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**Iowa Statewide Emergency Solutions Grant & Shelter Assistance Fund**

**2020-2021 Calendar Year Draft Application**

**Public Comments Received with IFA Responses**

**July 3, 2019**

**Comments Received:**

On May 21, 2019, the Iowa Finance Authority issued a draft proposed application for the 2020-2021 Iowa Statewide Emergency Solutions Grant (ESG) and Shelter Assistance Fund (SAF). The Authority invited stakeholder comments through Friday, May 31, 2019. Comments were submitted by email to amber.lewis@iowafinance.com. The Policy & Planning Committee of the Iowa Council on Homelessness also reviewed the application and provided feedback during a meeting on May 24, 2019. Comments and responses are below. Some comments have been edited slightly for clarity.

Thank you to all commenters for submitting thoughtful feedback to improve these programs.

**Comments Received with IFA Responses:**

1. Phoebe Trepp, Willis Dady:
2. If the awards will incorporate 2 years going forward, they should consider at least two years historically. I'm thinking both 2018 and 2017 information should be taken into consideration, as an agency may have had one issue arise in either year, which could be misleading. I'd suggest looking at data completion, funds used, outcomes, etc., from at least the previous 2 years.
3. I don't think the additional points for working with a new mentee or mentor agency should be provided, because this isn't something that is achievable for each applicant. If no new agencies are applying in our area, we can't be their mentor, and even if they are, who is to say they are a "good" program to partner with? Evaluating a partnership is complex and isn't done very well through answering a question or two. Some agencies claim to have partnerships but this means nothing, while others have deep partnerships that don't come across well in writing. Thus, I think these points will be all about wordsmithing and not about outcomes, so I don't think this should be included.

**RESPONSE:**

1. Several agencies have newer programs that may not have a full two years of data. This may be considered in future years. No change made.
2. Former Community Coordination Questions 8a and 8b have been revised and moved to different sections based on various comments received, as noted throughout this document, and the reference to an MOU for providing peer support is eliminated. Three points are retained for serving in a peer mentor role to other agencies, especially focused on ESG and SAF grants management.
3. Carol Chantrill, Iowa Council on Homelessness:

Below are a few review, comments, questions, suggestions.

Questions pertaining to programming, for instance are academic pipeline programs retroactive with cultural needs rather than proactive?

In the Operation section: Check the boxes to describe the agency's policies and procedures related to operations. Are the agencies and/or organizations’ providing information pertaining to the following three points?

1 -Should have a defined set of values and principles, and demonstrate behaviors, attitudes, policies, and structures that enable them to work effectively cross-culturally;

2 -Have the capacity to value diversity, conduct self assessment, manage the dynamics of difference, acquire and institutionalize cultural knowledge, and adapt to diversity and the cultural contexts of the communities they serve; and

3 - Incorporate the above in all aspects of policy making, administration, practice, service delivery, and systematically involve consumers, key stakeholders, and communities.

Within the application, a suggestion is made of moving question eight between nine and ten.

Minority impact statement, wording according to the State of Iowa and Federal regulatory OSHA manual, is the terminology updated, for instance:

Minority people include all mixed race and/or mixed ethnic individuals regardless of gender, socioeconomic class, sexual orientation, religious ability and/or any disability.

Question 5: Is this question including the demographic profiles such as DHS, frontline staff within the relationship between disproportionally and cultural responsive issues such as type of information, for instance parenting programs, and who are the key players such as courts, law enforcement schools, ect. and what is being brought to the table to provide? Is the population for rural and metro areas also inclusive and/or provided within another area of the application, such as an upload?

The assessments that are provided do each and/or all provide inclusive information noted from information provided in question five?

Regarding question 6a, are the financial statements uploaded certified and notarized with who prepared the information, where, when for what time frame, that is one year, two, three, for five, in other words what time frame is inclusive and/or non-inclusive?

In the MOU is this applied to existing and/or new structural developments of Phase I and Phase II?

