

The City of OKLAHOMA CITY

Planning Department

Community Development Division 420 W. Main, Suite 920, Oklahoma City, OK 73102

NOTICE OF FUNDING OPPORTUNITY FOR CONTINUUM OF CARE 2024-25

Introduction:

The US Department of Housing and Urban Development (HUD) Office of Special Needs Assistance Programs (SNAPS) has released the Notice of Funding Opportunity (NOFO) for the FY2024 & FY 25 Continuum of Care (CoC) Program. This announcement is to notify all parties seeking new or renewal funding of the changes and requirements for this year's competition and should be read in full. A technical assistance/question & answer session will be held on **Friday September 6, 2024,**

at 10am via Teams. Click here >(<u>Join the meeting now</u>) to join the meeting. If prompted for Meeting ID and Passcode – ID: 297 308 328 952. PC: pnqxw5. For call in, use 1-405-534-4946 Phone Conference ID: 521 370 459# Attendance of this meetings is <u>required</u> for any organization submitting a <u>renewal, new project, expansion, or consolidated application</u>. The type of projects requested and criteria that must be followed by each entity wishing to be considered for funding are outlined below.

General Information:

The purpose of the Continuum of Care Homeless Assistance Programs is to fund projects that will fill gaps in locally developed Continuum of Care systems to assist homeless persons to move to self-sufficiency and permanent housing.

This NOFO will be a 2-year NOFO. Renewing applicants will have to submit applications in 2024 but will not have to submit again next year in 2025. The 2025 competition will be held for Bonus (New) projects only.

ALL project applicants are strongly advised to read the full text of the Federal NOFO for the 2024 & 2025 CoC Program before applying. A link to the Federal NOFO can be found at the end of this document and will also be posted on the CoC website under the *Continuum of Care Notices and Applications* tab.

Bonus (New) and Reallocation Projects: HUD has announced there are is **\$815,618** infunds available for Bonus Projects in the 2024 Continuum of Care Competition. In addition to the bonus funds, additional funding may be made available through the reallocation process. Reallocation occurs when a renewal project is eliminated and the funds for that project are used to create a new project without adding to the CoC's overall Annual Renewal Demand. (ARD) Reallocated project are typically low-performing but other factors may contribute to reallocation, including voluntary reallocation by a subrecipient organization. All reallocations must be approved by the Allocations Committee of the Oklahoma City CoC as well as the CoC Board. Funds reallocated from YHDP projects may only be used to create another YHDP project.

New projects can be for either Permanent Supportive Housing (PSH), Permanent Housing-Rapid Re-housing (PH-RRH), Joint TH – PH-Rapid Re-Housing (TH-RRH) and Dedicated HMIS project, Supportive Services only Coordinated Entry (SSO-CE) projects. All new PSH projects must either be 100% dedicated to serve the chronically homeless or must meet the requirements of HUD's DedicatedPLUS designation. It is preferred that all new RRH projects serve homeless families coming directly from the streets or emergency shelter. However, projects serving homeless individuals and youth are also eligible.

BONUS FUNDING PRIORITY PROJECT

The Oklahoma City Continuum of Care is requesting new projects that will provide Rapid Rehousing assistance for *AT LEAST* up to 40 clients with a 20 client per case manager ratio. Applicants are encouraged to incorporate other sources of funds to increase the level of services and staff that can be provided, if possible. Projects applying to provide these services will be prioritized for bonus consideration in the FY24 CoC Competition.

DV Bonus: HUD has announced there is **\$923,161** in funds available for DV Bonus projects in the 2024Continuum of Care Competition. These projects should be designed to provide housing and services to survivors of domestic violence, dating violence, and stalking. The eligible project types are: Permanent Housing-Rapid Re-Housing (PH-RRH), Joint TH - Rapid Re-Housing (TH-RRH) and Supportive services only Coordinated Entry (SSO-CE).

Renewal: Renewal project applications are limited to a one (1) year term. As the current NOFO is a 2-year competition, projects that apply for renewal in 2024 will be automatically renewed in 2025. Renewing Permanent Supportive Housing projects may only serve persons coming directly from non-housing, emergency shelter, or transitional housing for people who are homeless. All eligible applicants for renewal grants must be able to document that they are fully participating (entering all required data on all homeless clients) in HMIS/ServicePoint. Entities proposing renewal projects must demonstrate they meet or exceed HUD performance measurements. If the entity or the renewal project does not meet the minimum HUD standards, the CoC Allocations Committee has the discretion to transfer the project to another CoC service provider or reallocate the funds to a new project.

