

**Humboldt County Continuum of Care**

**HUD Homeless Assistance  
FY 2015 Continuum of Care  
NOFA Competition**

**Technical Assistance (TA) Handbook**

**October 6, 2015**

## 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 2015 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 approximately nine **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 TA Workshop is intended to help projects prepare for the 2015 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 TA Workshop will guide you in preparing your applications. The Humboldt Local Process Information includes information about the local process in this community, this TA Handbook contains information you need to know for the HUD process.

## HOW TO USE THIS TA HANDBOOK

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

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## SUMMARY: 2015 NOFA COMPETITION OVERVIEW AND FUNDING AVAILABLE

On September 17, 2015, 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 2015. In 2015, the Humboldt CoC expects to be eligible to apply for approximately \$832,828 in funding to support housing and services for homeless households, and approximately \$21,726 for CoC Planning Funds.

### **Annual Renewal Demand Funding:**

\$724,199

This funding supports the CoC's existing housing and services. The CoC has the option to continue to support those programs, or to **redirect** those resources, in whole or in part, to (i) new permanent supportive housing projects for chronically homeless individuals and families; (ii) new rapid re-housing projects for individuals, families, and unaccompanied youth coming directly from the streets or emergency shelter or fleeing domestic violence; (iii) new projects for dedicated HMIS; or (iv) new Supportive Services Only projects for a centralized or coordinated assessment system.

### **Permanent Housing Bonus Funding:**

\$108,629.85

This funding supports (i) new permanent supportive housing projects that will exclusively serve chronically homeless individuals and families or (ii) rapid re-housing projects that will serve individuals, families or unaccompanied youth who come directly from the streets, emergency shelters, or are fleeing domestic violence

### **CoC Planning Funds:**

\$21,726

This funding supports CoC planning activities, and only the collaborative applicant, the County Department of Health and Human Services, 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 comprehensive information about applying for planning grants.

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. HUD is confident it will be able to fund all Tier 1 requests. In 2015, the amount of funding in Tier 1 is equal to the CoC's approved FY 2015 Annual Renewal Demand (ARD) less 15 percent (in 2014 it was 2 percent). The amount of funding in Tier 2 is equal to the amount

remaining in the CoC's FY 2015 ARD plus the Permanent Housing Bonus amount. Bonus projects will be ranked and reviewed in the same way as other projects, but applications for CoC planning will be submitted outside of the Tiering process.

**New this year**, however, projects in Tier 2 will be selected and funded based on a score related to: the overall CoC score, the project's ranked order, project type, and their level of Housing First implementation. This change is intended to reduce incentives for CoC's to "game the system" and instead, encourages CoCs to simply rank projects in priority order.

- **Anticipated Annual Renewal Demand:** \$724,199
- **Anticipated Tier 1 Amount:** \$615,569.15
- **Anticipated Tier 2 Amount:** \$217,259.70

**In 2015, funds are NOT available for:**

- Emergency shelter
- Homelessness prevention projects
- New transitional housing
- New supportive service only projects (except coordinated assessment)

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## A. HIGHLIGHTS OF THE FY2015 NOFA AND COMPETITION

- **Focus:** As expected, the NOFA and scoring criteria are very focused on HUD's policy priorities, including making strong progress on ending chronic, veteran, youth, and family homelessness and implementing Housing First system-wide.
- **Reliance on Data:** The community-level CoC Application has been restructured to be more cohesive and useful to CoCs for managing projects, building relationships, and being strategic. It will rely heavily on HMIS and other data, using system level performance measures.
- **New Questions:** Renewal projects will see new questions on their application form about grants management (e.g. submitting APRs on time) and Housing First implementation (e.g. screening and termination policies).
- **Submitting Match & Leverage:** All match and leverage letters will be submitted with the Project Applications via e-snaps this year.
- **CoC Technical Review:** Again this year, HUD expects each CoC to implement a thorough review and oversight process at the local level for both new and renewal project applications, including thorough threshold review.
- **Indirect Costs:** Applicants selected for funding 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. (See Section IV for additional information.)

- **Prioritization:** CoCs will be evaluated on the extent to which they are prioritizing chronically homeless individuals and families in all CoC Program-funded permanent supportive housing—not just those units that are dedicated to this population. Renewal projects that indicated in previous applications that they would prioritize chronically homeless persons in beds that become available through turnover in non-dedicated permanent supportive housing projects **must** continue to do so.
- **Clarification about Category 4 Eligibility:** Persons who are fleeing or attempting to flee human trafficking, including sex trafficking, may qualify as homeless under paragraph 4 of the “homeless” definition (fleeing domestic violence).

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## B. RANKING EXPLAINED

CoCs are required to either accept and rank or reject all projects submitted by project applicants in e-snaps, except CoC planning projects. CoCs should 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

The amount of funding available for Tier 1 is equal to 85 percent of the CoC’s annual renewal demand. 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 any 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 starting with the highest scoring CoCs (e.g. starting with the top ranked CoC, all projects receiving 96-100 points across the country will be funded first, then all projects receiving 91-95 points, etc.)

Tier 2 points are awarded as follows:

- **CoC Score:** Up to 60 points in direct proportion to the CoC score
- **CoC Ranking:** Up to 20 points for the CoC’s ranking of the project application(s), with the 20 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.
- **Project Type:** Up to 10 points will be based on the type of project and the population served
  - 10 points for renewal and new Permanent Housing, renewal Safe Haven, Homeless Management Information System, Supportive Services Only for Coordinated Entry System, or Transitional Housing that exclusively serves homeless youth
  - 3 points for other renewal Transitional Housing
  - 1 point for other renewal Supportive Services Only project applications

- **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 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).

### STRADDLING TIERS

For any projects that straddle the two tiers, the process for funding them is changed in 2015. In past years, projects were funded as if the whole project fell in Tier 2. This year, 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 (e.g., is able to continue serving homeless program participants effectively). This change reduces the incentive to move projects out of priority order in order to utilize the full Tier 1 amount.

### PLANNING COSTS

This year, 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. CoC planning projects that pass eligibility and review threshold will be conditionally selected using CoC scores from the highest scoring CoC to the lowest scoring CoC.

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## C. BEFORE APPLYING FOR A COC GRANT

This Handbook give 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 FY2015 CoC NOFA
- The CoC Program Interim Rule and
- The FY2015 General NOFA.

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

## DESIGNING YOUR PROJECT

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



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

1. **Strategic Resource Allocation** of all resources, including:
  - Comprehensive review of projects and reallocation when it would reduce homelessness
  - Maximizing the use of mainstream resources
  - Leveraging resources through partnerships (PHAs, philanthropy, etc.)
  - Reviewing the efficacy of transitional housing
2. **Ending Chronic Homelessness**
  - Increasing units for chronically homeless people
  - Targeting permanent supportive housing beds to chronically homeless people by prioritizing for entry within each project’s structure consistent with Notice CPD 14-012
3. **Ending Family Homelessness**
  - Ensuring access to housing resources for families, such as rapid rehousing, affordable housing units, permanent supportive housing
  - Addressing safety needs of persons fleeing domestic violence
4. **Ending Youth Homelessness**
  - Understanding the unique needs of homeless youth and reaching out to youth-serving organizations to help them fully participate in the CoC
  - Meeting the needs of homeless youth, including Lesbian, Gay, Bisexual, Transgender, and Questioning (LGBTQ) youth and victims of trafficking
  - When evaluating the performance of youth programs, taking into account the specific challenges faced by homeless youth
5. **Ending Veteran Homelessness**
  - To the extent possible, prioritizing veterans and their families who cannot be effectively assisted with Department of Veterans Affairs (VA) services for CoC-funded services
  - Coordinating CoC resources with VA-funded housing and services (e.g., HUD-VASH, SSVF)
6. **Using a Housing First Approach**
  - Removing barriers to entry, such as service participation requirements or preconditions such as sobriety or a minimum income threshold
  - Rapidly placing people into permanent housing
  - Utilizing a coordinated entry system
  - Implementing client-centered service delivery, where participation in services is based on the needs and desires of the program participant
  - Prioritizing households most in need

- Engaging a wide range of stakeholders (e.g. victim service providers, LGBTQ community, providers for victims of human trafficking, unaccompanied youth, etc.) in inclusive decision-making to ensure that service delivery is both client-centered and culturally competent.

## 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.

### 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 all beds will be dedicated for use by chronically homeless individuals and families
2. New rapid re-housing to serve homeless individuals, families and unaccompanied youth coming directly from the streets or emergency shelters or persons that meet the criteria of paragraph (4) of the definition of homeless (fleeing domestic violence) *[The NOFA is unclear about if youth must come from the streets or shelter. We expect a clarification is forthcoming.]*
3. New dedicated Homeless Management Information System (HMIS) project
4. New Supportive Services Only (SSO) project specifically for a centralized or coordinated assessment 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, does not reach the minimum threshold, or is recommended for reallocation by the Review and Rank Committee.

### B. NEW PERMANENT HOUSING BONUS PROJECTS

Different from last year, the CoC can apply for funds for new Permanent Housing Bonus projects that may be used for:

1. New permanent supportive housing projects that will serve 100 percent chronically homeless families and individuals
2. New rapid re-housing projects that will serve individuals, families or unaccompanied youth who come directly from the streets, emergency shelters, or are fleeing domestic violence or other persons who meet the criteria of paragraph (4) of the definition of

homeless [*The NOFA is unclear about if youth must come from the streets or shelter. We expect a clarification is forthcoming.*]

Bonus projects will be ranked with other projects, not funded separately as they were last year.

