Local Homeless Coordinating Board
San Francisco Continuum of Care

HUD Homeless Assistance
FY 2017 Continuum of Care
NOFA Competition

Technical Assistance (TA) Handbook
For New Project Applicants

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 contains 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.

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)

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.

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.

C. HIGHLIGHTS OF THE 2017 NOFA THAT WILL IMPACT 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.

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.**

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. 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**)

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

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.

D. OVERVIEW OF ELIGIBLE NEW PROJECT TYPES

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

- 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 25).
- Grant funds may be used for (see "Eligible Costs to Inform Project Design" section of this manual, page 23):
  - 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)

- ***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)

- Grant funds may be used for (see "Eligible Costs to Inform Project Design" section of this manual, page 23):
  - 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.

- o Limit supportive services to no more than 6 months after rental assistance stops.
- o 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.
- o 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.
- o 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.)*
- o 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):
  - o Set a maximum amount or percentage of rental assistance that a project participant may receive.
  - o Set a maximum number of months (up to 24 months) that a project participant may receive rental assistance.
  - o Set a maximum number of times that a project participant may receive rental assistance.
  - o Require project participants to share in the costs of rent.

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

- ***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 23):
  - o Capital costs (i.e., new construction, rehabilitation, or acquisition), leasing of a structure or units, and operating costs to provide transitional housing;
  - o Short term (up to 3 months) and/or medium-term (3-24 months) tenant-based rental assistance
  - o Supportive services
  - o HMIS
  - o 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 INFORMATON SYSTEM (HMIS) (REALLOCATION ONLY)

- 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 23):
  - 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)

- 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 23):
  - Supportive services
  - Indirect Costs
  - Administration.

A. THRESHOLD REQUIREMENTS

For new projects, the review process considers applicant and subrecipient eligibility and capacity, project eligibility, and project quality as part of the threshold review.

Project Eligibility Threshold: HUD will review eligibility threshold requirements on a pass/fail standard, and if standards are not met, the project will be rejected from the competition. Applicants and subrecipients must:
- Be eligible under the CoC Program (see subsection D below)
- Demonstrate financial and management capacity and experience to carry out the project and to administer Federal funds
- Submit required certifications
- Propose an eligible population for the project type, as designated by the CoC Program Interim Rule and the NOFA
- Show that the project is cost-effective, with costs not deviating substantially from the norm in that locale for similar project activities
- Agree to participate in HMIS (except for victim service providers who must use a comparable database)

Project Quality Threshold: HUD will review all new project applications to determine if they meet project quality threshold requirements with clear and convincing evidence. The housing and services proposed must be appropriate to the needs of the program participants and the community.
- For new permanent housing projects, applications must receive at least 3 out of 4 possible points to be funded. Quality threshold factors include:
  - Whether the type of housing, number, and configuration of units will fit the needs of the program participants;
  - Whether the type of the supportive services offered (regardless of funding source) will ensure that participants obtain or retain permanent housing;
  - Whether the plan to connect clients to benefits meets program participant needs; and
  - Whether participants are assisted in obtaining and remaining permanent housing in a manner that fits their needs.
- For new Joint TH and PH-RRH component projects, applications must receive at least 3 out of 5 possible points to be funded. Quality threshold factors include:
  - Whether the type of housing, number, and configuration of units will fit the needs of the program participants;
  - Whether the type of the supportive services offered (regardless of funding source) will ensure that participants obtain or retain permanent housing;
  - Whether the plan to connect clients to benefits meets program participant needs;

- o Whether participants are assisted in obtaining and remaining permanent housing in a manner that fits their needs; and
  - o Whether the project adheres to a housing first model.
- For new SSO projects for centralized or coordinated assessment systems, applications must receive at least 2 out of 4 possible points to be funded. Quality threshold factors include:
  - o Whether the system is easily accessible to all in the CoC's geography who are seeking information about homelessness assistance;
  - o Whether the advertising strategy is designed to reach persons with the highest barriers;
  - o Whether there is a standardized assessment process; and
  - o Whether the project ensures participants are directed to housing/services that fit their needs.
- For new HMIS projects, applications must receive at least 3 out of 4 possible points to be funded. Quality threshold factors include:
  - o How the HMIS funds will be expended in a way that is consistent with the CoC's funding strategy for the HMIS and furthers the CoC's HMIS implementation;
  - o Whether the HMIS collects all Universal Data Elements;
  - o Whether the HMIS un-duplicates client records; and
  - o Whether the HMIS produces all HUD-required reports and provide data as needed for HUD reporting (e.g., APR, quarterly reports, data for CAPER/ESG reporting).

