dph.ga.gov	(478) 464.0612 x 110
Promise Land	Augusta	Sheila Boazman sboazman@gmail.com	(706) 560-1022
SE Health District (Ware County Board of Health)	Waycross	Shelby Lee Freeman Shelby.Freeman@dph.ga.gov	(912) 764-2402
Union Mission, Inc.	Savannah	Ms. Ayana Eady aeady@unionmission.org	(912) 238-2777

### **Georgia Entitlement HOPWA Program**

The HOPWA program is the only Federal Program dedicated to addressing the housing needs of persons living with HIV/AIDS. DCA follows the HOPWA Program guidelines of Office of HIV Housing (OHH) with regard to program administration, performance evaluation, monitoring and reporting.

### **Funding Priorities**

Funding priorities for state fiscal year 2020 are listed below in the State's priority order of HOPWA Funding. Proposals to use HOPWA funds to provide services must give a full description of what is to be funded, and offer clear justification for the use of HOPWA funds.

1. Permanent Housing Programs
  - a. Tenant Based Rent Assistance (TBRA)
  - b. Facility Based Housing (FBH)
2. Emergency and Short-term/ Transitional Housing

3. Homeless Prevention Services
  - a. Short-term Rent, Mortgage and Utility assistance (STRMU)
4. Supportive Services
  - a. Permanent Housing Placement (PHP)

The HOPWA housing priority listed above is based on the changing needs of the community. In order to ensure that HOPWA services are able to meet the community members' needs, the goal is to have a full housing continuum in each community. Project Sponsors are encouraged to participate in the Coordinated Entry system developed by the Continuum of Care (CoC) in the project areas. They are also required to utilize the Homeless Management Information System (HMIS) database to document HOPWA beneficiaries, services provided, and to report project outcomes. The Housing First model should be adopted as a best practice in order to provide consumer-based services.

- Funding priorities will focus on incorporating these values in the programs. Agencies will be directed to create housing stability plans for HOPWA participants to ensure they do not become homeless upon discharge from the program. Agencies will also be directed to produce positive health outcomes based on client Viral Load and CD4 data. Agencies' financial management practices will also be assessed.
- DCA HOPWA Project Sponsors must use either HUD fair market rent (FMR) standards for their area, or they may also opt to use the local Public Housing Authority (PHA) rent standards.
- Continuous quality improvement is a process to ensure programs are systematically and intentionally improving services and increasing positive outcomes for the individuals and families served with HOPWA funds. Applicants must describe their methodology to incorporate the meaningful involvement of PLWHA, their input and feedback in program development, services, policies and procedures.
- Permanent Supportive Housing Program participants including those in both Facility Based Housing (FBH) and Tenant Based Rental Assistance (TBRA) must have annual assessments and certifications for renewal. They also must be assisted to create a housing stability plan to ensure housing upon discharge from the program. All the applicants must have written HOPWA policies and procedures that reflect these requirements.
- All HOPWA housing program beneficiaries should have access to supportive services helping them with case plans and housing stability plans. They must receive the support of a qualified case manager assisting them to access to HIV medical care, sustainable and affordable housing, and income generation.
- Within fifteen (15) days of the start of any HOPWA assistance, the beneficiaries with the help of the HOPWA case manager will develop and commit to an individualized

Housing Stability Plan. The aim should be to assist beneficiaries with attaining self-sufficiency outside of HOPWA assistance. All the client services and case notes, along with the individualized case plan, should be documented in each client's case file and in the HMIS system. Applicants must submit with the application a job description for each case manager.

### **Compliance Criteria**

Non-profit organizations must demonstrate collaboration with local mainstream service providers and local homeless and HIV/AIDS provider groups. The applicants are encouraged to participate in the Coordinated Entry process and participate in their Continuum-of-Care (CoC) to access all available resources for the HOPWA beneficiaries.

The successful applicant will be responsible for the collection and maintenance of records and information necessary to identify the number of unduplicated program recipients, the types of services provided, the dates of service delivery, and other data elements as specified by DCA. All the client data must be entered in the HMIS so that the Consolidated Annual Performance and Evaluation Report (CAPER) data can be retrieved from it.

