

SUMMARY OF THE 2019 CONTINUUM OF CARE NOTICE OF FUNDING AVAILABILITY (COC NOFA)

BACKGROUND

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 2019 CoC NOFA was released on July 3, 2019, opening the competition making available **APPROXIMATELY \$2.3 BILLION NATIONALLY** to serve people experiencing homelessness. The information in the NOFA sets forth the competition rules and processes for 2019.

This summary includes the highlights of the FY 2019 CoC NOFA. New or revised policies relating to the FY 2019 CoC Program Competition are indicated as ****NEW IN 2019**** and ****REVISED IN 2019****, respectively. Additional information about project application requirements and standards will be available locally. Details about anything in this summary can be found in the NOFA, available at: https://www.hud.gov/sites/dfiles/SPM/documents/6300_25_FY19_CoC.pdf.

IMPORTANT DATES AND FUNDING AMOUNTS

IMPORTANT HUD-REQUIRED DATES

- **WEDNESDAY, JULY 3, 2019**: 2019 CoC Program NOFA release date.
- **THURSDAY, JULY 11, 2019**: *e-snaps* became available.
- On or before **SATURDAY, AUGUST 31, 2019** (30 days prior to submission deadline): All project applications are required to be submitted to the CoC.
- On or before **SUNDAY, SEPTEMBER 15, 2019** (15 days prior to submission deadline): The CoC is required to notify all project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC.
- On or before **SATURDAY, SEPTEMBER 28, 2019** (2 days prior to submission deadline): CoCs must post on their website (or a partner's website) all parts of the CoC Consolidated Application and notify community members and key stakeholders that the Consolidated Application is available.

SUBMISSION DEADLINE:

MONDAY, SEPTEMBER 30, 2019 AT 8:00 PM EDT/6:00 PM CDT/5:00 PM PDT

- HUD may issue up to two conditional funding announcements.
- **SEPTEMBER 30, 2021**: All conditional funds awarded in this competition must be obligated.
- **SEPTEMBER 30, 2025**: Obligated funds must be expended.

AVAILABLE FUNDING FOR OUR COC

This year, in the San Francisco CoC, the eligible application amounts are as follows:

- CoC's estimated Annual Renewal Demand: \$44,862,542
 - ****REVISED IN 2019**** Estimated Tier 1 (100% of combined Annual Renewal Amounts for all projects eligible for renewal for the first time plus 94% of the combined Annual Renewal Amounts for all other projects eligible for renewal): \$42,370,572
 - Estimated Tier 2 (remainder of Annual Renewal Demand + CoC Bonus amount): \$4,735,097
- ****REVISED IN 2019**** Estimated CoC Bonus amount (5% of Final Pro Rata Need, or 25% of Preliminary Pro Rata Need minus Annual Renewal Demand, whichever is greater): \$2,243,127
- Estimated DV Bonus amount (10% of Preliminary Pro Rata Need or a minimum of \$50,000, whichever is greater, or maximum of \$5 million, whichever is less): \$1,329,366
- Estimated CoC Planning amount (3% of Final Pro Rata Need or \$1,250,000, whichever is less): \$1,250,000
 - Planning grants are not ranked again in 2019

2019 HUD COC POLICY PRIORITIES

CoCs will be evaluated based on the extent to which they further HUD's policy priorities. The policy priorities listed this year 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 all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, and those experiencing chronic homelessness).
- 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 encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness.
- d. CoCs should work to develop partnerships to help CoC Program participants sustainably exit Permanent Supportive Housing, such as through partnerships with Public Housing Authorities (PHAs) and other government, faith-based, and nonprofit resources specializing in areas such as treating mental illness, substance abuse, job training, and life skills.
- e. CoCs should review all projects eligible for renewal in FY 2019 to determine their effectiveness in serving people experiencing homelessness, including cost effectiveness.

4. ****REVISED IN 2019**** USING AN EVIDENCE-BASED APPROACH

- a. CoCs should prioritize projects that employ strong use of data and evidence, including the cost-effectiveness and impact of homelessness programs on positive housing outcomes, recovery, self-sufficiency, and reducing homelessness.
- b. Examples of measures that CoCs may use to evaluate projects include, but are not limited to: rates of positive housing outcomes, such a reduced length of time homeless and reduced rates of return to homelessness; improvements in employment and income; and improvements in overall well-being, such as improvements in mental health, physical health, connections to family, and safety.