Other Threshold Requirements:
- Project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s), as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings.
- For expansion projects, project applicants must clearly articulate the part of the project that is being expanded. Additionally, the project applicants must clearly demonstrate that they are not replacing other funding sources.
- Project applicants must demonstrate they will be able to meet all timeliness standards per 24 CFR 578.85.
- HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, or unresolved audit/monitoring finding related to one or more existing grants. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on the prior grant.
- All projects must have a DUNS number and active registration in SAM.

B. FUNDING LEVELS & LIMITS

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

- New project applications must request the full FMR amount per unit.
- 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.
- If the recipient has a subrecipient, it is required to share at least 50% of project administrative funds with its subrecipient(s).

C. TIMELINESS

- 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.
- For recipients of funds for rehabilitation or new construction:
  - Construction activities must begin within 9 months of the later of signing of the grant agreement or of signing an addendum to the grant agreement authorizing use of grant funds for the project.
  - Construction activities must be completed within 24 months of signing the grant agreement.
  - Activities that cannot begin until after construction activities are completed must begin within 3 months of the date that construction activities are completed.
- In order to expend funds within statutorily required deadlines, applicants funded for new sponsor-based and project-based rental assistance must execute the grant agreement and begin providing rental assistance within 2 years. However, HUD strongly encourages all rental assistance to begin within 12 months of award. Applicants unable to begin within 12 months should consult with the local HUD CPD Field Office.

D. ELIGIBLE APPLICANTS

- Non-profit organizations
- States
- Local governments
- Instrumentalities of State and local governments
- Public housing agencies

NOTE: HUD will not evaluate applications from ineligible applicants (including tribes, tribal entities, for-profit entities, and individuals).
HUD will review the applicant's capacity to do the work.

E. INITIAL FUNDING TERM

- New projects may request funding for a 1-year grant term (but in some cases, can also apply for a 2-, 3-, 4-, 5-, or 15-year grant). However, any new projects requesting capital costs (i.e., new construction, acquisition, or rehabilitation) are not eligible for 1-year requests and HUD will increase the grant term to 3 years if they are submitted for 1-year terms.
- A new project requesting, for example, $300,000 would receive the full amount for a one year grant, $150,000 each year for a two-year grant, and $100,000 each year for a three-year grant, and so on. If considering a longer-term grant, please review the NOFA or consult with HomeBase Local Team members for grant term requirements.

F. MATCH REQUIREMENT

- See "Other Resources" section of this handbook 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

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 CF 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.

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, <u>what governs is your grant agreement</u>.
- **If your grant agreement limits who you can serve beyond the limitations here, <u>that</u> 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"?

	PSH[#]	RRH	SH	TH[@]	SSO	CH
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

[#] 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).
[@] 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#	RRH	SH	TH@	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 came 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. **In the 2015 NOFA, HUD clarified that persons fleeing or attempting to flee human trafficking, including sex trafficking, qualify under this category.**	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
Must be disabled (physically, mentally, emotionally, developmentally, due to alcohol and/or drugs, or due to HIV/AIDS): • Long-continuing or indefinite duration • Substantially impedes ability to live independently • Of a nature that would be improved by suitable housing (See the full definition of disability below.)	X	May serve	X	May serve	May serve	X
Must live alone, suffer from serious mental illness and other debilitative behavioral conditions, live on the streets, and have been unwilling or unable to participate in supportive services.	May serve	May serve	X	May serve	May serve	May serve
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: • Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; AND • 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 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.	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

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 the 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.[1]

---

[1] 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.

