

**Local Homeless Coordinating Board  
San Francisco Continuum of Care**

**HUD Homeless Assistance  
FY 2017 Continuum of Care  
NOFA Competition**

**Technical Assistance (TA) Handbook  
For Direct Recipient Renewal Projects**

**July 31, 2017**

## CONTEXT

The CoC Program (24 CFR part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by persons experiencing homelessness; and to optimize self-sufficiency among those experiencing homelessness.

Each year the U.S. Department of Housing and Urban Development (HUD) releases a Notice of Funding Availability (NOFA), signifying the beginning of a funding competition among approximately 450 Continuums of Care (CoC), the community stakeholder groups that guide local responses to homelessness.

The FY 2017 CoC Competition consolidated application responses to the NOFA will consist of three parts: the **CoC Application**, which describes the CoC planning body, governance structure, overall performance, and the strategic planning process; the **CoC Project Listing**, which ranks the project applications for HUD and identifies any rejected applications, showing the CoC's priorities for funding; and a number of **Project Applications**, each of which reflects one project seeking funding.

Before the application is submitted to HUD, the CoC is required to hold a local competition to determine which project applications will be included in the consolidated application, along with their relative priority. The results of the local competition dictate which projects the CoC will prioritize. This CoC Bidders Conference is intended to help projects prepare for the 2017 local competition for CoC Program funds.

As a project applicant, you must participate in the local review and rank process and have your project selected for submission with the CoC consolidated application in the national competition in order to be eligible for funding. You must follow local procedures and submit local documents, and you also need to prepare for the HUD submission of the project application. HUD requires the use of a web-based application and grants management system called e-snaps.

The materials provided at this meeting will guide you in preparing your applications. This TA Handbook contains information you need to know for the HUD process, and the Local Materials packet provided contain information about the local process in this community.

There are three things to keep in mind when preparing your application:

1. Ensuring your application is competitive for funding in your CoC's local competition
2. Ensuring the project you are applying for is eligible for HUD funding and compliant with HUD requirements, and
3. Ensuring your application is filled out correctly.

Of these three, the local materials provided today will answer any questions you have about number 1, and this TA Handbook will answer the other two. **Designing Your Project** and **Program Requirements** sections speak to HUD eligibility and requirements. **Completing an Application in HUD's Web-Based Application System: e-snaps** will help you ensure your application is filled out correctly.

## HOW TO USE THIS TA HANDBOOK

This handbook is written to be a reference guide for recipient and subrecipient staff that are completing the project application or participating in project implementation. While you are welcome to read this document front to back, you may find it most useful to start from the Table of Contents.

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## SUMMARY: 2017 NOFA COMPETITION OVERVIEW AND FUNDING AVAILABLE

On July 14, 2017, the U.S. Department of Housing and Urban Development (HUD) released a Notice of Funding Availability (NOFA) for the McKinney-Vento Continuum of Care Homeless Assistance Grants for FY 2017. In 2017, the San Francisco CoC expects to be eligible to apply for approximately \$33,375,591 in funding to support housing and services for homeless households, and approximately \$944,592 for CoC Planning Funds.

**Annual Renewal Demand Funding:** \$31,486,407

This funding supports the CoC's existing housing and services. The CoC has the option to **continue to support** those programs, **or to reallocate** those resources, in whole or in part, to Permanent Supportive Housing, DedicatedPLUS, Rapid Rehousing, Joint TH-RRH, HMIS, or Coordinated Entry (SSO) projects. (Details regarding eligible populations follows.)

**Permanent Housing Bonus Funding:** \$1,889,184

This funding supports Permanent Supportive Housing, DedicatedPLUS, Rapid Rehousing, or Joint TH-RRH projects. (Details regarding eligible populations follows.)

**CoC Planning Funds:** \$944,592

This funding supports CoC planning activities, and only the collaborative applicant, the San Francisco Department of Homelessness and Supportive Housing (HSH), may apply for it. **The planning grant will not be ranked in this year's competition and is not competitive with housing or service projects.** As such, this Handbook does not include information about applying for planning grants.

**Anticipated Tier 1 Amount:** \$29,597,223

**Anticipated Tier 2 Amount:** \$3,778,368

**In 2017, funds are NOT available for:**

- Emergency shelter
- Homelessness prevention projects
- New transitional housing (except when joint with rapid rehousing)
- New supportive service only projects (except coordinated assessment)

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## A. RANKING AND TIERS EXPLAINED

As in past years, the funding that CoCs can apply for is divided into tiers, with projects prioritized in Tier 1 being more likely to be funded than projects of lower priority that are placed in Tier 2.

CoCs are required to either accept and rank or reject all projects submitted by project applicants in e-snaps, except CoC planning projects. CoCs are encouraged to consider the policy priorities established in the NOFA in conjunction with local priorities to determine the ranking of projects. All projects must pass HUD's eligibility and threshold requirements to be funded, no matter their priority.

### TIER 1

In 2017, the amount of funding available for Tier 1 is equal to the greater of the combined amount of Annual Renewal Amount for all permanent housing and HMIS projects eligible for renewal up to \$1,000,000, or 94 percent of the CoC's FY 2017 Annual Renewal Demand (ARD) (in 2016 it was 93 percent; in 2015 it was 85 percent). HUD will conditionally award projects from the highest scoring CoC to the lowest scoring CoC. Projects should be placed in priority order.

### TIER 2

The amount of funding available for Tier 2 is equal to the difference between Tier 1 and the CoC's Annual Renewal Demand plus the amount available for the Permanent Housing Bonus. Funding will be determined by the point value of each project application based on a 100-point scale. All Tier 2 projects will be funded in point order.

Tier 2 points are awarded as follows:

- **CoC Score:** Up to 50 points in direct proportion to the CoC score
- **CoC Ranking:** Up to 40 points for the CoC's ranking of the project application(s), with the points spread evenly across the Tier 2 funding amount. Higher ranked projects get more points, however, the formula used to award points gives a disincentive for large projects.
- **Commitment to Policy Priorities:** Up to 10 points for Housing First commitment
  - For Permanent Housing: Will receive points based on how the project commits to applying the Housing First model
  - Homeless Management Information System and Supportive Services Only for Coordinated Entry System projects: Will automatically receive 10 points
  - Transitional Housing, Joint TH-RRH, and other Supportive Services Only projects: Will receive points based on how the project demonstrates that it is low-barrier, prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions to entry (such as sobriety or a minimum income threshold).
- **NOTE:** HUD removed the scoring factor for project type in Tier 2, and no longer includes any priority for permanent housing projects, HMIS, or Coordinated Entry projects in Tier 2.

## STRADDLING TIERS

For any projects that straddle the two tiers, the Tier 1 portion will be funded in accordance with Tier 1 processes and the Tier 2 portion will be funded in accordance with Tier 2 processes. HUD may award project funds for just the Tier 1 portion, provided the project is still feasible with the reduced funding (i.e., is able to continue serving homeless program participants effectively).

## RECLASSIFICATION

Because new joint TH-RRH and permanent housing projects may be created by reallocation or permanent housing bonus amount, HUD may reclassify projects a CoC has submitted as a bonus project to reallocation (and vice versa) if CoC has exceeded the amount allowable for the submitted funding type. If that were to occur, it may impact ranking and result in lower priority projects not being funded. Your CoC's project applications, and the CoC Application and its attachments, will be reviewed carefully to avoid this occurring in this CoC.

## PLANNING COSTS

As in past years, applications for planning costs will be unranked. CoCs may only submit one application for CoC planning costs and it must be submitted by the Collaborative Applicant that is listed on the CoC Applicant Profile in e-snaps. HUD will conditionally select all CoC planning projects that pass eligibility and threshold review.

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## B. BEFORE APPLYING FOR A COC GRANT

This Handbook gives an overview of the CoC requirements and this funding opportunity. To ensure a comprehensive understanding and compliance with all CoC requirements, all applicants should read and be familiar with:

- The FY2017 CoC NOFA
- The CoC Program Interim Rule and
- The FY2017 General NOFA.

Links to each of these documents can be found in the Resources section at the end of this Handbook.

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## C. HIGHLIGHTS OF THE 2017 NOFA THAT WILL AFFECT GRANT RECIPIENTS

- **Expanded Program Eligibility and Project Types:** HUD is allowing certain projects, including both new and renewal projects, to serve broader populations. HUD also created a new project type- Joint TH and PH-RRH Component Projects. These expansions are discussed in detail under Eligible New Project Types below.
- **No leverage:** No leverage again this year!
- **Easier Form Completion:** Renewal project applicants (for grants that have renewed at least once) may submit their renewal project applications with no changes on select screens and budget forms have been simplified. This change should speed application processes for applicants and review by HUD staff. In addition, most of the mandatory

attachments in the Applicant Profile (e.g. HUD-2880, SF-LLL, HUD-50070) have been moved to *e-snaps* as fillable forms that only require a checkbox certification with the project applicant's authorized representative information.

- **Easier Project Expansion:** New this year, HUD is simplifying the process to expand existing projects. HUD allows project applicants to apply for a new expansion project under the reallocation process or permanent housing bonus in order to expand existing eligible renewal projects, and if both projects are funded, they will be contracted with a single grant agreement.
- **New Lobbying Form:** Federal agencies require the submission of a signed Certification Regarding Lobbying to ensure applicants acknowledge the requirements in Section 319 of Public Law 101-121, 31 U.S.C. 1352, (the Byrd Amendment) and 24 CFR part 87 before receiving a federal award. These statutes and regulation prohibit the use of federal award funds for lobbying the executive or legislative branches of the Federal government in connection with a specific award. This requirement is different and separate from the requirement for applicants to report lobbying activities using the SF-LLL form. The SF-LLL form must still be submitted by applicants that lobby or intend to lobby using non-federal funds. The only applicants excepted from submitting the Certification Regarding Lobbying form are federally-recognized Indian tribes because of each tribe's sovereign power. This form has also been hard-coded in *e-snaps* for project applicants and will need to be completed and certified in *e-snaps* before you have access to the actual project application.
- **Codes of Conduct:** All applicants must have a current HUD-approved Code of Conduct. Most organizations' Codes of Conduct were removed from HUD's website in early 2017, as they did not meet the requirements of 2 CFR part 200. If you do not see your organization on the list on the [Code of Conduct for HUD Grant Programs](#) page on HUD's website, be sure to attach a current and complete Code of Conduct to your Project Applicant Profile in *e-snaps*.
- **Program Regulation Apply When Amended:** The grant agreements will be subject to the program regulation as it may be amended from time to time. Recipients will be subject to regulatory revisions as they come into effect, without having to wait until the grant is renewed in a future competition.
- **2017 FMRs Will Apply:** Because the CoC Consolidated Application is due prior to the publication of the final FY 2018 FMRs, the FY 2017 FMRs will be used for funding amounts.
- **Environmental Requirements:** Two important changes for projects categorized or Categorically Excluded from review under the National Environmental Policy Act and not subject to 24 CFR 58.5 (CENST):
  - All scattered-site projects where program participants choose their own unit and are not restricted to units within a pre-determined specific project site or sites are categorized in 24 CFR 58.35(b)(1) as CENST. This now includes both tenant-based rental assistance and tenant-based leasing projects where program participants choose their own unit. Previous guidance included only Tenant Based Rental Assistance as eligible CENST projects.



- The [Exempt/CENST](#) form is only required for each project, not every unit. Previous guidance instructed recipients to complete an Exempt/CENST form for each unit.

## DESIGNING YOUR PROJECT

### I. HUD'S HOMELESS POLICY AND PROGRAM PRIORITIES

All projects should align with HUD's policy and program priorities, both to increase their likelihood of being funded in this cycle and to ensure that the funding is a good match for the project in the future. CoCs and Project Applications will be evaluated based on the extent to which they further HUD's policy priorities. Aligned with *Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness*, the policy priorities set forth in the NOFA are:

#### 1. Ending homelessness for all persons.

- a. CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
- b. CoCs should measure their performance based on local data taking into account challenges faced by subpopulations.
- c. CoCs should have a comprehensive outreach strategy to identify and continuously engage all unsheltered individuals and families.
- d. 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.
- e. CoCs should use the reallocation process to create new projects that improve their overall performance and better respond to their needs.

#### 2. Creating a systemic response to homelessness.

- a. CoCs should be using system performance measures such as the average length of homeless episodes, rates of return to homelessness, and rates of exit to permanent housing destinations to determine how effectively they are serving people experiencing homelessness.
- b. CoCs should be using 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.