5. ****NEW IN 2019**** INCREASING EMPLOYMENT

- a. CoCs and CoC-Program-funded projects should work with local employment agencies and employers to prioritize training and employment opportunities for people experiencing homelessness.
- b. CoCs should also promote partnerships with public and private organizations that promote employment.

6. ****NEW IN 2019**** PROVIDING FLEXIBILITY FOR HOUSING FIRST WITH SERVICE PARTICIPATION REQUIREMENTS

- a. CoC-Program-funded projects should work with individuals and families, with unconditional acceptance and without preconditions, to move quickly into permanent housing.
- b. This NOFA provides communities and programs with flexibility, without penalty, to use service participation requirements after people have been stabilized in housing.

APPLICATION STRUCTURE

The CoC Consolidated Application is made up of three parts:

1. **CoC Application** provides information about the CoC planning body, governance structure, overall performance, and the strategic planning process. This part of the application is scored and will determine the order in which CoCs are funded.
2. **Project Applications** are completed in e-snaps by agencies applying for projects.
3. **CoC Priority Listing** ranks all project applications in order of priority.

REVIEW AND RANK CHANGES AND REMINDERS

HUD requires CoCs to review and rank projects submitted by project applicants, except CoC planning projects, having them fall into two Tiers based on a financial threshold. All projects must pass HUD's eligibility and threshold requirements to be funded, no matter their priority.

TIER 1

- ****REVISED IN 2019**** Tier 1 is equal to 100% of the combined Annual Renewal Amounts for all projects eligible for renewal for the first time, plus 94% of the combined Annual Renewal Amounts for all other projects eligible for renewal.
- Tier 1 projects will be conditionally selected from the highest-scoring CoC to the lowest-scoring CoC, provided the project applications pass both eligibility and threshold review. In the event insufficient funding is available under this NOFA to award all Tier 1 projects, Tier 1 will be reduced proportionately, which could result in some Tier 1 projects falling into Tier 2. Therefore, CoCs should carefully determine the priority and ranking for all project applications in Tier 1 as well as Tier 2.

TIER 2

- Projects in Tier 2 are less likely to be funded, and every Tier 2 project will be scored using a 100-point scale based on three factors:
 - **COC SCORE.** Up to 50 of 100 points will be awarded in direct proportion to the score received on the CoC Application.
 - **COC PROJECT RANKING.** Up to 40 of 100 points for the CoC's ranking of the project application(s). To more evenly distribute funding across CoCs and take into account the CoC's ranking of projects, point values will be assigned directly related to the CoC's ranking of projects. Additional details are available in the NOFA.
 - ****REVISED IN 2019** LOW BARRIERS TO ENTRY.** Up to 10 of 100 points for:
 - How the project application demonstrates that it is low barrier and prioritizes rapid placement and stabilization in permanent housing;
 - How Permanent housing (including PSH and RRH), Transitional Housing, Joint Transitional Housing and Rapid Rehousing Component projects, safe haven projects, or Supportive Services Only projects that are not for centralized or coordinated assessment demonstrates that it is low-barrier, prioritizes rapid placement and stabilization in permanent housing, and does not have preconditions to entry (such as sobriety or a minimum income threshold); or
 - HMIS project or Supportive Services Only project for a centralized or coordinated assessment system will automatically receive 10 points.

IMPORTANT COC STRATEGY REMINDERS

- CoCs cannot receive grants for new projects, other than through reallocation, unless the CoC competitively ranks projects based on how they improve system performance.
- HUD is increasing the share of the CoC score that is based on performance criteria. Additionally, HUD has added scoring for increased collaborations with community partners for services to increase employment and all forms of income (employment income and non-employment income).

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- HUD will continue to prioritize funding for CoCs that have demonstrated the ability to reallocate resources to higher performing projects.