Who are the parties of the MOU?

Moving from the MOU to the ‘General’ section what are such provisions (i.e. second sentence) of the statement?

In question four, regarding history and five, regarding monitoring what is the amount of time of objective compliance, which is to improve mainstream program (i.e. if any) that pertains to each organization values?

**RESPONSE:**

Notes in response: The language for the Minority Impact Statement is taken directly from State of Iowa regulatory language. The required financial statements should include at least one fiscal year, and should include information regarding their preparation. The proposed MOU between partner mentor and mentee agencies is revised.

1. Keisha Meissner, Beacon of Life:

Under Program design, (6) Check the boxes to indicate your program's compliance with the selected requirements below. If the program will not meet ALL these requirements, STOP;

the program is not eligible to apply. (Note that not all program requirements are

included below; additional requirements apply if awarded funding.)

“The age or gender of a child under age 18 is NOT used as a basis for denying assistance to

any family.”

Since we are not a family shelter I wanted to confirm with you that we would still check this or does the wording need to be changed to say “if you are a family shelter.”

**RESPONSE:**

Confirmed; this requirement only applies to programs that serve families with minor children. Wording is updated to clarify.

1. Ashley Vaala, Lotus Community Project:

We thank you all for opening this competitive grant process to new organizations! There is a lot of consideration and changes made to give newbies a hand up. As one of those new organizations, we truly appreciate your efforts. Becoming eligible for this support is critical to our capabilities and it is a definite relief! Thank you.

1. As a new facility that is applying for grant dollars for a 2-year period, should Lotus be applying for our current capacity or for our total projected capacity? For example, we now have 25 beds but soon another facility will be vacant on our owned property with the potential to house several more individuals/families going into 2020-2021. Should we count projected capacity or current?
2. When counting eligible points, I am seeing many points we answer that we are a new project and either we don’t have the data or it doesn’t apply, how are those points received or how do we build and generate grant points with these answers? For example, under Performance, there are 32 points (the general 20 + 12 for reflection =32) with the opportunity for us to get 6 under the “New Applicant Only” section. I am calculating that there are 26 points we would check that we have never received funding and no data is available there. Again, we see this in the Budget and Grants Management section and so on. How does us marking not applicable or no data for in so much of these sections impact the 88 total points we are eligible for?
3. Also, in year 2 of this funding request (2021) we would have those numbers as we have been tracking with HMIS since the beginning of 2019, how can we showcase that for potentially more funding in year 2 of this?
4. We believe meet a good standard for our policies and procedure needs, just not the experience or evidence required in much of the application. A lot of this is due to our mentorship relationship with a more experienced agency. Thank you for recognizing the value of these partnerships of transparency in your application!

**RESPONSE:**

1. Applicants should base responses off current capacity. This is noted as a challenge of moving to two-year awards, and additional input will be sought for the next competition round for how to best account for changes in applicant capacity (increases or decreases).
2. The scoring for New Applicants without a qualifying data report has been revised, and will work as described below. (Also note, the Performance section “Reflection” question was not intended as an additional scored item, but rather as a place to summarize the results in the previous questions, with one score overall. This question has been revised for clarity.)
   1. New Applicants without a qualifying data report will skip the Performance section, also skipping those 25 points.
   2. Instead, they will complete an additional section created only for New Applicants without qualifying data reports. This section will also be worth 25 points.
   3. In the Grants Management section, there is a question about grants management history, worth 12 points. Applicants that are new and therefore have no data to report for this question will receive 0 points for this. This results in the same possible total described in the first proposed application materials of 88 points, but with a clearer path for obtaining those 88 points.
   4. New Applicants will be eligible for a total of 88 points, compared to 100 points for other applicants. Because of the formula used to determine awards, this means that New Applicants without qualifying data reports will be eligible for up to 88% of the funding that other applicants are eligible for.
3. We do not currently foresee changing the funding formula for year 2 based on new HMIS data.
4. Comments noted.
5. Charles Hill, Iowa Legal Aid:

I wanted to follow up on a change in the ESG application that you sent out. Under Section 6 there is a requirement that all clients are given an appeals process at the beginning of an intake. When we decide to represent a client, we have them sign a retainer that has our complaint/appeals process written on it. Additionally, any client that we meet with in person is given this form and they sign an investigative retainer (which also has the grievance/appeals process). However, some of our intakes come in over the phone. This is a bit different than many of the other ESG providers. If the client on the phone is given advice only, then we don’t have them sign the retainer, because they were never in the office and we also never agreed to offer legal assistance to these clients outside of the advice. If anyone on the phone is upset they were denied further assistance we do send them the appeals process which includes a written notice and right to written decision. So we are looking for clarification if we can feel confident we are complying with this new requirement. Thank you.

**RESPONSE:**

It was not the intent to introduce any new requirement regarding Termination of Assistance. The wording is updated slightly to remove the reference to clients signing at intake. Agencies should ensure they are following the applicable federal ESG rules at 24 CFR 576.402 for Terminating Assistance, which also apply to SAF.

1. Hope Metheny, YSS:
2. Community engagement 8a/b is needing more information on the peer mentor/mentee role. How are we supposed to know who would need a mentor if they have never applied for ESG/SAF funds previously? Is IFA going to provide a list of agencies that are interested in starting ESG/SAF so that the agencies will be able to reach out to those? Many of our agencies are in one specific region of the state so we don’t know who may need assistance from outside of our region, but if we know we could reach out and start conversations.
3. Budget 2d. Street outreach through YSS used to be able to apply for $50,000 through ESG grant but the way that it is worded now it would only be eligible to apply for $25,000. YSS serves the generic youth population. YSS will serve any youth through its street outreach program. Having youth services is very beneficial to youth as their minds are still developing and they are more involved with their peers in the SO setting when they can relate to those peers. I would like to see that youth general population services for Street outreach also be eligible for $50,000. Thank you for reviewing my comments.

**RESPONSE:**

1. These questions have been revised, as noted in other responses in this document.
2. This is the same limitation used for the most recent competition for the 2019 calendar year. For all categories, the eligible amount is reduced for programs that only serve a portion of persons that qualify as homeless—such as programs that only serve veterans, or victims of domestic violence, or persons with mental or physical disabilities, or youth, etc. No change for this competition, but interested in additional stakeholder feedback on this item for future competitions.
3. Kris Frakes, Institute for Community Alliances:

Thanks for sending this information. The application materials and clarity of processes continue to improve every year. I absolutely support the proposal for a 2-year competition cycle!

1. One minor observation: Re: page 15 in the Budget and Grants Management section – third paragraph, second sentence: “Subject to certain conditions, additional funding may be awarded for the 2021 year, based on the same eligible and requested amounts in this application.” Does the word “additional” refer to a potentially higher amount of funding? I don’t think this is the intent, but that is how I originally interpreted the sentence. Would the word “subsequent” or “successive” provide less room for interpretation?
2. Also, I have one suggestion/request that might help expedite the review process. Is it possible to add or link from a field to indicate whether a project is new or renewing and have this information appear on the scoring pages used by reviewers?
3. Another consideration is that maybe the question about new/renewing status could be asked once early in the application, and then responses linked in the various other sections of the application where this information is applicable. For example, if a project is new during this competition, there is no requirement that data be provided. So, in theory, the response field for data requirements/scoring could be prefilled, too.

**RESPONSE:**

1. Correct; “additional” was not meant to imply a higher amount. Wording is updated for clarity.
2. An additional section is added for New Applicants, and a question in the Performance section indicates if an applicant is new and also doesn’t have a qualifying data report to submit for the Performance section scoring.
3. The scoring for new applicants without a qualifying data report has been revised; see Question #4(b) and Response above.
4. Diane Nichols, Iowa Council on Homelessness:

Yeah, these changes are exciting!! It will allow new organizations to be eligible. I think the proposed changes look good, I do remember a few points from last year to mention:

1. Reviewers to receive the compiled report ahead of time instead of at the review meeting

2. Last year, while reviewing we realized that some should've been set to auto score. Have you denoted which ones will be auto scored ahead of time?