#### 3. Strategically allocating and using resources.

- a. Using cost, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness.
- b. CoCs should review project quality, performance, and cost effectiveness.
- c. HUD also encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness.
- d. CoCs should review all projects eligible for renewal in FY 2017 to determine their effectiveness in serving people experiencing homelessness as well as their cost effectiveness.

**4. Use a Housing First approach.**

- a. CoC Program funded projects should help individuals and families move quickly into permanent housing, and the CoC should measure and help projects reduce the length of time people experience homelessness.
- b. CoCs should engage landlords and property owners, remove barriers to entry, and adopt client-centered service methods.

## II. ELIGIBLE NEW PROJECT TYPES

New projects may apply for one of two funding streams:

- Reallocation of funding for renewal projects or
- Permanent Housing Bonus funding.

Requirements, eligibility, amounts and processes differ for the two types of funding, so potential applicants should consider both carefully. However, new permanent housing projects will be evaluated using the same criteria regardless of whether the CoC has identified them as bonus or reallocation projects.

### A. NEW PROJECTS CREATED BY REALLOCATION

The CoC may **reallocate funds from renewal projects to be used for:**

1. New permanent supportive housing projects where 100 percent of the beds are dedicated to chronically homeless individuals and families
2. DedicatedPLUS permanent supportive housing projects (**new this year**)
3. New rapid re-housing to serve homeless individuals and families, including unaccompanied youth, who are
  - a. residing in a place not meant for human habitation;
  - b. residing in an emergency shelter;
  - c. persons meeting the criteria of paragraph (4) of the definition of homeless, including persons fleeing or attempting to flee domestic violence situations;
  - d. residing in a transitional housing project that was eliminated in the FY 2017 CoC Program Competition (**new this year**);
  - e. residing in transitional housing funded by a Joint TH and PH-RRH component project (**new this year**); or
  - f. receiving services through a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system (**new this year**)
4. Joint TH and PH-RRH component projects, which will include transitional housing and permanent housing-rapid rehousing in a single project to serve individuals and families experiencing homelessness, including victims of domestic violence (**new this year**)
5. New dedicated Homeless Management Information System (HMIS) project (can only be carried out by the HMIS lead)
6. New Supportive Services Only (SSO) project to develop or operate a centralized or coordinated entry system

There is no guarantee that reallocated funding will be available, but it may be if one or more renewal projects decides not to apply or is not selected by the Panel.

New this year, CoCs may only reallocate eligible renewal projects that have previously been renewed under the CoC Program or projects funded under the Supportive Housing Program (SHP) or Shelter Plus Care (S+C) Program that are eligible for first-time renewal in the FY 2017

CoC Program Competition. **This indicates that CoC projects renewing for the first time cannot be reallocated. More information may be released by HUD.**

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## B. NEW PERMANENT HOUSING BONUS PROJECTS

The CoC can apply for funds for new Permanent Housing Bonus projects that may be used for:

1. New permanent supportive housing projects where 100 percent of the beds are dedicated to chronically homeless individuals and families
2. Dedicated PLUS permanent supportive housing projects (**new this year**)
3. New rapid re-housing to serve homeless individuals and families, including unaccompanied youth, who are
  - a. residing in a place not meant for human habitation;
  - b. residing in an emergency shelter;
  - c. persons meeting the criteria of paragraph (4) of the definition of homeless, including persons fleeing or attempting to flee domestic violence situations;
  - d. residing in a transitional housing project that was eliminated in the FY 2017 CoC Program Competition (**new this year**);
  - e. residing in transitional housing funded by a Joint TH and PH-RRH component project (**new this year**); or
  - f. receiving services through a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system (**new this year**)
4. Joint TH and PH-RRH component projects, which will include transitional housing and permanent housing-rapid rehousing in a single project to serve individuals and families experiencing homelessness, including victims of domestic violence (**new this year**)

Bonus projects will be ranked with other projects, not funded separately.

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## C. EXPANSION PROJECTS THROUGH REALLOCATION OR PH BONUS

New this year, HUD is simplifying the process to expand existing projects. HUD allows project applicants to apply for a new expansion project under the reallocation process or permanent housing bonus in order to expand existing eligible renewal projects that will increase the number of units in the project, or allow the recipient to serve additional persons. Project applicants that intend to submit a new reallocation or permanent housing bonus project for the purposes of expanding an eligible renewal project must:

- provide the eligible renewal grant number that the project applicant requests to expand on the new project application;
- indicate how the new project application will expand units, beds, services, persons served, or in the case of HMIS projects, how the current HMIS grant activities will be expanded for the CoC's geographic area; and

- ensure the funding request for the new expansion project is within the funding parameters allowed under the reallocation process or permanent housing bonus (i.e., not a request for transitional housing).

If both the new expansion project and the renewal it expands are conditionally selected for funding, **one grant agreement incorporating both project applications will be executed**. If the renewal project application is not conditionally selected for funding, the expansion project application will not be selected.

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## D. OVERVIEW OF ELIGIBLE NEW PROJECT TYPES

### 1. PERMANENT SUPPORTIVE HOUSING FOR CHRONICALLY HOMELESS PEOPLE (BONUS OR REALLOCATION)

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- Project must serve exclusively (100%) chronically homeless individuals and/or households with children (see “Eligible Project Participants: Who Can Be Served?” section of this manual, page 24).
- Grant funds may be used for (see “Eligible Costs to Inform Project Design” section of this manual, page 22):
  - Acquisition
  - Rehabilitation
  - New Construction
  - Leasing
  - Operations
  - Rental Assistance
  - Supportive Services
  - HMIS
  - Indirect Costs
  - Administration
- Project should use a “Housing First” approach in its design. Housing First is a model of housing assistance that is offered without preconditions (such as sobriety or a minimum income threshold) or service participation requirements, and rapid placement and stabilization in permanent housing are primary goals.
- Projects are prohibited from discriminating against chronically homeless families with children.
- Housing may be single site or scattered sites, and can be integrated with affordable or market-rate units.
- Services must be offered. Services may vary depending on residents’ needs.
  - Project may, but do not have to, require participating in non-disability related services. (Disability-related services include but are not limited to mental health services, outpatient health services, etc.)
  - Substance abuse treatment projects may require participation in substance abuse treatment services as a condition of continued participation in the project.

- Lease is required; must be renewable, for a term of at least one year, and terminable only for cause.

## 2. DEDICATEDPLUS (BONUS OR REALLOCATION)

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- **DedicatedPLUS project** is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless youth, that at intake are:
  - experiencing chronic homelessness as defined in 24 CFR 578.3;
  - 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;
  - residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
  - 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 prior to entering the project;
  - residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; **or**
  - 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.
- While the eligible populations are more expansive for DedicatedPLUS, as a permanent supportive housing (PSH) project the other project design considerations listed under PSH for Chronically Homeless People still apply.

## 3. RAPID RE-HOUSING (BONUS OR REALLOCATION)

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- Grant funds may be used for (see “Eligible Costs to Inform Project Design” section of this manual, page 22):
  - Short term (up to 3 months) and/or medium-term (3-24 months) tenant-based rental assistance
  - Supportive services
  - HMIS
  - Indirect Costs
  - Administration
- Lease is required; must be renewable, for a term of at least one year (regardless of the length of assistance provided), and terminable only for cause.
- Project must:
  - Limit rental assistance to no more than 24 months per household.

- Limit supportive services to no more than 6 months after rental assistance stops.
- Re-evaluate at least once per year whether the project participant continues to lack the resources and support networks necessary to retain housing without CoC assistance.
- Offer supportive services (may include any eligible CoC Program supportive service). Project participants should have access to a wide array of supportive services designed to help them retain stable, long-term housing.
- Require project participants to meet with a case manager at least monthly. *(Project is exempt if the Violence Against Women Act or the Family Violence Prevention and Services Act prohibit the recipient from making housing conditional on the participant's acceptance of services.)*
- Follow CoC written policies for:
  - Determining and prioritizing eligible families
  - Determining the amount or percentage of rent that each project participant must pay
- Project may (if aligned with written standards adopted by the CoC in consultation with ESG recipients in the CoC's geographic area and administered consistently across all projects):
  - Set a maximum amount or percentage of rental assistance that a project participant may receive.
  - Set a maximum number of months (up to 24 months) that a project participant may receive rental assistance.
  - Set a maximum number of times that a project participant may receive rental assistance.
  - Require project participants to share in the costs of rent.

#### 4. JOINT TH AND PH-RRH (BONUS OR REALLOCATION)

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- **Joint TH and PH-RRH component** projects may be created to better serve homeless individuals and families. The Joint TH and PH-RRH component project includes two existing program components—transitional housing and permanent housing-rapid rehousing—in a single project to serve individuals and families experiencing homelessness.
- Grant funds may be used for (see “Eligible Costs to Inform Project Design” section of this manual, page 22):
  - Capital costs (i.e., new construction, rehabilitation, or acquisition), leasing of a structure or units, and operating costs to provide transitional housing;
  - Short term (up to 3 months) and/or medium-term (3-24 months) tenant-based rental assistance
  - Supportive services
  - HMIS
  - Project administrative costs.



- When a program participant is enrolled in a Joint TH and PH-RRH component project, the recipient or subrecipient must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all participants.
- A program participant may choose to receive only the transitional housing unit or the assistance provided through the PH-RRH component, but the recipient or subrecipient must make both types of assistance available.
- At a minimum, project should:
  - Use a Housing First approach with client-driven service models and a focus on helping people move to permanent housing as quickly as possible – participants cannot be required to participate in treatment or services to receive assistance;
  - Have low barriers to entry and accommodate people with possessions, partners, pets, and other needs;
  - Incorporate client choice by helping participants find permanent housing based on their unique strengths, needs, preferences, and financial resources – participants will choose when they are ready to exit the crisis housing portion of the project and move to permanent housing, with providers assisting participants with this move.
  - Provide or connect participants to resources that help them improve their safety and well-being and achieve their goals; and
  - Target and prioritize people experiencing homelessness with higher needs and who are most vulnerable, especially those who are unsheltered, have experienced long or multiple episodes of homelessness, have higher barriers to exiting homelessness, and are more likely to be victims of violence or harm.

## 5. DEDICATED HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) (REALLOCATION ONLY)

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- HUD requires each CoC to designate an information system to comply with data collection requirements. HMIS supports CoC functioning, reporting and recordkeeping, centralized or coordinated assessment, and performance measurement.
- Grant funds may be used for (see “Eligible Costs to Inform Project Design” section of this manual, page 22):
  - HMIS
  - Indirect Costs
  - Administration
- The CoC’s HMIS Lead Agency is the only agency that can apply for this funding.

## 6. SSO PROJECT FOR A CENTRALIZED OR COORDINATED ASSESSMENT SYSTEM (REALLOCATION ONLY)

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- Centralized or coordinated assessment system is defined to mean a centralized or coordinated process designed to coordinate program participant intake, assessment,

and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.

- Grant funds may be used for (see “Eligible Costs to Inform Project Design” section of this manual, page 22):
  - Supportive services
  - Indirect Costs
  - Administration.

### III. RENEWAL PROJECTS DESIGN REQUIREMENTS

To be eligible for renewal funding:

- The application must be approved by the CoC for submission in this NOFA.
- The applicant must have an executed grant agreement by December 31, 2017, and the current grant must expire between January 1 and December 31, 2018.
- The applicant must be the entity that signed the expiring grant agreement with HUD.

The list of potential projects eligible for renewal in FY 2017 for our CoC is provided as a separate handout and is referred to in this Handbook as the Grants Inventory Worksheet or GIW. The total request for each renewing project may not exceed the amount HUD approved for that project on the GIW.

#### Consolidation

HUD encourages the consolidation of renewal grants when the grants are with the same recipient, have the same component and expire in the same year, however, projects that have not yet been consolidated must submit separate project applications for individual renewal grants. Consolidation can occur at grant agreement execution, with some limitations.

#### A. HIGHLIGHTS OF CHANGES IN THE FY2017 NOFA FOR RENEWAL PROJECTS

- Renewal project applicants (for grants that have renewed at least once) may submit their renewal project applications with no changes on select screens and have simplified budget screens. This change should speed application processes for applicants and review by HUD staff.
- A renewal project that is permanent supportive housing 100% dedicated to chronically homeless people 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.
- A renewal project that is rapid rehousing is not required to continue to serve only those participants who were in a rapid rehousing category when the project was initially funded. Therefore, if a renewing rapid rehousing project was originally funded to serve only families with children, that project, through the FY 2017 project application, may indicate it will also serve individuals if it so chooses.