ELIGIBLE NEW PROJECTS

- Again in 2019, CoCs may submit new projects created through reallocation, CoC Bonus, or a combination of reallocation and CoC Bonus, DV Bonus projects, CoC planning project, and UFA Costs project (if applicable).
 - Because new project applications may be created through the reallocation or bonus processes, if HUD determines that a project applicant or a CoC incorrectly classified one or more new projects as reallocation or bonus, HUD may reclassify the project(s) as either reallocation or bonus if the CoC exceeded either its reallocation or bonus amount.
 - If a project applicant uses both reallocation and bonus amounts to create a single new project but did not have sufficient amounts available from either source, HUD will reduce the project to the amount available, if any.
- ****NEW IN 2019** New Project Grant Terms.** HUD will allow new projects to request 1 year of funding with a longer initial grant term not to exceed 18 months. HUD has determined that most new projects requesting 1 year of funding normally take approximately 3 to 6 months to begin fully operating the new project (e.g., hiring staff, developing partnerships with landowners if leasing or renting). Therefore, a new project requesting 1 year of funding may request a grant term of 12 months to 18 months that will allow for the additional start-up process.

TRANSITION PROJECTS

- Again in 2019, applicants may transition their project(s) from one CoC Program Component to another (e.g., Transitional Housing to Rapid Rehousing, Rapid Rehousing to Permanent Supportive Housing) over a one-year grant cycle.
 - To create a transition grant, the CoC must wholly eliminate one or more projects and use those funds to create the single, new transition grant. The renewal project applicant must have the consent of its CoC.

CONSOLIDATED PROJECTS

- Again in 2019, applicants may consolidate two, three, or four eligible renewal projects into one project during the application process.
 - This means that a CoC Program recipient does not have to wait for a grant agreement amendment to be executed to consolidate two or more grants before it can apply for a single consolidated project in the CoC Program Competition.
 - The projects being combined during a grant consolidation will continue uninterrupted.
 - To be eligible for consolidation, projects must have the same recipient and be for the same component; and they will be funded in this competition only with FY 2019 funds (meaning no funds recaptured from prior years will be awarded to the project).

EXPANSION PROJECTS

- HUD will allow project applicants to apply for a new expansion project under the DV Bonus, reallocation, and CoC bonus processes to expand existing projects by adding units, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-Coordinated Entry projects within the CoC geographic area.

- In the FY 2018 NOFA, a project applicant was able to submit an application to add to a current homeless project that is funded from sources other than CoC Program funds. In the FY 2019 CoC Program NOFA, this is no longer included.
- DV Bonus funds can only be used to expand an existing renewal project if the expansion project is dedicated to survivors of domestic violence, dating violence, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3.
- In order to request an expansion for a current CoC Program-funded project, project applicants will be required to submit three project applications:
 - The renewal project application that will be expanded; and
 - A new project application with just the expansion information; and
 - A renewal project application that incorporates the renewal and new expansion activities and the combined budget line items for the renewal and the new expansion.
- The renewal and new projects will be ranked by the CoC, the combined expansion project will not be ranked and, if selected for conditional award, will take the ranked position of the stand-alone renewal project, and the separate new project will be removed from the ranking resulting in project applications below to slide up one ranked position.

ELIGIBLE TYPES OF NEW PROJECTS CREATED THROUGH BONUS OR REALLOCATED FUNDING

- ****NEW IN 2019** Fewer Population Eligibility Specifications.** Note that eligible new housing projects available through the 2019 NOFA contain fewer population limitations than the previous year.
- A CoC may apply the following types of new projects:
 - **PERMANENT HOUSING-PERMANENT SUPPORTIVE HOUSING PROJECTS** for chronically homeless at program entry or who meet the definition of DedicatedPLUS
 - **PERMANENT HOUSING-RAPID REHOUSING PROJECTS** for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 (and paragraph (3) if the CoC is approve to serve this population)
 - **JOINT TRANSITIONAL HOUSING AND RAPID REHOUSING COMPONENT PROJECTS** for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 (and paragraph (3) if the CoC is approve to serve this population)
 - **DEDICATED HMIS PROJECT** for the costs at 24 CFR 578.37(a)(2) that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant, and that is listed on the HMIS Lead form in the CoC Applicant Profile in *e-snaps* (and HMIS Lead can also apply for funding for comparable database for victim service providers).
 - **SUPPORTIVE SERVICES ONLY PROJECTS FOR COORDINATED ENTRY PROJECT** to develop or operate a centralized or coordinated assessment system.

