

Sacramento County Continuum of Care HUD-CoC Projects' Closure Policy and Procedures

Policy:

Sacramento Steps Forward (SSF) and the Continuum of Care (CoC) are committed to minimizing returns to homelessness due to the closure or non-renewal of projects funded under the Department of Housing and Urban Development- Continuum of Care grant (HUD-CoC).

HUD-CoC projects who are defunded during the annual Notice of Funding Availability (NOFA) competition or who are closing voluntarily, will develop a closure plan, including housing plans for participants to prevent returns to homelessness. Participants who cannot be permanently housed outside of the system are prioritized by the coordinated entry system for transfer.

Procedures:

Once the Project Review Committee (PRC) shares the preliminary ranking of projects, SSF will develop an initial closure plan with projects who fall into tier 2. A project's budget, number of remaining participants, transfer openings and other factors will be considered in the plan. If a grant extension is necessary to allow more time for transitioning participants, a letter will be drafted to the HUD Field Office.

The impact of closures will be assessed at both the project level and across projects ranked in tier 2.

After HUD announces the awarded projects, SSF will notify defunded projects within 2 business days. A close-out meeting to discuss HUD-extension requests, transfer availability, Move on Voucher options, and other issues will be scheduled within one week of the announcement. SSF will submit any requested grant extensions to the HUD Field Office and will submit requests earlier, if allowable. Immediate implementation of the close-out plan will begin, as the project must be closed by the end of the project's current grant term.

Regular meetings with SSF's Contracts team, Coordinated Entry team and project staff will help transition participants who are ready to move on or transfer to another project.

Any HUD-required documents will be submitted by the closing project to SSF no later than 60 days after the grant term ends. SSF will submit these to HUD no later than 90 days after the grant term ends (24 CFR 578.109). SSF will also record data and report out on participant and project outcomes.

Facilitating Transfers:

Closing project transfer requests will take priority over other types of transfers, with the exception of emergency transfers through the Violence Against Women's Act (VAWA). If there are multiple projects closing, grant term end dates will be considered in prioritizing transfers to other HUD-CoC projects. SSF will transfer eligible participants who would otherwise return to homelessness upon closure. Availability among projects with similar housing type, subpopulations, and the capacity to serve additional people will be explored.

The closing project will share original eligibility documentation with the receiving agency. Although SSF will check that eligibility criteria are met, the receiving agency should also verify participant eligibility before enrolling any clients into their project. The receiving agency will maintain documentation of the transfer process, including:

- Copies of all documentation used to verify eligibility into the original housing program (i.e. Homelessness Certification, Chronic Homelessness Certification, etc.).
- Transfer request information from the closing project and Sacramento Steps Forward