#### B. ELIGIBLE RENEWAL COSTS

All renewal projects must submit an application that reflects the same costs and amounts as are listed on the Grant Inventory Worksheet for that grant. Those costs may include:

- Leasing
- Rental assistance
- Operating costs

- Supportive services
- HMIS
- Indirect Costs
- Administration

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### C. THRESHOLD REQUIREMENTS

HUD assumes renewal projects meet project eligibility and quality threshold requirements because of previously approved grant applications, unless information to the contrary is received (e.g., monitoring findings, results from investigations by the Office of Inspector General, the recipient routinely does not draw down funds from eLOCCS at least once per quarter, consistently late APRs.). Eligibility threshold is determined on a pass/fail basis, and **if standards are not met, the project will be rejected from the competition.**

In addition, however, renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards identified in this NOFA or they will be rejected from consideration for funding.

When considering renewal projects for award, HUD will review information in eLOCCS; Annual Performance Reports (APRs); and information provided from the local HUD/CPD Field Office, including monitoring reports and A-133 audit reports as applicable, and performance standards on prior grants, and will assess projects using the following criteria on a pass/fail basis:

- Whether the project applicant’s performance met the plans and goals established in the initial application as amended
- Whether the project applicant demonstrated all timeliness standards for grants being renewed, including that standards for the expenditure of grant funds have been met
- The project applicant’s performance in assisting program participants to achieve and maintain independent living and record of success, except HMIS-dedicated projects are not required to meet this standard; and
- Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site.

HUD reserves the right to reduce or reject a funding request from the project applicant for the following reasons:

- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon
- Audit finding(s) for which a response is overdue or unsatisfactory
- History of inadequate financial management accounting practices
- Evidence of untimely expenditures on prior award
- History of other major capacity issues that have significantly affected the operation of the project and its performance
- History of not reimbursing subrecipients for eligible costs in a timely manner, or at least

- quarterly; and
- History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

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#### D. FUNDING LEVELS & LIMITS

Each year's Notice of Funding Availability (NOFA) will state how the renewal amount is to be calculated. This year, these rules apply:

- Eligible renewal projects requesting rental assistance are permitted to request a per-unit amount less than the Fair Market Rent (FMR), based on the actual rent costs per unit (but not more than). This will help to reduce the number of projects receiving rental assistance that have large balances of unspent funds remaining at the end of the operating year. Renewal project applicants must ensure that the amount requested will be sufficient to cover all eligible costs as HUD cannot provide funds beyond what is awarded through the competition.
- HUD will adjust leasing, operating, and rental assistance budget line items based on changes to the Fair Market Rents (FMR). All adjustments will be made prior to award announcement. Because the application deadline falls in FY2017, HUD will use FY2017 FMRs.
- To request increased funding to a higher level of services/housing than the previous grant, the applicant must submit a **new** application for any proposed expansion and renewal application to renew the existing project. (The only new applications for funding accepted will be those described earlier in this document, Section II.D.)
- If the recipient has a subrecipient, it is required to share at least 50% of project administrative funds with its subrecipient(s).

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#### E. FUNDING TERM

- All renewals are eligible to apply for one year of renewal funding.

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#### F. MATCH REQUIREMENT

- See "Other Resources" section of this manual for more detail.

#### IV. ELIGIBLE COSTS TO INFORM PROJECT DESIGN

Information about eligible costs under each line item can be found in the CoC Program Interim Rule, 24 CFR 578. A useful version of the CoC Program Interim Rule can also be found at: [https://www.hudexchange.info/resources/documents/CoCProgramInterimRule\\_FormattedVersion.pdf](https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf)

If you would like a document that clarifies eligible costs in an easy-to-read format, please contact your HomeBase Local Team member and one will be provided to you.

**NOTE: Projects often have additional limitations beyond those in the Interim Rule, due to their project design or the NOFA under which they were originally funded.**

A few things to highlight because they have **changed in recent years** include:

- Program income can be used at match. Program income must always be used for eligible activities under the grant. **New this year**, project applicants that intend to use program income as match must provide an estimate of how much program income will be used for match.
- Non-profit organizations have permanent authority to administer rental assistance projects for permanent housing projects.
- Tenant-based Rental Assistance is rental assistance in which program participants choose housing of an appropriate size in which to reside, and certain households with domestic violence experience have been able to retain the assistance outside the CoC's area. As of last year, other program participants may also choose housing outside the CoC's geographic area. If the recipient is able to meet all CoC requirements in the area where the participant chooses housing. If unable to meet the requirements, the recipient may refuse to permit the participant to retain TBRA if the participant moves outside of the geographic area.
- Indirect costs (also known as "facilities and administrative costs" defined at 2 CFR 200.56) are eligible under the CoC Program, and if the applicant does not have an approved federally negotiated indirect cost rate, the applicant may use a de minimis rate of 10 percent of Modified Total Direct Costs. (See call out box on next page for more detail.)

Also remember:

- Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible supportive services costs. Some limited training is eligible under administrative costs, however.
- Administrative costs do not include staff and overhead costs directly related to carrying out other eligible activities (e.g., rental assistance), because those costs are eligible as part of those activities.
- Time spent preparing the annual application to HUD is **not** an eligible use of CoC funds.

## INDIRECT COSTS

Indirect costs (also known as “facilities and administrative costs” defined at 2 CFR 200.56) are those costs incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect costs. Indirect cost pools should be distributed to benefited cost objectives on bases that will produce an equitable result in consideration of relative benefits derived. Refer to 2 CFR 200.413 and 200.414 for additional information on determining if costs charged to the award are direct or indirect.

Applicants selected for funding pursuant to this NOFA may charge indirect costs to the award.

Applicants with an approved federally negotiated indirect cost rate must submit with their application a copy of their approved Indirect Cost Rate Proposal to substantiate their request.

Applicants that do not have an approved federally negotiated indirect cost rate may charge a maximum rate of 10 percent of Modified Total Direct Costs. 2 CFR 200.414(f) states that nonfederal entities that have never received a negotiated indirect cost rate (except a governmental department or agency unit that receives more than \$35 million in direct Federal funding) may elect to charge a de minimis rate of 10 percent of Modified Total Direct Costs, which may be used indefinitely. If chosen, this methodology must be used consistently for all federal awards until the entity chooses to submit an indirect cost rate proposal and negotiate for a rate.

If an applicant chooses to negotiate for an indirect cost rate, the applicant must contact the designated cognizant agency for indirect costs. For information about cognizant agencies for indirect cost rates, see 2 CFR 200.19.

**V. ELIGIBLE PROJECT PARTICIPANTS: WHO CAN BE SERVED?**

All HUD CoC funding programs require that participants be homeless. However, different project types have different requirements for who is homeless and who is eligible.

While some of the categories below identify a certain subpopulation of homeless people who projects MUST serve exclusively, this does not mean the subpopulation may not be served by another project that is not limited to that population. However, HUD indicates that for any PSH beds, chronically homeless people within the specified subpopulation should be prioritized for entry.

**As always, what governs is your grant agreement.**

- **If your grant agreement limits who you can serve beyond the limitations here, that is the population you must serve.**
- **New project applicants may also have stricter limitations on who they are eligible to serve than what is included here.**
- **This section of the Handbook is included to orient you to the Program Rules, not the obligations that apply to your specific grant.**

**Key to abbreviations:**

**PSH** = permanent supportive housing  
**RRH** = rapid rehousing  
**SH** = Safe Haven  
**TH** = transitional housing  
**SSO** = supportive services only  
**CH** = Projects funded under the Samaritan Bonus for chronically homeless individuals or other projects serving only chronically homeless people

**HEARTH Definition Categories**

**Cat 1** = Shelter, Streets, etc.  
**Cat 2** = Imminently At Risk of Homelessness  
**Cat 3** = Families/youth homeless under other Federal statutes  
**Cat 4** = Homeless due to domestic violence, etc.

**Who Is “Homeless”?**

	<b>PSH<sup>#</sup></b>	<b>RRH</b>	<b>SH</b>	<b>TH<sup>@</sup></b>	<b>SSO</b>	<b>CH</b>
Living in places not meant for human habitation: cars, parks, sidewalks, and abandoned buildings	X Cat 1	X Cat 1	X Cat 1	X Cat 1	X Cat 1	X Cat 1
Living in emergency shelter or government/charity-funded motel (emergency voucher)	X Cat 1	X Cat 1	X Cat 1	X Cat 1	X Cat 1	X Cat 1

<sup>#</sup> New PSH for CH projects funded under the FY2017 CoC NOFA must comply with the CH column. New DedicatedPLUS projects have a slightly expanded definition of homelessness to apply from the CH column (see Section II.D.2, page 13).

<sup>@</sup> Joint TH and PH-RRH Component projects funded under the FY2017 CoC NOFA have similar eligibility requirements to a TH or RRH project in this chart.



	PSH <sup>#</sup>	RRH	SH	TH <sup>@</sup>	SSO	CH
Living in a Safe Haven (as defined by HUD)	X Cat 1	X Cat 1	X Cat 1	X Cat 1	X Cat 1	X Cat 1
Lived in one of the above places but temporarily – for no more than 90 days– in an institution	X Cat 1	X Cat 1	X Cat 1	X Cat 1	X Cat 1	X Cat 1
Living in Transitional Housing for homeless people and originally came from the streets or emergency shelter	X Cat 1	X* Cat 1	X Cat 1	X Cat 1	X Cat 1	
Living in Transitional Housing for homeless people and DID NOT originally come from the streets or emergency shelter	Limited to Cat 4			X Cat 1	X Cat 1	
Being evicted within fourteen days and no subsequent residence has been identified and lacks resources and support network to access housing		X* Cat 2		X Cat 2	X Cat 2	
Unaccompanied youth under 25 or families with children homeless under other Federal statutes and who have not had a lease/ownership/occupancy agreement for past 60 days, have moved 2+ times in past 60 days, and will continue being unstably housed because of one of several conditions/situations (e.g. chronic disabilities, employment barriers, etc.)		X* Cat 3 (if have special HUD approval)		X Cat 3 (if have special HUD approval)	X Cat 3 (if have special HUD approval)	
Fleeing domestic/dating violence, sexual assault, stalking, etc. and no other residence has been identified and lacks resources and support network to access housing.  <b>In the 2015 NOFA, HUD clarified that persons fleeing or attempting to flee human trafficking, including sex trafficking, qualify under this category.</b>	X Cat 4 but from streets, ES, SH, or TH (or institutions less than 90 days)	X Cat 4		X Cat 4	X Cat 4	X Cat 4 but see chronically homeless below

### Other Eligibility Requirements for CoC Project Participants

\* New RRH projects funded under this FY2017 CoC NOFA may not serve persons living in TH (unless the TH project was eliminated in the FY2017 CoC Program Competition, or the TH is funded by a Joint TH and PH-RRH component project); persons being evicted within fourteen days (Category 2); or youth/families homeless under other Federal statutes (Category 3).

	PSH	RRH	SH	TH	SSO	CH
<p>Must be disabled (physically, mentally, emotionally, developmentally, due to alcohol and/or drugs, or due to HIV/AIDS):</p> <ul style="list-style-type: none"> <li>• Long-continuing or indefinite duration</li> <li>• Substantially impedes ability to live independently</li> <li>• Of a nature that would be improved by suitable housing</li> </ul> <p>(See the full definition of disability below.)</p>	X	May serve	X	May serve	May serve	X
<p>Must live alone, suffer from serious mental illness and other debilitating behavioral conditions, live on the streets, and have been unwilling or unable to participate in supportive services.</p>	May serve	May serve	X	May serve	May serve	May serve
<p>Must be chronically homeless, defined as: A homeless individual, or a family with an adult head of household (of if no adult, a minor head of household) with a disability (see "Persons with Disabilities" defined below) who:</p> <ul style="list-style-type: none"> <li>• Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; AND</li> <li>• Has been homeless in such place for at least 12 months OR on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights</li> </ul> <p>Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but are included in the 12-month total.</p>	May serve	May serve	May serve	May serve	May serve	X

**People in the following situations are NOT homeless:**

- In housing, even though they are paying an excessive amount for their housing, the housing is substandard and in need of repair, or the housing is crowded;
- Living with relatives or friends;
- Living in a Board and Care, Adult Congregate Living Facility, or similar place;
- Being discharged from an institution (after a stay of 90 consecutive days or more); or
- Utilizing Housing Choice Vouchers, except Katrina evacuees that received Katrina Disaster Housing Assistance Program (KDHAP) Housing Choice Vouchers

## FREQUENTLY ASKED QUESTIONS: WHO IS HOMELESS?

*With regard to the final rule on the definition of homeless, does the condition that “The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance” apply when an individual or family who is living with someone is told they need to move out in a week?*

Yes, as long as they meet all of the other requirements of category 2 of the homeless definition. The second category of the definition of homeless includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent. It also includes individuals and families who are living in hotels and motels that they are paying for using their own resources. Any individual or family who will lose their housing within 14 days – including those who are within one week of losing their housing – who have not identified a subsequent residence, and who lack the resources or support networks needed to obtain other permanent housing, qualifies as “homeless” under category 2 of the homeless definition.