ELIGIBLE TYPES OF NEW PROJECTS CREATED THROUGH DOMESTIC VIOLENCE (DV) BONUS

- Through this NOFA, up to \$50 million is available nationally for DV Bonus projects, which are dedicated to survivors of domestic violence, dating violence, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3.
- A CoC may apply for up to 10 percent of its Preliminary Pro Rata Need (PPRN), or a minimum of \$50,000, whichever is greater, or a maximum of \$5 million, whichever is less, to create DV Bonus projects.
- A CoC may apply the following types of projects:

- **RAPID REHOUSING PROJECT** that demonstrates trauma-informed, victim-centered approaches and is dedicated to serving survivors of domestic violence, dating violence, or stalking;
- **JOINT TRANSITIONAL HOUSING AND RAPID REHOUSING COMPONENT PROJECT** that demonstrates trauma-informed, victim-centered approaches and is dedicated to serving survivors of domestic violence, dating violence, or stalking; and
- **SUPPORTIVE SERVICES ONLY PROJECTS FOR COORDINATED ENTRY** to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of survivors of domestic violence, dating violence, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different)
- ****NEW IN 2019** Number of applications.** A CoC may apply for any number of PH-RRH and Joint TH and PH-RRH projects provided that each application is for at least \$25,000. A CoC can only submit one project application for an SSO-CE project.
- **DV Bonus for Expansions.** A CoC may also apply to expand an existing renewal project, including one that was previously funded with DV Bonus funding. DV Bonus funding may be used to expand an existing renewal project that is not dedicated to serving survivors of domestic violence, dating violence, or stalking so long as the DV Bonus funds for expansion are solely for additional units, beds, or services dedicated to persons eligible to be served with DV Bonus funding.
- **Grant Term.** Regardless of the type of project the CoC applies for, the grant term must be 1-year.
- ****NEW in 2019** Project Quality Threshold for DV Bonus.** To be eligible to receive a DV Bonus project for PH-RRH or Joint TH and PH-RRH, a CoC must demonstrate that the project will use trauma-informed, victim-centered approaches.
- **Ranking.** CoCs are required to rank all DV Bonus projects on the New Project Listing of the CoC Priority Listing with a unique rank number. If a project application designated as DV Bonus is conditionally selected by HUD with DV Bonus funds, HUD will remove the ranked DV Bonus project from the New Project Listing and all other project applications ranked below the DV Bonus project will slide up one rank position. Any project that indicated it would like to be considered as part of the DV Bonus but was not selected as part of the DV Bonus, will retain the ranking provided by the CoC and be considered as a normal ranked project.
- **Scoring.** For projects the CoC indicates it would like considered as part of the DV Bonus, HUD will award a point value to each project application combining both the CoC Application score and responses to the domestic violence bonus specific questions in the CoC Application using the following 100-point scale:
 - ****REVISED IN 2018**** For Rapid Rehousing and joint Rapid Rehousing and Transitional Housing component projects:
 - **COC SCORE.** Up to 25 points in direct proportion to the score received on the CoC Application.
 - **NEED FOR THE PROJECT.** Up to 25 points based on the extent the CoC quantifies the need for the project in its portfolio, the extent of the need, and how the project will fill that gap.
 - **QUALITY OF THE PROJECT APPLICANT.** Up to 50 points based on the previous performance of the applicant in serving survivors of domestic violence, dating violence, or stalking, and their ability to house survivors and meet safety

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outcomes. Additionally, to be eligible to receive a PH-RRH or Joint TH and PH-RRH project, the CoC must demonstrate that the project will use trauma-informed, victim-centered approaches.