(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.

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.

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.

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 OR [_____], 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.**

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

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:**

- o **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
  - o **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.
  - o **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.

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. 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 and Detailed Instructions
- Renewal Project Application Instructional Guide and Detailed Instructions
- Budgets - Project Application Instructional Guide

B. STEPS TO COMPLETING YOUR PROJECT APPLICATION - SUBRECIPIENTS

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. Contact HSH to coordinate e-snaps access if you will be a subrecipient new applicant.

   > **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.

2. HSH will complete the Applicant Profile when it is the recipient – most new projects will elect to be subrecipients. Subrecipients should not complete or edit the Applicant Profile. Direct recipients should complete the Applicant Profile (see the next section of this Handbook "Recipient Documents" for guidance).

3. Projects will complete a Project Application for each project. See the "Renewal Project Instructional Guide," and tips for completing the application in this Handbook.

4. Do NOT hit submit on your application until after the local competition when you've been instructed to do so!

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.

- Most applicants will be subrecipients to HSH – if this is not the case, review the Detailed Instructions for completing an Applicant Profile.

- 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

Note - most new projects in San Francisco will be subrecipient applications, and these instructions are tailored to new subrecipient projects. Each subrecipient applicant completes, in e-snaps, a project application for each project. This list summarizes the other documents that need to be uploaded to e-snaps or provided to HSH, the recipient. **All must be dated between May 1, 2017 and September 28, 2017.**

Submitted to HSH:
- Form HUD-2880, Applicant/Recipient Disclosure/Update Report
- Applicant Code of Conduct (not required if listed on HUD website, **see below for more information about this requirement in 2017**)
- Survey on Equal Employment Opportunity (for non-profits; optional)

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)

C. 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 <u>selection</u> of the common questions project applicants generally have trouble answering,** but **does <u>not</u> 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.
- 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.

Question	New Project Answer and/or Notes
Page 1A Application Type A lot of the information in the first few charts 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.	
	Nothing to fill in on this page
Pages 1B. Legal Applicant and 1C. Application Details	
a. Legal Name	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, abbreviations, or acronyms must not be listed.
f. Contact person	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
Page 1D. Congressional District(s)	
15. Descriptive Title	If this is not the correct project name, 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 will operate. Should be 12 and/or 14.
17a. Proposed Project start date	Please select a date in 2018 that is feasible for the start of your project. The operating start date must be the first day of the month.
17b. Proposed Project end date	For one-year grants, please select a date 364 days after 17a
Page 1E. Compliance and Page 1F. Declaration	
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.
Page 1G. HUD 2880	

Question	New Project Answer and/or Notes
Checkbox: I certify that this information is true and complete (* I AGREE)	• Verify that all project information is complete and accurate. • If any pre-populated information is incorrect, you must correct it in the Applicant Profile (see part C.4 of this section for details).
Page 1H. HUD 50070	
Checkbox: I hereby certify that all the information stated herein, as well as any information provided in this accompaniment herewith, is true and accurate.	• If any pre-populated information is incorrect, you must correct it in the Applicant Profile. • This screen replaces the need to upload a form as an attachment.
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.
Page 2B. Experience of Applicant, Subrecipient(s), and Other Partners. Both project applicants and potential subrecipients must show satisfactory capacity, funds draw down history, and performance for existing grant(s), as applicable and evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of monitoring findings.	
1. Describe the experience of the applicant and potential	• Describe why the applicant, subrecipients, and partner organizations (e.g., developers, key

Question	New Project Answer and/or Notes

subrecipients (if any), in effectively utilizing federal funds and performing the activities proposed in the application, given funding and time limitations.	contractors, subcontractors, service providers) are the appropriate entities to receive funding.
	• Provide concrete examples that illustrate their experience and expertise in the following:
	   o Working with and addressing the target population's identified housing and supportive service needs;
	   o Developing and implementing relevant program systems, services, and/or residential property construction and rehabilitation;
	   o Identifying and securing matching funds from a variety of sources; and
	   o Managing basic organization operations including financial accounting systems.

