**Sacramento Continuum of Care**

# Technical Assistance (TA) Handbook
# For Applicants

## FY 2019 Continuum of Care NOFA Competition

July 19, 2019

**CONTEXT: THE COC COMPETITION AND PROCESS**

The Continuum of Care (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, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless; 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 CoCs, the community stakeholder groups that guide local responses to homelessness. The 2019 CoC NOFA was released on July 3, 2019, opening the competition making available approximately $2.3 billion nationally to serve people experiencing homelessness. The information in the NOFA sets forth the competition rules and processes for 2019.

The FY 2019 CoC Competition Consolidated Application, which the CoC will submit to HUD, will consist of three parts: the **CoC Application,** which describes the CoC planning body, governance structure, overall performance, and the strategic planning process; the **CoC Project Listing**, which ranks the project applications for HUD and identifies any rejected applications, showing the CoC's priorities for funding; and a number of **Project Applications**, each of which reflects one project seeking funding.

Before the application is submitted to HUD, the CoC is required to hold a local competition to determine which project applications will be included in the Consolidated Application, along with their relative priority. The results of the local competition dictate which projects the CoC will prioritize. The TA Workshop is intended to help projects prepare for the 2019 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 the TA Workshop will guide you in preparing your applications. This TA Handbook contains information you need to know for the HUD process, and other materials provided contain information about the local process in this community.

There are three things to keep in mind when preparing your application:
1. Ensuring your application is competitive for funding in your CoC's local competition,
2. Ensuring the project you are applying for is eligible for HUD funding and compliant with HUD requirements, and
3. Ensuring your application is filled out correctly.

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

**HOW TO USE THIS TA HANDBOOK**

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

On July 3, 2019, the U.S. Department of Housing and Urban Development (HUD) released a Notice of Funding Availability (NOFA) for the Fiscal Year (FY) 2019 Continuum of Care (CoC) Program competition. In 2019, the Sacramento CoC expects to be eligible to apply for approximately **$22,178,805** in funding to support housing and services for homeless households, and approximately **$609,817** for CoC Planning Funds.

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| **Annual Renewal Demand Funding:** This funding supports the CoC's existing housing and services. The CoC has the option to **continue to support** those programs, **or to reallocate** those resources, in whole or in part, to Permanent Supportive Housing, Rapid Rehousing, Joint Transitional Housing/Rapid Rehousing, HMIS, or Supportive Services Only Projects for Coordinated Entry. | **$20,327,219** |
| **Bonus Funding:** This funding supports Permanent Supportive Housing, Rapid Rehousing, Joint Transitional Housing/Rapid Rehousing, HMIS, or Supportive Services Only Projects for Coordinated Entry. | **$1,016,361** |
| **Domestic Violence Bonus Funding:** This funding supports Rapid Rehousing, Joint Transitional Housing/Rapid Rehousing, or Supportive Services Only Projects for Coordinated Entry. | **$835,225** |
| **CoC Planning Funds**: This funding supports CoC planning activities, and only the collaborative applicant Sacramento Steps Foward may apply for it.  **The planning grant will not be ranked in the competition and is not competitive with housing or service projects.** As such, this Handbook does not include information about applying for planning grants. | **$609,817** |

**Anticipated Tier 1 Amount:**                        **$19,149,583**

**Anticipated Tier 2 Amount:**                        **$2,193,997**

**In 2019, funds are NOT available for:**
- Emergency shelter
- Homelessness prevention projects
- New Transitional Housing (except when joint with Rapid Rehousing)
- New Supportive Services Only projects (except coordinated entry)

## A. RANKING AND TIERS EXPLAINED

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

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

### TIER 1

In 2019, the amount of funding available for Tier 1 is equal to 100% of the combined Annual Renewal Amounts for all projects eligible for renewal for the first time, plus 94% of the combined Annual Renewal Amounts for all other projects eligible for renewal (in 2018 it was 94 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 the amount available for the Bonus amount (but NOT the DV Bonus amount).  Funding will be determined by the point value of each project application based on a 100-point scale.  All Tier 2 projects will be funded in point order.

Tier 2 points are awarded as follows:

- **CoC Score**: Up to 50 of 100 points in direct proportion to the score received on the CoC Application.
- **CoC Ranking**: Up to 40 of 100 points for the CoC's ranking of the project application(s), with the points spread evenly across the Tier 2 funding amount.  Higher ranked projects get more points.
- **\*\*Changed in 2019\*\* Low Barriers to Entry**: Up to 10 of 100 points for how the project application demonstrates that it is low barrier and prioritizes rapid placement and stabilization in permanent housing;
    - Permanent housing (including PSH and RRH), Transitional Housing, Joint Transitional Housing and Rapid Rehousing Component projects, safe haven projects, or Supportive Services Only projects that are not for centralized or coordinated assessment can receive up to 10 points for demonstrating that the project is low-barrier, does not have preconditions to entry (such as sobriety or a minimum income threshold), and prioritizes rapid placement and stabilization in permanent housing; or
    - HMIS project or Supportive Services Only project for a centralized or coordinated assessment system will automatically receive 10 points.

### STRADDLING TIERS

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

**RECLASSIFICATION**

Because new project applications may be created through the reallocation or bonus processes, if HUD determines that a project applicant or a CoC incorrectly classified one or more new projects as reallocation or bonus, HUD may reclassify the project(s) as either reallocation or bonus if the CoC exceeded either its reallocation or bonus amount.

**PLANNING COSTS**

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

## B.   BEFORE APPLYING FOR A COC GRANT

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

- FY 2019 CoC NOFA: https://files.hudexchange.info/resources/documents/FY-2019-CoC-Program-Competition-NOFA.pdf
- CoC Program Interim Rule: https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml#seqnum578.99

## C.   HIGHLIGHTS OF THE 2019 NOFA THAT WILL IMPACT GRANT RECIPIENTS

- **\*\*NEW IN 2019\*\* for New Project Grant Terms:** HUD will allow new projects to request 1 year of funding with a longer initial grant term not to exceed 18 months. HUD has determined that most new projects requesting 1 year of funding normally take approximately 3 to 6 months to begin fully operating the new project (e.g., hiring staff, developing partnerships with landowners if leasing or renting). Therefore, a new project requesting 1 year of funding may request a grant term of 12 months to 18 months that will allow for the additional start-up process.
- **Youth:** Any youth-serving provider funded under this NOFA may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence.
    - **Youth Documentation.** As provided by the Consolidated Appropriations Act, 2019, youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under this NOFA.
    - **Definitions:** "Youth-serving provider" means a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. "Living in unsafe situations" means having an unsafe primary nighttime residence and no safe alternative to that residence.
- **DV Bonus:** Again in 2019, project applicants may apply for Domestic Violence (DV) Bonus Projects to serve survivors of domestic violence, dating violence, sexual assault, and stalking. This funding is in addition to the CoC Bonus funding for other populations. To be eligible to receive a DV Bonus project for PH-RRH or Joint TH and PH-RRH, a CoC must demonstrate that the project will use trauma-informed, victim-centered approaches.

- **FY 2019 FMRs Will Apply:** Because the CoC Consolidated Application is due prior to the publication of the final FY 2020 FMRs, the FY 2019 FMRs will be used for funding amounts.
- **Additional HUD Policy Priorities:** HUD states that CoCs and CoC-Program-funded projects should work with local employment agencies and employers to prioritize training and employment opportunities for people experiencing homelessness.
- **Youth Homelessness Demonstration Program (YHDP) Renewals:** YHDP projects that were initially awarded in FY 2016 may be eligible for renewal in the FY 2019 CoC Program Competition provided that they meet the requirements of the CoC Program and will have an operating end date in Calendar Year 2020. YHDP projects cannot use the reallocation process, consolidate with a non-YHDP project, nor use the expansion process outlined in the NOFA.
- **DedicatedPLUS Projects:** A renewal project that is Permanent Supportive Housing 100% dedicated to chronically homeless people may either become a DedicatedPLUS project or may continue to dedicate 100% of its beds to chronically homeless individuals and families. Projects that were awarded as DedicatedPLUS in a previous CoC Program Competition are required to include households with children to qualify as a DedicatedPLUS project in the FY 2019 CoC Program Competition.

## D. 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. The policy priorities set forth in this year's NOFA are:

1. **ENDING HOMELESSNESS FOR ALL PERSONS**
   a. CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
   b. CoCs should measure their performance based on local data taking into account challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, and those experiencing chronic homelessness).
   c. CoCs should have a comprehensive outreach strategy to identify and continuously engage all unsheltered individuals and families.
   d. CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.
   e. CoCs should use the reallocation process to create new projects that improve their overall performance and better respond to their needs.

2. **CREATING A SYSTEMIC RESPONSE TO HOMELESSNESS**
   a. CoCs should be using system performance measures such as the average length of homeless episodes, rates of return to homelessness, and rates of exit to permanent housing destinations to determine how effectively they are serving people experiencing homelessness.
   b. CoCs should be using their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent.

3. **STRATEGICALLY ALLOCATING AND USING RESOURCES**
   a. Using cost, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness.
   b. CoCs should review project quality, performance, and cost effectiveness.
   c. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness.
   d. CoCs should work to develop partnerships to help CoC Program participants sustainably exit Permanent Supportive Housing, such as through partnerships with Public Housing Authorities (PHAs) and other government, faith-based, and nonprofit resources specializing in areas such as treating mental illness, substance abuse, job training, and life skills.
   e. CoCs should review all projects eligible for renewal in FY 2019 to determine their effectiveness in serving people experiencing homelessness, including cost effectiveness.

4. **\*\*REVISED IN 2019\*\*  USING AN EVIDENCE-BASED APPROACH**
   a. CoCs should prioritize projects that employ strong use of data and evidence, including the cost-effectiveness and impact of homelessness programs on positive housing outcomes, recovery, self-sufficiency, and reducing homelessness.
   b. Examples of measures that CoCs may use to evaluate projects include, but are not limited to: rates of positive housing outcomes, such a reduced length of time homeless and reduced rates of return to homelessness; improvements in employment and income; and improvements in overall well-being, such as improvements in mental health, physical health, connections to family, and safety.

5. **\*\*NEW IN 2019\*\* INCREASING EMPLOYMENT**
   a. CoCs and CoC-Program-funded projects should work with local employment agencies and employers to prioritize training and employment opportunities for people experiencing homelessness.
   b. CoCs should also promote partnerships with public and private organizations that promote employment.

6. **\*\*NEW IN 2019\*\* PROVIDING FLEXIBILITY FOR HOUSING FIRST WITH SERVICE PARTICIPATION REQUIREMENTS**
   a. CoC-Program-funded projects should work with individuals and families, with unconditional acceptance and without preconditions, to move quickly into permanent housing.
   b. This NOFA provides communities and programs with flexibility, without penalty, to use service participation requirements after people have been stabilized in housing.

## NEW PROJECT: DESIGNING YOUR PROJECT

## 1. ELIGIBLE NEW PROJECTS

New projects may apply for three funding streams:
- Reallocation of funding for renewal projects, or
- CoC Bonus funding, or
- Domestic Violence (DV) Bonus funding.

Projects may also apply for a combination of Reallocation and CoC Bonus funding.

Requirements, eligibility, amounts and processes differ among the types of funding, so potential applicants should consider each carefully. However, all new permanent housing projects will be evaluated using the same criteria.

