

**From:** [Robertson, Teri K](#)  
**To:** ["Lewis, Amber \[IFA\]"](#)  
**Cc:** [Garner, Shari A](#); [Severin, Tim](#)  
**Subject:** FW: FW: [EXTERNAL] Re: YSS application  
**Date:** Thursday, June 13, 2019 6:28:20 PM  
**Attachments:** [Approved Iowa Balance of State CoC & ESG RRH Program Standards.docx](#)  
[CoC Start-Up April 11.pptx](#)  
[CoC Start-Up April 18.pptx](#)

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For my processing of YSS's new RRH project, I reviewed the Iowa Balance of State Continuum's written standards for RRH. I noted some things in the BOS standards that do not meet the CoC Program regulations and/or other program requirements. The RRH standards will need to be revised to be in compliance. The issues are listed below. Please note that the ESG Program has different requirements and I did not review the RRH standards for compliance with the ESG requirements.

The first section that needs to be revised is the Definitions, Homeless (CoC-Funded) section. This section incorrectly includes Category 2 and Category 3 of the homeless definition. The Iowa BOS Continuum is not approved to use Category 3 under the CoC Program, so it is misleading to include it. CoC Program RRH projects can only serve homeless persons under Category 1 and Category 4, unless the RRH project was funded before the Homeless Definition was published and continued to serve Category 2 homeless persons (essentially "grandfathered" to serve that category, per NOFA renewal threshold requirements). Guidance that came out initially for the CoC Program included Category 2, but it was dropped via NOFAs after the Homeless Definition was published. I would refer you to HUD Headquarters prepared slides that were utilized in our recent CoC Program Start-Up Training. Specifically, see slide 13 from the first session and slide 11 from the second session (both days presentations are attached for your convenience). I would also refer you to Form 5C in esnaps RRH applications, which does not give RRH applicants the option to choose Category 2 or Category 3 populations to be served.

The second section that needs to be revised is the section on Prioritization. Under the standard, it indicates that programs will determine and prioritize which eligible families and individuals will receive assistance. Per the regulations at 24 CFR 578.7(a)(9)(iii) and (iv) (and also at 24 CFR 578.37(a)(1)(ii)(A)), the Continuum must have written standards for determining and prioritizing who receives RRH assistance, as well as the amount or percentage of rent that each participant must pay.

I also have two suggestions to help clarify the current standards. Under Program Operations, you may want to add language to item 9 that the program should set the standards for those items. Also, under Follow-up Services, I would suggest adding that the CoC Program allows up to six months of follow-up services.

Once the BOS RRH written standards are revised, would you please share them with me, so I can work with YSS on how they apply to their new project.

Please let us know if you have any questions on this.

**From:** Lewis, Amber <amber.lewis@iowa.gov>

**Sent:** Tuesday, February 26, 2019 10:51 AM  
**To:** Robertson, Teri K <Teri.K.Robertson@hud.gov>  
**Cc:** Sarah Schulman <SSchulman@yss.org>  
**Subject:** Re: FW: [EXTERNAL] Re: YSS application

Yes, Teri, the Iowa Balance of State CoC has approved written standards for CoC Rapid Rehousing; these are attached.



Amber Lewis

HOMELESS PROGRAMS MANAGER | 515.725.2209



On Tue, Feb 26, 2019 at 10:27 AM Robertson, Teri K <[Teri.K.Robertson@hud.gov](mailto:Teri.K.Robertson@hud.gov)> wrote:

One of the things that I need to work through with YSS on this grant is their understanding of what can and must be done under a RRH project. One thing is whether they are following the Continuum's written standards for RRH. Does the Iowa BOS Continuum have approved written standards yet? If so, would you please send them to me or direct me to where I can locate them. Thanks you in advance for your assistance!

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**From:** Robertson, Teri K <[Teri.K.Robertson@hud.gov](mailto:Teri.K.Robertson@hud.gov)>  
**Sent:** Monday, February 25, 2019 3:56 PM  
**To:** Sarah Schulman <[SSchulman@yss.org](mailto:SSchulman@yss.org)>; 'Toby O'Berry' <[TOBerry@yss.org](mailto:TOBerry@yss.org)>  
**Cc:** 'Lewis, Amber' <[amber.lewis@iowa.gov](mailto:amber.lewis@iowa.gov)>  
**Subject:** Re: [EXTERNAL] Re: YSS application

After further investigation, I decided that I should take a look at the application. That was good, since it ends up that it was submitted as a Transition application. As such, I need to process it quickly, as it needs to have a start date of June 1st (just like the old New Hope project). I have a lot of questions on what you are proposing, so I would like to have a conference call with all applicable YSS staff as soon as feasible. This could also impact how YSS plans to finish out or exit the 20-year commitment on the host home property in Marshalltown.