Renewal Project Expansion: HUD is allowing renewal projects to apply for funds to expand their projects in the 2024 CoC Competition so that they may serve more individuals and families. Renewal applicants who wish to apply for expansion must fill out the project expansion supplement and submit it with their application. Expansion requests cannot exceed the amount of available bonus and reallocation funds. Expansion projects will be scored and ranked with bonus project applications and separately from the renewal project to be expanded. In eSnaps, renewing applicants requesting expansion will be required to submit a renewal project application and a new project application with the expansion information.

YHDP Replacement: YHDP projects may be competitively or non-competitively renewed or replaced in the FY24-25 NOFO. This definition has been expanded to include reallocation of YHDP projects. In this NOFO, CoCs may ow submit applications for YHDP replacements by:

- Reallocating a YHDP renewal project with a new YHDP replacement project that has the same subrecipient.
- Reallocating YHDP renewal project(s) to create one or more YHDP projects with a new subrecipient.
- Reallocating YHDP renewal project(s) to create YHDP expansion applications through the YHDP replacement process.

YHDP projects of all types my include requests to include special YHDP activities subject to the requirements in Attachment A of this NOFO. Special activities must be approved by the Youth Action Board (YAB) and a letter of approval must be submitted with the application.

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DV Reallocation: Subrecipients may reallocate (in whole or in part) eligible renewal projects that were previously funded through DV Bonus funds to create new projects that will serve the same population or expand existing DV projects. DV reallocations projects must be 100 percent dedicated to serving individuals and families fleeing or attempting to flee domestic violence, dating violence, dating violence, sexual assault or stalking. DV reallocations will use the CoC Bonus/Reallocation application when applying for a DV reallocation project.

The OKC CoC will be reallocating up to **\$48,085** in DV funds during the FY24 Competition. Any applicant for the reallocated funds will have to assume control of the project being reallocated until the current contract ends July 31, 2025. Interested applicants should contact the CoC Lead at jerod.shadid@okc.gov for more information.

Project Consolidation: Eligible renewal project applicants will have the ability to consolidate two or more eligible renewal projects (but no more than ten projects) into one project application during the application process. The projects being combined during a grant consolidation will continue uninterrupted. To be eligible for consolidation, projects must have the same recipient and be for the same component. To apply for a consolidated grant, applicants must submit separate renewal project applications for each of the grants that are proposed to be consolidated, and an application for the new consolidated grant with the combined budget and information of all grants proposed for consolidation.

Project Ranking: All projects will be prioritized and ranked by the Continuum of Care Board into Tiers based on their project application score. Tiers are financial thresholds that HUD requires CoCs to use for project ranking. A project may straddle the tiers. Tier 1 is equal to 93% of the CoC's Annual Renewal Demand (ARD). Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds than a CoC can apply for. CoC's total ARD plus any amount available for CoC Bonus projects, not including amounts available for DV Bonus projects. The Oklahoma City CoC's total estimated ARD is currently (\$6,084,911).

Tier 1	\$4,798,762
Tier 2	\$1,998,052

HMIS, CES YHDP and projects will automatically be ranked in Tier 1.

Eligible Applicants:

- Must be a registered 501(c) 3 nonprofit organization
- Must have a DUNS number and be registered with SAM –System for Award Management (previously CCR Central Contractor Registry) and not be on the Excluded Parties List
- Must have experience in providing housing and supportive services to the homeless population

Ineligible Activities:

Homeless prevention and emergency shelter activities are statutorily ineligible under the Continuum of Care program.

Type of Projects Being Requested:

Projects seeking CoC funds must meet all the following objectives related to housing and serving the City's homeless population:

 Help homeless individuals, youth and families obtain and then remain in permanent housing

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- Increase the skills and income of homeless individuals, youth and families.
- Help move homeless individuals, youth and families quickly out of shelters
- Help homeless individuals, youth and families achieve greater self-determination.