- For Supportive Services Only Projects for Coordinated Entry:
 - **COC SCORE.** Up to 50 points in direct proportion to the score received on the CoC Application.
 - **NEED FOR THE PROJECT.** Up to 50 points based on the extent to which the CoC demonstrates the need for a Coordinated Entry system that better meets the needs of survivors of domestic violence, dating violence, sexual assault, or stalking, and how the project will fill this need.

IMPORTANT POINTS FOR RENEWAL PROJECTS

- To be eligible for renewal in FY 2019, a project must have an executed grant agreement by December 31, 2019 and have an expiration date in Calendar Year (CY) 2020 (between January 1, 2020 and December 31, 2020).
- **DV BONUS PROJECTS AWARDED IN FY 2018.** DV Bonus projects awarded funding in the FY 2018 CoC Program Competition are eligible to apply for renewal in the FY 2019 CoC Program Competition provided:
 - The project has an operating end date in Calendar Year (CY) 2020 (between January 1, 2020 and December 31, 2020); and
 - Continues to serve 100 percent survivors of domestic violence, dating violence, or stalking.
- **YOUTH HOMELESSNESS DEMONSTRATION PROGRAM (YHDP) RENEWALS**
 - YHDP projects that were initially awarded in FY 2016 may be eligible for renewal in the FY 2019 CoC Program Competition provided that they meet the requirements of the CoC Program and will have an operating end date in Calendar Year 2020 (between January 1, 2020 and December 31, 2020). The following are applicable to YHDP projects renewing in the FY 2019 CoC Program Competition:
 - May only request 1 year of renewal funding; and
 - If the project applicant has more than one YHDP project that is eligible for renewal in FY 2019, the project applicant can consolidate the renewing YHDP projects through the renewal application provided it follows the process outlined in the NOFA.
 - A YHDP project that requested and received a waiver for activities related to youth must attach a new waiver request to the FY 2019 renewal application that will be reviewed by HUD.
 - YHDP projects cannot use the reallocation process, consolidate with a non-YHDP project, nor use the expansion process outlined in the NOFA.
- **DEDICATEDPLUS PROJECTS.** A renewal project that is Permanent Supportive Housing 100% dedicated to chronically homeless people may either become a DedicatedPLUS project or may continue to dedicate 100% of its beds to chronically homeless individuals and families. Projects that were awarded as DedicatedPLUS in a previous CoC Program Competition are required to include households with children to qualify as a DedicatedPLUS project in the FY 2019 CoC Program Competition.

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- For reference, a DedicatedPLUS project is a permanent supportive housing project where 100% of the beds are dedicated to serve individuals, households with children, and unaccompanied youth **that at intake meet one of the following categories:**
 - 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 and had been admitted and enrolled in a permanent housing project within the last year but were unable to maintain a housing placement and met the definition of chronic homeless prior to entering the project;
 - Residing in a transitional housing funded by a Joint TH and RRH component project and who were experiencing chronic homelessness;
 - Residing and has resided in a place not meant for human habitation, Safe Haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions and the individual or head of household meet the definition of ‘homeless individual with a disability; or
 - Receiving assistance through a Depart. 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.

IMPORTANT POINTS FOR ALL PROJECT APPLICANTS

- ****NEW IN 2019** YOUTH.** Any youth-serving provider funded under this NOFA may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence.
 - **Youth Documentation.** As provided by the Consolidated Appropriations Act, 2019, youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under this NOFA.
 - **Definitions.** HUD interprets “youth-serving provider” as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence.
 - These youth-related requirements supersede any conflicting requirements under this NOFA or the CoC Program rule.
- **DUNS/SAM REGISTRATION.** All project applicants must have a DUNS number and an active SAM registration, and the process can take up to four weeks to complete. Links to DUNS and SAM resources are on page 14 of the NOFA.
- **REQUIRED READING.** Project applicants should read the CoC NOFA and CoC Program Interim Rule (linked at the bottom of this document).
- **CODE OF CONDUCT.** All project applicants must ensure their organization has a Code of Conduct that complies with the requirements of 2 CFR part 200 and is on file with HUD. Be sure to review the Code of Conduct for HUD Grant Programs page on HUD’s website to ensure your organization is listed (which means you have submitted an approved Code of Conduct)(linked below). If you do not see your organization on the list, be sure to attach a current and complete Code of Conduct to your Project Applicant Profile in *e-snaps*.