### A. ELIGIBLE APPLICANTS

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

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

### B. NEW PROJECT FUNDING OPTIONS

#### NEW PROJECTS CREATED BY REALLOCATION OR BONUS OR COMBINATION

Applicants may apply for **reallocated funds** from renewal projects or **CoC Bonus** funding or a **combination of reallocated funds and CoC Bonus funding** for**:**
1. New Permanent Supportive Housing (PH-PSH) projects for either: (i) persons experiencing chronic homelessness at the time they initially enroll or (ii) persons who meet the definition of DedicatedPLUS (defined below on page 13).
2. New Rapid Re-housing (PH-RRH) projects to serve homeless individuals and families
3. Joint TH and PH-RRH component projects, which will include transitional housing and permanent housing-rapid rehousing in a single project, to serve homeless individuals and families
4. New dedicated Homeless Management Information System (HMIS) project (can only be carried out by the HMIS lead)
5. New Supportive Services Only (SSO-CE) project to develop or operate a centralized or coordinated entry system

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

## DOMESTIC VIOLENCE BONUS (DV BONUS)

Applicants may apply for **Domestic Violence Bonus** funding for projects dedicated to survivors of domestic violence, dating violence, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3, for the following project types:

1. Rapid Re-housing (PH-RRH) projects that demonstrate trauma-informed, victim-centered approached.
2. Joint TH and PH-RRH component projects that demonstrate trauma-informed, victim-centered approach.
3. Supportive Services Only Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of survivors of domestic violence, dating violence, sexual assault, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different).

A CoC can only submit one project application for an SSO-CE project. A CoC may apply for any number of RRH and Joint TH and RRH projects provided that each application is for at least $25,000.

A CoC may also apply to expand an existing renewal project, including one that was previously funded with DV Bonus funding. DV Bonus funding may be used to expand an existing renewal project that is not dedicated to serving survivors of domestic violence, dating violence, sexual assault, or stalking to dedicate additional units, beds, persons served, or services provided to existing program participants to this population.

CoCs are required to rank all DV Bonus projects on the CoC Priority Listing with a unique rank number.  If a project application designated as DV Bonus is conditionally selected by HUD with DV Bonus funds, HUD will remove the ranked DV Bonus project from the New Project Listing and all other project applications ranked below the DV Bonus project will slide up one rank position.  If the DV Bonus project application is not conditionally selected with DV Bonus funds, the project application will remain in its ranked position and will be considered for conditional award under the regular bonus amount available to the CoC.

For projects the CoC indicates it would like considered as part of the DV Bonus, HUD will award a point value to each project application combining both the CoC Application score and responses to the DV-Bonus-specific questions in the CoC Application using the following 100-point scale:
- **\*\*REVISED IN 2019\*\* For Rapid Rehousing and Joint Transitional Housing/Rapid Rehousing component projects**:
    - **CoC Score.** Up to 25 points in direct proportion to the score received on the CoC Application.
    - **Need for the Project**. Up to 25 points based on the extent the CoC is able to quantify the need for the project in its portfolio, the extent of the need, and how the project will fill that gap.
    - **Quality of the Project Applicant.** Up to 50 points based on the previous performance of the applicant in serving survivors of domestic violence, dating violence, sexual assault, or stalking, and their ability to house survivors and meet safety outcomes. Additionally,

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

- o **For Supportive Services Only projects for Coordinated Entry:**
  - o **CoC Score**. Up to 50 points in direct proportion to the score received on the CoC Application.
  - o **Need for the Project**. Up to 50 points based on the extent to which the CoC is able to demonstrate the need for a Coordinated Entry system that better meets the needs of survivors of domestic violence, dating violence, sexual assault, or stalking, and how the project will fill this need.

<span style="color:#4BACC6">EXPANSION PROJECTS THROUGH REALLOCATION, BONUS, OR DV BONUS</span>

A renewal project applicant may submit a new project application to **expand its current operations** by adding units, beds, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-Coordinated Entry projects.

- **\*REVISED THIS YEAR\*\*** In the FY 2018 NOFA, a project applicant was able to submit an application to add to a current homeless project that is funded from sources other than CoC Program funds. In 2019, the identification of expanding an existing non-CoC Program funded project is no longer a requirement for new project applications. Instead, all requests for CoC Program funds to expand an organizations' existing non-CoC funded projects will complete a new project application that only identifies the newly added CoC Program funded portion of the project. However, the prohibition regarding the use of CoC Program funds to replace state or local funds previously used or designated to assist persons experiencing homelessness remains a required confirmation for all new project applications.
- \*\*REVISED THIS YEAR\*\* In order to request an expansion for a current CoC Program-funded project, project applicants will be required to submit three project applications:
  - o The renewal project application that will be expanded; and
  - o A new project application with just the expansion information; and
  - o A renewal project application that incorporates the renewal and new expansion activities and the combined budget line items for the renewal and the new expansion.
  - o The renewal and new projects will be ranked by the CoC, the combined expansion project will not be ranked and, if selected for conditional award, HUD will take the ranked position of the stand-alone renewal project, and the separate new project will be removed from the ranking resulting in project applications below to slide up one ranked position.
- HUD will not fund capital costs (i.e., new constructions, rehabilitation, or acquisition) and HUD will only allow a 1-year funding request.
- DV Bonus funds can only be used to expand an existing renewal project if the expansion project is dedicated to survivors of domestic violence, dating violence, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3.  Therefore, project applicants *may* expand an existing renewal project that is not dedicated to serving survivors of domestic violence, dating violence sexual assault, or stalking that meet the definition of homeless in 24 CFR 578.3 to dedicate additional beds, units, persons served, or services provided to existing program participants to this population.
- Project applicants that intend to submit a new project application for the purposes of expanding an eligible CoC Program renewal project must:

- o enter the grant number of the project that is eligible for renewal that the project applicant requests to expand on the new project application;
- o indicate how the new project application will expand units, beds, services, persons served, or services provided to existing program participants, or in the case of HMIS or SSO-Coordinated Entry projects, how the current activities will be expanded for the CoC's geographic area; and
- o ensure the funding request for the expansion grant is within the funding parameters allowed under the reallocation or bonus funding amounts available.

## C. OPTIONS FOR NEW PROJECT TYPES

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

- *Permanent supportive housing (PSH) component* projects provide permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.
- Project must select program participants consistent with the CoC's Coordinated Entry process and must serve either:
  - o Persons experiencing chronic homelessness at the time they initially enroll in the project (defined in 24 CFR 578.3), OR
  - o A DedicatedPLUS population, in which 100 percent of the beds are dedicated to serve individuals, households with children, and unaccompanied youth that at intake meet one of the following categories:
    - experiencing chronic homelessness as defined in 24 CFR 578.3;
    - residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
    - residing in a place not meant for human habitation, emergency shelter, or safe haven and had been admitted and enrolled in a permanent housing project within the last year but were unable to maintain a housing placement and met the definition of chronic homeless as defined by 24 CFR 578.3 prior to entering the project;
    - residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3;
    - residing and has resided in a place not meant for human habitation, safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions and the individual or head of household meet the definition of 'homeless individual with a disability'; or
    - receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.
- Grant funds may be used for (see "Eligible Costs to Inform Project Design" section of this manual, page 26):
  - o Leasing
  - o Operations
  - o Rental Assistance

- o Supportive Services
- o HMIS
- o Indirect Costs
- o 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 .
- Housing may be single site or scattered sites and can be integrated with affordable or market-rate units.
- Services must be offered. Services may vary depending on residents' needs.
- Lease is required; must be renewable, for a term of at least one year, and terminable only for cause.

2. RAPID RE-HOUSING (BONUS, REALLOCATION OR DV BONUS)

- **Rapid re-housing (RRH) component** projects emphasize housing search and relocation services and short- and medium-term tenant-based rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into permanent housing and achieve stability in that housing.
- Project must select program participants consistent with the CoC's Coordinated Entry process and must serve certain populations:
  - o Projects applying for Bonus or Reallocation funding must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.
  - o Projects applying for DV Bonus funding must serve survivors of domestic violence, dating violence, sexual assault, or stalking who are defined as homeless at 24 CFR 578.3.
- Grant funds may be used for (see "Eligible Costs to Inform Project Design" section of this manual, page 26):
  - o Short term (up to 3 months) and/or medium-term (3-24 months) tenant-based rental assistance
  - o Supportive services
  - o HMIS
  - o Indirect Costs
  - o 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:
  - o Limit rental assistance to no more than 24 months per household.
  - o Limit supportive services to no more than 6 months after rental assistance stops.
  - o Re-evaluate at least once per year whether the project participant continues to lack the resources and support networks necessary to retain housing without CoC assistance.
  - o Offer supportive services (may include any eligible CoC Program supportive service). Project participants should have access to a wide array of supportive services designed to help them retain stable, long-term housing.
  - o Require project participants to meet with a case manager at least monthly. *(Project is exempt if the Violence Against Women Act or the Family Violence Prevention and*

*Services Act prohibit the recipient from making housing conditional on the participant's acceptance of services.)*
- o Follow CoC written policies for:
  - Determining and prioritizing eligible families
  - Determining the amount or percentage of rent that each project participant must pay
- Project may (if aligned with written standards adopted by the CoC in consultation with ESG recipients in the CoC's geographic area and administered consistently across all projects):
  - o Set a maximum amount or percentage of rental assistance that a project participant may receive.
  - o Set a maximum number of months (up to 24 months) that a project participant may receive rental assistance.
  - o Set a maximum number of times that a project participant may receive rental assistance.
  - o Require project participants to share in the costs of rent.

### 3. JOINT TH AND PH-RRH (BONUS, REALLOCATION OR DV BONUS)

- ***Joint TH and PH-RRH component*** project combines two existing program components–transitional housing and permanent housing-rapid rehousing–in a single project to serve individuals and families experiencing homelessness.
- Recipients should prioritize those with the highest needs using an evidence-based approach designed to provide stable housing and services that, to the greatest extent possible, move the participant towards self-sufficiency and independence. Program participants may only receive up to 24-months of total assistance
- Project must select program participants consistent with the CoC's Coordinated Entry process and must serve certain populations:
  - o Projects applying for Bonus or Reallocation funding must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.
  - o Projects applying for DV Bonus funding must serve survivors of domestic violence, dating violence, sexual assault, or stalking who are defined as homeless at 24 CFR 578.3.
- Grant funds may be used for (see "Eligible Costs to Inform Project Design" section of this manual, page 26):
  - o Leasing of a structure or units and operating costs to provide transitional housing;
  - o Short term (up to 3 months) or medium-term (3-24 months) tenant-based rental assistance
  - o Supportive services
  - o HMIS
  - o Project administrative costs
  - o In 2019, no capital costs are allowed.
- When a program participant is enrolled in a Joint TH and PH-RRH component project, the recipient or subrecipient must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all participants.
- A program participant may choose to receive only the transitional housing unit or the assistance provided through the PH-RRH component, but the recipient or subrecipient must make both types of assistance available.