2. Describe the experience of the applicant and potential subrecipients (if any) in leveraging other Federal, State, local, and private sector funds	• Include experience with all Federal, State, local and private sector funds.
3. Describe the basic organization and management structure of the applicant and subrecipients (if any).	• Include evidence of internal and external coordination and an adequate financial accounting system • Include the organization and management structure of the applicant **and** all subrecipients • Make sure to include a description of internal and external coordination and • Include the financial accounting system that will be used to administer the grant.
4a. Are there any unresolved monitoring or audit findings for any HUD grants (including ESG) operated by the applicant or potential subrecipients (if any)?	• Respond Yes if the recipient or subrecipient have open OIG audit findings; poor or non-compliance with applicable Civil Rights Laws and/or Executive Orders; or open McKinney-Vento related monitoring findings. Then describe the details and steps being taken to resolve the findings in the follow up question.
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.	
1a. CoC Number and Name	CA-501 San Francisco CoC
1b. CoC Applicant Name	City and County of San Francisco
3. Project Status	Correct answer: Standard
4. Component Type:	Choose: PH (for PSH and RRH), Joint TH and PH-RRH, HMIS, or SSO (if a Coordinated Entry grant)
5. Title V	This question refers to federal properties that were categorized as unutilized, underutilized, excess, or

Question	New Project Answer and/or Notes
	surplus for use to assist homeless persons, please answer as appropriate for your project.
Page 3B. Project Description (questions differ by project type)	
1. Provide a description that addresses the entire scope of the proposed project	All project applicants must provide a clear and concise project description. ***References to ineligible activities or failing to provide an adequate description of the project may result in rejection of the project application.*** The project description should address the entire scope of the project and include: • Community needs • A clear picture of the target population(s) to be served • The plan for addressing the identified needs/issues of the CoC target population(s) • Projected outcome(s), • Coordination with other source(s)/partner(s), and • Reason why CoC Program support is required. o The program description should describe the project at full operational capacity. o **Project applicants MUST match this description to all other parts of the application** including Part 5 and budgets in Part 6 **For Joint TH/RRH**: Be sure to describe how both the TH and PH-RRH portions of the project will be utilized. For example, the project will house participant in leased units for the TH portion up to X months and then will move participants to PH-RRH TRA units providing X services.
2. Describe the estimated schedule for the proposed activities, the management plan, and the method for assuring effective and timely completion of all work.	Demonstrate how full capacity will be achieved over the term requested in this application. Applicants must be able to begin assistance within 12 months of conditional award. Provide (1) a schedule and describe both (2) a management plan and (3) implementation methodology that will ensure that the project will begin operating within the requirements described in the FY 2017 CoC Program NOFA and CoC Program interim rule if it is selected for a funding award.

Question	New Project Answer and/or Notes
3. Will your project participate in a CoC Coordinated Entry process?	HUD and the CoC expect you to respond Yes.
4. Please identify the project's specific population focus. (Select ALL that apply)	Select relevant checkbox(es) if project will have a 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. Make sure the populations you select align with this grant opportunity (e.g. if you are applying for PSH, select chronic homeless). If a permanent housing project, make sure subpopulations with people with disability are checked. *Note*: It is <u>not</u> in your best interest to overpromise to these questions.
5. Housing First. a. Will the project quickly move participants into permanent housing	HUD's preference is Yes. HUD expects new Joint TH and PH-RRH Component Projects to adopt a Housing First approach.
b. Does the project ensure that participants are not screened out based on the following items?	HUD's preference is that you check the first four boxes.
c. Does the project ensure that participants are not terminated from the program for the following reasons?	HUD's preference is that you check the first four boxes.
d. Will the project follow a "Housing First" approach?	HUD's preference is Yes. If you answered the questions above in alignment with HUD's preferences, this will autopopulate Yes. Please note that if you do respond Yes to all of the above questions, you will be contractually required to operate your project in accordance with your answers.
8. Will participants be required to live in a particular structure, unit, or locality, at some point during the period of participation	Yes/No. Site-based projects should say Yes. (For TH/RRH, if either part is site-based, say Yes.)
8b. If yes, how and why	Tenant Based Rental Assistance permanent housing projects may require clients to live in a particular structure for the first year and in a defined geographical area for the entire term of stay in the program. This