Would one of you please coordinate with other applicable staff and let me know a couple of dates/times that will work for you all to do a call?

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**From:** Sarah Schulman <[SSchulman@yss.org](mailto:SSchulman@yss.org)>  
**Sent:** Thursday, February 21, 2019 2:15:12 PM  
**To:** 'Lewis, Amber'; Robertson, Teri K  
**Cc:** Toby O'Berry; Liz Manion  
**Subject:** RE: [EXTERNAL] Re: YSS application

Thank you for your help, Amber!

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**From:** Lewis, Amber [<mailto:amber.lewis@iowa.gov>]  
**Sent:** Thursday, February 21, 2019 2:14 PM  
**To:** Robertson, Teri K <[Teri.K.Robertson@hud.gov](mailto:Teri.K.Robertson@hud.gov)>  
**Cc:** Toby O'Berry <[TOBerry@yss.org](mailto:TOBerry@yss.org)>; Liz Manion <[LManion@yss.org](mailto:LManion@yss.org)>; Sarah Schulman <[SSchulman@yss.org](mailto:SSchulman@yss.org)>  
**Subject:** [EXTERNAL] Re: YSS application

**[THIS MESSAGE IS FROM OUTSIDE THE ORGANIZATION. EXERCISE CAUTION WHEN FOLLOWING ANY LINKS THAT MAY BE INCLUDED.]**

Excellent! Thanks Teri. Glad everyone got connected that needed to be, as well.

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Amber Lewis

HOMELESS PROGRAMS MANAGER | 515.725.2209

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On Thu, Feb 21, 2019 at 2:04 PM Robertson, Teri K <[Teri.K.Robertson@hud.gov](mailto:Teri.K.Robertson@hud.gov)> wrote:

Yes, that answers my question. Thank you, Amber!!

**From:** Lewis, Amber <[amber.lewis@iowa.gov](mailto:amber.lewis@iowa.gov)>

**Sent:** Thursday, February 21, 2019 1:57 PM

**To:** Robertson, Teri K <[Teri.K.Robertson@hud.gov](mailto:Teri.K.Robertson@hud.gov)>

**Cc:** Contact <[toberry@yss.org](mailto:toberry@yss.org)>; Liz Manion <[lmanion@yss.org](mailto:lmanion@yss.org)>; Sarah Schulman <[SSchulman@yss.org](mailto:SSchulman@yss.org)>

**Subject:** Re: YSS application

Teri, last year's CoC Priority Listing submitted to HUD is attached; this really appears to show this as a reallocation. Hopefully this provides the information you need to be able to confirm this.

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Amber Lewis

HOMELESS PROGRAMS MANAGER | 515.725.2209

On Thu, Feb 21, 2019 at 1:34 PM Robertson, Teri K <[Teri.K.Robertson@hud.gov](mailto:Teri.K.Robertson@hud.gov)> wrote:

Thanks Amber! I got ahold of Sarah Schulman (Liz's replacement) and she was going to talk to Toby, but I haven't heard back. How we process the grant depends on what YSS did, so that is why I am searching for an answer.

**From:** Lewis, Amber <[amber.lewis@iowa.gov](mailto:amber.lewis@iowa.gov)>

**Sent:** Thursday, February 21, 2019 1:07 PM

**To:** Robertson, Teri K <[Teri.K.Robertson@hud.gov](mailto:Teri.K.Robertson@hud.gov)>

**Cc:** Contact <[toberry@yss.org](mailto:toberry@yss.org)>; Liz Manion <[lmanion@yss.org](mailto:lmanion@yss.org)>

**Subject:** Re: YSS application

Hi Teri,

I thought they did this through a reallocation for a new RRH project. However, I'm not especially familiar with the process for a Transition, and am a little nervous to be the final word on that. I'm cc'ing Toby O'Berry and Liz Manion from YSS in hopes they are the right people who can respond to this.

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Amber Lewis

HOMELESS PROGRAMS MANAGER | 515.725.2209

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On Thu, Feb 21, 2019 at 10:16 AM Robertson, Teri K <[Teri.K.Robertson@hud.gov](mailto:Teri.K.Robertson@hud.gov)> wrote:

I am the CPD Rep for YSS. I know that they did not renew their New Hope (IA0019) grant and they reallocated the funds for a new project that was funded. I am having a tough time connecting with them, so I am hoping you may be able to answer my question.

Did they do the new application as a Transition (changing the project component from TH to RRH) or did they do it as a reallocation for a new project?

Thank you in advance for your assistance!

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