- If CoC Program funds are not being requested for both TH and PH-RRH units, the project application must still describe the number of TH and PH-RRH units that will be utilized by the project, if selected for conditional award, and provide details in the project description of how TH and PH-RRH assistance will be provided.
- The program must provide enough rapid re-housing assistance to ensure that at any given time a program participant may move from transitional housing to permanent housing. This may be demonstrated by identifying a budget that has twice as many resources for the rapid re-housing portion of the project than the TH portion, by having twice as many PH-RRH units at a point in time as TH units, or by demonstrating that the budget and units are appropriate for the population being served by the project.

## 4. DEDICATED HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) (BONUS OR REALLOCATION)

- HUD requires each CoC to designate an information system to comply with data collection requirements. HMIS supports CoC functioning, reporting and recordkeeping, centralized or coordinated assessment, and performance measurement.
- Grant funds may be used for (see "Eligible Costs to Inform Project Design" section of this manual, page 26):
  - o HMIS
  - o Indirect Costs
  - o Administration
- The CoC's HMIS Lead Agency is the only agency that can apply for this funding.

## 5. SUPPORTIVE SERVICES ONLY PROJECT FOR A CENTRALIZED OR COORDINATED ASSESSMENT SYSTEM (BONUS, REALLOCATION, OR DV BONUS)

- Supportive Services Only- Coordinated Entry (SSO-CE) component projects allow recipients and subrecipients to provide services to homeless individuals and families not residing in housing operated by the recipient.
- 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.
- Applicants may also apply for DV Bonus funding for new Supportive Service Only-coordinated entry projects to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of survivors of domestic violence, dating violence, sexual assault, or stalking.
- Grant funds may be used for (see "Eligible Costs to Inform Project Design" section of this manual, page 26):
  - o Supportive services
  - o Indirect Costs
  - o Administration.

## 2. NEW PROJECT DESIGN REQUIREMENTS

### A. FUNDING LEVELS & LIMITS

Each year's Notice of Funding Availability (NOFA) states 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. Because the application deadline falls in FY2019, HUD will use FY2019 FMRs.
- If the recipient has a subrecipient, it is required to share at least 50 percent of project administrative funds with its subrecipient(s).

### B. 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.
- In order to expend funds within statutorily required deadlines, applicants funded for new sponsor-based and project-based rental assistance must execute the grant agreement and begin providing rental assistance within 2 years. However, HUD strongly encourages all rental assistance to begin within 12 months of award.  Applicants unable to begin within 12 months should consult with the local HUD CPD Field Office.

### C. INITIAL FUNDING TERM

- New projects (except for projects requesting capital costs) 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, the following exceptions apply:
  - **NEW THIS YEAR** HUD will allow new projects to request 1 year of funding with a longer initial grant term not to exceed 18 months. HUD has determined that most new projects requesting 1 year of funding normally take approximately 3 to 6 months to begin fully operating the new project (e.g., hiring staff, developing partnerships with landowners if leasing or renting). Therefore, a new project requesting 1 year of funding may request a grant term of 12 months to 18 months that will allow for the additional start- up process.
  - Any new expansion project that is submitted to expand an eligible renewal CoC Program-funded project may only request a 1-year grant term, regardless of the project type.
  - Any new project that is requesting consideration under the DV Bonus (see Section III.C.2.h of this NOFA for more information) may only request a 1-year grant term, with 1-year of funding, regardless of project type.
- A new project requesting, for example, $300,000 would receive the full amount for a one-year grant, $150,000 each year for a two-year grant, and $100,000 each year for a three-year grant, and so on.  If considering a longer-term grant, please review the NOFA or consult with HomeBase Local Team members for grant term requirements.

- See "Match Requirements" section of this handbook on page 28.

## 3. NEW PROJECT 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 information about Eligible Applicants on page 10)
- Demonstrate the 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
- Agree to participate in HMIS (except for victim service providers who must use a comparable database and planning/UFA grant recipients)

**Project Quality Threshold:** HUD will review all new project applications to determine if they meet project quality threshold requirements. If awarded, a recipient is required to meet all the criteria listed for its component. The housing and services proposed must be appropriate to the needs of the program participants and the community.
- For DV Bonus projects for PH-RRH or Joint TH and PH-RRH, the applicant must demonstrate that the project will use trauma-informed, victim-centered approaches.
- For new permanent housing projects, applications must receive at least 3 out of 4 possible points and **must receive the point under the third criteria** to be funded. Quality threshold factors include that:
  - The type of housing proposed, including the number and configuration of units, will fit the needs of the program participants (e.g., two or more bedrooms for families).
  - The type of supportive services that will be offered to program participants will ensure successful retention in or help to obtain permanent housing, including all supportive services regardless of funding source.
  - **The proposed project has a specific plan to coordinate and integrate with other mainstream health, social services, and employment programs and ensure program participants will be assisted to obtain the benefits from the mainstream programs for which they may be eligible (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).**
  - Program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g., provides the participant with some type of transportation to access needed services, safety planning, case management, additional assistance to ensure retention of permanent housing).
- For new Joint TH and PH-RRH component projects, applications must receive at least 4 out of 6 possible points and **must receive the point under the fourth criteria** to be funded. Quality threshold factors include that:

- o The type of housing proposed, including the number and configuration of units, will fit the needs of the program participants (e.g., two or more bedrooms for families.)
- o The proposed project will provide enough rapid re-housing assistance to ensure that at any given time a program participant may move from transitional housing to permanent housing. This may be demonstrated by identifying a budget that has twice as many resources for the rapid re-housing portion of the project than the TH portion, by having twice as many PH-RRH units at a point in time as TH units, or by demonstrating that the budget and units are appropriate for the population being served by the project.
- o The type of supportive services that will be offered to program participants will ensure successful retention or help to obtain permanent housing, including all supportive services regardless of funding source.
- o **The proposed project has a specific plan to coordinate and integrate with other mainstream health, social services, and employment programs and ensure program participants will be assisted to obtain the benefits from the mainstream programs for which they may be eligible (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).**
- o Program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g., provides the participant with some type of transportation to access needed services, safety planning, case management, additional assistance to ensure retention of permanent housing).
- o The project has low barriers to entry and prioritizes rapid placement and stabilization in permanent housing.
- For new Supportive Services Only- Coordinated Entry (SSO-CE) projects for centralized or coordinated assessment systems, applications must receive at least 3 out of 5 possible points and **must receive the point under the fifth criteria** to be funded. Quality threshold factors include that:
  - o The centralized or coordinated assessment system is easily available/reachable for all persons within the CoC's geographic area who are seeking information regarding homelessness assistance. The system must also be accessible for persons with disabilities within the CoC's geographic area.
  - o There is a strategy for advertising that is designed specifically to reach homeless persons with the highest barriers within the CoC's geographic area.
  - o There is a standardized assessment process.
  - o Ensures program participants are directed to appropriate housing and services that fit their needs.
  - o **The proposed project has a specific plan to coordinate and integrate with other mainstream health, social services, and employment programs and ensure program participants will be assisted to obtain the benefits from the mainstream programs for which they may be eligible (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).**
- For new HMIS projects, applications must receive at least 3 out of 4 possible points to be funded. Quality threshold factors include that:
  - o The HMIS funds will be expended in a way that is consistent with the CoC's funding strategy for the HMIS and furthers the CoC's HMIS implementation.
  - o The HMIS collects all Universal Data Elements as set forth in the HMIS Data Standards.
  - o The ability of the HMIS to un-duplicate client records.

o The HMIS produces all HUD-required reports and provides data as needed for HUD reporting (e.g., APR, quarterly reports, data for CAPER/ESG reporting) and other reports required by other federal partners.

**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; or does not routinely draw down funds from eLOCCS at least once per quarter. 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.
- Evidence of the issues related to the following may prevent an award from being granted to otherwise successful applicants. Detailed information on each requirement is posted on HUD's Funding Opportunities Page (https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/fundingopps)
  o Resolution of Civil Rights Matters
  o Outstanding Delinquent Federal Debts
  o Debarments and/or Suspensions
  o Pre-selection Review of Performance
  o Sufficiency of Financial Management System
  o False Statements
  o Mandatory Disclosure Requirement
  o Conducting Business in Accordance with Ethical Standards/Code of Conduct
  o Prohibition Against Lobbying Activities
  o Equal Protection for Faith-based and Community Organizations

## RENEWAL PROJECTS REQUIREMENTS

To be eligible for renewal funding:
- The application must be approved by the CoC for submission in this NOFA.
- The applicant must have an executed grant agreement by December 31, 2019, and the current grant must expire between January 1 and December 31, 2020.
- The applicant must be the entity that signed the expiring grant agreement with HUD.

The list of potential projects eligible for renewal in FY 2019 for our CoC is provided in the Local Competition Handbook 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. RENEWAL PROJECT CHANGES IN 2019 NOFA

- **DedicatedPLUS Projects**. A renewal project that is Permanent Supportive Housing 100% dedicated to chronically homeless people may either become a DedicatedPLUS project or may continue to dedicate 100% of its beds to chronically homeless individuals and families. If a renewal project that has 100% of its beds dedicated to chronically homeless individuals and families elects to become a DedicatedPLUS project, the project will be required to adhere to all fair housing requirements at 24 CFR 578.93. Projects that were awarded as DedicatedPLUS in a previous CoC Program Competition are required to include households with children to qualify as a DedicatedPLUS project in the FY 2019 CoC Program Competition.

### B. OTHER TYPES OF GRANT OPTIONS FOR RENEWALS IN 2019: TRANSITION GRANTS, CONSOLIDATIONS, EXPANSION GRANTS

Again in 2019, renewal projects applicants have three options that had not been available in competitions prior to FY 2018. They can choose to:
- Transition the renewal project to another CoC Program component (eliminating the gap between contracts when CoCs have allowed agencies to 'reallocate to themselves' in past competitions),
- Consolidate several grants through the application process thereby avoiding a lengthy grant amendment process, or
- Expand the renewal grant (as described above at page 10).

### TRANSITION GRANTS

- Applicants may transition renewal projects from one CoC Program component (e.g., Transitional Housing to Rapid Rehousing, Rapid Rehousing to Permanent Supportive Housing) to another using the CoC Program Competition upon approval of the CoC.
- By the end of the FY 2019 operating year, the transition grant must be operating under the new component and will be eligible to apply for renewal in the next CoC Program Competition under the component to which it transitioned.
- To create a transition grant, the CoC must wholly eliminate one or more projects and use those funds to create the single, new transition grant (so resulting project type must be allowed as a new project under this NOFA competition).

- For a new project to be considered a transition grant, the applicant for the new project must be the same recipient for the eligible renewal grant(s) being eliminated, and the applicant must provide the grant number(s) of the projects being eliminated to create the new project and attach a copy of the most recently awarded project application (e.g., if the project was last funded in the FY 2018 CoC Program Competition, a copy of the FY 2018 CoC Program Competition project application must be attached to the project application).
- No more than 50% of each transition grant may be used for costs of eligible activities of the program component originally funded.  All remaining funds awarded must be used for eligible activities awarded under the new component for the project.
- Transition grants conditionally awarded in the FY 2019 CoC Program Competition will have one year to fully transition from the original component to the new component and this will take place during the transition grant's normal operating year.
- The project's operating start date will be the day after the end of the previous grant term for the expiring component, i.e., the transition grant will have the same operating year as the expiring component project. For transition grants reallocated from more than one project, the operating start day of the transition grant will be the day after the end of the earliest expiring grant term.
- If HUD determines that a new project that applied to be a transition grant does not qualify to be a transition grant, but meets all other new project requirements, then HUD may award the project as a new project that is not a transition grant. In these instances, the recipient will not be permitted to expend any FY 2019 funds on activities not included in the new project application.