Question	New Project Answer and/or Notes
	allowance applies to TRA projects when it is necessary for the coordination of supportive services; however, TRA projects must still operate in a way that provides for tenant choice according to 24 CFR 578.51(c).
	Narrative should explain why the applicant has chosen to enforce this requirement for participants.
	RRH projects are encouraged to provide as much client choice as possible in the selection of their permanent unit, keeping in mind that program participants will remain in these units after the RRH assistance ends.
9a/b. Will more than 16 persons live in one structure?	Yes/No. (HUD prefers a no, unless justified by local market conditions). Narrative should explain the local market conditions that necessitate a project of this size and how neighborhood integration can be achieved for program participants.
10. (**PSH Only**) Indicate whether the project is "100% Dedicated" or "DedicatedPLUS"	A new project that is permanent supportive housing must choose: • To become a DedicatedPLUS project. Projects that select "DedicatedPLUS" will be required to fill all vacancies with persons meeting these criteria and should only select "DedicatedPLUS" if the project applicant intends to use all or some of their beds to serve individuals and families that meet the broadened criteria. • To become a 100% dedicated to chronically homeless individuals and families project. Please see part II.D.2 of this Handbook for details regarding DedicatedPLUS. 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.
Page 3C. Expansion	
1. Will the project use an existing homeless facility or incorporate activities provided by an existing project?	Yes/No. Only projects wishing to expand a current renewal project will say Yes.
2. Is this new project application requesting a "Project Expansion"	Yes/No. Applicants can apply for an expansion project to expand existing eligible renewal projects that will

| Question	New Project Answer and/or Notes
of an eligible renewal project of the same component type?	increase the number of units in the project, or allow the recipient to serve additional persons, and (new this year) have one grant agreement for both projects at contracting stage. Can also expand to provide additional services or bring facilities up to state/local government health and safety standards.
3. Select the activities below that describe the expansion project, and click on the "Save" button below to provide additional details.	The selection of each item will correspond with additional questions.
Page 4A. Supportive Services for Participants (not for HMIS or CE)	
1a. Are the proposed project policies and practices consistent with the laws related to providing education services to individuals and families?	• Yes if project will serve families or unaccompanied youth • N/A if project will serve adults over 25 only Please contact HomeBase Local Team if you need a form policy.
1b. Does the proposed project have a designated staff person to ensure that the children are enrolled in school and receive educational services, as appropriate?	• Yes if project will serve families or unaccompanied youth • N/A if project will serve adults over 25 only
2. Describe how participants will be assisted to obtain and remain in permanent housing.	Describe plans to move program participants quickly into PH-PSH, and plans to ensure that program participants stabilize in PH-PSH. An acceptable response will: • Acknowledge the needs of the target population • Include plans to address those needs through current and proposed case management activities and the availability and accessibility of supportive services such as–housing search, primary health services, mental health services, educational services, employment services, life skills, child care services, etc. • Good strategies should be specifically tailored–as related to this application–for individuals, older adults, youth, families, etc. • If program participants will be housed in units not owned by the project applicant, the narrative must also indicate how appropriate units will be identified and how the project applicant or subrecipient will ensure that rents are reasonable.