Grantees must comply with the HUD HOPWA Program Regulations at 24 CFR Part 574, as amended. Program requirements include, but are by no means limited to, the following:

- 1) Costs requested for reimbursement via automatic deposit by DCA must be "reasonable and justifiable," and are only eligible to the extent that they are consistent with the program approved by DCA.
- 2) All funds will be reimbursable to sub-grantees based upon actual program expenses with supporting documentation (retained by sub-grantee) and subject to monitoring by HUD and DCA.
- 3) Expenses are only eligible to the extent that they benefit "eligible persons" under the HOPWA program, as defined herein.
- 4) Environmental - All grants are subject to environmental review in accordance with the federal regulations governing HOPWA program.
- 5) All grants to non-profit organizations are subject to the administrative requirements and cost principals outlined in OMB Circulars A-110 and A-122. These requirements for local governments are outlined in 24 CFR, Part 85 and OMB Circular A-87.
- 6) Sponsor administrative costs are limited to 7% of the grant amount.
- 7) All agencies funded must comply with the Violence Against Women Act (VAWA) and have a Language Accessibility Plan (LAP) for the Limited English Proficiency (LEP) population as per HUD guidelines.
- 8) All agencies must participate in Homeless Management Information System (HMIS) by DCA to enter client level data as required by HUD.

## **Compliance with House Bill (HB) 87**

The "Illegal Immigration Reform and Enforcement Act of 2011" signed into law by Governor Nathan Deal on May 13, 2011, for contracts signed on or after July 1, 2011 requires DCA and GHFA to only contract with entities that are registered with the e-verify program and to obtain an affidavit from the entity certifying participation in the e-verify program. Any subsequent subcontractors (or subcontractors of subcontractors) utilizing DCA or GHFA funds must also participate in the e-verify program and must provide a sworn Affidavit with the e-verify I.D. number. DCA-funded organizations must complete and execute a "*Contractor Affidavit under O.C.G.A. § 13-10-91(b)(1)*." Note that this Affidavit must be executed by the person that executes the DCA HOPWA application. It is necessary also that any subcontractors (and subcontractors of subcontractors) utilizing funds under the Agreement provide the "*Subcontractor Affidavit under O.C.G.A. § 13-10-91(b)(3)*."

## **Federal Reporting Requirements**

*Important notice regarding mandatory federal reporting requirements:* The Federal Funding Accountability and Transparency Act of 2006 requires sub-recipients receiving federal funds to register with Dun and Bradstreet (D & B) to obtain a D-U-N-S number and complete or renew their registration in the System for Award Management (SAM). To find information on how to obtain a D-U-N-S number and register in SAM please visit the following websites:

- <https://www.dnb.com/duns-number.html>  
and  
<https://sam.gov/SAM/pages/public/index.jsf>

Completing these registration processes is free, but may take up to 10 days to complete. A D-U-N-S number and confirmation that your agency is active in SAM is required as part of this year's application. No awards will be made without this information.

## **Compliance with Fair Housing Laws**

All HOPWA project sponsors are expected to comply with the fair housing requirements including all applicable provisions of the Americans with Disabilities Act (Title 42, United States Code Sections 12101–12213) and implementing regulations at Title 28, CFR, Part 35 (States and local government grantees) and Part 36 (public accommodations and requirements for certain types of short-term housing assistance).

## **Eligible Activities**

Eligible activities are those named in current HUD regulations (24 CFR 574.300) for the HOPWA Program that include but are not limited to the following: housing or fair housing information, acquisition, rehabilitation, limited new construction, project or tenant-based rental assistance (including shared housing), homelessness prevention, supportive services (to include health, mental health, assessment, permanent housing placement, drug and alcohol, day care,



personal assistance, nutritional services, etc.), general case management, housing operating costs, technical assistance and administrative expenses. DCA reserves the right to exclude any of the above activities based on funding availability.

### **HOPWA Program Goals**

The goal of the HOPWA Program is to provide allowable services to eligible persons through:

- Sound fiscal management
- Appropriate eligibility determination
- Suitable service access
- Proper documentation
- Improving access to HIV treatment and other healthcare support
- Utilization of HMIS
- Reducing the risk of homelessness among persons living with HIV/AIDS and their families
- Fostering long-term solutions to housing programs.