## CONSOLIDATED PROJECTS

- Eligible renewal project applicants may consolidate two, three, or four eligible renewal projects into one project application during the application process.
- The projects being combined during a grant consolidation will continue uninterrupted.
- To be eligible for consolidation, projects must have the same recipient and be for the same component; and they will be funded in this competition only with FY 2019 funds (meaning no funds recaptured from prior years will be awarded to the project).
- HUD will not permit a Transitional Housing and a Rapid Rehousing project to consolidate to form a Joint Transitional Housing and Rapid Rehousing Component project and will not permit a transition grant to be consolidated with any other project.  If a project meeting these characteristics attempts to consolidate as part of the project application process, the submitted consolidated project will be rejected by HUD during the application review process.
- To apply for a consolidated grant, applicants must submit separate renewal project applications for each of the grants that are proposed to be consolidated, and an application for the new consolidated grant with the combined budget and information of all grants proposed for consolidation.  Project applications for the grants that are proposed to be consolidated will be ranked, and if all those grants are selected, HUD will award the single consolidated grant.  If one of the grants proposed to be consolidated is found to be ineligible for consolidation or is not selected, HUD will award all grants that are eligible for renewal and selected as separate grants.
- If a project applicant incorrectly requests consolidation of two or more eligible renewal projects, HUD may reduce the consolidated project in which case the project applicant will permanently lose funding.
- The start date for the consolidated grant, if conditionally awarded, will be the day after the expiration date of the eligible renewal project with the earliest expiration date.  The expiration

date for the consolidated grant will be calculated by averaging the expiration dates for all expiring grants included in the consolidated grant weighted by the size of each expiring grant.

- Applicants must ensure:
  - o Consolidating projects are the same component;
  - o Budget line items for the consolidated project application submitted exactly match the sum of the budget line items for each of the individual projects as they appear on the GIW posted to the HUD Exchange;
  - o Expiring grant numbers and operating start and end dates for the projects that are consolidating are provided;
  - o Operating end dates end in CY 2019;
  - o Projects are in good standing with HUD, meaning none of the projects have:
    - ▪ outstanding audit or monitoring findings,
    - ▪ outstanding obligation to HUD that is in arrears,
    - ▪ unresolved construction delays,
    - ▪ a history of poor financial management/drawdown issues,
    - ▪ history of low occupancy levels, or lack experience in administering the project type, or
    - ▪ other capacity issues.

## EXPANSION PROJECTS

- A renewal project applicant may submit a new project application under the DV Bonus, reallocation, and COC bonus processes to expand its current operations by adding units, beds, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-Coordinated Entry projects within the CoC's geographic area. See page 12 for details.

## C. ELIGIBLE RENEWAL COSTS

All renewal projects must submit an application that reflects the same costs and amounts as are listed on the Grant Inventory Worksheet for that grant. Those costs may include:
- Leasing
- Rental assistance
- Operating costs
- Supportive services
- HMIS
- Indirect Costs
- Administration

## D. THRESHOLD REQUIREMENTS

HUD assumes renewal projects meet project eligibility and quality threshold requirements because of previously approved grant applications, unless information to the contrary is received (e.g., monitoring findings, results from investigations by the Office of Inspector General, the recipient routinely does not draw down funds from eLOCCS at least once per quarter, consistently late APRs.) and if the renewal project has compliance issues which results in the project not operating in accordance with 24 CFR part 578. Eligibility threshold is determined on a pass/fail basis, and **if standards are not met, the project will be rejected from the competition.**

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

When considering renewal projects for award, HUD will review information in eLOCCS; Annual Performance Reports (APRs); and information provided from the local HUD/CPD Field Office, including monitoring reports and 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.

## E.  FUNDING LEVELS & LIMITS

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

- Applicants requesting renewal of grants for rental assistance are permitted to request a per-unit amount less than the Fair Market Rent (FMR) if the actual rent per unit under lease is less than the FMR (but not more than). This will help 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 the amount requested will be sufficient to cover all eligible costs as HUD cannot provide funds beyond the amount awarded through this Competition. Project applications for rental assistance cannot request more than 100 percent of the published FMR.
  - o  The applicant must provide copies of the leases to establish the actual rents.

- HUD will adjust leasing, operating, and rental assistance budget line items based on changes to the Fair Market Rents (FMR). Because the application submission deadline falls in FY 2019, HUD will use FY 2019 FMRs for funding amounts.
- 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 at page 10.)
- If the recipient has a subrecipient, it is required to share at least 50% of project administrative funds with its subrecipient(s).

## F.  FUNDING TERM

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

## G.  MATCH REQUIREMENT

- See "Match Requirements" section of this handbook on page 28.

## 4. ELIGIBLE COSTS TO INFORM PROJECT DESIGN

Information about eligible costs under each line item can be found in the CoC Program Interim Rule, 24 CFR 578.   An eligible costs handout will be provided at the TA Workshop. This handout is meant as a quick reference summary and does not reproduce the information from the Interim Rule in full.

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

A few things to highlight because they have **changed in recent years** include:
- Program income can be used at match.  Program income must always be used for eligible activities under the grant.
- Tenant-based Rental Assistance is rental assistance in which program participants choose housing of an appropriate size in which to reside, and certain households with domestic violence experience have been able to retain the assistance outside the CoC's area. Other program participants may also choose housing outside the CoC's geographic area. If the recipient is able to meet all CoC requirements in the area where the participant chooses housing. If unable to meet the requirements, the recipient may refuse to permit the participant to retain TBRA if the participant moves outside of the geographic area.
- Indirect costs (also known as "facilities and administrative costs" defined at 2 CFR 200.56) are eligible under the CoC Program, and if the applicant does not have an approved federally negotiated indirect cost rate, the applicant may use a de minimis rate of 10 percent of Modified Total Direct Costs. (See call out box on next page for more detail.)

Also remember:
- Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible supportive services costs. Some limited training is eligible under administrative costs, however.
- Operating costs do not include operating costs of emergency shelters and supportive services only facilities, maintenance and repair of housing where those costs are included in the lease (landlord responsibilities), or a structure or unit also subsidized by rental assistance funds.
- Administrative costs do not include staff and overhead costs directly related to carrying out other eligible activities (e.g., rental assistance), because those costs are eligible as part of those activities.
- Time spent preparing the annual application to HUD is **not** an eligible use of CoC project funds (it is, however, an eligible use of CoC planning grant funds).

**INDIRECT COSTS**

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

As described in 2 CFR 200.403, costs must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both.

Applicants selected for funding pursuant to this NOFA may charge indirect costs to the award.  Project applicants that intend to charge indirect costs to the conditional award must clearly state in the project application(s) the rate and distribution base the project intends to use and should include indirect costs in their detailed project budget(s).

Applicants with an approved federally negotiated indirect cost rate must submit with their application a letter or other documentation from the cognizant agency showing the approved rate.

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.  Documentation of the decision to use the de minimis rate must be retained on file for audit. See Indirect Cost Rate FAQs on pages 76-77 of this TA Handbook for more information about the de minimis rate and calculating Modified Total Direct Costs.

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.

## PROGRAM REQUIREMENTS

## 1. MATCH REQUIREMENTS

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

- The recipient or subrecipient must match all grant funds, except for leasing funds which have no match requirement, 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.

- **The match must be used for activities that are eligible under Subpart D of the CoC Interim Rule FOR THE PROJECT** (e.g. operations costs are not eligible as match in a rental assistance project).

- **Cash Match**: A recipient or subrecipient may use funds from any source, including any other federal sources (excluding Continuum of Care program funds), as well as State, local, and private sources, provided that funds from the source are not statutorily prohibited to be used as a match (e.g. HOME). (The recipient must ensure that the rules governing match funds allow them to be match for the CoC Program.)
    - **NOTE: Program income CAN be used as match.** Project applicants that intend to use program income as match must provide an estimate of how much program income will be used for match.

> **Leverage**
> In the past, having letters indicating financial support ("leverage letters") for its projects improved the CoC's score in the national competition. Since 2016, the CoC has not been scored on the amount of leverage it submits and leverage documentation is not required as part of the project application

- **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.

## A. DOCUMENTATION OF MATCH

Applicants are required to document all match commitments for HUD. Documentation must be dated between May 1, 2019 and September 30, 2019.

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

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

## B. FORM OF MATCH LETTER

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

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

| | |
|---|---|
| Name of organization providing the resource | |
| Type of contribution and use* | |
| Value of the contribution** | |
| Name of project | |
| Specific grant the contribution will support (e.g. if project is S+C and has two CoC grants supporting the project, note if this is for S+C1 2019 or S+C2 2020) | |
| Name of grant recipient and/or subrecipient | |
| Date the contribution will be available*** | [_____], 2020 OR [_____], 2021 |
| Name of person authorized to commit these resources | |
| Title of person authorized to commit these resources. | |
| Signature of person authorized to commit these resources. | |
| Date | Must be dated between May 1 and September 30, 2019 |

\*  E.g., cash, childcare, case management, health care, etc.  If cash, also state allowable activities to be funded by match.
\*\* For in-kind, identify method used to determine the value of the donation.
\*\*\* **For renewals, this date must be within your 2020-2021 operating year.**

**PLEASE NOTE:  As stated above, match must be used for eligible costs of the project, which may vary.  Costs listed below could be eligible sources of match for CoC projects, but not all are eligible for ALL CoC projects.**

**Advocacy**
Benefits advocacy
Housing advocacy
Legal assistance, advocacy, representation, and referrals
Peer advocacy
Tenant rights workshops

**Children**
After-school children's program
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
K-12 homeless education
Parenting classes
Summer camp
School supplies
Therapeutic day Care

**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
Sewing classes
Training tuition
Training videos and games
Tutoring
Uniform vouchers
Vocational services

**Financial Services**
Asset/resource management services
Money management
Representative payee services

**Health**
AIDS-related services
Dental screening services
Dual diagnosis services
Gynecological services
Health care resources and education
Healthcare 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**
Financial move in grants, housing search support and monthly housing clinics
Housing
Housing placement
Housing search assistance
Maintenance and repair projects/beautification project
Move-In assistance
Property management
Rental assistance and financial assistance for move-in costs
Rental subsidies

Referrals
Restraining order assistance, court accompaniment and consultation
Support services supervision
Technical assistance
Translation services
Veteran's services assistance
Subsidized/free bus passes

**Human Resources**
Americorps VISTA Volunteers
Consultation staff
Mental health advocacy staff
Volunteer hours

**In-Kind**
Clothing
Equipment
Food
Furnishings
Household items

**Operations**
Administrative support
Clerical services
Consulting and practical support
Facility Space
Mail service
Office/workshop space
Programming

**Supportive Services**
Artistic services to residents
Assessment services
Benefits eligibility support
Case management
Community development
Family Support Services
Independent living services
Mentoring services
Outreach
Recreational trips and activities

## 2. 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 2019, these requirements are detailed in the 2019 CoC Program NOFA and the CoC Interim Program Rule (24 CFR 578). **All grant recipients and subrecipients should read these documents carefully.**