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## C. OVERVIEW OF ELIGIBLE NEW PROJECT TYPES

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

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- Project must serve exclusively chronically homeless individuals and/or households with children (see “Eligible Project Participants: Who Can Be Served?” section of this manual).
- Grant funds may be used for (see “Eligible Costs to Inform Project Design” section of this manual):
  - Acquisition
  - Rehabilitation
  - New Construction [NOTE TO HB: SOME COMMUNITIES DISALLOW HARD COSTS, EVEN IF HUD ALLOWS. THOSE COMMUNITIES SHOULD REMOVE THESE BULLETS.]
  - Leasing
  - Operations
  - Rental Assistance
  - Supportive Services
  - HMIS
  - 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, 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 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. RAPID RE-HOUSING FOR HOMELESS PEOPLE LIVING ON THE STREETS OR IN EMERGENCY SHELTER OR FLEEING DOMESTIC VIOLENCE (BONUS OR REALLOCATION)

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- Grant funds may be used for (see “Eligible Costs to Inform Project Design” section of this manual):
  - Short term (up to 3 months) and/or medium-term (3-24 months) tenant-based rental assistance
  - Supportive services
  - HMIS
  - Administration
- Lease is required; must be renewable, for a term of at least one year (regardless of the length of assistance provided), and terminable only for cause.
- Project must:
  - Limit rental assistance to no more than 24 months per household.
  - Limit supportive services to no more than 6 months after rental assistance stops.
  - Re-evaluate at least once per year whether the project participant continues to lack the resources and support networks necessary to retain housing without CoC assistance.
  - Offer supportive services (may include any eligible CoC Program supportive service). Project participants should have access to a wide array of supportive services designed to help them retain stable, long-term housing.
  - Require project participants to meet with a case manager at least monthly. *(Project is exempt if the Violence Against Women Act or the Family Violence Prevention and Services Act prohibit the recipient from making housing conditional on the participant's acceptance of services.)*
  - Follow CoC written policies for:
    - Determining and prioritizing eligible families
    - Determining the amount or percentage of rent that each project participant must pay
- Project may (if written standards are adopted by the CoC in consultation with ESG recipients in the CoC's geographic area and administered consistently across all projects):
  - Set a maximum amount or percentage of rental assistance that a project participant may receive.
  - Set a maximum number of months (up to 24 months) that a project participant may receive rental assistance.
  - Set a maximum number of times that a project participant may receive rental assistance.
  - Require project participants to share in the costs of rent.

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

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

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

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- Centralized or coordinated assessment system is defined to mean a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.
- Grant funds may be used for (see “Eligible Costs to Inform Project Design” section of this manual):
  - Supportive services
  - Administration

## III. NEW PROJECT BASIC DESIGN REQUIREMENTS

### 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

- Agree to participate in HMIS (except for victim service providers who must use a comparable database)
- Administer their programs or activities in the most integrated setting appropriate to the needs of qualified homeless with disabilities.

**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, quality threshold factors include: the type, scale, and location of housing; the type and scale of services; the plan to connect clients to benefits; the plan to obtain/maintain client housing; and whether at least 75% of program participants come from street, shelter, safe havens or fleeing domestic violence. The project is required to achieve at least 3 out of 5 possible points.
- For new SSO projects for centralized or coordinated assessment systems, quality threshold factors include: whether the system is easily accessible to all; the advertising strategy; the assessment process; and whether the system ensures participated are directed to housing/services that fit their needs. The project must receive at least 2 out of 4 possible points.
- For new HMIS projects, quality threshold factors include: 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; whether the HMIS collects all Universal Data Elements; whether the HMIS un-duplicates client records; and 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). The project must receive at least 3 out of 4 possible points.

**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.

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## 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. These adjustments will be made as follows:
  - Funds awarded for rental assistance in all new projects will be adjusted by applying the FMR in effect at the time of application submission to HUD, including in the cases where the FMR for a specific area has decreased from the previous year.
  - Funds awarded for operating and leasing in permanent housing projects will be increased based on the average increase in FMR amounts within the CoC's geographic area, weighted for population density.
    - Because leasing and operating costs do not decrease relative to rent amounts for specific units (e.g., operating costs for 10 units that have rents of \$500 are likely the same as for 10 units that have rents that are \$450) adjustments to leasing and operating line items will not include decreases if FMRs decrease in the geographic area. The operating and/or leasing budget line items in these projects will remain the same as in the most recent grant agreement or grant agreement amendment.
- If the recipient has a subrecipient, it is required to share at least 50% of project administrative funds with its subrecipient(s).

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## 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.

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#### D. ELIGIBLE APPLICANTS

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

**NOTE: HUD will review the applicant's capacity to do the work.**

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#### 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.
- This means that 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 for grant term requirements.

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#### F. MATCH REQUIREMENT

- See "Match and Leverage" section of this manual for more detail.



## IV. RENEWAL PROJECTS DESIGN REQUIREMENTS

To be eligible for renewal funding:

- The application must be approved by the CoC for submission in this NOFA.
- The current grant must expire between January 1 and December 31, 2016.
- The applicant must be the entity that signed the expiring grant agreement with HUD.

The list of potential projects eligible for renewal in FY 2015 for our CoC is provided separately, and is referred to in this Handbook as the Grants Inventory Worksheet or GIW. The total request for each renewing project may not exceed the amount HUD approved for that project on the GIW.

### A. HUD POLICY PRIORITIES RELATING TO RENEWAL GRANTS

The following HUD policy priorities may have an effect on renewal projects this year:

- **Housing First** is one of HUD's policy priorities. HUD recognizes that there may be some instances where the Housing First approach is not appropriate for a particular permanent or transitional housing project. For example, this may include projects where residents are focused on obtaining support to recover from substance use disorders, and such projects may be alcohol and drug free to support their continued sobriety. However, in general, **Housing First approaches are encouraged across all types of projects.**
- **Ending chronic homelessness** is a goal of *Opening Doors*. CoCs will be evaluated on the extent to which they are prioritizing chronically homeless individuals and families in all CoC Program-funded permanent supportive housing.
- **Strategic resource allocation**, another HUD priority, requires a comprehensive review of projects and reallocation when it would reduce homelessness. Using this guidance, projects that do not further CoC and federal policy may not be prioritized for funding in 2015.

#### Consolidation

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

### B. ELIGIBLE RENEWAL COSTS

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

- Leasing

- Rental assistance
- Operating costs
- Supportive services
- HMIS
- Project administration

## C. THRESHOLD REQUIREMENTS

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

**New in 2015:** The project application will ask several questions about project eligibility threshold standards. If standards are not met, the project will be rejected from the competition.

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

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

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

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

- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;

- Audit finding(s) for which a response is overdue or unsatisfactory;
- History of inadequate financial management accounting practices;
- Evidence of untimely expenditures on prior award;
- History of other major capacity issues that have significantly affected the operation of the project and its performance;
- History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and
- History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

For other threshold requirements related to project eligibility and quality, renewal projects will be considered as having met these requirements through the previously approved grant application unless information to the contrary is received (e.g., monitoring findings, results from investigations by the Office of Inspector General, consistently slow draws from LOCCS, consistently late APRs) and if the renewal project has compliance issues which results in the project not operating in accordance with 24 CFR part 578.

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#### D. FUNDING LEVELS & LIMITS

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

- Eligible renewal projects requesting rental assistance are permitted to request a per-unit amount less than the Fair Market Rent (FMR), based on the actual rent costs per unit (but not more than). This will help to reduce the number of projects receiving rental assistance that have large balances of unspent funds remaining at the end of the operating year. Renewal project applicants must ensure that the amount requested will be sufficient to cover all eligible costs as HUD cannot provide funds beyond what is awarded through the competition.
- HUD will adjust leasing, operating, and rental assistance budget line items based on changes to the Fair Market Rents (FMR). All adjustments will be made prior to award announcement. These adjustments will be made as follows:
  - Funds awarded for rental assistance will be adjusted in one of two ways:
    - Funds awarded for rental assistance in all projects requesting the FMR will be adjusted by applying the FMR in effect at the time of application submission to HUD, including in the cases where the FMR for a specific area has decreased from the previous year.
    - Funds awarded for rental assistance for renewal projects that request less than FMR, that is, a per-unit amount based on the actual rent costs per unit, will be increased based on the average increase in FMR amounts within the CoC's geographic area, weighted for population density. In the event that the FMR for a specific area decreased from the previous year, project applicants will not receive an award that exceeds the FMR after adjustment. If the FMR for the project applicant's area decreased from the previous year, the project will be awarded the lesser amount of the

- per-unit amount requested by the project applicant, based on the actual rent costs per unit, or the FMR after adjustment.
- Funds awarded for operating and leasing in permanent housing projects will be increased based on the average increase in FMR amounts within the CoC’s geographic area, weighted for population density.
    - Because leasing and operating costs do not decrease relative to rent amounts for specific units (e.g., operating costs for 10 units that have rents of \$500 are likely the same as for 10 units that have rents that are \$450) adjustments to leasing and operating line items will not include decreases if FMRs decrease in the geographic area. The operating and/or leasing budget line items in these projects will remain the same as in the most recent grant agreement or grant agreement amendment.
  - To request increased funding to a higher level of services/housing than the previous grant, the applicant must submit a **new** application for any proposed expansion and renewal application to renew the existing project. (The only new applications for funding accepted will be those described earlier in this document.)
  - If the recipient has a subrecipient, it is required to share at least 50% of project administrative funds with its subrecipient(s).