*With regard to the final rule on the definition of homeless, are all individuals and families that are currently residing in transitional housing programs now eligible for permanent supportive housing?*

No, not all individuals and families currently residing in transitional housing will be eligible for permanent supportive housing. Permanent housing projects must continue to abide by the limitations and requirements included in the NOFA under which they were funded, including the limitation on eligibility. For example, projects funded in the FY2016 CoC Competition must continue to abide by the limitation on Permanent Supportive Housing set forth in the NOFA in Section V.G.2.b(4), which states, "The only persons who may be served by any non-dedicated permanent housing beds are those who come from the streets, emergency shelters, safe havens, institutions, or transitional housing. Homeless individuals and homeless families coming from transitional housing must have originally come from the streets or emergency shelter. Homeless individuals and families with a qualifying disability who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life threatening conditions and are living in transitional housing, are eligible for permanent supportive housing even if they did not live on the streets, emergency shelters, or safe havens prior to entry in the transitional housing. Persons exiting institutions where they resided for 90 days or less and came from the streets, emergency shelter, or safe havens immediately prior to entering the institution are also eligible for permanent supportive housing."

*Are youth who are within 14 days of exiting the foster care system who have not identified other permanent housing and have no other resources or support networks to obtain permanent housing defined as homeless under Category 2 of the definition of homeless?*

No. Youth who are within 14 days of exiting the foster care system who have not identified other permanent housing and who have no other resources or support

networks to obtain permanent housing are not defined as homeless under Category 2 of the definition of homeless. This is different than how HUD operationalized eligibility for Transitional Housing and Supportive Service Only projects under the Supportive Housing Program.

The HEARTH Act amendments changed the definition of homeless for HUD's Homeless Assistance programs and HUD began implementing the changes through the FY2011 Homeless Assistance Grants Program competition. In most instances, the definition was broadened; however, in this one instance, the definition was narrowed.

The statutory language in Section 103(5), which HUD further clarified through the regulations, defines as homeless, "An individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided." Through the regulation, HUD further clarified that individuals exiting systems of care, including institutions and foster care, are no longer defined as homeless if they have resided there for more than 90 days and were not previously living on the streets or in emergency shelter prior to entering the institution or system of care. This means that unaccompanied youth being emancipated from the foster care system are not defined as homeless under Category 1, unless they are residing on the streets or in an emergency shelter at the point of intake. Additionally, HUD has determined that individuals exiting institutions, or systems of care, are not defined as homeless under paragraph (2) of the definition of homeless even if they are within 14-days of discharge and no subsequent residence has been identified. This means that unaccompanied youth who are being emancipated from the foster care system are not defined as homeless under Category 2, and are therefore not eligible for those projects that serve Category 2 in the CoC Program.

#### **Definition of "Persons with Disabilities":**

- A person shall be considered to have a disability if he or she has a disability that:
  - Is expected to be long-continuing or of indefinite duration;
  - Substantially impedes the individual's ability to live independently;
  - Could be improved by the provision of more suitable housing conditions; and
  - Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury.
- A person will also be considered to have a disability if he or she has a developmental disability.<sup>1</sup>

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<sup>1</sup> Developmental disability means, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002): (1) A severe, chronic disability of an individual that—

- (i) Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- (ii) Is manifested before the individual attains age 22;
- (iii) Is likely to continue indefinitely;
- (iv) Results in substantial functional limitations in three or more of the following areas of major life activity:
  - (A) Self-care;
  - (B) Receptive and expressive language;
  - (C) Learning;
  - (D) Mobility;
  - (E) Self-direction;

- A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).
- The term person with disabilities also includes, except in the case of the SRO component,
  - Two or more persons with disabilities living together,
  - One or more such persons living with another person who is determined to be important to their care or well-being, and
  - The surviving member or members of any disabled household who were living, in a unit assisted with CoC funds, with the deceased member of the household at the time of his or her death. (The right to rental assistance under this part will terminate at the end of the grant period in which the deceased member was a participant.)

Key to the definition of disability is determining that the impairment is of long-continued or indefinite duration and **substantially impedes** the person’s ability to live independently. For example, drug or alcohol abuse that does not substantially impede a person’s ability to live independently **does not** qualify as a disability.

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(F) Capacity for independent living;  
 (G) Economic self-sufficiency; and

(v) Reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

(2) An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of the definition of “developmental disability” if the individual, without services and supports, has a high probability of meeting those criteria later in life.

## PROGRAM REQUIREMENTS

### VI. OTHER RESOURCES

#### A. MATCH

Recipients and subrecipients are required to provide cash or in-kind match from sources outside of this grant funding request in accordance with the CoC regulations.

- The recipient or subrecipient must match all grant funds, except for leasing funds, with no less than **25 percent** of funds or in-kind contributions from other sources. The 25 percent match must be provided on a grant-by-grant basis.
- **Cash Match:** A recipient or subrecipient may use funds from any source, including any other federal sources (excluding Continuum of Care program funds), as well as State, local, and private sources, provided that funds from the source are not statutorily prohibited to be used as a match. (The recipient must ensure that the rules governing match funds allow them to be match for the CoC Program.)
  - **The cash must be used for activities that are eligible under Subpart D of the CoC Interim Rule.**
  - **NOTE: Program income CAN be used as match.** Project applicants that intend to use program income as match must provide an estimate of how much program income will be used for match.
- **In-kind Match:** The recipient or subrecipient may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that, if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible.
  - Before grant execution, services to be provided by a third party must be documented by a memorandum of understanding (MOU) between the recipient or subrecipient and the third party that will provide the services.
    - Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization.
    - The MOU must establish the unconditional commitment, except for selection to receive a grant, by the third party to provide services, the specific service to be provided, the profession of the persons providing the service, and the hourly cost of the service to be provided.

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## B. LEVERAGE

In the past, having letters indicating financial support (“leverage letters”) for its projects improved the CoC’s score in the national competition. In 2017, as in 2016, the CoC is not scored on the amount of leverage it submits and leverage documentation is not required as part of the project application.

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## C. DOCUMENTATION OF MATCH

Applicants are required to document all match commitments for HUD. Documentation must be dated between May 1, 2017 and September 28, 2017.

The following pages provide a form for documentation and potential sources of match. The agency may write a letter instead of using the chart on the following page, but the letter must include each of the pieces of information represented.

In the project application, projects must list the type of source and the value of each match commitment, but will NOT be required to attach the match letter. The match information entered in e-snaps should be based on the current commitments at the time of project application, covering the requested grant operating period, and NOT based on projections. The application should be accurate, with a commitment letter(s) in place that includes the amount(s) listed.

## D. FORM OF MATCH LETTER

[This must be on the letterhead of the entity providing the resource.]

In the chart below is information regarding the resource being provided by this agency.

Name of organization providing the resource	
Type of contribution*	
Value of the contribution**	
Name of project	
Name of grant recipient and/or subrecipient	
Date the contribution will be available***	[____], 2018 <u>OR</u> [____], 2019
Name of person authorized to commit these resources	
Title of person authorized to commit these resources.	
Signature of person authorized to commit these resources.	
Date	Must be dated between May 1 and September 28, 2017

\* E.g., cash, childcare, case management, health care, etc.

\*\* If possible, identify the formula and values used in calculating the value.

\*\*\* **For renewals, this date must be within your 2018-2019 operating year.**



## E. EXAMPLES OF OTHER RESOURCES

### **Advocacy**

Assistance to immigration  
Benefits advocacy  
Housing advocacy  
Legal assistance, advocacy, representation, and referrals  
Peer advocacy  
Tenant rights workshops

### **Children**

After-school children's program  
Child development consultation  
Child care services  
Children's books, loaned television, videos, art supplies as available, training, tickets for special events  
Children's art program  
Children's books  
Children's circus program  
Children's holiday party and shopping spree  
K-12 homeless education  
Parenting classes  
Summer camp  
Therapeutic day Care  
Weekly children's art program

### **Counseling**

Bereavement counseling and pastoral services  
Counseling services  
Crisis intervention  
Landlord/tenancy counseling  
Pre-treatment counseling, support groups, counseling, and housing assistance  
Recovery groups  
Support groups  
Therapy

### **Education, Employment and Training**

After school and associated summer school activities  
Aftercare services  
Basic computer skills classes and individual tutoring for residents and graduates  
Benefits and Work Incentive Workshops  
Computer literacy training

Employment and training services  
Education/courses  
Education Counseling  
ESL  
Job development and employment services  
Job research  
Job placement  
Job retention  
Leadership training  
Life skills training  
Literacy  
Nutrition education/cooking classes  
School supplies for children  
Sewing classes  
Training tuition  
Training videos and games  
Transitional housing  
Tutoring  
Uniform vouchers  
Vocational services

### **Financial Services**

Asset/resource management services  
Money management  
Representative payee services

### **Health**

Acupuncture services  
Adult day health care  
AIDS-related services  
Dental screening services  
Detoxification services  
Dual diagnosis services  
Emergency room services  
Gynecological services  
Health care resources and education  
Healthcare services  
Medical services  
Medical, psychiatric and pharmacy services  
Medication support  
Mental health services  
Peer support  
Pregnancy testing  
Preventative Health Care Services  
Psychiatric disability evaluations  
Psychotherapy  
Residential and outpatient treatment services  
Respite care

Substance abuse services  
Triage

### **Housing**

Construction loans cash match  
Emergency motel vouchers  
Emergency shelter  
Financial move in grants, housing search support and monthly housing clinics  
Housing  
Housing placement  
Housing search assistance  
Leasehold value of building  
Maintenance and repair projects/beautification project  
Move-In assistance  
Property management  
Rental assistance and financial assistance for move-in costs  
Rental subsidies

### **Human Resources**

Americorps VISTA Volunteers  
Advertising  
Applicant interview  
Consultation staff  
Mental health advocacy staff  
New employee orientation  
Pre-Employment process  
Volunteer hours

### **In-Kind**

Cash/Grants  
Clothing  
Equipment  
Food  
Furnishings  
Household items  
Welfare benefits

### **Operations**

Administrative support  
Clerical services  
Consulting and practical support  
Facility Space  
Indirect Expenses  
Mail service

Office/workshop space  
Programming  
Voice mail

### **Supportive Services**

Artistic services to residents  
Assessment services  
CalWORKS eligibility support  
Case management  
Community development  
Family Support Services  
Grooming  
Independent living services  
Mentoring services  
Outreach  
Recreational trips and activities  
Referrals  
Restraining order assistance, court accompaniment and consultation  
Shelter services  
Story telling  
Support services supervision  
Team Leader  
Technical assistance  
Translation services  
Veteran's services assistance  
YMCA membership & joining fees  
Transportation  
Subsidized/free bus passes  
Transportation  
Vehicle

## VII. LATER RESPONSIBILITIES FOR RECIPIENTS AND SUBRECIPIENTS

If your application is conditionally awarded, you will have a number of responsibilities. **Please be sure that you are capable of carrying all of them out before submitting your application.** The list that follows includes some of the recipient/subrecipient responsibilities. For 2017, these requirements are detailed in the 2017 General Section NOFA, 2017 CoC Program NOFA, and the CoC Interim Program Rule (24 CFR 578). **All grant recipients and subrecipients should read these three documents carefully.**

### A. NEW PROJECTS

- **Pre-Contract Requirements:**
  - Proof of site control, match, environmental review, and the documentation of financial feasibility must be completed within 12 months of the announcement of the award, or 24 months in the case of funds for acquisition, rehabilitation, or new construction. The 12-month deadline may be extended by HUD for up to 12 additional months upon a showing of compelling reasons for delay due to factors beyond the control of the recipient or subrecipient.
  - **Use Covenants:** All grants of funds for acquisition, rehabilitation or new construction require recordation of a HUD-approved use and repayment covenant requiring operation of the program for 15 years.
  - **Environmental Review:** All grants for acquisition, rehabilitation, conversion, leasing, repair, disposal, demolition, or construction must demonstrate that the project site is free of hazardous materials that could affect the health and safety of the occupants.
  - **Section 3 Compliance:** Projects using housing assistance funding for housing rehabilitation (including reduction and abatement of lead-based paint hazards, but excluding routine maintenance, repair and replacement) or housing construction, are subject to Section 3 of the Housing and Urban Rehabilitation Act of 1968.
  - **Building Codes:** Housing and facilities constructed or rehabilitated with assistance under this part must meet State or local building codes, and in the absence of State or local building codes, the International Residential Code or International Building Code (as applicable to the type of structure) of the International Code Council
  - **Other like requirements** (e.g., lead based paint, environmental requirements, real property acquisition and relocation, etc.)