HUD Eligible Projects Include:

(1) Renewal Projects

- (a) PH-PSH renewal projects must serve one of the following:
 - (i) program participants who are eligible for assistance under the project's current grant agreement;
 - (ii) persons eligible to be served by DedicatedPLUS projects as described in Section where all units funded by this project must be used to serve program participants who meet the qualifications for DedicatedPLUS:
- Or (iii) persons experiencing chronic homelessness at the time they initially enrolled in the project.
- (b) PH-RRH, Joint TH and PH-RRH component, TH, and SSO projects may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.
- (c) Renewal projects originally awarded under a previous year's DV Bonus must continue to serve survivors of domestic violence, dating violence, sexual assault, and stalking.
- (d) YHDP renewal projects must serve youth experiencing homelessness, including unaccompanied, pregnant and parenting youth, where no member of the household is older than 24.

(2) New Projects

- (a) New PH-PSH projects must serve one of the following:
 - (i) persons eligible to be served by DedicatedPLUS projects in which case all units funded by the project must be used to serve program participants who meet the qualifications for DedicatedPLUS; or
 - (ii) persons experiencing chronic homelessness at the time they initially enroll in the project.
- (b) New PH-RRH, Joint TH and PH-RRH, and Coordinated SSO projects may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.
- (c) New DV Bonus projects (RRH, Joint TH and PH-RRH, and Coordinated Entry SSO) must serve survivors of domestic violence, dating violence, sexual assault, or stalking.

COORDINATED ENTRY PARTICIPATION REQUIREMENT:

The Department of Housing and Urban Development requires that every Continuum of Care develop a coordinated system of assessment and services. HUD has further required that this system prioritize clients based on information gathered during assessment and that CoC providers begin accepting ALL new clients through it. The Oklahoma City coordinated services system utilizes a prioritized, byname list of clients to make referrals during weekly Coordinated Case Management meetings. Every CoC Permanent Supportive Housing provider must have a representative at these meetings and be receiving ALL clients through this system.

Project Submittal Information:

Oklahoma City is the collaborative applicant for the CoC application to HUD. All project applicants must submit the Local Priorities Application via email to the collaborative applicant at jerod.shadid@okc.gov and cc: sharon.leveston-sharpe@okc.gov during the period starting 10:00 a.m. August 30, 2024 and ending 8:00pm September 30, 2024. All new, renewal and expansion project applicants must also complete the full CoC Project Application for FY 2023 in eSnaps at https://esnaps.hud.gov. All eSnaps project applications are due by 5:00 p.m. October 25, 2024. Once applications are completed, the collaborative applicant should be notified immediately. Project Applicants SHOULD NOT submit their application in eSnaps but only notify the

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collaborative applicant. The collaborative applicant will review the application for errors and then submit or return the application for correction.

Applying organizations are responsible for ensuring all applications are complete before contacting the collaborative applicant. New or renewal projects that are incomplete will not be ranked and will not receive funding

For more information, the full text of the Federal NOFA and other information can be found at the address below.

FY23_Continuum_of_Care_Competition (hud.gov)

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DesignatedPLUS Project Requirements:

(From 2022 CoC NOFA)

DedicatedPLUS project. g. DedicatedPLUS Project. A permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals, households with children, and unaccompanied youth (including pregnant and parenting youth) that at intake meet one of the following categories:

- (1) experiencing chronic homelessness as defined in 24 CFR 578.3;
- (2) residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
- (3) residing in a place not meant for human habitation, emergency shelter, or Safe Haven and had been admitted and enrolled in a permanent housing project within the last year but were unable to maintain a housing placement and met the definition of chronic homeless as defined by 24 CFR 578.3 prior to entering the project;
- (4) residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3;
- (5) residing and has resided in a place not meant for human habitation, Safe Haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions and the individual or head of household meet the definition of 'homeless individual with a disability; or
- (6) receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

A renewal project where 100 percent of the beds were dedicated to chronically homeless individuals and families, as described in Section III.B.2.b, under the grant that is being renewed may either become a DedicatedPLUS project or may continue to dedicate 100 percent of its beds to chronically homeless individuals and families. If a renewal project that has 100 percent of its beds dedicated to chronically homeless individuals and families elects to become a DedicatedPLUS project, the project will be required to adhere to all fair housing requirements at 24 CFR 578.93.

Projects that were awarded as DedicatedPLUS in a previous CoC Program Competition are required to include households with children to qualify as a DedicatedPLUS project in the FY 2021 CoC Program Competition.

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HUD's Homeless Policy and Program Priorities

The following are HUD's Homeless Policy Priorities as listed in the 2023 Continuum of Care Program NOFA. All applicants should read these priorities and carefully consider them when completing their application.