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#### E. FUNDING TERM

- All renewals will be renewed for one year per HUD requirement.

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#### F. MATCH REQUIREMENT

- See “Match and Leverage” section of this manual for more detail.

## V. ELIGIBLE COSTS TO INFORM PROJECT DESIGN

This section includes a detailed description of allowable CoC expenses for these eligible costs:

1. Leasing
2. Rental assistance
3. Operations
4. Supportive services
5. HMIS
6. Administration.

Information about other eligible costs can be found in the CoC Program Interim Rule.

**NOTE:** Projects will have additional limitations beyond those included here due to their project design or the NOFA under which they are funded.

### **New Information in 2015 about Indirect Costs**

Indirect costs (also known as “facilities and administrative costs” defined at 2 CFR 200.56) represent the expenses of doing business that are not readily identified with a particular cooperative agreement, grant, contract, project function, or activity, but are necessary for the general operation of the applicant organization and the conduct of activities it performs. Refer to 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.

### 1. LEASING

Leasing structures or individual units to provide supportive housing or supportive services to

homeless persons during the period covered by the grant is an eligible cost under the CoC program. In a leasing project, the lease is between the owner and the recipient/subrecipient.

**Leasing funds may not be used to lease units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership, where the partnership owns the structure, unless HUD authorized an exception for good cause.**

Uses of Leasing Funds: The grantee or project sponsor may use grant funds to pay up to 100 percent of the rent charged by a property owner (within rent limitations described below). If electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds, but not cable, phone, or internet. Recipients and subrecipients may also use leasing funds to pay security deposits, in an amount not to exceed 2 months of actual rent. An advance payment of the last month's rent may be provided to the landlord in addition to the security deposit and payment of the first month's rent.

Rent Limitations: When grants are used to pay rent for all or part of a structure or structures, the rent paid must be reasonable in relation to rents being charged in the area for comparable space. In addition, the rent paid may not exceed rents currently being charged by the same owner for comparable unassisted space. When grants are used to pay rent for individual housing units, the rent paid must be reasonable in relation to rents being charged for comparable units, taking into account the location, size, type, quality, amenities, facilities, and management services. In addition, the rents may not exceed rents currently being charged for comparable units, and the rent paid may not exceed HUD-determined fair market rents (FMRs).

Occupancy Agreements and Subleases: Leasing projects are required to have occupancy agreements and/or subleases.

Occupancy Charges and Rent: Leasing programs *may* charge occupancy charges or rent to program participants. Occupancy charges and rent from program participants must be calculated as provided in § 578.77 of the CoC Interim Rule. Occupancy charges and rent collected from program participants are program income. Program income earned during the grant term must be used for eligible activities under the grant, but cannot be used as match. Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to grant funds. In addition, rents and occupancy charges collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing. **Program income cannot be used as match or leverage.**

Leases: Program participants in permanent housing must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party. Program participants in transitional housing must enter into a lease agreement or occupancy agreement for a term of at least one month. The agreement must be

automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

**Housing Standards:** Housing leased with Continuum of Care program funds must meet the applicable housing quality standards (HQS). Before any assistance will be provided on behalf of a program participant, the recipient, or subrecipient, must physically inspect each unit to assure that the unit meets HQS. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected. Recipients or subrecipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

**Limitations on Leasing Assistance:** If grant funds are used for leasing assistance, the project may not receive rental assistance, acquisition, rehabilitation or new construction assistance.

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## 2. RENTAL ASSISTANCE

Grant funds may be used for rental assistance for homeless individuals and families. Except for Sponsor-based Rental Assistance (described below), in rental assistance, the lease is between the program participant and the owner.

**Types of Rental Assistance:** The rental assistance may be short-term, up to 3 months of rent; medium-term, for 3 to 24 months of rent; or long-term, for longer than 24 months of rent. (Short- or medium-term rental assistance cannot be used in properties supported with CoC acquisition, rehabilitation, or new construction funds.) The rental assistance may be tenant-based, project-based, or sponsor-based, and may be for transitional or permanent housing.

- **Tenant-based Rental Assistance** is rental assistance in which program participants choose housing of an appropriate size in which to reside. To facilitate services, program participants may be required to live in a specific area or a specific structure, in some cases. Program participants who have complied with all program requirements during their residence retain the rental assistance if they move within the CoC area. Certain DV victims may retain the assistance outside of the CoC's area. TBRA may not be used in projects supported with CoC acquisition, rehabilitation or new construction assistance.
- **Sponsor-based Rental Assistance** is rental assistance provided through contracts between the recipient and a sponsor organization. Program participants must reside in housing owned or leased by the sponsor. A sponsor may be a private, nonprofit organization, or a community mental health agency established as a public nonprofit organization.
- **Project-based Rental Assistance** is rental assistance provided through a contract with the owner of an existing structure, where the owner agrees to lease the subsidized units to program participants. Program participants will not retain rental assistance if they move.

**Uses of Rental Assistance:** Grant funds may be used for rental assistance for homeless

individuals and families. Grant funds also may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit. If a unit is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person. No additional assistance will be paid until the unit is occupied by another eligible person. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies. Recipients and subrecipients may use grant funds in an amount not to exceed one month's rent to pay for any damage to housing due to the action of a program participant. This shall be a one-time cost per participant, incurred at the time a participant exits a housing unit.

Rental assistance administrator: Rental assistance may be administered by a State, unit of general local government, a public housing agency, or currently, a non profit agency. It is not yet known if non profits will be able to administer rental assistance going forward.

Grant amount: The amount of rental assistance in each project will be based on the number and size of units proposed by the applicant to be assisted over the grant period. The amount of rental assistance in each project will be calculated by multiplying the number and size of units proposed by the FMR of each unit on the date the application is submitted to HUD, by the term of the grant.

Rent reasonableness: Although awards are made based on FMR, HUD will only provide rental assistance for a unit if the rent is reasonable. The recipient or subrecipient must determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units.

Resident rent: Rental assistance programs *must* charge rent to program participants. Rent from program participants must be calculated as provided in § 578.77 of the CoC Interim Rule. Rent collected from program participants is program income. Program income earned during the grant term must be used for eligible activities under the grant. Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to grant funds. In addition, rents collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing.

Leases: Program participants in permanent housing must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party. Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.



Restrictions: Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources. Program funds may not be used for rental assistance and operating costs or rental assistance and leasing in the same project.

Housing Standards: Housing for which rental assistance payments are made must meet the applicable housing quality standards (HQS), except that 24 CFR 982.401(j) applies only to housing occupied by program participants receiving tenant-based rental assistance. Before any assistance will be provided on behalf of a program participant, the recipient, or subrecipient, must physically inspect each unit to assure that the unit meets HQS. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected. Recipients or subrecipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

CoC Written Standards: Rental assistance must be administered in accordance with the policies and procedures established by the Continuum for providing Continuum of Care assistance, including about evaluating individuals' and families' eligibility for assistance, determining and prioritizing which eligible individuals and families will receive transitional housing, rapid rehousing, or permanent supportive housing, and what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.

*Note: CoCs may not have these standards in place yet, but as HEARTH is implemented and CoCs develop such standards, rental assistance programs must align with the CoC's standards.*

Payment of grant: The amount of rental assistance in each project will be reserved for rental assistance over the grant period. Recipients will make draws from the grant funds to pay the actual costs of rental assistance for program participants. A recipient must serve at least as many program participants as shown in its application for assistance. If the amount in each grant reserved for rental assistance over the grant period exceeds the amount that will be needed to pay the actual costs of rental assistance, due to such factors as contract rents being lower than FMRs and program participants being able to pay a portion of the rent, recipients or subrecipients may use the excess funds for covering the costs of rent increases, certain staffing costs related to rental assistance, or for serving a greater number of program participants.

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### 3. SUPPORTIVE SERVICES

Uses of Supportive Services Funds: Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair,

building security, furniture, utilities, and equipment are eligible as a supportive service.

Need for Services: Supportive services must be necessary to assist program participants obtain and maintain housing. Recipients and subrecipients shall conduct an annual assessment of the service needs of the program participants and should adjust services accordingly.

Duration of Services: For a transitional housing project, supportive services must be made available to residents throughout the duration of their residence in the project. Permanent supportive housing projects must provide supportive services for the residents to enable them to live as independently as is practicable throughout the duration of their residence in the project. Services may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.