### A. ALL PROJECTS

- **Annual Audits:** Any recipient expending $750,000 or more in a year in Federal Funds must conduct a single audit for that year.
- **Reporting:**
    - **Annual Performance Reports (APR):** Your agency will be responsible for submitting an APR for each project every year, which provides client data, service utilization information, program outcomes, and financial information. HUD may terminate the renewal of any grant and require repayment if the APR is not filed on time or if HUD deems the APR unacceptable or showing noncompliance with grant requirements
    - **Record-keeping:** Recipients must maintain records and within the timeframe required, make any reports, including those pertaining to race, ethnicity, gender, and disability status that HUD may require. CoC applicants may report this data as part of their APR submission to HUD.
    - **Transparency Act:** Award notices may also include requirements for sub-award reporting in compliance with the requirements of the Federal Financial Assistance Accountability and Transparency Act of 2006 (Pub. L. 109-282) (Transparency Act) and Section 872 of the Duncan Hunter National Defense Authorization Act for Fiscal Year 2009 (Pub. L. 110-417)
- **Impact/Success Indicators:** All projects, except for HMIS, must provide systematic indicators for evaluating the positive impact/success the project will have on clients and reducing homelessness in the community. HUD will require projects to include measures for: length of time in the project; recidivism; movement to and stability in permanent housing; connection with mainstream benefits; and job and income growth for persons who are homeless. Projects may also indicate additional measures on which the project will chart success.
- **Other Data Requests:** Your agency must provide performance and other requested data to the CoC for community-level analysis and planning.
- **Match Documentation:** Your agency must maintain documentation of any required match funding in your financial reports on a grant-specific basis.
- **HMIS Participation:** Your agency must participate in the CoC's Homeless Information Management System and enter data consistent with the applicable HMIS Data Standards.
- **Performance**: Your agency must perform the tasks outlined in your application and grant agreement, including complying with all of the language in the Applicant Certifications, and following all HUD statutes and regulations applicable to the grant.
- **Documentation of Homeless Status and Disability Status:** HUD requires all recipients to document the homeless status, and in some cases the disability status, for all clients.
- **Housing Related Requirements:** HUD requires 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:** 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, 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.
- **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.
- **Some Pre-Contract Requirements for New Projects:**
    - 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.

- o **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.
- o **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
- o **Other like requirements** (e.g., lead based paint, environmental requirements, real property acquisition and relocation, etc.)

## B. TIMELINESS

All projects must adhere to certain timeliness standards in order to receive this funding.
- Recipients conditionally awarded funds in the 2019 CoC funding round must be obligated by September 30, 2021 and spent by September 30, 2025. However, grant terms and timeliness standards may require shorter timelines.
- Recipients must draw down funds at least once per quarter of the program year, after eligible activities commence.
- See also "Timeliness" under "New Project Basic Design Requirements"

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

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

## NAVIGATIONAL GUIDES AND DETAILED INSTRUCTIONS

Please review the HUD Training Modules and Guides/Instructions **BEFORE** accessing e-snaps or attempting to enter data. **Information in this handout supplements the HUD provided navigational guides and detailed instructions by providing the local information you need to complete the forms. Use both side by side.** Many of the HUD provided guides include screenshots that allow you to follow along and may save you time since they offer very detailed instructions and useful tips.

Over 600 pages of training modules, navigational guides, and detailed instructions can be accessed on this webpage:

**https://www.hudexchange.info/programs/e-snaps/**

**The following e-snaps guides are available on that website under the following headings**:

Updating CoC and Project Applicant Information (Subheading: Project Applicant and Funding Recipient)*
- Project Applicant Authorized Representative Update
- Project Applicant Profile Navigational Guide
- Putting the Applicant Profile in Edit-Mode
- How to Complete the HUD Form 2880 in e-snaps
- DUNS Number and SAM Resource

Submitting Applications for Project Funding
- How to Access the Project Application
- Transferring an Existing Project
- How to Complete the HUD Form 2880 in e-snaps
- Renewal Project Application Detailed Instructions and Instructional Guide
- Process for Completing Renewal Project Application Screens
- New Project Application Detailed Instructions and Navigational Guide

How To: Technical Guides
- Add and Delete Registrants in e-snaps
- Understand e-snaps Features and Functions
- Navigate the Left Menu Bar
- Create a Zip File and Capture a Screenshot

Special Topics
- Consolidating Projects
- Transitioning Projects
- Applying for DV Bonus Projects
- Expanding Projects

- [Applying for DedicatedPLUS Projects](#)

**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 people on staff with access but having more than two can lead to confusion and errors.

- e-snaps is the HUD system; it is the channel through which your application(s) will be transmitted to HUD at the end of the competition.  It is NOT the system for the local competition. Information regarding submission of your application materials can be found in your local competition materials.

- The e-snaps system is not always user-friendly or glitch-free.  It is likely that you will encounter some problems along the way.  Do not hesitate to contact your HomeBase Local Team members if you have problems with e-snaps.  That said, many problems can be avoided by following the instructions closely and relying upon the navigational guides and detailed instructions listed above, and by using the correct internet browser

## STEP 1: LOGIN TO E-SNAPS OR CREATE A NEW LOGIN

1. Enter e-snaps by logging in to **https://esnaps.hud.gov**, 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 the local competition materials for more information.

   a. If your agency is new to e-snaps, navigate to **https://esnaps.hud.gov** and select "Create a Profile" from the e-snaps log-in page.

## STEP 2: REVIEW AND COMPLETE APPLICANT PROFILE

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

**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.

Complete the Applicant Profile portion of e-snaps utilizing this Navigational Guide: https://files.hudexchange.info/resources/documents/Project-Applicant-Profile-Navigational-Guide.pdf

Below are more details and tips regarding the sections of the Applicant Profile that you will be reviewing and completing.

## ORGANIZATION INFORMATION: CCR & DUNS

You need to have a DUNS number and complete or renew your registration 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. The SAM website is https://sam.gov/SAM/. According to a HomeBase Local Team review of the SAM website, the following agencies have active registrations:

| Agency | Active Registration on SAM? |
|---|---|
| Sacramento Steps Forward | Yes; expires on 09/07/2019 |
| Sacramento Housing and Redevelopment Agency | Yes; expires on 04/15/2020 |
| TLCS, Inc. | Yes; expires on 03/03/2020 |
| Mercy Housing California | Yes; expires on 05/30/2020 |
|  |  |
|  |  |

Again in 2019, sam.gov is requiring additional steps in its registration process due to fraud, including submission of notarized letters. If your agency needs to register, please update your SAM Registration early in the application process as it can take up to 4 weeks to complete the process.

## ADDITIONAL INFORMATION: CONGRESSIONAL DISTRICTS AND CODE OF CONDUCT

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

The congressional districts in this CoC include:
- o CA-03
- o CA- 06
- o CA- 07
- o CA- 09

2. **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: https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants, **and**
- If the information (e.g. name of organization, authorized official) has not been revised.

**Most organizations' Codes of Conduct were removed from HUD's website in early 2017**, as they did not meet the requirements of 2 CFR part 200, and the organizations were notified by another HUD office that a new Code of Conduct must be submitted. You can review the Code of Conduct for HUD Grant Programs (https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants) page on HUD's website to see organizations listed which means they have submitted an approved Code of Conduct.

### *If Not Listed*
An applicant not listed on the website must submit a copy of its code of conduct with its application for assistance.

| Agency | Code of Conduct on HUD's Website? |
|---|---|
| Sacramento Steps Forward | Yes |
| Sacramento Housing and Redevelopment Agency | Yes |
| TLCS, Inc. | Yes |
| Mercy Housing California | 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.

### *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.

## HUD FORM 2880: APPLICANT/RECIPIENT, DISCLOSURE/UPDATE REPORT

A Project Applicant is **required** to complete HUD form 2880 to complete the Applicant Profile. **As of 2017**, this form is completed as a screen in e-snaps rather than as an uploaded attachment. There are a few tricky bits, please see the "How to Complete the HUD Form 2880 in e-snaps" form here: **https://files.hudexchange.info/resources/documents/How-to-Complete-the-HUD-Form-2880-in-e-snaps.pdf**

## NON-PROFIT DOCUMENTATION

*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

**Tips:**
- Do NOT hit submit on your application until after the local competition when you've been instructed to do so!
- 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.
  - **Similar to last year,** renewal project applicants (for grants that have renewed at least once) may submit their renewal project applications **with no changes** on select screens.

- The "Complete" button on the Applicant Profile must be selected within the timeframe of the competition period. Therefore, when you log in the first time during this NOFA period, even if there is a statement "This e.Form has been marked as complete," you MUST put the forms in edit-mode (select the Edit button on the Submission Summary page), revise the Profile (you must make at least one change and save it, even if you then change it immediately back), and select the "Complete" button again.
- **Complete one Applicant Profile per applicant only (NOT one per project).**
    o If you are applying for a new project and a renewal project, you will need to register for multiple funding opportunities within your Applicant Profile.
    o If you have multiple funding opportunities, make sure to create the project application under the correct Funding Opportunity name.
- 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.

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**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 (including various Federal forms) for each project. This list summarizes the other documents that need to be uploaded to e-snaps.

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

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

**Attached to Project Application**
- Documentation of Subrecipient Eligibility (e.g., 501(c)(3) letter)

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## STEP 3: 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 Project Application training module and/or review the "How to Access the Project Application" guide found here: **https://files.hudexchange.info/resources/documents/how-to-access-the-project-application.pdf**

## STEP 4: 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 when using narratives to describe your project in the project application.
- Project applications differ depending if they are for new or renewal projects, and the type of project (e.g., leasing, rental assistance, services). This handbook **includes a <u>selection</u> of the common questions project applicants generally have trouble answering,** but **does <u>not</u> include all questions** on the applications.  At the same time, if a question listed here is not part of your application, it does not necessarily mean there is a problem because it likely only applies for another project type.  We have tried to note when questions only apply for certain project types.
- Renewal projects should reflect the information on the CoC's Grant Inventory Worksheet (GIW). You can find that document in your local competition materials.  New projects are not reflected on the GIW and their responses should just reflect their proposal.
- HMIS, SSO (including Coordinated Entry), and Planning Grant questions are not included in this section of the Handbook, however many of the questions below are also part of the HMIS, SSO, and Planning applications. Please see the appropriate Detailed Instructions for completing those grant applications.

## A.    SF-424 FORM

In 2018 the Federal Government outlayed approximately $700 billion in grants to State and local governments. Executive Order 12372, "Intergovernmental Review of Federal Programs," was issued with the desire to foster the intergovernmental partnership and strengthen federalism by relying on State and local processes for the coordination and review of proposed Federal financial assistance and direct Federal development. The Order allows each State to designate an entity to perform this function. **In 2019, California elected to participate in the intergovernmental review process and designated the State Clearinghouse of the Office of Planning and Research as the entity to perform that function.**

Renewal and New Project applications must now submit their SF-424 form (exported from e-snaps) to the State website found here: http://cfda.opr.ca.gov/#/

The SF-424 Form in e-Snaps consists of the following sections within the project application (both new and renewal):
- 1A. SF-424 Application Type
- 1B. SF-424 Legal Applicant

- 1C. SF-424 Application Details
- 1D. SF-424 Congressional District(s)
- 1E. SF-424 Compliance
- 1F. SF-424 Declaration

## HOW TO EXPORT IN E-SNAPS

In order to export the complete SF-424 Form to a PDF within e-snaps, you must complete and save all of the sections listed above. Once completed and saved in e-snaps, you must then select the option that says "Export to PDF" at the bottom of the gray, left-hand navigation bar. You must then select only the sections listed above (1A through 1F) using the checkboxes and export those sections of the application into a PDF document that you can then upload to the State website for review.