3. Move comments under each section rather than at the end of the whole application.

Thanks for the work you put into this.

**RESPONSE:**

Suggestions are noted for the review portion of the competition.

1. Crissy Canganelli, Shelter House:

These comments may have already been captured by the P&P C. If so, no need to duplicate.

a) Restrict SAF funds to ESG allowable activities.

b) Program Design: Reconsider #3. Instead ask applicants to verify/demonstrate active involvement in Coordinated Entry—weighted for % of individuals served from the list by the applicant?

c) Community Coordination: Delete 8a. This should be for future consideration.

d) Community Coordination: Move 8b to Threshold requirement—no points—and require a letter of support from the relevant CSR lead.

e) Budget and Grants Management: 2a-Consider creating separate categories for actual bed nights provided for the general homeless population versus actual bed nights provided for victims of domestic violence. Bed nights provided for the general homeless population should maintain a multiplier of 6 while nights provided for victims of domestic violence should be moved to 3 (the same as Transitional Housing). This would provide only a modest correction for the fact that domestic violence shelter services receive substantial funding from the State of Iowa and federal government while there are no other state or federal funds for emergency shelter services for the general population. This same approach should be made for entities that already receive ESG funds through entitlement community competitions.

f) Budget and Grants Management: 6a and 6b. Audits and Certified Reviews of Financial Statements are considered as though they are of equal rigor—they are not. Also, there is no consistency in rigor between auditing firms. Reconsider entirely the assignment of points in this area—it should be a Threshold requirement.

g) Exhibits: 6. Add a requirement for written standards for providing assistance if funded by SAF.

h) Consider elevating the requirement to demonstrate compliance with HUD’s Equal Access Rule.

**RESPONSE:**

1. Most SAF funds are already restricted to ESG allowable activities. Some allowance has been made over the years for a few activities that qualify under SAF but not ESG. Additional input is requested from stakeholders for future competitions. No change at this time.
2. The former question #3 about counties served is removed. The focus of counties served will be more about regions. Additional input is requested for future competitions about how to best incorporate Coordinated Entry results.
3. The peer mentorship questions have been revised, as noted elsewhere in this document. They are revised to eliminate the reference to an MOU with a partnering agency, language revised to focus more on grants management, and moved to the Grants Management and New Applicants Only sections.
4. 8b is moved to a new section for New Applicants, and a letter of support from the relevant Coordinated Services Lead is added.
5. The approach described in the comment is similar to the approach already taken for the RRH, HP, and Street Outreach categories. This would be a significant change in the Shelter category. Rather than changing this after the public comment period has passed, additional public comment is requested for future competitions, especially in advance of releasing draft competition materials, such as through advance consultation and discussion with the Iowa Council on Homelessness.
6. Question is removed. Agencies that have received ESG or SAF before are required to submit an Audit or Review, but item is not scored.
7. This item in the Exhibits section is revised some to include written standards for SAF.
8. The Shelter question in the Program Design section includes an item related to equal access; this is also added to the Certifications section.

Comments from Iowa Council on Homelessness Policy & Planning Committee, 5/24/2019:

1. Two year awards:

* The City of Des Moines does two-year awards; this seems to work well; they don’t release the money until they have it. Helps to budget in advance.
* Like the idea of considering two years of performance. One caveat: if allowing newer agencies, could have some challenges.
* Could do a yearly performance review/data check/monitoring report. Would be useful to make sure agencies are looking at their data.
* A local United Way does a two-year funding cycle. When they do this, still have to submit a data report and look at performance measures, persons served, outcomes, etc. Some sort of update would be helpful between the two years.
* May want to put out something to grantees to share the reasons for the two-year cycle.
* Would like more information on what the “certain requirements” are for the second year of funding.
* Overall: Support for the two-year cycle; need for some additional logistical details to be fleshed out.