Eligible Costs: **Any cost that is not described as an eligible cost under this section is not an eligible cost of providing supportive services using Continuum of Care program funds.**

Eligible costs include:

- Annual Assessment of Service Needs
- Assistance with moving costs
- Case management – costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s). Eligible component services and activities consist of: counseling, coordinating services, using the centralized or coordinated assessment system, obtaining benefits, monitoring participant progress, providing referrals, providing risk assessment/safety planning with victims of domestic violence, and developing individualized housing and service plans.
- Child care – costs of establishing and operating child care, and providing child-care vouchers, for children under the age of 13 (unless disabled, then 18) from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities. **The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.**
- Education services – costs of improving knowledge and basic educational skills. Eligible services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Eligible component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.
- Employment assistance and job training – costs of establishing and operating employment assistance and job training programs, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of

providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

- Food – cost of providing meals or groceries to program participants
- Housing search and counseling services – costs of assisting eligible program participants to locate, obtain, and retain suitable housing. Eligible component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements. Other eligible costs are: mediation with property owners and landlords on behalf of eligible program participants; credit counseling, accessing a free personal credit report, and resolving personal credit issues; and the payment of rental application fees.
- Legal services – fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family’s ability to obtain and retain housing. Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants. Eligible component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient’s employees’ salaries and other costs necessary to perform the services. **Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.**
- Life skills training – costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.
- Mental health services – the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Eligible component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
- Outpatient health services – the direct outpatient treatment of medical conditions when provided by licensed medical professionals including: Providing an analysis or assessment of an individual’s health problems and the development of a treatment plan; Assisting individuals to understand their health needs; Providing directly or

assisting individuals to obtain and utilize appropriate medical treatment; Preventive medical care and health maintenance services, including in-home health services and emergency medical services; Provision of appropriate medication; Providing follow-up services; and Preventive and non-cosmetic dental care.

- Outreach services – costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants. Eligible costs include the outreach worker’s transportation costs and a cell phone to be used by the individual performing the outreach. Eligible component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the CoC’s area.
- Substance abuse treatment services – costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.
- Transportation – the costs of program participant’s travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other eligible services; mileage allowance for service workers to visit program participants and to carry out housing quality inspections; the cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants; the cost of gas, insurance, taxes, and maintenance for the vehicle; the costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and if public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to certain restrictions.
- Utility deposits – this form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.
- Direct provision of services – if the service described above is being directly delivered by the recipient or subrecipient, eligible costs for those services also include the costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and the salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.

Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible supportive services costs. (See project administration eligible costs.)

While it is not required, recipients and subrecipients may require program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by

the disability. If the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program.

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#### 4. OPERATIONS

Operations funds may be used to pay the costs of the day-to-day operation of transitional and permanent housing in a single structure or individual housing units.

Eligible Uses of Operations Funds: Operations can be used for:

- The maintenance and repair of housing
- Property taxes and insurance
- Scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost)
- Building security for a structure where more than 50 percent of the units or area is paid for with grant funds
- Electricity, gas, and water
- Furniture (which cannot be retained by program participants at the end of the program)
- Equipment.

Not in Rental Assistance or SSO Projects: **CoC Program funds may not be used for rental assistance and operating costs in the same project.** CoC Program funds may not be used for the operating costs of emergency shelter- and supportive service-only facilities. CoC Program funds may not be used for the maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease.

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#### 5. HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

HMIS funds may be used to pay the costs of contributing data to the HMIS designated by the Continuum of Care. Activities funded under this section must comply with the HMIS requirements.

Eligible Costs: Eligible HMIS costs for CoC programs include the costs of:

- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, fax machines, and furniture
- Obtaining technical support
- Leasing office space

- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Paying salaries for operating HMIS, including: Completing data entry; Monitoring and reviewing data quality; Completing data analysis; Reporting to the HMIS Lead; Training staff on using the HMIS; and Implementing and complying with HMIS requirements;
- Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS
- Paying staff travel costs to conduct intake
- Paying participation fees charged by the HMIS Lead, as authorized by HUD, if the recipient or subrecipient is not the HMIS Lead.

If the recipient or subrecipient is the HMIS Lead (the only entity that may receive a grant in the HMIS component), it may also use these funds to pay the costs of:

- Hosting and maintaining HMIS software or data
- Backing up, recovering, or repairing HMIS software or data
- Upgrading, customizing, and enhancing the HMIS
- Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems
- Administering the system
- Reporting to providers, the Continuum of Care, and HUD
- Conducting training on using the system, including traveling to the training.

Victim Services and Legal Services Providers: If the recipient or subrecipient is a victim services provider, or a legal services provider, it may use HMIS funds to establish and operate a comparable database that complies with HUD’S HMIS requirements.

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## 6. ADMINISTRATIVE COSTS

The recipient or subrecipient may receive funding for the payment of project administrative costs related to the planning and execution of Continuum of Care activities. This does not include staff and overhead costs directly related to carrying out other eligible activities, because those costs are eligible as part of those activities.

Use of Administrative Funds: Eligible administrative costs include:

- Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:
- Salaries, wages, and related costs of the recipient’s staff, the staff of subrecipients, or other staff engaged in program administration. Program administration assignments include the following:
  - Preparing program budgets and schedules, and amendments to those budgets and schedules

**Reminder:** Time spent preparing

- Developing systems for assuring compliance with program requirements
  - Developing agreements with subrecipients and contractors to carry out program activities
  - Monitoring program activities for progress and compliance with program requirements
  - Preparing reports and other documents directly related to the program for submission to HUD
  - Coordinating the resolution of audit and monitoring findings
  - Evaluating program results against stated objectives
  - Managing or supervising persons whose primary responsibilities with regard to the program include these administrative tasks.
- Travel costs incurred for monitoring of subrecipients
  - Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services
  - Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space
  - Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings and costs of carrying out the environmental review responsibilities are also eligible uses of administrative funds.

the annual application to HUD is not an eligible use of CoC funds.

Allocation of Costs: In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant.

Sharing Requirement: Recipients must share at least 50% of project administrative funds with its subrecipients.

## VI. ELIGIBLE PROJECT PARTICIPANTS: WHO CAN BE SERVED?

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

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

As always, what governs is your grant agreement. If your grant agreement limits who you can serve, that is the population you must serve. **New project applicants may have stricter limitations on who can be served than what is included here.**

### **Key to abbreviations:**

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

### **HEARTH Definition Categories**

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

### **Who Is “Homeless”?**

	<b>PH</b>	<b>SH</b>	<b>TH</b>	<b>SSO</b>	<b>CH</b>
Living in places not meant for human habitation: cars, parks, sidewalks, and abandoned buildings	X Cat 1	X Cat 1	X Cat 1	X Cat 1	X Cat 1
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
Living in a Safe Haven	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
Living in Transitional Housing for homeless and originally came from the streets or emergency shelter	X Cat 1	X Cat 1	X Cat 1	X Cat 1	
Living in Transitional Housing for homeless and DID NOT originally come from the streets or emergency shelter			X Cat 1	X Cat 1	



	PH	SH	TH	SSO	CH
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	
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)	
Fleeing domestic/dating violence, sexual assault, stalking, etc. and no other residence has been identified and lacks resources and support network to access housing.  <b>In the 2015 NOFA, HUD clarified that persons fleeing or attempting to flee human trafficking, including sex trafficking, qualify under this category.</b>	X Cat 4		X Cat 4	X Cat 4	X Cat 4 but see chronically homeless below

### Other Eligibility Requirements for CoC Project Participants

	PH	SH	TH	SSO	CH
Must be disabled (physically, mentally, emotionally, developmentally, due to alcohol and/or drugs, or due to HIV/AIDS): <ul style="list-style-type: none"> <li>Long-continuing or indefinite duration</li> <li>Substantially impedes ability to live independently</li> <li>Of a nature that would be improved by suitable housing</li> </ul> (See the full definition of disability below.)	X	X	May serve	May serve	X
Must live alone, suffer from serious mental illness and other debilitating behavioral conditions, live on the streets, and have been unwilling or unable to participate in supportive services.	May serve	X	May serve	May serve	May serve

	PH	SH	TH	SSO	CH
<p>Must be chronically homeless:</p> <ul style="list-style-type: none"> <li>unaccompanied homeless individual or family with at least one adult member</li> <li>who has either been continuously homeless for a year or more OR has had at least four episodes of homelessness in the past three years</li> <li>with a disabling condition (disabling condition is defined as a “diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions.”)</li> </ul> <p>To be considered chronically homeless, the person must have been sleeping in a place not meant for human habitation, or in an emergency shelter, or in a Safe Haven during that time.</p> <p>An episode of homelessness is a separate, distinct, and sustained stay on the streets and/or in an emergency homeless shelter.</p> <p>The applicable statutes, regulations and NOFAs do not define “sustained,” and so you should use the common definition of the word – continued -- read in context with “separate” and “distinct.”</p>	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;
- Currently incarcerated;
- Living with relatives or friends;
- Living in a Board and Care, Adult Congregate Living Facility, or similar place;
- Being discharged from an institution (after a stay of 90 consecutive days or more); or
- Utilizing Housing Choice Vouchers, except Katrina evacuees that received Katrina Disaster Housing Assistance Program (KDHAP) Housing Choice Vouchers

**FREQUENTLY ASKED QUESTIONS: WHO IS HOMELESS?**

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

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

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

No, not all individuals and families currently residing in transitional housing will be eligible for permanent supportive housing. Permanent housing projects must continue to abide by the limitations and requirements included in the NOFA under which they were funded, including the limitation on eligibility. For example, projects funded in the FY2015 CoC Competition must continue to abide by the limitation on Permanent Supportive Housing set forth in the NOFA in Section IV.E.2.d(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.”

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

No. Youth who are within 14 days of exiting the foster care system who have not identified other permanent housing and who have no other resources or support networks to obtain permanent housing are not defined as homeless under Category 2 of the definition of homeless. This is different than how HUD operationalized eligibility for Transitional Housing and Supportive Service Only projects under the Supportive Housing Program.