Question	New Project Answer and/or Notes
	• Established arrangements and coordination with landlords and other homeless services providers should be detailed in the narrative. Landlord engagement is a critical piece of the strategy and will be explained in a good response. **Joint TH/RRH**: The description should account for the special nature of the Joint component with both TH and RRH, including the types of supports that are offered to program participants in both portions of the project–the TH and the RRH portions–and how the program participants will be assisted to quickly move from the TH portion into the RRH portion.
3. Describe specifically how participants will be assisted both to increase their employment and/or income and to maximize their ability to live independently.	Narrative should: • Address the needs of the target population, • Address the required supportive services, • Address the availability and accessibility of those supportive services, • Address any coordination with other homeless services providers and mainstream systems, • Describe how service delivery directly leads to program participant employment, • Describe how service delivery leads directly to program participants accessing SSI, SSDI, or other mainstream services, • Describe how the requested funds contribute to program participants becoming more independent. NOTE: • Education plays an important role in the personal development of program participants and should be considered a strategy to maximize their ability to live independently. • HUD encourages project applicants to explain how education will address the encampment and unsheltered homelessness and survivors of DV.
4. 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_** supportive services provided to 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. The list presented is both exclusive and exhaustive according to 24 CFR 578.53. Only the activities listed will be considered eligible activities with respect to the

Question	New Project Answer and/or Notes
	Project Application.
	Note: Having services that still say "Select" is acceptable and indicates service is not provided. Do not overpromise in this section.
5. Questions about activities to increase access to mainstream benefits	The project application responses to these questions will be aggregated into the CoC application.
	NOTE:
	• Transportation assistance to clients to attend mainstream benefit appointments, employment training, or jobs may include bus passes, rail/subway cards, vehicle owned by the organization, taxi fare, etc.
	• Regular follow-ups with participants to ensure mainstream benefits are received and renewed means project will follow-up at least annually ensure that participants have applied for and are receiving benefits and renew when required.

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)

0 + 4 + 0 = 4 people
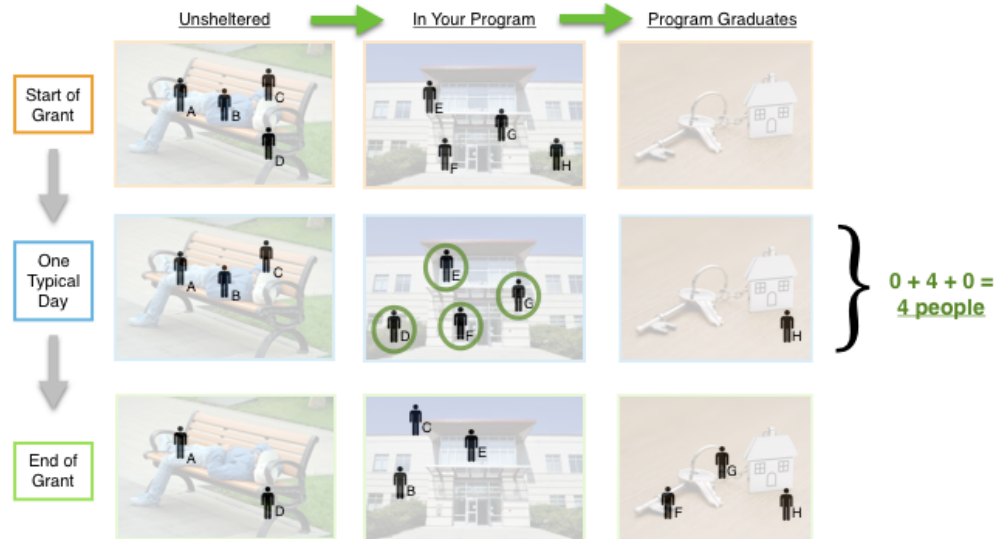
A **Point-in-Time Count** taken on **One Typical Day** would show **4 people** in your program. It does not matter that several other people have passed through your program — for a Point-in-Time Count, you should only look at how many people are in your program on one typical day.

Question	New Project Answer and/or Notes
Page 4B. Housing Type and Location (not for HMIS or CE)	
Total Units: Total Beds: Total Dedicated CH Beds: (Additional columns for Joint TH/RRH projects)	• Answer should reflect beds supported by CoC funds at full capacity on a single day • Should align with Screen 3B, 5A and 5B, budgets and the CoC point in time count for this project. • If a PSH project that is 100% Dedicated, dedicated CH beds must equal total beds • If a PSH project that is DedicatedPLUS, number of dedicated CH beds is up to the project. • If Joint TH and PH-RRH, the number of TH units/beds and RRH units/beds must equal the total number of units for the project.