### B. ALL PROJECTS

- **Annual Audits:** Any recipient expending \$750,000 or more in a year in Federal Funds must conduct a single or program-specific audit for that year in accordance with the provisions of OMB Circular No. A-133.
- **Reporting:**

- **Annual Performance Reports (APR):** Your agency will be responsible for submitting an APR for each project every year, which provides client data, service utilization information, program outcomes, and financial information. HUD may terminate the renewal of any grant and require repayment if the APR is not filed on time or if HUD deems the APR unacceptable or showing noncompliance with grant requirements
- **Record-keeping:** Recipients must maintain records and within the timeframe required, make any reports, including those pertaining to race, ethnicity, gender, and disability status that HUD may require. CoC applicants may report this data as part of their APR submission to HUD.
- **Transparency Act:** Award notices may also include requirements for sub-award reporting in compliance with the requirements of the Federal Financial Assistance Accountability and Transparency Act of 2006 (Pub. L. 109-282) (Transparency Act) and Section 872 of the Duncan Hunter National Defense Authorization Act for Fiscal Year 2009 (Pub. L. 110-417)
- **Impact/Success Indicators:** All projects, except for HMIS, must provide systematic indicators for evaluating the positive impact/success the project will have on clients and reducing homelessness in the community. HUD will require projects to include measures for: length of time in the project; recidivism; movement to and stability in permanent housing; connection with mainstream benefits; and job and income growth for persons who are homeless. Projects may also indicate additional measures on which the project will chart success.
- **Other Data Requests:** Your agency must provide performance and other requested data to the CoC for community-level analysis and planning.
- **Match Documentation:** Your agency must maintain documentation of any required match funding in your financial reports on a grant-specific basis.
- **HMIS Participation:** Your agency must participate in the CoC's Homeless Information Management System and enter data consistent with the applicable HMIS Data Standards.
- **Performance:** Your agency must perform the tasks outlined in your application and grant agreement, including complying with all of the language in the Applicant Certifications, and following all HUD statutes and regulations applicable to the grant.
- **Documentation of Homeless Status and Disability Status:** HUD requires all recipients to document the homeless status, and in some cases the disability status, for all clients.
- **Housing Related Requirements:** HUD required recipients to ensure: compliance with HQS, that housing is appropriate to the needs of the persons served, suitable dwelling size, and that housing rental amount is within HUD's guidelines.
- **Service Related Requirements:** Supportive housing programs must provide meals or meal preparation facilities, and residential supervision. All programs must provide ongoing assessment of supportive services.

- **Fair Housing:** HUD requires compliance with requirements related to Fair Housing and Equal Opportunity, Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity, and Resolution of Outstanding Civil Rights Matters. This includes outreach to underserved populations, including those with Limited English Proficiency.
- **Calculation of Client Rent:** HUD determines the amount of rent that can be charged to clients, and recipients must show documentation of rental calculations.
- **No program fees:** Recipients and subrecipients may not charge program participants program fees.
- **Policies:** All CoC recipients are required to institute certain policies including: participant participation, grievance procedures, due process for participant termination, staff rules, emergency safety and evacuation procedures, confidentiality restrictions, non-discrimination, free from religious influences, conflict of interest, anti-lobbying, drug-free workplace, etc.
- **State and Local Requirements:** Services provided with CoC program funds must be provided in compliance with all applicable State and local requirements, including licensing requirements.
- **Mainstream Resources:** You must coordinate and integrate your program with other mainstream health, social services and employment programs for which your clients may be eligible
- **Prevention and Discharge Planning:** Any governmental entity serving as an applicant must agree to develop and implement to the maximum extent practical and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care other youth facilities, or corrections programs and institutions) in order to prevent such discharge from immediately resulting in such persons entering the homeless system.
- **Coordination with Educational Agencies:** Any program serving homeless families will have to certify that their programs will establish policies and practices that are consistent with, and do not restrict the exercise of rights provided by the education subtitle of the McKinney Vento Act and other laws relating to the provision of education and related services to individuals and families experiencing homelessness. They must also designate a staff person to ensure that children are enrolled in school and connected to appropriate services within the community.
- **Limited English Proficiency:** Recipients and subrecipients must comply with Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency (LEP)”
- **Ethics:** Recipients and subrecipients must not be debarred or suspended, not have delinquent federal debts, conduct business in accordance with core values and ethical standards/code of conduct.

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### C. TIMELINESS

All projects must adhere to certain timeliness standards in order to receive this funding.

- Recipients conditionally awarded funds in the 2017 CoC funding round must be obligated by September 30, 2019 and spent by September 30, 2024. However, grant terms and timeliness standards may require shorter timelines.
- Recipients must draw down funds at least once per quarter of the program year, after eligible activities commence.
- See also “Timeliness” under “New Project Basic Design Requirements”

## COMPLETING AN APPLICATION IN HUD'S WEB-BASED APPLICATION SYSTEM: E-SNAPS

HUD requires application submission through the web-based e-snaps system. The e-snaps website is [www.hud.gov/esnaps](http://www.hud.gov/esnaps). To get started in e-snaps, follow the steps below.

### A. FIRST THINGS FIRST: TRAINING MODULES

**Please review the HUD Training Modules BEFORE accessing e-snaps or attempting to enter data. They may save you time since they offer very detailed instructions and very useful tips.**

They can be accessed on this webpage:

<https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources/>

**The following e-snaps Training Materials are available:**

#### General Resources

- e-snaps Features and Functions Resource
- Adding and Deleting Registrants in e-snaps Resource
- Updating the Applicant Profile Resource
- Creating a Zip File and Capturing a Screenshot Resource
- DUNS Number and SAM Resource

#### CoC Program Competition- Project Applicants

- Project Applicant Authorized Representative Update Resource
- Project Applicant Profile Instructional Guide
- Project Transfers Resource
- New Project Application Instructional Guide
- Renewal Project Application Instructional Guide
- Budgets - Project Application Instructional Guide

## B. STEPS TO COMPLETING YOUR PROJECT APPLICATION

1. Enter e-snaps by logging in to <http://www.hud.gov/esnaps>, using your prior user name and password or, if your agency has not used e-snaps before, by establishing a new account. (See “Project Applicant Profile Instructional Guide” training module for guidance, if you will be the grant recipient, or ask your proposed grant recipient, if you will be the subrecipient.)
2. Recipients should complete the Applicant Profile (see the next section of this Handbook “Recipient Documents” for guidance). **DO NOT ATTEMPT TO GO DIRECTLY TO YOUR PROJECT APPLICATION.** If you get there, there is likely a mistake and you will probably have to retrace your steps.
3. Once you have established your agency as an applicant with the Applicant Profile, you can initiate your Project Application(s). Although you only need one Applicant Profile per agency (in almost all cases), you will need to complete a Project Application for each project.
  - a. **NEW THIS YEAR:** Renewal project applicants (for grants that have renewed at least once) may submit their renewal project applications **with no changes** on select screens.
4. Do NOT hit submit on your application until after the local competition when you’ve been instructed to do so!

**Remember:** There is a local competition preceding the national competition. You must complete a local application in tandem with this one. Please see the local competition materials for more information.

### Some e-snaps tips:

- Your agency must have at least one person on staff who is able to access and enter data into e-snaps. It is preferable to have two, but having more than two can lead to confusion and errors.
- e-snaps is the HUD system; it is the channel through which your application(s) will be transmitted to HUD at the end of the competition. It is NOT the system for the local competition. Information regarding submission of your application materials can be found in your local competition materials.
- The e-snaps system is not always user-friendly or glitch-free. It is likely that you will encounter some problems along the way. Do not hesitate to contact your HomeBase Local Team members if you have problems with e-snaps. That said, many problems can be avoided by following the instructions closely and relying upon the Training Modules and by using the correct browser.



### **Short List of All Attachments to e-snaps**

Each applicant completes, in e-snaps, an applicant profile (the SF-424 Application for Federal Assistance) and then a project application for each project. This list summarizes the other documents that need to be uploaded to e-snaps. **All must be dated between May 1, 2017 and September 28, 2017.**

**NEW THIS YEAR**, applicants are no longer required to upload the following forms as attachments, and instead will complete the following HUD forms as screens directly in e-snaps:

- Form HUD-2880, Applicant/Recipient Disclosure/Update Report
- Form HUD-50070, Certification for a Drug-Free Workplace
- SF-LLL, Disclosure of Lobbying of Activities (if applicable, for non profits only)
- Certification Regarding Lobbying (new form)

#### **Attached to Applicant Profile**

- Applicant Code of Conduct (not required if listed on HUD website, **see below for more information about this requirement in 2017**)
- Nonprofit Documentation of Applicant Eligibility (for non-profits only; e.g., 501(c)(3) letter)
- Survey on Equal Employment Opportunity (for non-profits; optional)
- (Only if applicant is requesting indirect costs AND has an approved federally negotiated indirect cost rate) Approved Indirect Cost Rate Proposal

**If your project expends funds in the geographic area of one or more other CoCs, please talk to HomeBase Local Team as an additional attachment may be required.**

#### **Attached to Project Application**

- Documentation of Subrecipient Eligibility (e.g., 501(c)(3) letter)

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## C. RECIPIENT DOCUMENTS & APPLICANT PROFILE

**Please note: Before you can access the online location where you complete the Project Application, you must complete and submit the Applicant Profile and related documents.**

### 1. GENERAL INSTRUCTIONS

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Review the following training modules at <https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources/> when you are completing the Applicant Profile on e-snaps

- Updating the Applicant Profile Resource
- Project Applicant Profile Instructional Guide

**Follow the training modules precisely.  
They can be very helpful, but must be used slide by slide.**

**Information in this handout supplements the training modules by providing the local information you need to complete the forms. Use both side by side.**

#### Tips:

- The "Complete" button on the Applicant Profile must be selected within the timeframe of the competition period. Therefore, when you log in the first time during this NOFA period, even if there is a statement "This e.Form has been marked as complete," you **MUST** put the forms in edit-mode (select the Edit button on the Submission Summary page), revise the Profile (you must make at least one change and save it, even if you then change it immediately back), and select the "Complete" button again.
- **Complete one Applicant Profile per applicant only (NOT one per project).**
  - If you are applying for a new project and a renewal project, you will need to register for multiple funding opportunities within your Applicant Profile.
  - If you have multiple funding opportunities, make sure to create the project application under the correct Funding Opportunity name.
- Complete the Applicant Profile on e-snaps at [www.hud.gov/esnaps](http://www.hud.gov/esnaps)
- All required attachments must be uploaded before the Project Applicant will be able to access the Project Application. Please make sure all attachments are current before submitting your application. **Per the 2017 NOFA, all attachments must contain accurate and complete information and be dated between May 1, 2017 and September 28, 2017.**
- To upload attachments, the steps for most documents are:
  - Download the form from HUD's website
  - Complete and save the form on your computer
  - Upload that document when completing the Applicant Profile in e-snaps

## 2. PAGE 2. ORGANIZATION INFORMATION: CCR & DUNS

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- You need to have a DUNS number and complete or renew your registration on the System for Award Management (SAM) (the successor to CCR) to enter into a grant agreement with HUD. The Dun and Bradstreet website is [www.dnb.com](http://www.dnb.com). The SAM website is [www.sam.gov](http://www.sam.gov). According to a HomeBase Local Team review of the SAM website, the following agencies have active registrations:

## 3. PAGE 4. ADDITIONAL INFORMATION: CONGRESSIONAL DISTRICTS AND CODE OF CONDUCT

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### 1. Indicate applicant's congressional districts:

The congressional districts in this CoC include:

- CA-12\_\_
- CA- 14\_\_

### 4. Is the applicant's code of conduct already on file with HUD?

**Background:** Applicants are required to develop and maintain a written code of conduct. Consistent with regulations governing specific programs, your code of conduct must prohibit real and apparent conflicts of interest that may arise among officers, employees, or agents; prohibit the solicitation and acceptance of gifts or gratuities by your officers, employees, or agents for their personal benefit in excess of minimal value; and outline administrative and disciplinary actions available to remedy violations of such standards.