NOTE: Information in these sections are pre-populated from the Applicant Profile. Please review the information to ensure accuracy. Refer to guidance links listed on page 37 above if changes are to be made in the Applicant Profile.

## HOW TO UPLOAD THE SF-424 FORM TO THE STATE WEBSITE

To upload the SF-424 Form to the State website, navigate to http://cfda.opr.ca.gov/#/.
The form on the left side of the screen under "Federal Assistance Application is Subject to Review" should be completed with the following information:

| Question | How to Respond |
|---|---|
| Organization Name | Name of organization that has been listed in screen 1B (Legal Applicant) in e-snaps |
| Email Address | Email address that has been listed in screen 1B (Legal Applicant) in e-snaps |
| Catalogue of Federal Domestic Assistance (CFDA) | 14.267 |
| Name of Federal Agency | Department of Housing and Urban Development |
| Primary Place of Performance | Address listed in screen 1B (Legal Applicant) in e-snaps (Street Line 1, City/Town, Zip Code) |
| Proposed Project State Date | Must match date in screen 1D in e-snaps |
| Proposed Project End Date | Must match date in screen 1D in e-snaps |
| Form 424 Attachment | Select "Choose File" and select the e-Snaps export PDF form (do not include any other sections of the e-snaps application) |

Once this form is completed and the PDF is attached, click "Submit".

NOTE: Please ensure that the date you have submitted the SF-424 Form on the State website matches the date you input for e-snaps screen "1E. SF-424 Compliance" under question 19.

## B. SELECTED QUESTIONS FOR NEW PROJECT APPLICATIONS TO ADDRESS COMMON ERRORS

| Question | New Project Answer and/or Notes |
|---|---|
| **Part 1** 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. | |
| **Pages 1B. Legal Applicant and 1C. Application Details** | |
| a. Legal Name | Remember: This is the recipient name, not the subrecipient. The legal name must match the name on the organization's articles of incorporation or other legal governing authority. Surrogate names, abbreviations, or acronyms must not be listed. |
| f. Contact person | HUD will contact the person listed in field f. regarding curable deficiencies for the application, and so this person should be the most knowledgeable about the application. This may be the organization's authorized representative, a program manager, financial analyst, or grant writer |
| **Page 1D. Congressional District(s)** | |
| 16. Congressional District(s): b. Project: | Must reflect congressional district(s) in which the project will operate.  Should be CA-03, CA-06, CA-07 and/or CA-09. |
| 17a. Proposed Project start date | For all RA/leasing/operating projects, please select a date in 2020 that is feasible for the start of your project. The operating start date must be the first day of the month. |
| 17b. Proposed Project end date | For one-year grants, please select a date 12-18 months after 17a |
| **Page 1E. Compliance and Page 1F. Declaration** | |
| 19. Is the Application Subject to Review By State Executive Order 12372 Process? | For projects located in the State of California, choose: "yes" from the dropdown box. You must then select the date that you will upload the complete SF-424 export from e-snaps (Page 1A through Page 1E) to the State website located here: http://cfda.opr.ca.gov/#/ |
| **Page 2A. Project Subrecipients** | |
| Total Expected Sub Awards | • Add any amounts that are expected to be awarded to subrecipients, taking into account amount the recipient will retain for administration or other costs. |
| **Page 2B. Experience of Applicant, Subrecipient(s), and Other Partners -** Both project applicants and potential subrecipients must show satisfactory capacity, funds draw down history, and performance for existing grant(s), as applicable and evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of monitoring findings. | |
| 1. Describe the experience of the applicant and potential subrecipients (if any), in effectively utilizing | • Describe why the applicant, subrecipients, and partner organizations (e.g., developers, key contractors, subcontractors, service providers) are the appropriate entities to receive funding.<br>• Provide concrete examples that illustrate their experience and |

| Question | New Project Answer and/or Notes |
|---|---|
| federal funds and performing the activities proposed in the application, given funding and time limitations. | expertise in the following:<br>o Working with and addressing the target population's identified housing and supportive service needs;<br>o Developing and implementing relevant program systems, services, and/or residential property construction and rehabilitation;<br>o Identifying and securing matching funds from a variety of sources; and<br>o Managing basic organization operations including financial accounting systems. |
| 2. Describe the experience of the applicant and potential subrecipients (if any) in leveraging other Federal, State, local, and private sector funds | Include experience with all Federal, State, local and private sector funds. If the project applicant and subrecipient have no experience leveraging other funds, include the phrase "No experience leveraging other federal, state, local, or private sector funds." |
| 3. Describe the basic organization and management structure of the applicant and subrecipients (if any). Include evidence of internal and external coordination and an adequate financial accounting system. | • For **both** the project applicant and any subrecipients, include evidence of internal and external coordination and an adequate financial accounting system.<br>• Include the organization and management structure of the project applicant and all subrecipients<br>• Be sure to include a description of internal and external coordination and<br>• Be sure to include a description of the financial accounting system that will be used to administer the grant. |
| 4a. Are there any unresolved monitoring or audit findings for any HUD grants (including ESG) operated by the applicant or potential subrecipients (if any)? | • Respond Yes if the recipient or subrecipient have open OIG audit findings; poor or non-compliance with applicable Civil Rights Laws and/or Executive Orders; or open McKinney-Vento related monitoring findings. Then describe the details and steps being taken to resolve the findings in the follow up question. |
| **Page 3A. Project Detail -** This page determines what pages/questions are available later in application. If e-snaps asks you to fill out irrelevant information (e.g. about the number of units you will serve, but you are SSO project), review this page to ensure it is correct. ||
| 1a. CoC Number and Name | CA-503 Sacramento Continuum of Care |
| 1b. CoC Collaborative Applicant Name | Sacramento Steps Forward |
| 3. Project Status | Correct answer: Standard |
| 4. Component Type: | Choose: PH (for PSH and RRH), Joint TH and PH-RRH, HMIS, or SSO (if a Coordinated Entry grant). If you get questions that do not |

| Question | New Project Answer and/or Notes |
|---|---|
| | pertain to your project on later screens, confirm this answer is correct first. |
| 5. Title V | This question refers to federal properties that were categorized as unutilized, underutilized, excess, or surplus for use to assist homeless persons, please answer as appropriate for your project. |

**Page 3B. Project Description (**questions differ by project type)

| Question | New Project Answer and/or Notes |
|---|---|
| 1. Provide a description that addresses the entire scope of the proposed project | *References to ineligible activities or failing to provide an adequate description of the project may result in rejection of the project application.*<br><br>Provide a detailed description of the scope of the project including:<br>• the target population(s) to be served,<br>• project plan for addressing the identified housing and supportive service needs,<br>• anticipated project outcome(s),<br>• coordination with other organizations (e.g., federal, state, nonprofit), and<br>• the reason CoC Program funding is required.<br><br>**\*\*NEW THIS YEAR\*\*** If project will implement any service participation requirements or requirements beyond what is typically included in a lease agreement, describe what those requirements are and how they will be implemented.<br><br>HUD recommends using generic data rather than specific dates (e.g. in FY2020, this project will serve 10 persons) to reduce the need for annual updates.<br><br>o The program description should describe the project at full operational capacity.<br>o **Project applicants MUST match this description to all other parts of the application** including Part 5 and budgets in Part 6<br><br>**For Joint TH/RRH**: If CoC Program funds will not be requested for both TH and PH-RRH units in this application, the description must describe the number of TH and PH-RRH units that will be utilized by the project from another funding source(s), and provide details of how TH and PH-RRH assistance will be provided for all participants under this joint component. For example, if TH units are requested in this application and PH-RRH units will not be funded with CoC Program funds (i.e. ESG etc.), the description must include information as to where the funds for the PH-RRH units will come from, and if provided by a separate organization, provide organizational information and source funding for these units and the number of units supported |

| Question | New Project Answer and/or Notes |
|---|---|
| 2. For each primary project location or structure in the project, enter the number of days from the execution of the grant agreement that each of the following milestones will occur as related to CoC Program funds requested in this project application. | Generally, applicants must be able to begin assistance within 12 months of conditional award (exceptions for SBRA and PBRA however HUD encourages all to begin within 12 months).<br><br>If a milestone is not applicable, leave the associated fields blank. If the project has only one location or structure, or no structures, complete only column A. If multiple structures, complete one column for each structure**. |
| 4. Please identify the project's specific population focus. (Select ALL that apply) | Select relevant checkbox(es) if project will have a special capacity in its facilities, program designs, tools, outreach or methodologies for a specific subpopulation or subpopulations. This does not necessarily mean that the project exclusively serves that subpopulation(s), but rather that they are uniquely equipped to serve them.<br><br>Make sure the populations you select align with this grant opportunity (e.g. if you are applying for PSH, select chronic homeless). If a permanent housing project, make sure subpopulations with people with disability are checked.<br><br>*Note*: It is <u>not</u> in your best interest to overpromise to these questions. |
| d. Will the project follow a Housing First approach? | If you answered the questions above in alignment with HUD's preferences, this will auto populate "Yes".<br><br>Please note that if you do respond Yes to all of the above questions, you will be contractually required to operate your project in accordance with your answers. |
| 7. Will participants be required to live in a particular structure, unit, or locality, at some point during the period of participation<br><br>7a.. If yes, how and why | Yes/No.<br><br>Site-based projects should say Yes. (For TH/RRH, if either part is site-based, say Yes.)<br><br>Tenant Based Rental Assistance permanent housing projects may require clients to live in a particular structure for the first year and in a defined geographic 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). |

| Question | New Project Answer and/or Notes |
|---|---|
| | Narrative should explain why the applicant has chosen to enforce this requirement for participants.<br><br>RRH projects are encouraged to provide as much client choice as possible in the selection of their permanent unit, keeping in mind that program participants will remain in these units after the RRH assistance ends. |
| 8a/b. Will more than 16 persons live in one structure? | Yes/No. (HUD prefers a no, unless justified by local market conditions). Narrative should explain the local market conditions that necessitate a project of this size and how neighborhood integration can be achieved for program participants. |
| **Page 4A. Supportive Services for Participants** (not for HMIS or CE) | |
| 1. Acknowledgment that applicants requesting funds to provide housing or services to children and youth, with or without families, must establish policies and practices consistent with the McKinney-Vento Act and other laws relating to the provision of educational services. | • Check the box to acknowledge that you will be required to meet these requirements if you are serving households with children.<br><br>Please contact HomeBase Local Team if you need a form policy. |
| 2. Describe how participants will be assisted to obtain and remain in permanent housing. | Describe how the project applicant plans to help program participants move into permanent housing, and how the plan ensures program participants stabilize and remain in permanent housing.<br><br>An acceptable response will:<br>• Acknowledge the needs of the target population<br>• Include plans to address those needs through current and proposed case management activities and the availability and accessibility of supportive services such as–housing search, primary health services, mental health services, educational services, employment services, life skills, child care services, etc.<br>• If program participants will be housed in units not owned by the project applicant, the narrative must also indicate how appropriate units will be identified, the project's established arrangements with homeless service providers, and how the project applicant or subrecipient will ensure that rents are reasonable. |