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

The statutory language in Section 103(5), which HUD further clarified through the regulations, defines as homeless, “An individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided.” Through the regulation, HUD further clarified that individuals

exiting systems of care, including institutions and foster care, are no longer defined as homeless if they have resided there for more than 90 days and were not previously living on the streets or in emergency shelter prior to entering the institution or system of care. This means that unaccompanied youth being emancipated from the foster care system are not defined as homeless under Category 1, unless they are residing on the streets or in an emergency shelter at the point of intake. Additionally, HUD has determined that individuals exiting institutions, or systems of care, are not defined as homeless under paragraph (2) of the definition of homeless even if they are within 14-days of discharge and no subsequent residence has been identified. This means that unaccompanied youth who are being emancipated from the foster care system are not defined as homeless under Category 2, and are therefore not eligible for those projects that serve Category 2 in the CoC Program.

**Definition of “Persons with Disabilities”:**

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

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

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

- 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.

## PROGRAM REQUIREMENTS

### VII. MATCH & LEVERAGE

Recipients and subrecipients are required to provide cash or in-kind match in accordance with the CoC regulations. In addition, HUD scores the CoC on program leverage to see what other resources are supporting the programs it funds.

- 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 and/or program income), 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.
- **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.

**NOTE: Program income cannot be used as match.**

**New in 2015:** Applicants are required to submit all match and leverage documentation to HUD with their application in e-snaps. Documentation must be dated within 60 days of the application deadline of November 20.

The following materials provide examples of documentation and potential sources of match and leverage.

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

## A. DOCUMENTATION OF LEVERAGED RESOURCE OR CASH MATCH

In the chart below is information regarding the leveraged resource or cash match being provided by this agency.

Name of organization providing the leveraged resource or cash match	
Type of contribution*	
Value of the contribution**	
Name of project	
Name of sponsor	
Date the contribution will be available***	[____], 2016 OR [____], 2017
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 within 60 days of the application deadline (between September 22 and November 20, 2015)

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

Note: You must submit documentation of your cash match (i.e. cost sharing) requirement.

Where it says "Type of contribution" write in "cash".

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

\*\*\* **For renewals, this date must coincide with your 2016-2017 operating year.**

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## B. EXAMPLES OF LEVERAGE

### **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

## VIII. ENERGY STAR

The Department of Housing and Urban Development has adopted a wide-ranging energy action plan for improving energy efficiency in all program areas. As a first step in implementing the energy plan, HUD, the Environmental Protection Organization (EPA), and the Department of Energy (DOE) have signed a partnership to promote energy efficiency in HUD's affordable housing programs, including public housing, HUD insured housing, and housing financed through HUD formula and competitive programs. The purpose of the Energy Star partnership is to promote energy-efficient affordable housing stock while protecting the environment.

HUD promotes energy-efficient housing. All McKinney-Vento funded projects are encouraged to purchase and use Energy Star labeled products. Applicants constructing, rehabilitating, or maintaining housing or community facilities are encouraged to promote energy efficiency in design and operations. They are urged especially to purchase and use products that display the Energy Star label. Applicants providing housing assistance or counseling services are encouraged to promote Energy Star materials and practices, as well as buildings constructed to Energy Star standards, to both homebuyers and renters. Applicants are encouraged to undertake program activities that include developing Energy Star promotional and information materials, providing outreach to low- and moderate-income renters and buyers on the benefits and savings when using Energy Star products and appliances, utilizing Energy Star-designated products in the construction or rehabilitation of housing units, and replacing worn products or facilities such as light bulbs, water heaters, furnaces, etc., with Energy Star products to reduce operating costs. Communities and developers are encouraged to promote the designation of community buildings and homes as Energy Star compliant. For further information about Energy Star, please go to <http://www.energystar.gov/>

## IX. LATER RESPONSIBILITIES FOR RECIPIENTS AND SUBRECIPIENTS

If your application is conditionally awarded, you will have a number of responsibilities. **Please be sure that you are capable of carrying all of them out before submitting your application.** The list that follows includes some of the recipient/subrecipient responsibilities. For the 2015 NOFA, these requirements are detailed in the 2015 General Section NOFA, 2015 CoC Program NOFA, and the CoC Interim Rule. **All grant recipients and subrecipients should read these three documents carefully.**

### A. NEW PROJECTS

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

## B. ALL PROJECTS

- **Annual Audits:** Any recipient expending \$750,000 or more in a year in Federal Funds must conduct a single or program-specific audit for that year in accordance with the provisions of OMB Circular No. A-133.
- **Reporting:**
  - **Annual Performance Reports (APR):** Your agency will be responsible for submitting an APR for each project every year, which provides client data, service utilization information, program outcomes, and financial information. HUD may terminate the renewal of any grant and require repayment if the APR is not filed on time or if HUD deems the APR unacceptable or showing noncompliance with grant requirements
  - **Record-keeping:** Recipients must maintain records and within the timeframe required, make any reports, including those pertaining to race, ethnicity, gender, and disability status that HUD may require. CoC applicants may report this data as part of their APR submission to HUD.
  - **Transparency Act:** Award notices may also include requirements for sub-award reporting in compliance with the requirements of the Federal Financial Assistance Accountability and Transparency Act of 2006 (Pub. L. 109-282) (Transparency Act) and Section 872 of the Duncan Hunter National Defense Authorization Act for Fiscal Year 2009 (Pub. L. 110-417)
- **Impact/Success Indicators:** All projects, except for HMIS, must provide systematic indicators for evaluating the positive impact/success the project will have on clients and reducing homelessness in the community. HUD will require projects to include measures for: length of time in the project; recidivism; movement to and stability in permanent housing; connection with mainstream benefits; and job and income growth for persons who are homeless. Projects may also indicate additional measures on which the project will chart success.
- **Other Data Requests:** Your agency must provide performance and other requested data to the CoC for community-level analysis and planning.
- **Match Documentation:** Your agency must maintain documentation of any required match funding in your financial reports on a grant-specific basis.
- **HMIS Participation:** Your agency must participate in the CoC's Homeless Information Management System and enter data consistent with the applicable HMIS Data Standards.
- **Performance:** Your agency must perform the tasks outlined in your application and grant agreement, including complying with all of the language in the Applicant Certifications, and following all HUD statutes and regulations applicable to the grant.
- **Energy Star:** HUD encourages all recipients of its funds to use Energy Star appliances for energy conservation.
- **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.

- **Distribution of Funds:** Recipients must distribute the funds to subrecipients (in advance of expenditures by the subrecipients); distribute the appropriate portion of the funds to a subrecipient no later than 45 days after receiving an approvable request for such distribution from the subrecipient; and draw down funds at least once per quarter of the program year, after eligible activities commence.
- **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.
- **Please see the FY2015 NOFA** (especially section V.F.3.) for additional information.

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### C. TIMELINESS

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

- Recipients conditionally awarded funds in the 2015 CoC funding round must be obligated by September 30, 2017 and spent by September 30, 2022. However, grant terms and timeliness standards may require shorter timelines.
- Recipients must distribute the funds to subrecipients (in advance of expenditures by the subrecipients); distribute the appropriate portion of the funds to a subrecipient no later than 45 days after receiving an approvable request for such distribution from the subrecipient; and 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 ELECTRONIC APPLICATION SYSTEM: E-SNAPS

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

### IMPORTANT!

#### Not all browsers work for e-snaps

The e-snaps system is not compatible with Chrome and newer versions of Firefox (v39 or later). Users should use Internet Explorer 10 or 11 (in compatibility mode) or older versions of Internet Explorer or Firefox which are available from Microsoft and Mozilla. If you need assistance in accessing e-snaps contact the HUD Exchange e-snaps Ask A Question (AAQ)

#### 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
- Accessing the Project Application Resource
- FY 2015 New Project Application Instructional Guide
- FY 2015 Renewal Project Application Instructional Guide
- FY 2015 Performance Measures - Project Application Instructional Guide
- FY 2015 Budgets - Project Application Instructional Guide

## B. STEPS TO COMPLETING YOUR PROJECT APPLICATION

1. Enter e-snaps by logging in to <http://www.hud.gov/esnaps>, using your prior user name and password or, if your agency has not used e-snaps before, by establishing a new account. (See “Project Applicant Profile Instructional Guide” training module for guidance, if you will be the grant recipient, or ask your proposed grant recipient, if you will be the subrecipient.)

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

2. Recipients should complete the Applicant Profile (see the next section of this Handbook “Recipient Documents” for guidance). **DO NOT ATTEMPT TO GO DIRECTLY TO YOUR PROJECT APPLICATION.** If you get there, there is likely a mistake and you will probably have to retrace your steps.
3. Once you have established your agency as an applicant with the Applicant Profile, you can initiate your Project Application(s). Although you only need one Applicant Profile per agency (in almost all cases), you will need to complete a Project Application for each project.
4. Do NOT hit submit on your application until after the local competition when you’ve been instructed to do so! Project applications must be submitted in e-snaps by Tuesday, November 17, 2015.