Simply stated, the Code of Conduct:

- Must prohibit the solicitation and acceptance of gifts or gratuities by officers, employees, and agents for their personal benefit in excess of minimal value;
- Outline administrative and disciplinary actions available to remedy violations of such standards,
- Describe the method to be used to ensure that all officers, employees and agents of the organization are aware of the Code of Conduct, and
- Must be written on company letterhead that provides a mailing address, authorized official name, and telephone number.

All applicants for HUD funding must have a Code of Conduct on file with HUD. An applicant is prohibited from receiving an award of funds from HUD if it fails to meet this requirement for a Code of Conduct.

**Answering this question in the Applicant Profile:** An applicant who previously submitted an application and included a copy of its code of conduct **will not** be required to submit another copy if

- The applicant is listed on HUD’s Web site:  
<http://www.hud.gov/offices/adm/grants/codeofconduct/cconduct.cfm>, **and**
- If the information (e.g. name of organization, authorized official) has not been revised.

**Most organizations’ Codes of Conduct were removed from HUD’s website in early 2017**, as they did not meet the requirements of 2 CFR part 200, and the organizations were notified by another HUD office that a new Code of Conduct must be submitted. Be sure to review the [Code of Conduct for HUD Grant Programs](#) page on HUD’s website to ensure your organization is listed which means you have submitted an approved Code of Conduct.

***If Not Listed***

An applicant not listed on the website must submit a copy of its code of conduct with its FY2017 application for assistance.

If you need to submit a copy of your code of conduct, it must include:

<b><i>Applicant Letterhead</i></b>	
	<p>A cover on applicant letterhead including:</p> <ul style="list-style-type: none"> <li>- The name and title of the responsible official;</li> <li>- Mailing address;</li> <li>- Business telephone number; and</li> <li>- Email address</li> </ul>
<b><i>Conflict of Interest Provisions</i></b>	
	<p>The Code of Conduct must prohibit real and apparent conflicts of interest that may arise among officers, employees or agents, or any member of his or her immediate family, his or her partner or an organization that employs any of the indicated parties. For the CoC Program:</p> <ul style="list-style-type: none"> <li>• No Continuum of Care board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.</li> <li>• No covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.</li> </ul>
<b><i>Organizational Conflict of Interest Provisions</i></b>	
	<p>If applicable, the Code of Conduct must also cover organizational conflicts of interest.</p>

	<ul style="list-style-type: none"> <li>• For the CoC Program, an organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or subrecipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under the CoC program, or when a covered person's (meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients) objectivity in performing work with respect to any activity assisted with CoC funds is or might be otherwise impaired. Such an organizational conflict would arise when a board member of an applicant participates in decisions of the applicant concerning the award of a grant, or provision of other financial benefits, to the organization that such member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations under § 578.49(b)(2) and § 578.51(g) and housing quality inspections of property under § 578.75(b) that the recipient, subrecipient, or related entity owns.</li> </ul>
<b>Unlawful Procurement Standards</b>	
	<p>The Code of Conduct must prohibit the solicitation and acceptance by employees of gifts or gratuities in excess of minimum value. Officers, employees, or agents are prohibited from soliciting or accepting gifts or gratuities in excess of minimum value.</p>
<b>Unlawful Procurement Sanctions</b>	
	<p>If the officers, employees, or agents, or by contractors or their agents fail to comply with the code of conduct, this will result in penalties, sanctions, or other disciplinary actions. The Code of Conduct must provide for administrative and disciplinary actions to be applied for violations of such standards.</p>

***If Revised Information***

An applicant must also include a copy of its code of conduct if the information listed on the above website has changed, e.g.,

- The person who submitted the previous application is no longer your authorized organization representative,
- The organization has changed its legal name or merged with another organization, or
- The address of the organization has changed.

***Post-award***

Before entering into an agreement with HUD, an applicant awarded assistance under a HUD program NOFA will be required to submit a copy of its code of conduct and describe the methods it will use to ensure that all officers, employees, and agents of its organization are aware of its code of conduct.

**4. FIRST FORM/ATTACHMENT: HUD FORM 2880: APPLICANT/ RECIPIENT DISCLOSURE/UPDATE REPORT**

A Project Applicant is **required** to complete HUD form 2880 to complete the Applicant Profile. **New this year**, this form is completed as a screen in e-snaps rather than as an

uploaded attachment.

**Background on 2880s:** HUD must provide CoC assistance in accordance with HUD subsidy layering requirements in section 102 of the Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545) and 24 CFR part 4, subpart A. An applicant must submit information in its application on other sources of governmental assistance that the applicant has received, or reasonably expects to receive, for a proposed project or activities. HUD’s review of this information is intended to prevent excessive public assistance for proposed project or activities by combining (layering) assistance under this program with other governmental housing assistance from federal, State, or local agencies, including assistance such as tax concessions or tax credits.

**Completing the form:**

- Most of the information (Applicant name, EIN, address) will autopopulate from other portions of the Project Applicant Profile and the project applications (once completed)(e.g. 4. *Amount of HUD Assistance Requested/Received* will be populated from the Applicant’s Summary Budget screen for each application upon completion.)
- **PART I, Question 2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of \$200,000 during this fiscal year (Oct. 1 - Sep. 30)?** Within the Project Applicant Profile, select “Yes” if the **combined total amount of all your agencies annual CoC Program project applications are more than \$200,000**. Select “No” if the combined total amount of all your agencies annual CoC project applications are \$200,000 or less. If the answer is “No,” Part II and Part III of the form will not appear and the form can be submitted after the “I agree” checkbox is selected. If “Yes” is selected Part II and Part III of the form will appear and must be completed.
- **If Yes to Question 2:**
  - **Part II. Other Government Assistance and Expected Sources and Uses of Funds.**
    - **A. Other Government Assistance.** Project applicants and recipients must report any other government assistance involved in the project. "Other government assistance" is defined to include any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance from the Federal government (other than that requested from HUD in the CoC Program project application), a State, or a unit of general local government, or any agency or instrumentality thereof, that is, or is expected to be made, available with respect to the project (grant) for which the assistance is sought.
    - **B. Non-Government Assistance.** Note that the applicant and recipient disclosure report must specify all expected sources and

uses of funds—both from HUD and any other source—that have been or are to be, made available for the project. Non-government sources of funds typically include (but are not limited to) foundations and private contributors.

- **Part III. Interested Parties.** Project applicants must provide information on:
  - 1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity; and
  - 2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).

## 5. SECOND FORM/ATTACHMENT: CODE OF CONDUCT

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If you determined you need to update or upload a Code of Conduct earlier in the Applicant Profile (see above) this is the screen where you upload it.

## 6. THIRD FORM/ATTACHMENT (FOR NON-PROFITS) NON-PROFIT DOCUMENTATION

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### ***Where is it?***

In your agency's records.

### ***What is it?***

- A copy of the IRS ruling providing tax-exempt status under section 501(c)(3) of the IRS Code; or
- Documentation showing that the applicant/sponsor is a certified United Way agency; or
- A certification from a licensed CPA that no part of the net earnings of the organization inures to the benefit of any member, founder, contributor, or individual; that the organization has a voluntary board; that the organization practices nondiscrimination in the provision of assistance; and that the organization has a functioning accounting system that provides for each of the following (mention each in the certification):
  - (a) Accurate, current and complete disclosure of the financial results of each federally sponsored project.
  - (b) Records that identify adequately the source and application of funds for federally sponsored activities.
  - (c) Effective control over and accountability for all funds, property and other assets.
  - (d) Comparison of outlays with budget amounts.
  - (e) Written procedures to minimize the time elapsing between the transfer of funds to the recipient from the U.S. Treasury and the use of the funds for program purposes.

- (f) Written procedures for determining the reasonableness, allocability and allowability of costs.
- (g) Accounting records, including cost accounting records, which are supported by source documentation.
- Letter from authorized state official showing applicant as organized and in good standing as a public nonprofit organization

#### 7. FOURTH FORM/ATTACHMENT (FOR NON-PROFITS) SURVEY ON ENSURING EQUAL OPPORTUNITIES FOR APPLICANTS (SF-424 SUPP)

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This form is for non-profits only. The form to download and complete on your computer can be found at:

<https://www.hudexchange.info/resources/documents/Survey-on-Ensuring-Equal-Opportunity-for-Applicants.pdf>

#### 8. REGISTER FOR PROJECT APPLICATION FUNDING OPPORTUNITY

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The final steps before you begin your Project Application are registering for the funding opportunity. Follow the instructions in the Project Application training module.

### D. COMPLETING THE PROJECT APPLICATION

***Please Note:***

- The following instructions provide guidance about completing the forms, not describing an eligible project. Please review the materials earlier in this Handbook regarding eligible costs and eligible participants.
- Project applications differ depending if they are for new or renewal projects, and the type of project (e.g., leasing, rental assistance, services). This handbook **includes a selection of the common questions project applicants generally have trouble answering, but does not include all questions** on the applications. At the same time, if a question listed here is not part of your application, it does not necessarily mean there is a problem because it likely only applies for another project type. We have tried to note when questions only apply for certain project types.
- Renewal projects should reflect the information on the CoC's Grant Inventory Worksheet (GIW). You can find that document in your local competition materials. New projects are not reflected on the GIW and their responses should just reflect their proposal.
- HMIS, SSO (including Coordinated Entry), and Planning Grant questions are not included in this section of the Handbook, however many of the questions below are also part of the HMIS, SSO, and Planning applications. Please see the appropriate Detailed Instructions for completing those grant applications.



**There are several important changes in e-snaps for renewal applications this year:**

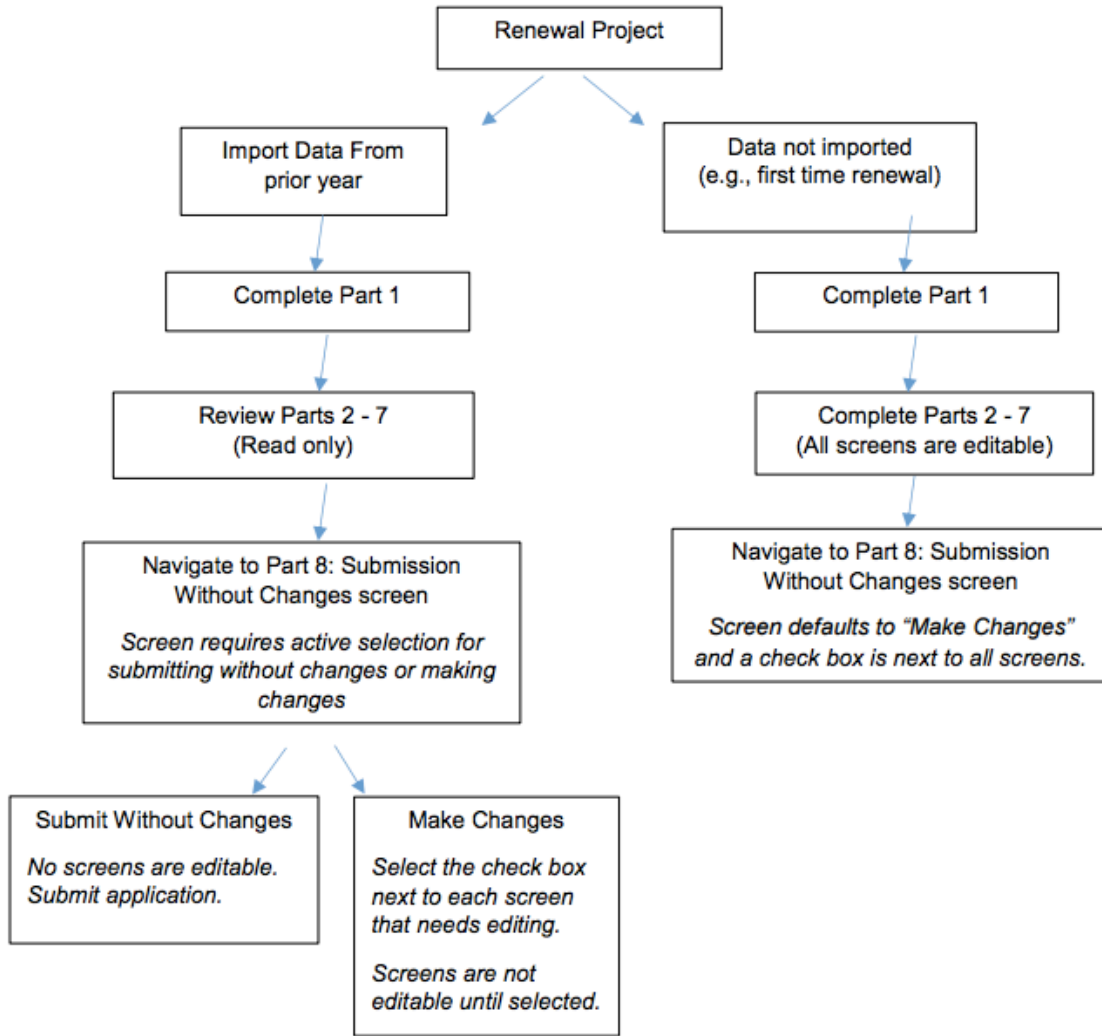
- Part 1 of the application has new screens in e-snaps that were previously uploaded as attachments (HUD 2880, HUD form 50070, and SF-LLL). A new form about lobbying is also being added, but it will also be completed in e-snaps.
- **Detailed budgets are no longer required** for leased structures, supportive services, operating, or HMIS budgets. HUD expects the details in the current grant agreement (as amended) will be the baseline amounts for renewal application grant amounts. It is the responsibility of the project application to ensure, if conditionally awarded renewal funds, that funds will only be expended on eligible costs as outlined for each Budget Line Item (BLI) in 24 CFR part 578 which will be verified during HUD monitoring.
- **To save you time in application writing and HUD time in application review, renewal applications can be submitted without changing most screens this year, if the information is accurate.** When considering making changes to a FY 2017 renewal project application; in general, HUD discourages applicants from making annual updates. If you **import data** into your renewal project application from last year (not an option for first-time renewals), you will be unable to edit most of the application screens until you navigate to the “Submission Without Changes” screen (listed in the left menu bar in Part 8) and select “Make Changes.”
  - After reviewing all of the pre-filled information and completing Section 1 and Screens 3C (if applicable), 6D, 7A, and 7B, if you do not wish to edit any screens, you can submit to HUD as is. **NOTE: Do not hit submit in e-snaps until instructed to do so through your local process.**
  - If you do need to edit screens, you can select the specific screens you wish to open for editing by checking boxes and selecting “Save.” If you do this by error and did not want to make edits, simply navigate to that screen to re-save the data.
  - Once opened for editing, you should navigate to each screen to update / change the information on those screens, selecting “Save” before navigating to another screen.