The Office of HIV/AIDS Housing (OHH) has established a set of values for implementing HOPWA Modernization, including,

1. No person should become homeless as the result of HOPWA Modernization;
2. All funds should be used to meet the needs of eligible households, with no funds recaptured from grants; and
3. Grantees should ensure their project designs meet the changing needs of the modern HIV epidemic, with the goal of positive health outcomes and reduced viral loads for HOPWA-assisted households.

### **Selection Process and Application Submission Requirements**

Applications will be solicited through a Notice of Funds Availability for the FFY2020 Program Year. This notice will be put on the DCA website. The notice will also be emailed to known HIV/AIDS service and housing providers, public health departments, local governments, and other interested parties. Faith-based organizations have full access to the selection process as described in regulations and within the application. Applications must be submitted online to DCA before the application deadline. The applicant must also provide required certifications and provide all supporting documentation requested by DCA. Each applicant must demonstrate to the satisfaction of DCA that it is in compliance with Federal, State and local laws and regulations, and that it is capable of carrying out applicable programs. DCA may require additional information during the review process and applicants are expected to comply with these requests.

DCA will hold several HOPWA Application workshops, Q&A Sessions and webinars. Additional information including date, location and time will be provided via email through the Notice of Funding Availability scheduled to be released in February or March, 2020.

The application process, including deadlines for HOPWA will be announced on the DCA HOPWA webpage.

DCA staff will review all HOPWA applications. Existing funded agencies applying for renewal of funding will be assessed based on their performance outcomes. The funding decisions will be announced on or around June 30, 2020 for applications that are complete and submitted on or before each of the deadlines.

DCA reserves the right to fund any agency for the HOPWA program in order to address DCA priorities including, but not limited to, providing HOPWA services in geographical areas lacking adequate service coverage. DCA also reserves the right to distribute HOPWA funds outside of the annual application process based on changing needs and subject to funding availability. Funds may be distributed to currently funded agencies with additional service needs or to new or existing agencies that have the capacity to provide HOPWA services in service areas that have unmet needs.

Please direct questions regarding this process to John Shereikis by email at [john.shereikis@dca.ga.gov](mailto:john.shereikis@dca.ga.gov) and/or Dr. Harvinder K. Makkar by email at [harvinder.makkar@dca.ga.gov](mailto:harvinder.makkar@dca.ga.gov).

### **Maximum Grant Amounts and Funding Factors**

The next funding cycle will correspond with FFY2020 from October 1, 2020 through September 30, 2021. There are no minimum and maximum funding amounts established for this program, and there are no predetermined funding amounts by type of assistance. Applicants are advised to scale their requests based on housing need for eligible persons, organizational capacity, funding history, the types of activities proposed, number of counties served, participation in state or regional referral networks, and other relevant factors as determined by the applicant and DCA. Efforts will be made to find providers to cover all the DCA HOPWA jurisdiction counties.

Applicants can submit an application requesting funding for Housing, Supportive Services, and Administrative Costs. All Staff training is part of Administrative Costs unless otherwise indicated by HUD. Project sponsor administrative costs are limited to 7% of the grant amount.

All applicants are encouraged to have other funding sources as well to show the financial stability of the agency. Awards are made at the sole discretion of DCA. Funding decisions are final and not subject to appeal. Incomplete or ineligible applications, including applications that do not adequately address consolidated plan certification(s), may be returned unprocessed. If a project falls within DCA's Balance of State consolidated plan jurisdiction, then no certification needs to be submitted with the application and DCA will make the final determination regarding consistency.

Funding determinations under the HOPWA program are made using a “threshold” method for selecting grantees. Applicants must meet a capacity test, and funding decisions for all non-profit agencies shall also be based upon the following factors: the complexity or nature of the request; organizational development and capacity; the extent to which the organization operates under the authority of a diversified, involved, volunteer, community-based board of directors; professional management; the consistency of the organization’s identity or its mission to the provision of HIV/AIDS (as applicable) services; the extent to which the organization utilizes networks to avoid duplication of housing and services; participation in appropriate Continuums of Care; sound operating procedures, accounting policy and controls; and organizational and financial policy, stability and capacity. An additional “threshold” measure applies under the HOPWA program. Under HOPWA, relative need is examined and new applicants are denied funding when they propose to duplicate services within a service area where HOPWA programs are already being carried out by eligible sponsors. New applicants applying to collaborate and extend additional services in the area will be considered.