**RESPONSE:**

A brief explanation for the two-year funding cycle is added. The language about meeting “certain requirements” is clarified to read “contract requirements.”

1. New agencies:

* There is a need to provide support and bring new agencies up to a certain level.
* For new agencies, would like to ensure the basic standards are being met (such as the standards developed by the Council a few years ago).
* Concern: adding more agencies takes away from the available funding for existing agencies.
* Concern about funding an agency with these funds if they haven’t completed a full fiscal year.
* Also concerned about an agency having the systems in place to meet grant requirements, if they haven’t yet completed a full year of operations. These can be complicated programs, and even experienced agencies can struggle to meet requirements.

**RESPONSE:**

A new section is added for New Applicants without a qualifying data report. New questions are added, some of which address these comments.

1. Other budget concerns:

* Concern: Millions of dollars in other types of state funding going to some agencies with specialized services such as domestic violence; money that isn’t available to the general pool of other shelters.
* Suggestion: For Shelter, could limit eligible available amount if only limited to specific population; the same as the current limits for RRH, HP, and Street Outreach.

**RESPONSE:**

This is addressed earlier in Comment 9e and Response above.

1. Applicant Profile: Question 7, Transitional Housing (TH).

* Comment: Perhaps this should no longer be allowed, as it is no longer a priority of HUD.
* Question: Could Iowa limit this, even though HUD still allows it?
* Comment: In some communities, TH may be really needed/desired. Has historically filled an important role.
* Recommendation of group: Table and review TH eligibility question for next year. Give time to research and prepare in advance. Would be a substantive change.

**RESPONSE:**

Comments noted; additional feedback would be helpful prior to the next competition.

1. Program rules applied to certain beds:

* Some agencies are taking SAF or ESG funds, and then only applying the program rules to just one or a small number of beds. Recommendation: If taking ESG or SAF funds for Shelter, should apply overall program rules to entire Shelter.
* Comment: May be happening in some cases because an agency doesn’t want to participate fully in Coordinated Entry.

**RESPONSE:**

Question 10 is added to the Applicant Profile section to address this concern.

1. Program Design, Question 3:

* Need more information on what it means to “serve” multiple counties.
* For Shelters, not as relevant.
* Or could relate more to CSR regions; more about participation in various counties?
* For Coordinated Entry, shouldn’t matter so much where someone is located. If someone is willing to relocate, then a RRH program should serve them. If doing CE appropriately.
* Concern: people coming to an area needing help; displacing people in that location who also need help.

**RESPONSE:**

This question is removed.

1. Program Design, Questions 11 and 12 (these questions changed to 10 and 11 in updated draft):

* Some really substantial heavy lifting for policy items, policies and procedures—only check-boxes, but too many points and focus on this item.
* Should an agency have to verify these items, by uploading policies and procedures?

**RESPONSE:**

No change made. These items may be monitored during in-person visits, but not required for the application at this time. May be considered for future competitions.

1. Community Coordination, Question 3: Have an agency mark all regions they participate in.

**RESPONSE:**

Change made.

1. Community Coordination, Question 4:

* Are these questions only relevant to agency leads? How about non-agency leads?
* Getting points for this incentivizes community participation.
* Do the drop-down selections need more explanation, especially for other CoCs that don’t use these same designations?
* For agencies in multiple CSRs, how would they answer this? For all?

**RESPONSE:**

The drop-down selections for Types of Contribution are revised slightly for clarity/explanation.