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- **HUMAN TRAFFICKING.** Again HUD clarifies that persons who are fleeing or attempting to flee human trafficking may qualify as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3; and, therefore, the individuals may be eligible for certain forms of homeless assistance under the CoC Program, subject to other restrictions that may apply.
 - ****NEW in 2019**** HUD removed additional language used in the 2018 NOFA that could limit the above to certain circumstances.
- **2019 FMRS WILL APPLY.** Because the application submission deadline falls in FY 2019, HUD will use FY 2019 FMRs for funding amounts.
- **ESTIMATE AMOUNT OF PROGRAM INCOME 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.
- **EFFECT OF PROGRAM REGULATION AMENDMENTS.** 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.
- **ELIGIBILITY REQUIREMENTS FOR APPLICANTS OF HUD'S GRANTS PROGRAMS.** Evidence of the following issues may prevent an award from being granted to otherwise successful applicants. Detailed information on each requirement is posted on [HUD's Funding Opportunities Page](#). Outstanding civil rights matters must be resolved to HUD's satisfaction prior to grant award, provided that all applicable legal processes have been satisfied.
 - Outstanding Delinquent Federal Debts
 - Debarments and/or Suspensions
 - Pre-selection Review of Performance
 - Sufficiency of Financial Management System
 - False Statements
 - Mandatory Disclosure Requirement
 - Conducting Business in Accordance with Ethical Standards/Code of Conduct
 - Prohibition Against Lobbying Activities
 - Equal Protection for Faith-based and Community Organizations

COMMUNITY-LEVEL CHANGES AND REMINDERS

- ****NEW in 2019** OTHER GUIDANCE.**
 - **Faith-Based Organizations.** Executive Orders 13798 and 13831, promote religious liberty and the increased engagement of faith-based groups in creating opportunity and serving underserved communities
 - **Promoting Opportunity and Economic Mobility.** Executive Order 13828 instructs federal agencies to promote prosperity and economic opportunity to the greatest extent possible, by structuring programs to promote self-sufficiency and reduce dependency. This includes incorporating mechanisms such as: work incentives, policies to strengthen families, and including greater participation from the private sector and faith-based organizations, all of which should work to uplift the most vulnerable to self-sufficiency, thereby alleviating the need for government assistance and reducing reliance on government intervention and resources
- ****NEW in 2019** ADMINISTRATIVE, NATIONAL AND DEPARTMENT POLICY REQUIREMENTS FOR HUD RECIPIENTS.** New in 2019, this section specifies:
 - Affirmatively Furthering Fair Housing.
 - Economic Opportunities for Low-and Very Low-income Persons ([Section 3](#)).

- *Unchanged from 2019:* Equal Access to Housing Regardless of Sexual Orientation or Gender Identity.
- **PROJECT QUALITY THRESHOLD.** HUD will review all new project applications to determine if they meet project quality threshold requirements specified in the NOFA. Any project requesting renewal funding will be considered as having met these requirements through its previously approved grant application unless information to the contrary is received (e.g., monitoring findings, results from investigations by HUD's Office of Inspector General, the recipient routinely does not draw down funds from eLOCCS at least once per quarter, consistently late APR submissions) and if the renewal project has compliance issues which results in the project not operating in accordance with 24 CFR part 578.
 - ****NEW in 2019**** For new permanent housing projects, the following is now a firm requirement rather than an option among several others: The proposed project has a specific plan to coordinate and integrate with other mainstream health, social services, and employment programs and ensure that program participants are assisted to obtain benefits from the mainstream programs for which they may be eligible (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).
 - ****NEW in 2019**** For new Joint TH and PH-RRH component projects, the following is now a firm requirement rather than an option among several others: The proposed project has a specific plan to coordinate and integrate with other mainstream health, social services, and employment programs and ensure that program participants are assisted to obtain benefits from the mainstream programs for which they may be eligible (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).
 - ****NEW in 2019**** For new Joint TH and PH-RRH component projects, one option to meet threshold requirements changed from adhering to housing first model to the following: The project has low barriers to entry and prioritizes rapid placement and stabilization in permanent housing
 - ****NEW in 2019**** For new SSO-Coordinated Entry projects, the following threshold requirement has been added: The proposed project has a specific plan to coordinate and integrate with other mainstream health, social services, and employment programs and ensure that program participants are assisted to obtain benefits from the mainstream programs for which they may be eligible (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).
- **RACIAL DISPARITIES.** Research has found racial disparities in rates of homelessness. Specifically, people who are black or Native American experience homelessness at disproportionately higher rates. Efforts to prevent and end homelessness should consider and address racial inequities to achieve positive outcomes for all persons experiencing homelessness (e.g., receiving necessary services and housing to exit homelessness).
- **COMPLIANCE WITH VIOLENCE AGAINST WOMEN ACT (VAWA) RULE.** Provides various protections to victims of domestic violence, dating violence, sexual assault, and stalking under the CoC Program and other HUD programs. The grants to be awarded under this NOFA must comply with the VAWA rule as provided in 24 CFR 578.99(j). To be in compliance, each CoC must have established an emergency transfer plan under 24 CFR 578.7(d) and make related updates to the written standards for administering CoC program assistance under 24 CFR 578.7(a)(9)(ii), (iii) and (v) by the time the local CPD Field Office issued the first FY 2017 grant agreement for a project in the CoC's geographic area for projects awarded funds in the FY 2017 CoC Program Competition.