All funded agencies will receive HOPWA Implementation training to explain the HOPWA contract, program activities, guidelines, requirements and expectations, HMIS usage and enrollment and financial reimbursement process. In addition, all agencies will also receive individual Technical Assistance for HOPWA program and HMIS guidance. All funded agencies can also access Technical Assistance as needed.

If all contract conditions are met, payments to recipient organizations will be made on a cost-reimbursement basis. Exceptions may be made on a case-by-case basis by DCA staff.

HOPWA project sponsors will be expected to provide performance information (goals and actual outputs) for all activities undertaken during the operating year supported with HOPWA funds. Performance is measured by the number of households and units of housing that were supported with HOPWA or other federal, state, local, or private funds for the purposes of providing housing assistance and support to persons living with HIV/AIDS and their families. HOPWA project sponsors must also report the source(s) of cash or in-kind leveraged federal, state, local or private resources used in the delivery of the HOPWA program and the amount of leverage dollars. Project sponsors must also meet Federal, State financial, and other reporting requirements

All activities must be conducted in full compliance with program regulations published at 24 CFR § 574, as well as all Federal, State and local laws and regulations.

All records created as a result of the submission of an application to participate are subject to disclosure under the Georgia Open Records Act and the applicant expressly consents to such disclosure. The Applicant agrees to hold harmless the State Housing Trust Fund for the Homeless, the Georgia Housing and Finance Authority, and the Georgia Department of Community Affairs against all losses, costs, damages, expenses, and liability of any nature or kind (including but not limited to attorney’s fees, litigation and court costs) directly or indirectly resulting from or arising out of the release of any information pertaining to the Applicant’s

submission of an application and implementation of any activities as a result of funding under this program, pursuant to a request under the Georgia Open Records Act.

Agencies receiving HOPWA funds must maintain (for a five-year period from the close of a grant) financial records and client files sufficient to ensure proper accounting and disbursing of amounts received from HOPWA funds and make the records available to HUD or DCA for inspection.

### **Monitoring**

Effective oversight of sub recipients is an important function of the Department of Community Affairs (DCA). Monitoring provides information about sub recipients that is critical for making informed judgments about program effectiveness and management efficiency. DCA approaches monitoring as a cooperative endeavor with sub recipients and an ongoing process of continuous communication and evaluation. DCA's monitoring policy adheres to and reflects 2 CFR § 200.331 (Requirements for pass-through entities) and 2 CFR § 200.501 (Audit requirements), and all regulations referenced therein. Additionally, 2 CFR § 200.501 mandates that any non-Federal sub recipient that expends more than \$750,000 during a fiscal year must have a single audit conducted in accordance with 2 CFR § 200.514 (Scope of audit) except when it elects to have a program-specific audit conducted in accordance with 2 CFR § 200.501(c).

Program monitoring is an ongoing process of reviewing the progress of HOPWA program in lieu of performance goals met by its funded sponsors. DCA will conduct on-site and/or remote review of the HOPWA housing programs and its financial expenditures to identify any gaps and needs and provide corrective actions.

### **HOPWA Housing Goals and Projected Outcomes**

Through the HOPWA program grant awards, the State expects to be able to provide HOPWA housing assistance to a total of 355 unduplicated households during FFY2020 through the types of housing assistance indicated in the table below. The household may receive more than one type of HOPWA assistance. (The number will not match the total housing goal by type of assistance due to the anticipation of some households receiving more than one type of assistance). This is based on DCA's Consolidated Plan and as reported in the Annual Action Plan.

**FFY2020 HOPWA - Housing Goals**

<b>Type of HOPWA Assistance</b>	<b>Number of Units Designated or Available for People with HIV/AIDS and their families</b>
TBRA	198
PH in facilities	35
STRMU	60
ST or TH facilities	20
PH placement (Supportive service)	65

As a result of persons projected to be served through HOPWA grants awarded, the State expects participants to meet the following housing stability goals (by type of housing assistance):

**FFY2020 HOPWA – Projected Outcomes**

<b>Type of HOPWA Assistance</b>	<b>Housing Stability (persons determined to be stable at the end of the operating year)</b>
Tenant-based rental assistance (TBRA)	96%
Units provided in facilities that are being developed, leased or operated with HOPWA funds (PH in facilities)	93%
Short-term rent, mortgage and utility assistance to prevent homelessness (STRMU)	81%