1. Community Coordination, Questions 8a and 8b (peer mentorship and new agencies):

* Not sure why this kind of partnership would be incentivized more than other kinds of innovative partnerships.
* Recommend: If this is an interest of the IFA, put it on list of things to discuss, but for later 2022 application phase.
* Have put a lot of time into helping other agencies, but not through a formalized MOU process.
* For not even just new agencies, some agencies already provide a lot of technical assistance to other agencies—training, sharing of policies, etc.
* Hard to add something like this in without advance notice. Even a letter of support may be hard to get from some agencies.
* Most agencies wouldn’t be eligible for these points.
* Agencies should do this on their own, but maybe not get points for doing this.
* Too much focus on new ideas and new agencies, but not enough back-up that a new agency is needed in a particular area.
* Could the need for a new agency be demonstrated in a different way? Such as through HMIS data, CE, overall strategic planning, etc.
* Want to support overall mentoring and technical assistance, but needs some rethinking on how this is incentivized.
* For a new agency, perhaps a letter of support from their local CoC or CSR would be helpful to demonstrate a need for those services.
* 8a: Would be worth having a conversation somewhere on how to provide peer mentorship in some way, and some credit for agencies that are doing this.

**RESPONSE:**

* Former Community Coordination Question 8a is changed to eliminate the reference to a formal MOU for providing peer support, reduced to three points, moved to the Budget & Grants Management section, and language updated to emphasize peer support focused on grants management. Peer support is valued, and especially important for new agencies or programs that are not experienced in managing these grants.
* A new section for New Applicants without a qualifying data report is added. A question is added about support from the local CoC or Coordinated Services Region.

1. Performance, overall section:

Good changes for outcome benchmarks—more realistic this year.

**RESPONSE:**

Noted.

1. Performance, Questions 4a and 4b:

* What about a program that is both a Family Shelter and Individual Shelter?
* What would a data report look like for this kind of program?

**RESPONSE:**

The Institute for Community Alliances analyzed all shelter projects and found no significant difference in those shelters that served only families vs families/singles. Therefore they would fall into the same category. Based on their recommendation, the language is updated to clarify between a Family or Family/Individual Shelter and Individual Only Shelter.

1. Performance, Question 8 (for legal services providers (ESG) or shelter food providers (SAF)):

* Good for a larger conversation on whether these types of programs should be eligible in the future.
* Consider narrowing down the question that pertains to legal services providers and making clear we’re only looking for the percentage where eviction was prevented or delayed—remaining permanently housed. Still won’t have the accompanying reports, but would be better. And if they are requesting funding for both HP and RRH, should include specific performance results for each one.

**RESPONSE:**

Question is revised slightly to specify that performance results should be included for every type of assistance that is requested in the application. Additional feedback would be helpful prior to the next competition.

1. Performance, Question 9:

* What is the purpose of this reflection question, for 12 points?
* Should it be spelled out more, such as, “what is this data telling you?”

**RESPONSE:**

The wording of this item is updated to better reflect its intent. Questions 4a-8 aren’t scored individually, since not all are applicable to every agency. Instead, all questions are scored together through this item.

1. Performance, Question 10:

* If no data to provide, shouldn’t earn any points. This question should be a threshold question.
* Difficult to score.
* A lot of people interested in starting shelters, but may not always be best for the system overall.
* Should need to first prove you know what you’re doing and can produce good outcomes.
* If a DV provider, costs the providers money. So could be a barrier for a new agency to be participating in DVIMS. (Although also pointed out that DV agencies are eligible for additional pools of funding that other general shelters are not.)
* If applying, should have a minimum of a year participation in HMIS or DVIMS. Also demonstrate ability to participate in other ways.

**RESPONSE:**

Additional section is added for New Applicants Only. Other comments are addressed in other areas of this document.

1. Budget Question 4: Add timeframe.

**RESPONSE:**

Revised to add a timeframe of three years.

1. General comments: Add back up more on Equal Access. May want to add in something as well about VAWA protections.

**RESPONSE:**

Equal access addressed in Comment 9(h) above. VAWA protections are included as part of Certifications.

1. Given the volume of comments and suggestions, support delaying competition timeframe if needed to make updates and changes that make sense.

**RESPONSE:**

Comment noted.