- (1) Ending homelessness for all persons. In 2022, the United States Interagency Council on Homelessness (USICH) presented All In: The Federal Strategic Plan to Prevent and End Homelessness to the President and Congress. The plan is built around six pillars: three foundations—equity, data and evidence, and collaboration—and three solutions—housing and supports, crisis response, and prevention. The work funded through this NOFO will support the actions and strategies proposed within the pillars. To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness. CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, those experiencing chronic homelessness, and people with disabilities, including those living with HIV/AIDS). CoCs should partner with housing, health care, and supportive services providers to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.
- (2) Use a Housing First approach. Housing First prioritizes rapid placement and stabilization
- in permanent housing and does not have service participation requirements or preconditions. CoC Program funded projects should help individuals and families move quickly into permanent housing, and CoCs should measure and help projects reduce the length of time people experience homelessness. Additionally, CoCs should engage landlords and property owners to identify housing units available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client-centered service methods. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.
- (3) Reducing Unsheltered Homelessness. In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the country. People living unsheltered have extremely high rates of physical and mental illness and substance use disorders. CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, and supportive services to provide permanent housing options for people who are unsheltered. CoCs should work with law enforcement and their state and local governments to eliminate policies and practices that criminalize homelessness.
- (4) *Improving System Performance*. CoCs should be using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations) to determine how effectively they are serving people

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experiencing homelessness. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing, and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent. CoCs should review all projects eligible for renewal in FY 2023 to determine their effectiveness in serving people Page 8 of 124

experiencing homelessness, including cost-effectiveness. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.

- (5) Partnering with Housing, Health, and Service Agencies. Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. This is especially important as the CARES Act and American Rescue Plan have provided significant new resources to help end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:
- (a) Work closely with public and private healthcare organizations and assist program participants to receive primary care, receive housing related services, and obtain medical insurance to address healthcare needs. This includes developing close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.
- (b) Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new program resources provided through the Homelessness Assistance and Supportive Services Program (HOME-ARP) that was created through the American Rescue Plan.
- (c) Partner with local workforce development centers to improve employment opportunities.
- (d) Work with Tribal organizations to ensure that Tribal members can access CoCfunded assistance when a CoC's geographic area borders a Tribal area.
- (6) Racial Equity. In nearly every community, Black, Indigenous, and other people of color are substantially over-represented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: developing a coordinated community response created in partnership with a racially diverse set of stakeholders and people experiencing homelessness and partnering with organizations with experience serving underserved populations. CoCs should review local policies, procedures, and processes with attention to identifying barriers that result in racial disparities and taking steps to eliminate barriers to improve racial equity and to address disparities.
- (7) *Improving Assistance to LGBTQ+ Individuals*. Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlaps with other forms of prohibited discrimination. CoCs should address the needs of Page 9 of 124

LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in

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their planning processes. Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure privacy, respect, safety, and access regardless of gender identity or sexual orientation in projects. CoCs should also consider partnering with organizations with expertise in serving LGBTQ+ populations.

(8) Persons with Lived Experience. The people who know best what solutions will effectively end homelessness are those who are experiencing homelessness. HUD expects CoCs to include people with lived homeless expertise and experience in their local planning and decision-making process. People with lived experience should determine how local policies may need to be revised and updated to improve the effectiveness of homelessness assistance programs, including participating in planning and oversight activities, and developing local competition processes. CoC leaders and stakeholders should prioritize hiring people who have experienced homelessness in areas where their expertise is needed. (9) Increasing Affordable Housing Supply. The lack of affordable housing is the main driver of homelessness. CoCs play a critical role in educating local leaders and stakeholders about the importance of increasing the supply of affordable housing and the specific consequences of the continued lack of affordable housing. CoCs should be communicating with jurisdiction leaders, including for the development of Consolidated Plans, about the harmful effects of the lack of affordable housing, and they should engage local leaders about steps such as zoning and land use reform that would increase the supply of affordable housing. This FY 2023 CoC NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable housing supply.

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DEFINITIONS

Refer to this list for terms in this NOFA as well as both the Local Priorities and eSnaps Applications.

Annual Renewal Demand (ARD): The total amount of all of the projects that will be eligible for renewal in the CoC Program Competition. HUD will calculate the ARD by combining the total amount of funds requested by eligible renewal projects.