**SHOULD I FIX THIS TYPO IN MY RENEWAL APPLICATION?**

HUD staff have hinted that application sections that are not edited will undergo only a perfunctory review and that applications that are edited will receive a deeper review. Therefore, if the imported application section is accurate for the renewal program, it may not benefit applicants to make small or non-substantive edits.

On the other hand, projects that have made amendments, that have consolidated, or have made changes in their program design since last year’s project application **will absolutely** need to make changes.

## Renewal Application Process in 2017



### Question

### Renewal Project Answer and/or Notes

**Page 1A Application Type** A lot of the information in Section 1 (1A-1J) is pre-populated from the Project Applicant Profile. If there are any discrepancies, or errors, edit the Project Applicant Profile, as you will not be able to change the Project Application.

5b. Federal Award Identifier

**Must** match GIW. **NEW THIS YEAR**, HUD is requesting the **project PIN**, the first 6 digits of the grant number, rather than the full 16 digit grant number. If importing data, should autopopulate correctly with just the 6 characters. Triple check this one!

**Pages 1B. Legal Applicant** (all fields prepopulated from Applicant Profile)

a. Legal Name

Must match GIW (prepopulated from Applicant Profile).

Remember: This is the recipient name, not the subrecipient. The legal name must match the name on the organization's articles of incorporation or other legal governing authority. Surrogate names,

Question	Renewal Project Answer and/or Notes
f. Contact person	<p>abbreviations, or acronyms must not be listed. The applicant must also be the recipient of record for the grant requesting renewal, not a new agency taking over the grant.</p> <p>HUD will contact the person listed in field f regarding curable deficiencies for the application, and so this person should be the most knowledgeable about the application. This may be the organization’s authorized representative, a program manager, financial analyst, or grant writer</p>
<b>Page 1D. Congressional District(s)</b>	
15. Descriptive Title	If this title is not correct, you will need to edit in “projects” form on e-snaps
16. Congressional District(s): b. Project:	Must reflect congressional district(s) in which the project operates. Should be 12 and/or 14.
17a. Proposed Project start date	Must be the date 364 days before 17b. Must be the first day of the month and match eLOCCS.
17b. Proposed Project end date	Must match GIW (and eLOCCS) but the date should be in <b>2019 (may autopopulate 2018, so make sure to watch this).</b>
<b>Page 1E. Compliance and Page 1F. Declaration</b>	
19. Is the Application Subject to Review By State Executive Order 12372 Process?	Choose: b. Program is subject to E.O. 12372 but has not been selected by the State for review.
20. Delinquent debt	Project Applicants with an outstanding Federal debt will not be eligible to receive HUD funds, unless: (1) a negotiated repayment schedule is established and the repayment schedule is not delinquent, or (2) other arrangements satisfactory to HUD are made prior to the award of funds by HUD. The explanation of any debt owed and the repayment arrangements must be provided on Screen 1E. If arrangements satisfactory to HUD cannot be completed within 90 days of notification of selection, HUD will not execute a grant agreement with a project applicant.
<b>Page 1G. HUD 2880</b>	
Checkbox: I certify that this information is true and complete (* I AGREE)	<ul style="list-style-type: none"> <li>• Verify that all project information is complete and accurate.</li> <li>• If any pre-populated information is incorrect, you must correct it in the Applicant Profile (see part C.4 of this section for details)</li> </ul>
<b>Page 1H. HUD 50070</b>	
Checkbox: I hereby certify that all the information stated herein, as well as any information provided in this accompaniment herewith, is true and accurate.	<ul style="list-style-type: none"> <li>• If any pre-populated information is incorrect, you must correct it in the Applicant Profile.</li> <li>• This screen replaces the need to upload a form as an attachment.</li> </ul>

**Question**

**Renewal Project Answer and/or Notes**

**Page 1I. Certification Regarding Lobbying**

Checkbox: I hereby certify that all the information stated herein, as well as any information provided in this accompaniment herewith, is true and accurate.

- New this year, Federal agencies require the submission of a signed Certification Regarding Lobbying to ensure applicants acknowledge the requirements in Section 319 of Public Law 101-121, 31 U.S.C. 1352, (the Byrd Amendment) and 24 CFR part 87 before receiving a federal award. These statutes and regulation prohibit the use of federal award funds for lobbying the executive or legislative branches of the Federal government in connection with a specific award.
- This requirement is different and separate from the requirement for applicants to report lobbying activities using the SF-LLL form. The SF-LLL form must still be submitted by applicants that lobby or intend to lobby using non-federal funds.
- The only applicants excepted from submitting the Certification Regarding Lobbying form are federally-recognized Indian tribes because of each tribe’s sovereign power.

**Page 1J. SF-LLL**

Does the recipient or subrecipient of this CoC grant participate in federal lobbying activities (including a federal administration or Congress) in connection with the CoC Program?

- Select Yes or No to reveal additional questions.
- You should only select yes if you are a non-profit AND you engage in lobbying activities. Not many agencies should select yes.

**NEW THIS YEAR:** Projects that have renewed before will see that most of the next screens are locked to editing. You should review them for accuracy, and if you need to edit screens you will be able unlock them in Section 8 and return to make edits. Please review carefully and ONLY unlock the screens you must unlock. *The following notes may be helpful to you as you review your application.*

**Page 2A. Project Subrecipients**

- If there is a subrecipient(s), this should be completed with their information. If no recipient, can be left blank.
- Congressional districts should be same as or a subset of 16b above.
- Total subrecipient grant amount should not include the admin amount kept by the recipient (cannot exceed 50% of admin)

**Page 2B. Recipient Performance**

Question	Renewal Project Answer and/or Notes
1. APR Submission On Time	<ul style="list-style-type: none"> <li>Should be Yes. APRs are due within 90 days of when the grant term expires. For those first-time renewals for which the original grant term has not yet expired, please write, "First-time renewal and grant term has not yet expired" and provide the date by which the APR must be submitted</li> </ul>
2. HUD Monitoring/OIG Audit Findings	<ul style="list-style-type: none"> <li>Should be No. If you selected "Yes", indicate the date of the oldest unresolved finding and provide a brief explanation for why the monitoring or audit finding remains unresolved and the steps that have been taken towards resolution (e.g., responded to the HUD letter, but no final determination received).</li> </ul>
3. Quarterly Drawdowns	<ul style="list-style-type: none"> <li>Should be Yes. If no, include an explanation.</li> </ul>
4. Recaptured Funds	<ul style="list-style-type: none"> <li>Should be No. If yes, include an explanation for why funds were not expended.</li> </ul>

Make especially sure your answers on 2B are accurate for this year!

**Page 3A. Project Detail** - This page determines what pages/questions are available later in application. If e-snaps asks you to fill out irrelevant information (e.g. about the number of units you will serve, but you are SSO project), review this page to ensure it is correct.

2a. CoC Number and Name	CA- 501 – San Francisco CoC
2b. CoC Collaborative Applicant Name	City and County of San Francisco
4. Project Status	Correct answer: Standard
5. Component Type:	Must match GIW.
6. Title V	This question refers to federal properties that were categorized as unutilized, underutilized, excess, or surplus for use to assist homeless persons, please answer as appropriate for your project.

**Page 3B. Project Description**

1. Provide a description that addresses the entire scope of the proposed project	<p>All project applicants must provide a comprehensive and concise project description. <b><i>References to ineligible activities or failing to provide an adequate description of the project may result in rejection of the project application.</i></b></p> <p>The project description should address the entire scope of the project and include:</p> <ul style="list-style-type: none"> <li>Community needs</li> <li>A clear picture of the target population(s) to be served</li> <li>The plan for addressing the identified needs/issues of the CoC target population(s)</li> <li>Projected outcome(s),</li> <li>Coordination with other source(s)/partner(s), and</li> <li>Reason why CoC Program support is required</li> </ul>
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Question	Renewal Project Answer and/or Notes
2. Does your project have a specific population focus?	<ul style="list-style-type: none"> <li>○ The program description should describe the project at full operational capacity.</li> <li>○ <b><u>Project applicants MUST match this description to all other parts of the application</u></b> including Part 5 and budgets in Part 6</li> </ul> <p>Select “Yes” if project has special capacity in its facilities, program designs, tools, outreach or methodologies for a specific subpopulation or subpopulations. This does not necessarily mean that the project exclusively serves that subpopulation(s), but rather that they are uniquely equipped to serve them. If “Yes” is selected, select the relevant checkbox(es).</p> <p><i>Note:</i> It is not in your best interest to overpromise to these questions. However, please match your answer to prior applications.</p> <p>Also, if a permanent supportive housing project, make sure subpopulations with people with disability are checked.</p>
3. Housing First.	<p>The Housing First answers will be aggregated for the CoC application, and if our CoC is more Housing First oriented, our score will increase. <b>For renewal housing projects, if you indicated your project is Housing First in the past, but it is not any longer based on your answers to the next questions, please talk to HomeBase Local Team staff.</b></p> <p>Please note that saying yes to these questions creates a contractual obligation to operate in this manner for your project.</p>