Question	New Project Answer and/or Notes

Pages 5A/5B. Project Participants – Households/Subpopulations (not for HMIS or CE)

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, must have a disabled adult in the family
- If a project for chronically homeless, 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

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 or CE)

1. Enter the percentage of project participants that will be coming from each of the following locations:	Consider participant eligibility for program type:

- If a new PSH project for CH, need to come from streets, shelter, or safe haven.
- If a new DedicatedPLUS project, need to come from streets, shelter, safe haven, TH eliminated in 2017 competition, TH portion of Joint TH and PH-RRH project, or VA-funded homeless assistance program.
- If new RRH, need to come from street, shelter, safe havens, DV, TH eliminated in 2017 competition, TH portion of Joint TH and PH-RRH project, or VA-funded homeless assistance program.
- If new Joint TH and PH-RRH, need to come from street, shelter, safe haven, imminent risk of losing night time residence within 14 days, DV, TH, or a VA funded homeless program.

If people you will serve will spend 90 consecutive days or less in an institution, use homeless status from before the

Question	New Project Answer and/or Notes
	institutional stay, or describe the population in the text box.
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.
3. Describe the outreach plan to bring these homeless participants into the project	For projects participating in a CoC's coordinated entry process, simply explain that coordinated entry will provide outreach and access and describe the specific coordination and referral process between coordinated entry and this project. Explain how program participants will be identified and connected with the offered housing and services.
6A. Funding Request	
3. Does this project propose to allocate funds according to an indirect cost rate?	Please see the Indirect Cost Rate subsection below.
4. Select a grant term	1 Year. (Could be more, but rarely chosen.)
5. Select the costs for which funding is being requested	Project Applicants may NOT have any of the following combinations in a single structure or housing unit: • Acquisition and/or rehabilitation with new construction • Leasing with acquisition, rehabilitation, or new construction* • Rental assistance with acquisition, rehabilitation, or new construction* • Leasing and rental assistance* • Rental assistance and operations* * Joint TH and PH-RRH component may have budgets that reflect these combinations, but not in a single structure or housing unit.
6C/6E. Leased Units Budget Detail/Rental Assistance Budget Detail	
FMR area:	San Francisco, CA HUD Metro FMR Area
Units	Units should align with Pages 4B/5A/5B as applicable
6F/6G/6H/ Supportive Services/Operating/HMIS Budget Detail	
Operations/Services Quantity Description	Make sure there is enough Quantity Detail: (e.g. "1 FTE @ $45,000 Case Manager Salary, including benefits" or "50 hours @ $25/hour including benefits". "1 FTE" is NOT enough) and that **costs are eligible.** Request should be equal to one year of the relevant cost.

Question	New Project Answer and/or Notes
6I. Sources of Match	
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).
6J. Summary Budget	
8. Admin	**MAKE SURE FILLED IN**. Admin cannot exceed 10% of program costs.
12. Total Match	25% match required (including admin, excluding leasing)
7A. Attachment(s)	
All attachments	Any attachment necessary will be uploaded here (e.g. additional information for 2880, third party inkind match MOU)
Subrecipient Nonprofit Documentation	Required if the applicant and project subrecipient are different entities, and the subrecipient is a nonprofit organization
8B. Submission Summary	
	Make sure nothing reads "Please Complete"

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

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**

- **CoC Program Interim Rule (24 CFR part 578): https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version**
- **New Project Application Instructional Guide and Detailed Instructions: https://www.hudexchange.info/resource/2909/coc-project-application-instructions-for-new-projects/**

- **HUD Websites:**
    - **www.hud.gov**
    - **www.hudexchange.info**

- **Funding Application: www.hud.gov/esnaps**

- **Training and Resources: www.hudexchange.info/homelessness-assistance/**

- **HUD Exchange Ask A Question (AAQ): www.hudexchange.info/get-assistance**

- **Listserv: www.hudexchange.info/mailinglist**