| Question | New Project Answer and/or Notes |
|---|---|
| | New projects applying for DV bonus funds must tailor the description to include how survivors will be assisted to obtain and remain in permanent housing that addresses their particular needs and includes trauma-informed, victim-centered approaches.<br><br>**Joint TH/RRH**: The description should account for the special nature of the Joint component with both TH and RRH, including the types of supports that are offered to program participants in both portions of the project–the TH and the RRH portions–and how the program participants will be assisted to quickly move from the TH portion into the RRH portion. |
| 3. What specific plan does this project have to specifically coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible? | Describe:<br>1. how the project will help program participants obtain income (e.g., access to employment programs and educational opportunities);<br>2. how the supportive services provided will lead directly to program participants gaining employment, accessing SSI, SSDI, or other mainstream income streams; and<br>3. how the requested CoC Program funds will contribute to program participants becoming more independent (e.g. accessing Medicare, Medicaid, early childhood education). |
| 4. For all supportive services available to participants, indicate who will provide them, how they will be accessed, and how often they are provided. | Should reflect **_all_** supportive services provided to participants, whether funded by CoC funds or other funds.  If you do provide a service, please respond to all the related questions. At least one row must be completed.<br><br>Note:  Having services that still say "Select" is acceptable and indicates service is not provided. |
| 5. Questions about activities to increase access to mainstream benefits | The project application responses to these questions will be aggregated into the CoC application.<br><br>NOTE:<br>• Transportation assistance to clients to attend mainstream benefit appointments, employment training, or jobs may include bus passes, rail/subway cards, vehicle owned by the organization, taxi fare, etc.<br>• Regular follow-ups with participants to ensure mainstream benefits are received and renewed means project will follow-up at least annually ensure that participants have applied for and are receiving benefits and renew when required. |
| **Question** | **New Project Answer and/or Notes** |

**Page 4B. Housing Type and Location** (not for HMIS or CE)

| Question | New Project Answer and/or Notes |
|---|---|
| Total Units:<br>Total Beds:<br>Total Dedicated CH Beds:<br><br>(Additional columns for Joint TH/RRH projects) | • Answer should reflect beds supported by CoC funds at full capacity on a single day<br>• Should align with Screen 3B, 5A and 5B, budgets and the CoC point in time count for this project.<br><br>• If a PSH project that is 100% Dedicated, dedicated CH beds must equal total beds<br>• If a PSH project that is DedicatedPLUS, number of dedicated CH beds is up to the project.<br>• If Joint TH and PH-RRH, the number of TH units/beds and RRH units/beds must equal the total number of units for the project. If either of the TH portion or the PH-RRH portion are funded through other non-CoC funding source(s) be sure to enter to include these units, beds, and funding source(s). |

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

| | |
|---|---|
| Households | Must match Page 3B, including the narrative and project type selected, as well as the supportive services provided on Page 4A and the housing type and location information provided on Page 4B, AND budgets.<br>• If PSH project, must have a disabled adult in the family<br>• If a project for chronically homeless, must reflect disabled adults and chronic homelessness.<br><br>Should reflect the number of households or persons served at **single point in time at maximum occupancy**<br>• Should NOT be the number served over the course of a year or grant term<br><br>On Page 5B, the first 3 columns are mutually exclusive, the rest can duplicate, except that "Persons not represented by an identified subpopulation" are mutually exclusive to all other rows. If anyone is listed in "Persons not represented by an identified subpopulation," you must describe the population being served in the textbox. Make sure the population described is **eligible**. |

**6A. Funding Request**

| | |
|---|---|
| 2. What type of CoC funding is this project applying for in the 2019 CoC Competition? | In FY 2019, new projects may apply for reallocation funds, bonus funds, a combination of bonus and reallocation, or DV bonus funds. Select the appropriate funding from the dropdown menu.<br><br>New PH-PSH and HMIS projects are NOT eligible for DV Bonus funds. Transition grants may only apply for reallocation funds. |
| 5. Select the costs for which funding is being | Project Applicants may NOT have any of the following combinations in a single structure or housing unit: |

| Question | New Project Answer and/or Notes |
|---|---|
| requested | • Acquisition and/or rehabilitation with new construction<br>• Leasing with acquisition, rehabilitation, or new construction*<br>• Rental assistance with acquisition, rehabilitation, or new construction*<br>• Leasing and rental assistance*<br>• Rental assistance and operations*<br><br>* Joint TH and PH-RRH component may have budgets that reflect these combinations, but not in a single structure or housing unit. |
| 6. If awarded, will this project require an initial grant term greater than 12 months? | You can request a 13-18-month initial grant performance period here. |

| **6C/6E. Leased Units Budget Detail/Rental Assistance Budget Detail** | |
|---|---|
| FMR area: | Sacramento--Roseville--Arden-Arcade, CA HUD Metro FMR Area |
| Units | Units should align with Pages 4B/5A/5B as applicable |

| **6F/6G/6H Supportive Services/Operating/HMIS Budget Detail** | |
|---|---|
| Operations/Services Quantity Description | Make sure aligns with 3B and 4A and that there is enough Quantity Detail: (e.g. "1 FTE @ $45,000 Case Manager Salary, including benefits" or "50 hours @ $25/hour including benefits".  "1 FTE" is NOT enough) and that **costs are eligible.**<br><br>Request should be equal to one year of the relevant cost.<br><br>**Please see the budget worksheet provided by HomeBase Local Team to aid with budget development for Operations, Services, and HMIS.** |

| **6J. Summary Budget** | |
|---|---|
| 8. Admin | **MAKE SURE FILLED IN**. Admin cannot exceed 10% of program costs. |

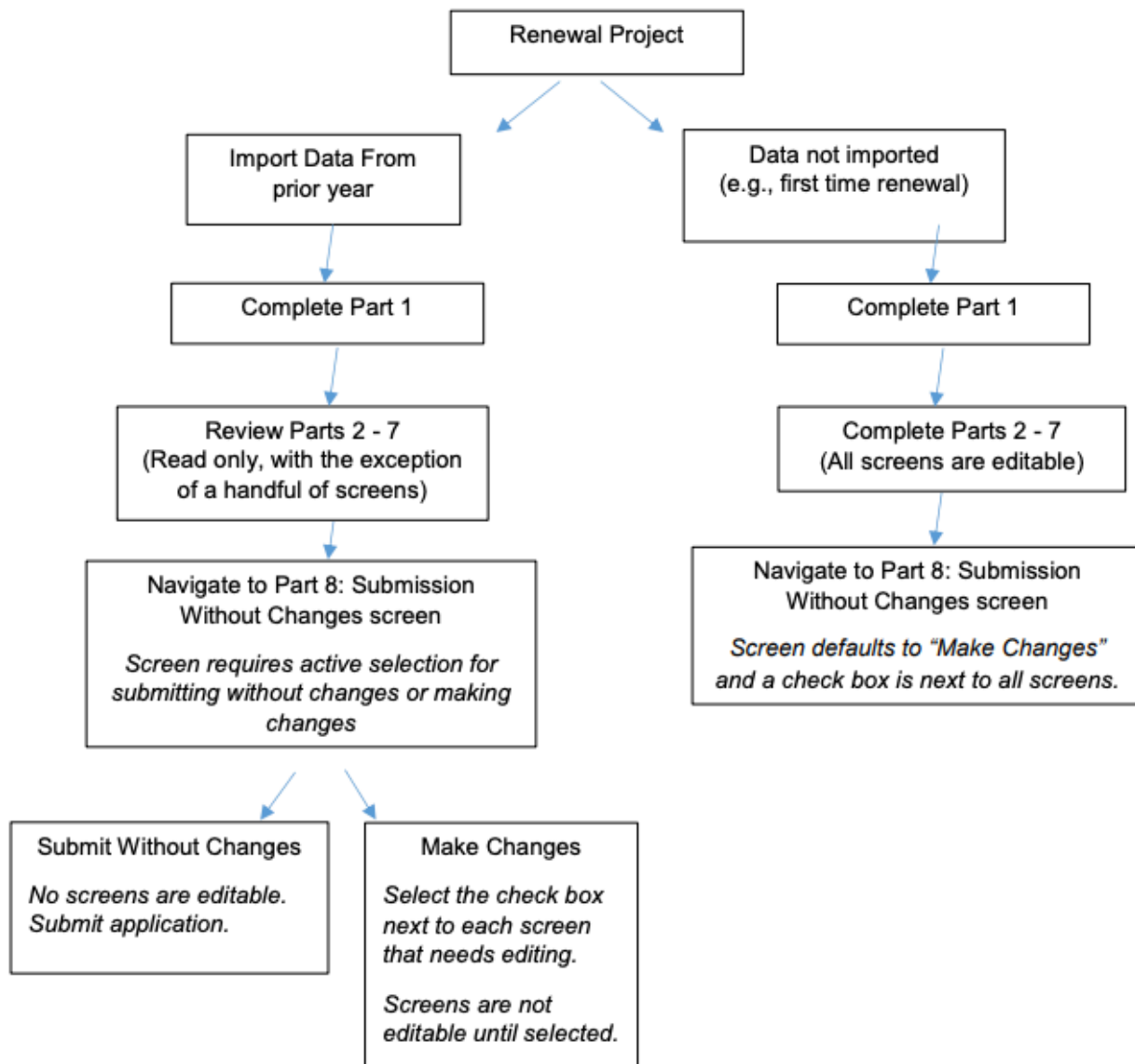| **7A. Attachment(s)** | |
|---|---|
| All attachments | Any attachment necessary will be uploaded here (e.g. additional information for 2880; third party in-kind match MOU; most recently awarded project application(s), if transitioning project types.) |
| Subrecipient Nonprofit Documentation | Required if the applicant and project subrecipient are different entities, and the subrecipient is a nonprofit organization |

| **8B. Submission Summary** | |
|---|---|
| | Make sure nothing reads "Please Complete" |

## C.    RENEWAL PROJECTS

- **Again this year, HUD is allowing renewal applications to be submitted without changing the information in most screens, if that information is accurate**.  If you **import data** into your renewal project application from last year (not an option for first-time renewals), you will be unable to edit most of the application screens until you navigate to the "Submission Without Changes" screen (listed in the left menu bar in Part 8) and select "Make Changes."
  - After you complete Part 1, the following screens are open for review:
    - Information about Submit Without Changes
    - Recipient Performance
    - Renewal Expansion
    - Renewal Grants Consolidation
    - 3A. Project Detail
    - 6D. Sources of Match
    - Part 7. Attachments and Certification
    - Part 8. Submission Summary
  - All other information included in the renewal project application is read-only unless applicants check the boxes on the "Submit Without Changes" screen in Part 8 for the screens they intend to change.
  - After reviewing and completing these screens  if you do not wish to edit any screens, you can submit to HUD as is. **NOTE: Do not hit submit in e-snaps until instructed to do so through your local process.**
  - If you do need to edit screens, you can select the specific screens you wish to open for editing by checking boxes and selecting "Save."  **Once an applicant selects a checkbox and clicks "Save," box cannot then be unchecked.**
  - Once opened for editing, you should navigate to each screen to update / change the information on those screens, selecting "Save" before navigating to another screen.
  - For applicants seeking to consolidate multiple grants through the FY 2019 CoC Competition, as described below, applicants may "Submit without Changes" for the individual project application, however, the "Submit without Changes" function is not available for the fully consolidated application and applicants must input data manually into the application for all required fields.
- **Again in the FY 2019 CoC Program Competition, grant recipients have the option to consolidate up to four of their eligible renewal projects into one grant.** To be eligible for consolidation, renewal projects *must* 1) have a grant period that will expire in the Calendar Year (CY) 2020, as confirmed on the FY2019 Final GIW; 2) be consolidated under the same recipient, and; 3) all have the same component and project type (i.e. PH-PSH, PH-RRH, Joint TH/PH-RRH, TH, SSO, SSO-CE or HMIS).
  - **If you are interested in consolidating projects, please contact HomeBase to discuss the process further.** Please note, you will also need to notify the HUD Field Office of your intent to consolidate projects. More instructions are provided here: https://www.hudexchange.info/resource/5723/consolidating-eligible-renewals-during-the-fy-2018-coc-program-competition/    (Despite the reference to 2018 in the link, the information is for 2019.)
- **Recipients may also transition renewal projects from one CoC Program component to another** using the reallocation process in the CoC Program Competition upon approval of the CoC.