- **MEANINGFUL PARTICIPATION.** Applicants must identify the steps they will take to ensure that traditionally marginalized populations (such as racial and ethnic minorities and persons with disabilities) will be able to meaningfully participate in the planning process. The applicant must identify the specific populations that it will include, identify community organizations that represent these populations, and describe how these populations will be included in the planning process. For capital investment projects, grantees should commit to and demonstrate plans to employ low-income and very low-income persons and/or utilize Section 3 businesses at levels beyond those required by Section 3. In seeking public participation, applicants and recipients must ensure that all communications are provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 and, as applicable, the Americans with Disabilities Act. In addition, Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d require that grantees take reasonable steps to ensure meaningful access to services, programs, and activities by persons with Limited English Proficiency (LEP persons).
- **COC MERGERS.** To encourage CoC mergers and mitigate the potential adverse scoring implications that may occur when a high performing CoC merges with one or more lower performing CoC(s), HUD will award up to 25 bonus points to CoCs that first registered as a merged CoC during the FY 2018 or FY 2019 CoC Program Registration process. CoCs may want to consider undertaking mergers next year prior to the Registration deadline.
- **REALLOCATION.** CoCs may only reallocate eligible renewal projects that have previously been renewed under the CoC Program.
- **PLANNING COSTS FOR CES.** CoCs may use planning costs to design and plan for the implementation of a centralized or coordinated assessment system.
- **POSTING OF COC APPLICATION.** CoCs must post on their website (or a partner website within the CoC), at least 2 days before the application submission deadline, all parts of the CoC Consolidated Application, including the CoC Application with attachments and the CoC Priority Listing with all project applications accepted and ranked, or rejected, and notify community members and key stakeholders that the CoC Consolidated Application is available.

RESOURCES:

- 2019 CoC NOFA Competition Page: <https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notices>
- 2019 CoC NOFA: <https://www.hudexchange.info/resource/5842/fy-2019-coc-program-nofa/>
- HUD Announcement of 2019 NOFA Release: <https://www.hudexchange.info/news/the-fy-2019-coc-program-competition-opening-and-updates/>
- CoC Program Interim Rule (24 CFR part 578): <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>
- Training and Resources: www.hudexchange.info/homelessness-assistance/
 - Code of Conduct for HUD Grant Programs: www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conduct
- Subscribe to HUD Listserv: www.hudexchange.info/maillinglist
- HUD Exchange, Ask A Question (AAQ): <https://www.hudexchange.info/program-support/my-question/>
- HUD Websites: www.hud.gov; www.hudexchange.info
- Application Pages
 - Access E-snaps Application System: <https://esnaps.hud.gov>
 - E-snaps Information: <https://www.hudexchange.info/programs/e-snaps/>