### Some e-snaps tips:

- Your agency must have at least one person on staff who is able to access and enter data into e-snaps. It is preferable to have two, but having more than two can lead to confusion and errors.
- e-snaps is the HUD system; it is the channel through which your application(s) will be transmitted to HUD at the end of the competition. It is NOT the system for the local



competition. Information regarding submission of your application materials can be found in the Local Process 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 HomeBase if you have problems with e-snaps. That said, many problems can be avoided by following the instructions closely and relying upon the Training Modules and by using the correct browser.

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

Each applicant completes, in e-snaps, an applicant profile (the SF-424 Application for Federal Assistance) and then a project application for each project. This list summarizes the other documents that need to be uploaded to e-snaps. All must be dated between July 1, 2015 and November 20, 2015

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

- Form HUD-2880, Applicant/Recipient Disclosure/Update Report (one for each project, zipped together)
- SF-LLL, Disclosure of Lobbying of Activities (if applicable, for non profits only)
- Applicant Code of Conduct
- Form HUD-50070, Certification for a Drug-Free Workplace
- Documentation of Applicant Eligibility (e.g. 501(c)(3) letter)
- SF-424 Supplement: Survey on Ensuring Equal Opportunities for Application (non profits only, voluntary)
- (Only if applicant is requesting indirect costs AND has an approved federally negotiated indirect cost rate) Approved Indirect Cost Rate Proposal

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

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

- Documentation of Subrecipient Eligibility (e.g. 501(c)(3) letter)
- Match and Leverage Documentation

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## C. RECIPIENT DOCUMENTS & APPLICANT PROFILE

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

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### 1. GENERAL INSTRUCTIONS

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

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

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

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

#### Tips:

- The "Complete" button on the Applicant Profile must be selected within the timeframe of the competition period. Therefore, when you log in the first time during this NOFA period, even if there is a statement "This e.Form has been marked as complete," you **MUST** put the forms in edit-mode (select the Edit button on the Submission Summary page), revise the Profile, and select the "Complete" button again.
- **Complete one Applicant Profile per applicant only (NOT one per project).**
  - If you are applying for a renewal project and a renewal project, you will need to register for multiple funding opportunities within your Applicant Profile.
  - If you have multiple funding opportunities, make sure to create the project application under the correct Funding Opportunity name.
- Complete the Applicant Profile on e-snaps at [www.hud.gov/esnaps](http://www.hud.gov/esnaps)
- All required attachments must be uploaded before the Project Applicant will be able to access the Project Application. Please make sure all attachments are current before submitting your application. **Per the 2015 NOFA, all attachments must contain accurate and complete information and be dated between July 1, 2015 and November 20, 2015.**
- To upload attachments, the steps for most documents are:

- Download the form from HUD’s website
- Complete and save the form on your computer
- Upload that document when completing the Applicant Profile in e-snaps

**2. PAGE 2. ORGANIZATON INFORMATION: CCR & DUNS**

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

<b>Agency</b>	<b>Active Registration on SAM?</b>
Arcata House Partnership	No
Humboldt Bay Housing Development	Yes
Humboldt County Department of Health and Human Services	Yes
Redwood Community Action Agency	Yes

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

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**1. Indicate applicant’s congressional districts:**

The congressional districts in this CoC include:

- CA-02

**4. Is the applicant’s code of conduct already on file with HUD?**

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

Simply stated, the Code of Conduct:

- Must prohibit the solicitation and acceptance of gifts or gratuities by officers,

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

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

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

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

You should review the copy previously submitted for accuracy. If the information on the attachment is still accurate, you do not need to replace the attachment for FY2015. If the information has changed, however, you will need to delete the attachment on file, complete a new attachment, and upload it to e-snaps (later in the Applicant Profile).

*If Not Listed*

An applicant not listed on the website must submit a copy of its code of conduct with its FY2015 application for assistance.

Agency	Code of Conduct on HUD’s Website?
Arcata House Partnership	No
Humboldt Bay Housing Development	No
Humboldt County Department of Health and Human Services	No
Redwood Community Action Agency	Yes

*If Revised Information*

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

- The person who submitted the previous application is no longer your authorized

- organization representative,
- The organization has changed its legal name or merged with another organization, or
- The address of the organization has changed.

### **The Regulation that Applies to Non-Profit Organizations (and Institutions of Higher Educations and Hospitals)**

The recipient shall maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts.

No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by Federal funds if a real or apparent conflict of interest would be involved.

Such a conflict would arise when:

- (i) The employee, officer or agent,
- (ii) Any member of his immediate family,
- (iii) His or her partner, or
- (iv) An organization which employs, or is about to employ, any of the above, has a financial or other interest in the firm selected for award.

The officers, employees, and agents of the recipient shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to subagreements.

However, recipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.

The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the recipient.

### **The Regulation that Applies to State and Local Governments**

Grantees and subrecipients will maintain a written code of standards of conduct governing the performance of their employees engaged in the award and administration of contracts.

No employee, officer or agent of the grantee or subrecipients shall participate in selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved.

Such a conflict would arise when:

- (i) The employee, officer or agent,
- (ii) Any member of his immediate family,
- (iii) His or her partner, or

(iv) An organization which employs, or is about to employ, any of the above, has a financial or other interest in the firm selected for award.

The grantee's or subrecipient's officers, employees or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to subagreements.

Grantee and subrecipients may set minimum rules where the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value.

To the extent permitted by State or local law or regulations, such standards or conduct will provide for penalties, sanctions, or other disciplinary actions for violations of such standards by the grantee's and subrecipient's officers, employees, or agents, or by contractors or their agents.

The awarding agency may in regulation provide additional prohibitions relative to real, apparent, or potential conflicts of interest.

***Post-award***

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

**AS A REMINDER**

**Project Applicants will be required to upload their attachments during this NOFA competition, even if they have uploaded these attachments before.** All required attachments must be uploaded before the Applicant will be able to access the Project Application. The attachments must contain accurate and complete information and must be dated between July 1, 2015 and November 20, 2015.

**5. FIRST UPLOAD: APPLICANT/ RECIPIENT DISCLOSURE/UPDATE REPORT (HUD-2880)**

A Project Applicant is **required** to submit one HUD form 2880 **per project dated during the current competition year (dated between July 1, 2015 and November 20, 2015)**, in order to complete the Applicant Profile. All Project Applicants **MUST** submit current date and correct HUD-2880(s) that **accurately reflect the total amount requested in the FY2015 CoC Program Competition.**

- The form is located at <http://portal.hud.gov/hudportal/documents/huddoc?id=2880.pdf> Once you

have downloaded the HUD form, complete it and save an electronic copy on your computer.

- If you have more than one project, fill out one form per project.
- For each project for which you expect to receive, assistance from HUD in excess of \$200,000 during the during the fiscal year, you must identify:
  - The amount requested in this year’s application;
  - Any other government assistance include any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance from the Federal government (other than that requested from HUD in the application), a State, or a unit of general local government, or any agency or instrumentality thereof; and
  - The name, Social Security Number or Employer Identification number, type of participation in the project, and financial interest of each developer, consultant, contractor, and persons receiving \$50,000 or 10 percent of the funds requested in the application (whichever is lower).
- Combine all documents into one file as a zip file. Zipping the file is important because there is a limit to the size document that can be attached. Note that you can scan the 2880s into one PDF file, but there is a size limitation.

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

## 6. SECOND UPLOAD (FOR NON-PROFITS) DISCLOSURE OF LOBBYING ACTIVITIES (SF-LLL)

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You should complete this form ONLY if you are a non-profit AND you participate in lobbying activities.

The form can be found at:

<http://www.hud.gov/offices/adm/hudclips/forms/files/sflll.pdf>

## 7. THIRD UPLOAD: CODE OF CONDUCT

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

## 8. FOURTH UPLOAD: DRUG FREE WORKPLACE

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You are required to submit one HUD 50070 (Certification for a Drug-Free Workplace) dated during the current competition (dated between July 1, 2015 and November 20, 2015). You can find the form to download at:

<http://portal.hud.gov/hudportal/documents/huddoc?id=50070.pdf>

## 9. FIFTH UPLOAD (FOR NON-PROFITS) NON-PROFIT DOCUMENTATION

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### **Where is it?**

In your agency's records.

### **What is it?**

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

## 10. SIXTH UPLOAD (FOR NON-PROFITS) SURVEY ON ENSURING EQUAL OPPORTUNITIES FOR APPLICANTS (SF-424 SUPP)

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This form is OPTIONAL and is for non-profits only.

The form to download and complete on your computer can be found at:



<http://www.hud.gov/offices/adm/hudclips/forms/files/sf424supp.doc>

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

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

## D. COMPLETING THE PROJECT APPLICATION

### **Please Note:**

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

### **CoC Technical Review**

HUD expects each CoC to implement a thorough review and oversight process at the local level for both new and renewal project applications. Specifically, HUD requires that each CoC review all applications to ensure that: program participants and proposed activities are eligible, each project narrative is fully responsive based on the question and detailed instructions, the application is internally consistent, and all required attachments are accurate, complete and dated correctly. HomeBase will undertake this review for this CoC. While we hope this Handbook provides helpful guidance to you as you write your application, please know that there will also be a second review to ensure it is complete.

<b>Question</b>	<b>Answer and/or Notes</b>
<b>Page 1A Application Type</b>	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.
5b. Federal Award Identifier	Renewal Projects: <b>Must</b> match GIW New Projects: Will be blank
<b>Pages 1B. Legal Applicant and 1C. Application Details</b>	
a. Legal Name	Renewal Projects: Must match GIW (prepopulated from Applicant Profile).  Remember: This is the recipient name, not the subrecipient.