**Page 3C. Dedicated Plus (MUST EDIT SCREEN, PSH projects only)**

1. Indicate whether the project is “100% Dedicated”, “DedicatedPLUS”, or “N/A”	<p>A renewal project that is permanent supportive housing must choose:</p> <ul style="list-style-type: none"> <li>• (If it hasn’t been 100% Dedicated to Chronically Homeless before) To continue serving a non Chronically Homeless population by selecting ‘N/A’</li> <li>• To become a 100% DedicatedPLUS project</li> <li>• To become/remain a 100% dedicated to chronically homeless individuals and families project.</li> </ul> <p>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.</p> <p>Please see part II.D.2 of this Handbook for details regarding DedicatedPLUS.</p>
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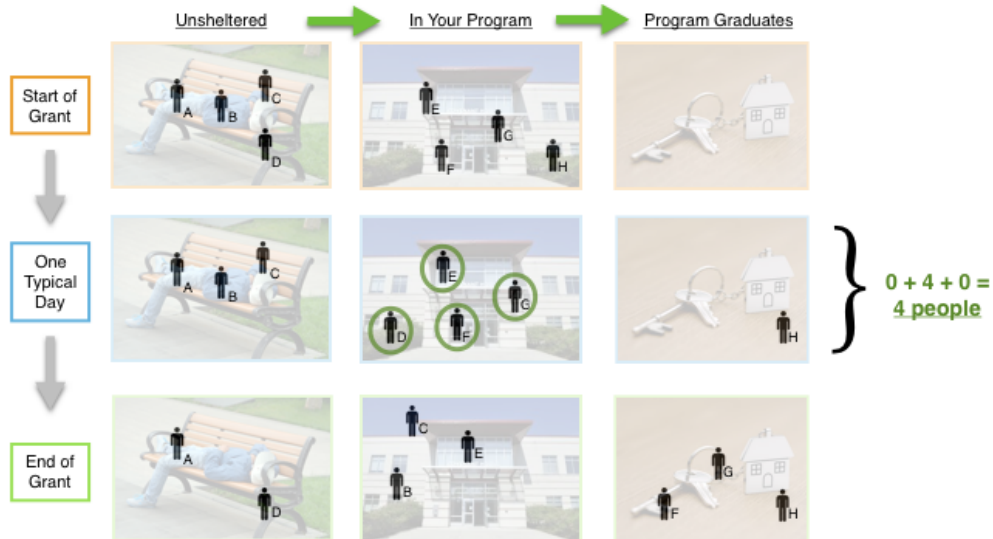
Question	Renewal Project Answer and/or Notes
	Regardless of the project applicant choice above, the project can still dedicate beds to individuals and families experiencing chronic homelessness on Screen 4B, and those beds dedicated to chronic homelessness must continue to operate in accordance with Section III.A.3.b. of the FY 2017 NOFA. <i>Changing the number of beds dedicated to chronically homeless people may affect the CoC's score in future competitions.</i>

<b>Page 4A. Supportive Services for Participants (all projects except HMIS)</b>	
1. For all supportive services available to participants, indicate who will provide them, how they will be accessed, and how often they are provided.	Should reflect all services for provided for participants, whether funded by CoC funds or other funds. If you do provide a service, please respond to all the related questions. At least one row must be completed.  Note: Having services that still say "Select" is acceptable and indicates service is not provided. Do not overpromise in this section.
2. Questions about activities to increase access to mainstream benefits	The project application responses to these questions may be aggregated into the CoC application.

## Point-in-Time Count

A **POINT-IN-TIME** COUNT CAPTURES THE PEOPLE WHO ARE IN YOUR PROGRAM ON ANY ONE NIGHT.

(Use a Point-in-Time Count for Screens 5A and 5B)



A **Point-in-Time Count** taken on **One Typical Day** would show **4 people** in your program. It does not matter that several other people have passed through your program — for a Point-in-Time Count, you should only look at how many people are in your program on one typical day.

## Page 4B. Housing Type and Location (all projects except SSO and HMIS)

Total Units:

Total Beds:

Total Dedicated CH Beds:

- Total units, beds: Should include all units in the project supported by CoC funds, at a point in time, at full capacity
- Total CH Dedicated beds: Should include all beds dedicated and prioritized for chronically homeless people
  - If chose 100% Dedicated on 3C, the number of Total Dedicated should match Total Beds
  - If chose DedicatedPLUS on 3C, applicant may choose to dedicate beds to chronically homeless people here.
- Should generally Screens 5A and 5B



**Pages 5A/5B. Project Participants – Households/Subpopulations** (all projects except HMIS)

Households

Must match Page 3B, including the narrative and project type selected, as well as the supportive services provided on Page 4A and the housing type and location information provided on Page 4B, AND budgets.

- If PSH project, you must have a disabled adult in each family
- If a project for chronically homeless (see Page 4B), you must reflect disabled adults and chronic homelessness.

Should reflect the number of households or persons served at single point in time at maximum occupancy

- Should NOT be the number served over the course of a year or grant term
- Should align with last year’s contracted amount (hint: see last year’s application)

On Page 5B, the first 3 columns are mutually exclusive, the rest can duplicate, except that “Persons not represented by an identified subpopulation” are mutually exclusive to all other rows.

If anyone is listed in “Persons not represented by an identified subpopulation,” you must describe the population being served in the textbox. Make sure the population described is **eligible**.

**Page 5C. Outreach for Participants** (all projects except HMIS)

1. Enter the percentage of project participants that will be coming from each of the following locations:

Consider participant eligibility for program type (**see chart on next page for full breakdown**):

- If PH project, people need to come from: the streets, emergency shelters, Safe Havens, or transitional housing.
- If a PSH bonus project, dedicating units for CH, or **prioritizing CH for units**, need to come from streets, shelter, or safe haven.
- If a TH or SSO project, remember that you cannot serve people exiting an institution where they have lived more than 90 days
- Homeless under other federal statutes—serving requires HUD approval of CoC request. **NO** CoCs have approval.

If a person recently spent 90 consecutive days or less in an institution, use his or her homeless status from before the institutional stay, or describe the population in the text box.

	PH-PSH	PH-RRH	TH	SH	SSO
Directly from the street or other locations not meant for human habitation	X	X	X	X	X
Directly from emergency shelters	X	X	X	X	X
Directly from safe havens	X	X	X	X	X
Persons fleeing domestic violence	X	X	X	X	X
Directly from the TH Portion of a Joint TH and PH-RRH Component project	X	X	X		X
Persons receiving services through a Department of Veterans Affairs (VA)-funded homeless assistance program	X	X	X		X
Directly from transitional housing eliminated in the FY 2017 CoC Program Competition		X			
Persons at imminent risk of losing their night time residence within 14 days, have no subsequent housing identified, and lack the resources to obtain other housing (TH and SSO projects only)			X		X
Directly from transitional housing			X		X

2. If the total is less than 100 percent, identify the other location(s)

If this question is answered, make sure the answer is within HUD's eligibility requirements. Most projects should not have to complete this answer.

**6A. Funding Request-**

*RENEWAL BUDGET AMOUNTS MUST MATCH GIW EXACTLY UNLESS REALLOCATING*

**Note: Make sure any changes to your budget through grant agreement, amendment, or reallocation are included in your final application.**

3. Does this project propose to allocate funds according to an indirect cost rate?

Please see the Indirect Cost Rate subsection below.

5. Select the costs for which funding is being requested

Must match GIW

**6B/6C. Leased Units Budget Detail/Rental Assistance Budget Detail**

FMR area:

San Francisco, CA HUD Metro FMR Area

Number of units

- Must be equal to GIW amounts/units (as applicable)
- Units should align with Pages 4B/5A/5B as applicable

**Leased Structures, Supportive Services, Operating, HMIS Budget Detail**

n/a

**New this year**, renewal projects do not require the submission of detailed information for the leased structures, supportive services, operating, or HMIS budgets. There are no separate screens for these budgets; instead, the requested funding amounts are located on the Summary Budget screen, 6E.

In general, HUD expects the details of the most recent approved budgets as amended to be the base of renewal grant expenses.

However, any reasonable and eligible costs within each CoC cost category can be expended and HUD verify them during monitoring.

**6D. Sources of Match MUST EDIT SCREEN**

Sources of Match

The match information should be based on the current commitment at time of project application and NOT based on projections. HUD expects the amount(s) listed on this form to be accurate, with a commitment letter with the amount listed to be in place.

“Date of written commitment” refers to the date the commitment was signed, not the date it will be available.

See “Other Resources” section of this Handbook for additional information.

Program Income

Program income may be counted as match for CoC Program funds. New this year, HUD has added questions for projects that generate program income and plan to use it as match, including source (e.g. “rent”) and amount (estimated amount).

**6E. Summary Budget**

3, 4, 5, 7. Budget Amounts **MAKE SURE FILLED IN AND MATCHES GIW**

11. Total Match 25% match required (including admin, excluding leasing)

8. Total Assistance plus Admin Requested Must match GIW.

**Submission Without Changes**

1. Are the requested renewal funds reduced as a result of reallocation? For local competition, please leave blank unless you are choosing to apply for less than your grant amount.

2. Do you wish to submit this application without making changes? (Choose: Submit without changes or Make changes) Choosing “Submit without changes” indicates to HUD that project applicants have not made changes and are requesting to renew your project per the project details as brought forward from your prior approved renewal grant agreement (or amendment agreement) into your 2017 application. This question excludes Section 1, 3C, 6D, 7A and 7B which must be edited.

Choose “Make changes” if you must make edits.

3. Specify which screens require changes by clicking the checkbox next to the name and then clicking the Save button. Provide a brief description of the changes that will be made.

Once project applicants have clicked a checkbox and saved the screen, the checked box will become read-only and cannot be unchecked. Only check boxes next to screens that project applicants are certain require changes, as unlocking screens that will not change may cause significant delays in HUD’s project application assessment process.

Be specific but brief about all changes you propose to make (bullets are fine). If you check a box in error, note that too.

	First Time Renewals: Note that you are a first time renewal in the explanation box.
<b>7A. Attachment(s)</b>	
All attachments	Any attachment necessary will be uploaded here (e.g. additional information for 2880, third party in-kind match MOU)
Subrecipient Nonprofit Documentation	Required if the applicant and project subrecipient are different entities, and the subrecipient is a nonprofit organization
<b>8B. Submission Summary</b>	
	Make sure nothing reads "Please Complete"

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## E. INDIRECT COST RATE (SCREEN 6A, QUESTION 3)

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### FAQS

**What is an indirect cost rate?** The indirect cost rate allows a project to spend some of its HUD funding on costs that are difficult to assign to any particular project. Or as stated in 2 CFR 200.56, “Indirect (F&A) costs means those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.” For example, if your management/admin team runs three different projects out of the same building, then depreciation for that building would be an indirect cost. Similarly, the cost of an outside accounting firm that does the accounting for your entire organization would be an indirect cost, or the cost of a human resources tool like Zenefits.

**Is the indirect cost rate the same thing as the administration line item?** No. Sometimes both budgets are 10%, but that’s just a coincidence. They’re two different concepts, and one project can apply for both admin and indirect costs.

**Will choosing to use an indirect cost rate change my CoC project’s funding award?** No. The indirect cost rate does not increase or decrease the amount of funding your project receives from HUD. Instead, the indirect cost rate gives you more flexibility about how to spend that money.

**What is an Indirect Cost Rate Agreement?** An indirect cost rate agreement is an agreement between (1) a branch of the federal government and (2) a nonprofit, local government, or state government. The agreement sets the percentage of a federal grant that can be used on “indirect costs” like accounting and human resources.

**Where do I look to see if I have an Indirect Cost Rate Agreement?** If you are the CoC project recipient (i.e. you have an eLOCCS account), you should talk to your accountant, lawyer, or executive director to find out if you have an indirect cost rate agreement. However, if you are a sub-recipient, then you should ask your recipient if it has an indirect cost agreement.

**What if I don’t have an Indirect Cost Rate Agreement?** If you or your primary recipient already has an indirect cost rate agreement on file, then you need to use that agreement. However, if you don’t have a signed agreement on file yet, that is not a problem! You do not need an Indirect Cost Rate Agreement. HUD will allow you to use a 10% de minimis rate even with no agreement.

**What else should I know about Indirect Cost Rates?** Applicants that do not have an approved federally negotiated indirect cost rate may charge a maximum rate of 10 percent of Modified Total Direct Costs, which is defined in 2 CFR 200.68. Modified Total Direct Cost (MTDC) means “all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and

with the approval of the cognizant agency for indirect costs.” Therefore, rental assistance and leasing costs are excluded and some supportive services costs may also be excluded from the base number, which could impact the total amount you can use for indirect costs.

## RESOURCES

- **2017 CoC NOFA:** <https://www.hudexchange.info/resource/5419/fy-2017-coc-program-nofa/>
- **General Section NOFA:**  
[https://portal.hud.gov/hudportal/documents/huddoc?id=2017nofa\\_gensec.pdf](https://portal.hud.gov/hudportal/documents/huddoc?id=2017nofa_gensec.pdf)
- **Renewal Project Application Detailed Instructions and Instructional Guide:**  
<https://www.hudexchange.info/resource/2910/coc-project-application-instructions-for-renewal-projects/>
- **CoC Program Interim Rule (24 CFR part 578):**  
<https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version>
- **HUD Websites:**
  - [www.hud.gov](http://www.hud.gov)
  - [www.hudexchange.info](http://www.hudexchange.info)
- **Funding Application:** [www.hud.gov/esnaps](http://www.hud.gov/esnaps)
- **Training and Resources:** [www.hudexchange.info/homelessness-assistance/](http://www.hudexchange.info/homelessness-assistance/)
- **HUD Exchange Ask A Question (AAQ):** [www.hudexchange.info/get-assistance](http://www.hudexchange.info/get-assistance)
- **Listserv:** [www.hudexchange.info/maillinglist](http://www.hudexchange.info/maillinglist)