By-Name List: The Oklahoma City CoC has four separate by -name lists that are updated and maintained by partner agencies; these are literally names that identify people experiencing homelessness in the community by name and prioritize housing placements and case management resources based on VI-SPDAT scores. The subpopulations included in those by-name lists are as follows: Chronic, Veteran, Youth, and Family. These by-name Lists are the mechanism by which clients are moved from prescreen for vulnerability to case management and housing placement. The list is updated based on VI-SPDATs that have been inputted at any agency in the community and entered into HMIS. The list is managed based on vulnerability rather than the entry date to the coordinated entry system. VI-SPDAT scores are ranked such that clients are served in order of vulnerability. It is important to note that the family by-name list is not currently being maintained community-wide; agency participation in the family by-name list is preferred but not required. It is also important to note that apart from the family list, there is only one list per population for the entire community; individual agencies do not maintain their own priority lists or waiting lists. Prioritization for all placements through partner agencies should come from the appropriate by-name list. Since all prioritization occurs via this list it is also referred to as the 'Master List'.

Chronically Homeless (HUD Definition): To be considered chronically homeless, a person must have a disability and have been living in a place not meant for human habitation, in an emergency shelter (including hotels and motels paid for by charitable organizations or by federal, state and local government programs), or transitional housing for the last 12 months continuously or on at least four occasions in the last three years where those occasions cumulatively total at least 12 months.

CoC: The Oklahoma City Continuum of Care Committee (OKC CoC) is a committee comprised of citizens and non-profit service providers interested in working on community homeless and poverty issues. The OKC CoC Committee provides oversight in coordinating competitive and formula programs specific to serving the City's homeless population. This group also makes funding recommendations for the City's Social Services grant. The HUD Continuum of Care Grant is an annual competitive grant that builds on the previous year's performance in developing specialized housing with supports for those who are homeless, chronically homeless and have significant disabilities.

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Disability (**HUD Definition**): A physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury that is expected to be long-continuing or of indefinite duration, substantially impedes the individual's ability to live independently, and could be improved by the provision of more suitable housing conditions.

Final Pro Rata Need (FPRN): When Preliminary Pro Rata Need (PPRN) and Annual Renewal Demand (ARD) are compared, the higher amount is considered the Final Pro Rata Need (FPRN). FPRN is the base for the maximum award amount for projects within a CoC.

Fleeing domestic abuse or violence (HUD Definition Category 4): Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; and (iii) Lacks the resources or support networks to obtain other permanent housing.

HMIS: (Homeless Management Information System) This is the database used to record and track client-level information. HMIS ties together homeless service providers within a community to help create a more coordinated and effective housing and service delivery system. The City of Oklahoma City's HMIS is staffed by a contracted administrator. The software provider is Bowman Systems, Service Point.

Housing First: This model provides housing first, and then combines that housing with supportive treatment services in the areas of mental and physical health, substance abuse, education, and employment. Housing is provided in apartments scattered throughout a community.

Journey Home OKC: This is the name of Oklahoma City's initiative that emphasizes housing homeless veterans and people experiencing chronic homelessness and provides them with wraparound case management services. Journey Home OKC is comprised of over 40 government, non-profit, and faith-based organizations that work together to end veteran and chronic homelessness. All Journey Home partner organizations house clients from the prioritized By- Name List and all CoC funded projects are required to take *all* of their clients from the list. The Journey Home initiative also emphasizes housing families and youth through the same approach.

Literally Homeless (HUD Definition Category 1): Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Permanent Supportive Housing (PSH): PSH is a program that helps eligible people find a permanent home and also connects them to case management and other supportive services in the community. Permanent Supportive Housing is prioritized for the most vulnerable people in the community.

Preliminary Pro Rata Need (PPRN): The amount of funds a CoC could receive based upon geographic areas included by the CoC as part of their geography and reviewed by HUD during the CoC Program Registration Process.

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Rapid Re-housing (RRH): RRH is designed to help individuals and families quickly exit homelessness and return to permanent *housing*. Rapid re-housing is prioritized by medium acuity levels as determined by the VI-SPDAT. This assistance is generally shorter and less intensive than PSH.

Unaccompanied Youth: These are people under the age of 24 who present for services without an adult. This definition applies to local program planning and reporting to other funders; HUD defines youth as 18-24 and classifies 17 and below as children.

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