Question	Answer and/or Notes
	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. The applicant <b>must also be</b> the recipient of record for the grant requesting renewal
<b>Page 1D. Congressional District(s)</b>	
16. Congressional District(s): b. <b>Project:</b>	Must reflect congressional district(s) in which the project operates. Should be CA-02.
17a. Proposed Project start date	Renewal Projects: Must be the date 364 days before 17b  New Projects: Please select a date in 2016 that is feasible for the start of your project.
17b. Proposed Project end date	Renewal Projects: Must match GIW but the date should be in <b>2017 (may autopopulate 2016, so make sure to watch this)</b>  New Projects: Please select a date 364 days after 17a.
<b>Page 1E. Compliance and Page 1F. Declaration</b>	
19. Is the Application Subject to Review By State Executive Order 12372 Process?	Choose: b. Program is subject to E.O. 12372 but has not been selected by the State for review.
<b>Page 2A. Project Subrecipients</b>	
	<ul style="list-style-type: none"> <li>• If there is a subrecipient(s), this should be completed with their information. If no recipient, can be left blank.</li> <li>• Congressional districts should be same as or a subset of 16b above.</li> <li>• Total subrecipient grant amount should not include the admin amount kept by the recipient (cannot exceed 50% of admin)</li> </ul>
<b>RENEWAL PROJECTS: Page 2B. Recipient Performance-</b> This page is <b>new in 2015</b> and asks questions about project applicant capacity. If your answers are not in line with HUD expectations, there may be issues funding your grant.	
1. APR Submission	• Should be Yes. If not, talk to HomeBase.
2. HUD Monitoring Findings	• Should be No. If not, talk to HomeBase.
3. Quarterly Drawdowns	• Should be Yes. If not, talk to HomeBase.
4. Recaptured Funds	• Should be No. If not, talk to HomeBase.
<b>NEW PROJECTS: Page 2B. Experience of Applicant, Subrecipient(s), and Other</b>	

Question	Answer and/or Notes
<b>Partners</b>	
<p>1. Describe the experience of the applicant and potential subrecipients (if any), in effectively utilizing federal funds and performing the activities proposed in the application, given funding and time limitations.</p>	<ul style="list-style-type: none"> <li>• Describe why the applicant, subrecipients, and partner organizations (e.g., developers, key contractors, subcontractors, service providers) are the appropriate entities to receive funding.</li> <li>• Provide concrete examples that illustrate their experience and expertise in the following: <ul style="list-style-type: none"> <li>○ Working with and addressing the target population’s identified housing and supportive service needs;</li> <li>○ Developing and implementing relevant program systems, services, and/or residential property construction and rehabilitation;</li> <li>○ Identifying and securing matching funds from a variety of sources; and</li> <li>○ Managing basic organization operations including financial accounting systems.</li> </ul> </li> </ul>
<p>2. Describe the experience of the applicant and potential subrecipients (if any) in leveraging other Federal, State, local, and private sector funds.</p>	<ul style="list-style-type: none"> <li>• Include experience with all Federal, State, local and private sector funds.</li> </ul>
<p>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.</p>	<ul style="list-style-type: none"> <li>• Include the organization and management structure of the applicant <b>and</b> all subrecipients</li> <li>• Make sure to include a description of internal and external coordination and</li> <li>• Include the financial accounting system that will be used to administer the grant.</li> </ul>
<p>4a. Are there any unresolved monitoring or audit findings for any</p>	<ul style="list-style-type: none"> <li>• 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</li> </ul>

Question	Answer and/or Notes
HUD grants (including ESG) operated by the applicant or potential subrecipients (if any)?	details and steps being taken to resolve the findings in the follow up question.
<b>Page 3A. Project Detail</b> - 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.	
1/2a. CoC Number and Name	CA-522 – Humboldt County CoC
1/2b. CoC Applicant Name	Humboldt County
4. Project Status	Correct answer: Standard
5. Component Type:	Renewal Projects: Must match GIW. New Projects: PH (unless an HMIS or Coordinated Entry grant)
6. Title V	This question refers to properties that were categorized as unutilized, underutilized, excess, or surplus for use to assist homeless persons, please answer as appropriate for your project.
<b>Page 3B. Project Description</b> (varied by component, see each question)	
1. Provide a description that addresses the entire scope of the proposed project	<p>All project applicants must provide a comprehensive and concise project description. <b><i>References to ineligible activities or failing to provide an adequate description of the project may result in rejection of the project application.</i></b></p> <p>The project description should address the entire scope of the project and include:</p> <ul style="list-style-type: none"> <li>• A clear picture of the target population(s) to be served</li> <li>• The plan for addressing the identified needs/issues of the CoC target population(s)</li> <li>• Projected outcome(s), and</li> <li>• Coordination with other source(s)/partner(s).</li> </ul> <ul style="list-style-type: none"> <li>○ The program description should describe the project at full operational capacity.</li> <li>○ <b><u>Project applicants MUST match this description to all other parts of the application</u></b> including Part 5, housing and income performance measures in Part 6, and budgets in Part 7</li> </ul>

Question	Answer and/or Notes
NEW PROJECTS ONLY: 2. Describe the estimated schedule for the proposed activities, the management plan, and the method for assuring effective and timely completion of all work.	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 2015 CoC Program NOFA and CoC Program interim rule if it is selected for a funding award.
2/3. Does/Will your project participate in a CoC Coordinated Entry process?	<p>Renewal Projects: If you say No, you will be asked to explain why. Please indicate your intent to participate, when it is available for your project type.</p> <p>New Projects: HUD and the CoC expect you to respond Yes.</p>
3/4. Does your project have a specific population focus?	<p>Select “Yes” if project has special capacity in its facilities, program designs, tools, outreach or methodologies for a specific subpopulation or subpopulations. This does not necessarily mean that the project exclusively serves that subpopulation(s), but rather that they are uniquely equipped to serve them. If “Yes” is selected, select the relevant checkbox(es).</p> <p><i>Note:</i> It is not in your best interest to overpromise to these questions. However, please match your answer to prior applications.</p> <p>Also, if a permanent housing project, make sure subpopulations with people with disability are checked.</p> <p>New Projects: Make sure the populations you select align with this grant opportunity (e.g. if you are applying for PSH, select chronic homeless)</p>
4/5. Housing First. a. Does/Will the project quickly move participants into permanent housing?	<p><b>The next four questions are NEW in 2015.</b> The answers will be aggregated for the CoC application, and if our CoC is more Housing First oriented, our score will increase. <b>For renewal housing projects, if you indicated your project is Housing First in the past, but it is not any longer based on your answers to the next questions, please talk to HomeBase staff.</b></p> <p>For renewal housing projects, if you have answered “Yes” that you are Housing First in the past, you should be able to indicate</p>

Question	Answer and/or Notes
	<p>Yes.</p> <p>HUD's preference is Yes.</p>
<p>b. Does/Will the project ensure that participants are not screened out based on the following items: too little income, active substance abuse, criminal record, history of domestic violence?</p>	<p>For renewal housing projects, if you answered "Yes" that you are Housing First in the past, you should be able to check the first four boxes to show that you are low barrier.</p> <p>HUD's preference is that you check the first four boxes.</p>
<p>c. Does/Will the project ensure that participants are not terminated from the program for the following reasons: failure to participate in services, failure to make progress on a service plan, loss of income?</p>	<p>For renewal housing projects, if you answered "Yes" that you are Housing First in the past, you should be able to check all three boxes.</p> <p>HUD's preference is that you check all three boxes.</p>
<p>d. Does/Will the project follow a "Housing First" approach?</p>	<p>For renewal projects, if you have answered "Yes" that you are Housing First in the past, you should be able to indicate Yes.</p> <p>HUD's preference is Yes.</p>
<p>RENEWAL RENTAL ASSISTANCE PROJECTS ONLY: 5b. Is this a CoC Program leasing or former SHP project that had been approved by HUD to revise the renewal project budget from leasing</p>	<ul style="list-style-type: none"> <li>This question refers to only those project revising budgets in 2015, so for most projects the answer is No.</li> </ul>

Question	Answer and/or Notes
to rental assistance?	
<p>9. NEW PROJECTS ONLY: Will participants be required to live in a particular structure, unit, or locality, at some point during the period of participation?</p> <p>9b. If yes, how and why</p>	<p>Yes/No. 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 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.</p>
<p>10a/b. NEW PROJECTS ONLY: Will more than 16 persons live in one structure?</p>	<p>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.</p>
<b>Page 4A. Supportive Services for Participants</b>	
<p>1a. Are the proposed project policies and practices consistent with the laws related to providing education services to individuals and families?</p>	<ul style="list-style-type: none"> <li>• Yes if project serves families or unaccompanied youth</li> <li>• N/A if project serves adults only</li> </ul> <p>Please contact HomeBase if you need a form policy.</p>
<p>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?</p>	<ul style="list-style-type: none"> <li>• Yes if project serves families or unaccompanied youth</li> <li>• N/A if project serves adults only</li> </ul>
<p>2. NEW PROJECTS ONLY: Describe</p>	<p>Narrative:</p> <ul style="list-style-type: none"> <li>• Should address how the applicant will take into</li> </ul>



Question	Answer and/or Notes
<p>how participants will be assisted to obtain and remain in permanent housing.</p>	<p>consideration the needs of the target population and the barriers that are currently preventing them from obtaining and maintaining permanent housing</p> <ul style="list-style-type: none"> <li>• Should describe how those needs and barriers will be addressed through case management and/or other supportive services that will be offered through the project</li> <li>• If housing units not owned by applicant, show how units will be identified to ensure reasonable rents</li> <li>• Detail arrangements and coordination with landlords and other providers</li> </ul>
<p>3. NEW PROJECTS ONLY: Describe specifically how participants will be assisted both to increase their employment and/or income and to maximize their ability to live independently.</p>	<p>Narrative should show how addressing needs of target population, services, availability of services, coordination with other providers/mainstream systems, and connect service delivery to outcomes of employment, income, and ability to live independently</p>
<p>2/4. For all supportive services available to participants, indicate who will provide them, how they will be accessed, and how often they are provided.</p>	<p>Should reflect all services for provided for participants, whether funded by CoC funds or other funds. If you do provide a service, please respond to all the related questions. At least one row must be completed.</p> <p>HomeBase Note: Having services that still say “Select” is acceptable and indicates service is not provided. Do not overpromise in this section.</p>
<p>3/5. Please identify whether the project includes the following activities:</p>	<p>Questions about assistance for accessing mainstream benefits are <b>new in 2015</b>. Please respond according to your project’s practices.</p>
<p><b>Page 4B. Housing Type and Location</b></p>	
<p>Total Units: Total Beds: Total Dedicated CH Beds: Total Non-</p>	<ul style="list-style-type: none"> <li>• Renewal Projects: Total units, beds: should match last year’s contracted amount, including CH beds dedicated and prioritized <ul style="list-style-type: none"> <li>○ Shortcut tip: If you haven’t amended the grant, look at last year’s Project Application in this chart.</li> </ul> </li> </ul>

Question	Answer and/or Notes
Dedicated CH Beds:	<p>Renewal projects that indicated they would prioritize chronically homeless persons in beds that become available through turnover in non-dedicated permanent supportive housing projects must continue to do so.</p> <ul style="list-style-type: none"> <li>Total CH Dedicated/non-Dedicated beds: Should align with charts 3B, 5A and 5B, budgets and the CoC point in time count for this project.</li> </ul>
<b>Pages 5A/5B. Project Participants – Households/Subpopulations</b>	
Households	<p>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.</p> <ul style="list-style-type: none"> <li>If PSH project, must have a disabled adult in the family</li> <li>If a project for chronically homeless (see Page 4B) must reflect disabled adults and chronic homelessness.</li> </ul> <p>Should reflect the number of households or persons served at single point in time at maximum occupancy</p> <ul style="list-style-type: none"> <li>Should NOT be the number served over the course of a year or grant term</li> <li>Should align with last year’s contracted amount (hint: see last year’s application)</li> </ul> <p>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.</p> <p>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 <b>eligible</b>.</p>
<b>Page 5C. Outreach for Participants (all projects except HMIS)</b>	
1. Enter the percentage of project participants that will be coming from each of the following locations:	<p>Consider participant eligibility for program type:</p> <ul style="list-style-type: none"> <li>If PH project, people need to come from: the streets, emergency shelters, Safe Havens, or transitional housing.</li> <li>If a PSH bonus project (now or in prior years) or <b>prioritizing CH for units</b>, need to come from streets, shelter, or safe haven.</li> <li>If new RRH, you must serve people from street, shelter,</li> </ul>

Question	Answer and/or Notes
	<p>safe havens.</p> <ul style="list-style-type: none"> <li>• If a TH or SSO project, remember that you cannot serve people exiting an institution where they have lived more than 90 days</li> <li>• Homeless under other federal statutes—serving requires HUD approval of CoC request. <b>NO</b> CoCs have approval.</li> </ul> <p>If a person recently spent 90 consecutive days or less in an institution, use his or her homeless status from before the institutional stay, or describe the population in the text box.</p>
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.
NEW PROJECTS ONLY 3. Describe the outreach plan to bring these homeless participants into the project	<p>This plan should include reference to your community’s coordinated entry system.</p> <p>Also describe the contingency plan if the project experiences difficulty in meeting the requirements regarding service populations (e.g. re-evaluating the intake assessment procedures or outreach plan).</p>
<b>SOME NEW PROJECTS ONLY: 5D. Discharge Planning Policy</b>	
1. Has the state or local government developed or implemented a discharge planning policy?	Correct answer is Yes. If you are unsure, please discuss with HomeBase.
<b>6A. Standard Performance Measures (all except HMIS and SSO)</b>	
Housing Measures	<ul style="list-style-type: none"> <li>• PH/TH should have a goal of 80% (per local guidelines)</li> <li>• TH should have a goal of 85% (per local guidelines)</li> <li>• “Universe” amount should be not be less than units served, and should also reflect the general number of people served in a year (i.e. Page 4C).</li> <li>• “Target (#)” is the number that, with the Universe, gets you the correct target percentage (e.g. if you have a universe of 10 and a goal of 80%, you would put 8 here). Because only whole numbers can be entered, you may need to adjust your Universe number (e.g. a PH project with a Universe of 3 could have Targets of 2 or 3,</li> </ul>

Question	Answer and/or Notes
	<p>resulting in Goals of 66% or 100%. The project might choose to make its Universe 5, so that the Target can be 4, resulting in a goal of 80%).</p> <p>For SSO/SH projects, see Training Module if detail needed.</p>
Income Measures	<p>Choice of 2a or 2b:            2a. Should be at least 50%            2b. Should be at least 20%</p>
<b>6B. Additional Performance Measures</b>	
<b>7A. Funding Request- RENEWAL BUDGETS MUST MATCH GIW EXACTLY.</b>	
3. Are the requested renewal funds reduced from the previous award using reallocation?	Question refers to a change between this year's GIW and the project application. Must match CoC answers as recommended by the Review and Rank Committee
4. Does this project propose to allocate funds according to an indirect cost rate?	See information about Indirect Costs at the beginning of Section IV of this Handbook.
5. Select a grant term	1 Year (prepopulated for renewals). (If new project, could be more, but rarely)
6. Select the costs for which funding is being requested	<p>Renewal projects: Must match GIW</p> <p>Project Applicants may NOT have any of the following combinations in a single structure or housing unit:</p> <ul style="list-style-type: none"> <li>• Acquisition and/or rehabilitation with new construction</li> <li>• Leasing with acquisition, rehabilitation, or new construction</li> <li>• Rental assistance with acquisition, rehabilitation, or new construction</li> <li>• Leasing and rental assistance</li> <li>• Rental assistance and operations</li> </ul>
Leased Units Budget Detail/Rental Assistance Budget Detail	<p>FMR area: Humboldt County</p> <p>Efficiency: \$630            1-Bedroom: \$692            2-Bedroom: \$933            3-Bedroom: \$1,375            4-Bedroom: \$1,600</p>

Question	Answer and/or Notes
	For renewal projects: <ul style="list-style-type: none"> <li>• Must be equal to GIW amounts/units (as applicable)</li> <li>• Units should align with Pages 4B/5A/5B as applicable</li> </ul>
Operations/Services Quantity Description	Make sure there is enough Quantity Detail: (e.g. “1 FTE Case Manager Salary + benefits, or child care for 15 children”. “1 FTE” is NOT enough) and that <b>costs are eligible AND approved</b>
Total request for Grant Term	Renewal Projects: Must match GIW
Sources of Match/Leverage	The Match and Leverage 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 <b>and attached to the application in e-snaps.</b>
<b>7I. Summary Budget</b>	
Admin	<b>MAKE SURE FILLED IN.</b> Renewal Projects: Must match GIW.
Match	25% match required (including admin, excluding leasing)
Total budget	Renewal Projects: Must match GIW.
<b>8A. Attachment(s)</b>	
Subrecipient Nonprofit Documentation	If the applicant and project subrecipient are different entities, and the subrecipient is a nonprofit organization
Match/Leverage Documentation	New in 2015, attach match and leverage documentation.
<b>9B. Submission Summary</b>	
	Make sure nothing reads “Please Complete”

## RESOURCES

- **2015 CoC NOFA:** <https://www.hudexchange.info/resource/4688/fy-2015-coc-program-nofa/>
- **General Section NOFA:** [www.hudexchange.info/e-snaps/fy-2015-coc-program-nofa-coc-programcompetition/](http://www.hudexchange.info/e-snaps/fy-2015-coc-program-nofa-coc-programcompetition/)
- **CoC Program Interim Rule (24 CFR part 578):** <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version>
- **Training Resources:** [www.hudexchange.info/homelessnessassistance/](http://www.hudexchange.info/homelessnessassistance/)
  - CoC Program Interim Rule training materials and program resources
  - Application Instructional Guides

- Application Detailed Instructions
  - FAQs
- **Broadcast Information:** [www.hud.gov/offices/adm/grants/fundsavail.cfm](http://www.hud.gov/offices/adm/grants/fundsavail.cfm)
- **HUD Exchange e-snaps Ask A Question (AAQ):** <http://www.hudexchange.info/get-assistance/>
- **To join the HUD listserv:** [www.hudexchange.info/maillinglist](http://www.hudexchange.info/maillinglist)