- o Project applicants can transition an existing renewable component (e.g., TH) to another component (e.g., PH-RRH). To take advantage of the transition grant, the project applicant must use the reallocation process to relocate the existing eligible renewal component to one of the eligible new project components: PH-PSH, PHRRH, Joint TH and PH-RRH, dedicated HMIS, or SSO-CE
- o **If a project is transitioning program components, the applicant must complete a NEW project application for the project, NOT a renewal application.** More instructions are provided here: https://www.hudexchange.info/resource/5850/transition-project-requirements-for-the-coc-program-competition/

**Renewal Application Process**

```
                        ┌─────────────────────┐
                        │   Renewal Project   │
                        └─────────────────────┘
                          ↙                ↘
        ┌──────────────────────┐    ┌──────────────────────────┐
        │ Import Data From      │    │ Data not imported         │
        │ prior year            │    │ (e.g., first time renewal)│
        └──────────────────────┘    └──────────────────────────┘
                  ↓                             ↓
        ┌──────────────────────┐    ┌──────────────────────────┐
        │ Complete Part 1       │    │ Complete Part 1           │
        └──────────────────────┘    └──────────────────────────┘
                  ↓                             ↓
        ┌──────────────────────┐    ┌──────────────────────────┐
        │ Review Parts 2 - 7    │    │ Complete Parts 2 - 7      │
        │ (Read only, with the  │    │ (All screens are editable)│
        │ exception of a handful│    └──────────────────────────┘
        │ of screens)           │                ↓
        └──────────────────────┘    ┌──────────────────────────┐
                  ↓                  │ Navigate to Part 8:       │
        ┌──────────────────────┐    │ Submission Without        │
        │ Navigate to Part 8:   │    │ Changes screen            │
        │ Submission Without    │    │                           │
        │ Changes screen        │    │ Screen defaults to        │
        │                       │    │ "Make Changes" and a      │
        │ Screen requires active│    │ check box is next to all  │
        │ selection for         │    │ screens.                  │
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│ Submit Without   │  │ Make Changes      │
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│                  │  │ Select the check  │
│ No screens are   │  │ box next to each  │
│ editable.        │  │ screen that needs │
│ Submit           │  │ editing.          │
│ application.     │  │                   │
│                  │  │ Screens are not   │
│                  │  │ editable until    │
│                  │  │ selected.         │
└──────────────────┘  └──────────────────┘
```

**Use the following navigational guide alongside the information below in order to assist you in accurately completing your renewal project application:**
**https://files.hudexchange.info/resources/documents/FY-2019-Renewal-Project-Application-Navigational-Guide.pdf**

| Question | Renewal Project Answer and/or Notes | |
|---|---|---|
| **Page 1A Application Type** A lot of the information in Section 1 (1A-1J) is pre-populated from the Project Applicant Profile. If there are any discrepancies, or errors, edit the Project Applicant Profile, as you will not be able to change the Project Application. | | |
| 5b. Federal Award Identifier | **Must** match GIW.  HUD is requesting the **project PIN,** the first 6 digits of the grant number, rather than the full 16 digit grant number. If importing data, should autopopulate correctly with just the 6 characters.  Triple check this one! | |
| **Page 1D. Congressional District(s)** | | |
| 16. Congressional District(s): b. Project: | Must reflect congressional district(s) in which the project operates.  Should be CA-03, CA-06, CA-07 and/or CA-09 | |
| 17a. Proposed Project start date | Must be the date 364 days before 17b.  Must be the first day of the month and match eLOCCS. | |
| 17b. Proposed Project end date | Must match GIW (and eLOCCS) but the date should be in **2020 (may autopopulate 2019, so make sure to watch this).** | |
| **Page 1E. Compliance and Page 1F. Declaration** | | |
| 19. Is the Application Subject to Review By State Executive Order 12372 Process? | For projects located in the State of California, choose: "yes" from the dropdown box.<br><br>You must then select the date that you will upload the complete SF-424 export from e-snaps (Page 1A through Page 1E) to the State website located here: http://cfda.opr.ca.gov/#/ | |
| **Recipient Performance Screen** | | |
| 1. APR Submission On Time | • Should be Yes.  APRs are due within 90 days of when the grant term expires.   For those first-time renewals for which the original grant term has not yet expired, please write, "First-time renewal and grant term has not yet expired" and provide the date by which the APR must be submitted | Make especially sure your answers on 2B are accurate for this year! |
| 2. HUD Monitoring/OIG Audit Findings | • Should be No.  If you selected "Yes", indicate the date of the oldest unresolved finding and provide a brief explanation for why the monitoring or audit finding remains unresolved and the steps that have been taken towards resolution (e.g., responded to the HUD letter, but no final determination received). | |

| Question | Renewal Project Answer and/or Notes |
|---|---|
| 3. Quarterly Drawdowns | • Should be Yes.  If no, include an explanation. |
| 4. Recaptured Funds | • Should be No.   If yes, include an explanation for why funds were not expended. |

**Renewal Grant Expansion Screen –** In the FY 2019 Competition allows project applicants to submit a Renewal Project Applications that combines one renewal and up to two new expansion projects into one combined renewal expansion project application.

**Renewal Grant Consolidation Screen –** In the FY 2019 Competition, project applicants can request their eligible renewal projects to be part of a Renewal Grant Consolidation. This process can consolidate up to 4 renewal grants into 1 consolidated grant.

| | |
|---|---|
| 1. Is the project applicant requesting consolidation? | • Be sure to discuss any plans to consolidate projects with HomeBase and/or the Collaborative Applicant. You also must notify the Field Office of your intent to consolidate. <br> • If you answer yes, indicate whether this is the individual or fully consolidated application. |

**Information About Submission without Changes** - Projects that have renewed before will see that most of the next screens are locked to editing, except for 3A, 7A, and 7B which are mandatory for all projects to update.  You should review them for accuracy, and if you need to edit screens you will be able unlock them in Section 8 "Submission without Changes" screen and return to make edits.  At this screen, applicants can decide no updates are required and submit without changes. Please review carefully and ONLY unlock the screens you must unlock. *The following notes may be helpful to you as you review your application.*

**Page 3A. Project Detail**

| | |
|---|---|
| 5. Component Type: | Must match GIW. 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. |
| 6. Title V | This question refers to federal properties that were categorized as unutilized, underutilized, excess, or surplus for use to assist homeless persons, please answer as appropriate for your project. |

**Page 3B. Project Description**

| | |
|---|---|
| 1. Provide a description that addresses the entire scope of the proposed project | ***References to ineligible activities or failing to provide an adequate description of the project may result in rejection of the project application.*** <br><br> Provide a detailed description of the scope of the project including: <br> • the target population(s) to be served, <br> • project plan for addressing the identified housing and supportive service needs, <br> • anticipated project outcome(s), <br> • coordination with other organizations (e.g., federal, state, nonprofit), and <br> • the reason CoC Program funding is required. |

| Question | Renewal Project Answer and/or Notes |
|---|---|
| | **\*\*NEW THIS YEAR\*\*** If project will implement any service participation requirements or requirements beyond what is typically included in a lease agreement, describe what those requirements are and how they will be implemented. <br><br> • This section should not include significant changes unless the project was amended. <br> • HUD recommends using generic data rather than specific dates (e.g. in FY2020, this project will serve 10 persons) to reduce the need for annual updates. <br> • The program description should describe the project at full operational capacity. <br> • **Project applicants MUST match this description to all other parts of the application** including Part 5 and budgets in Part 6 <br><br> **For Joint TH/RRH**: If CoC Program funds will not be requested for both TH and PH-RRH units in this application, the description must describe the number of TH and PH-RRH units that will be utilized by the project from another funding source(s), and provide details of how TH and PH-RRH assistance will be provided for all participants under this joint component. **x** |
| 2. Does your project have a specific population focus? | 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). <br><br> Also, if a permanent supportive housing project, make sure subpopulations with people with disability are checked. |
| 3. Housing First. | The Housing First answers will be aggregated for the CoC application. **For renewal housing projects, if you indicated your project is Housing First in the past, but it is not any longer based on your answers to the next questions, please talk to HomeBase Local Team staff.** <br><br> Please note that saying yes to these questions creates a contractual obligation to operate in this manner for your project. |

| Question | Renewal Project Answer and/or Notes |
|---|---|
| **Page 4B. Housing Type and Location** (all projects except SSO and HMIS) | |
| Total Units:<br>Total Beds:<br>Total Dedicated CH Beds: | • Total units, beds: Should include all units in the project supported by CoC funds, at a point in time, at full capacity<br>• Total CH Dedicated beds: Should include all beds dedicated <u>and</u> prioritized for chronically homeless people<br>    ○ If chose 100% Dedicated on 3C, the number of Total Dedicated should match Total Beds<br>    ○ If chose DedicatedPLUS on 3C, applicant may choose to dedicate beds to chronically homeless people here.<br>• Should generally Screens 5A and 5B<br>• Joint TH and PH-RRH: The totals must reflect the total units and total beds at full capacity on a single night for both the TH and RRH portions of the project. If either of the TH portion or the PH-RRH portion are funded through other non-CoC funding source(s) be sure to enter to include these units, beds, and funding source(s). |
| **Pages 5A/5B. Project Participants – Households/Subpopulations** (all projects except HMIS) | |
| Households | Must match Page 3B, including the narrative and project type selected, as well as the supportive services provided on Page 4A and the housing type and location information provided on Page 4B, AND budgets.<br>• If PSH project, you must have a disabled adult in each family<br>• If a project for chronically homeless (see Page 4B), you must reflect disabled adults and chronic homelessness.<br><br>Should reflect the number of households or persons served at single point in time at maximum occupancy<br>• Should NOT be the number served over the course of a year or grant term<br>• Should align with last year's contracted amount (hint: see last year's application)<br><br>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.<br><br>If anyone is listed in "Persons not represented by an identified subpopulation," you must describe the population being served in the textbox. Make sure the population described is **eligible**. |
| **Screen 5C has been removed because of CoC requirements to use Coordinated Entry.** | |
| **6A. Funding Request-**<br>*RENEWAL BUDGET AMOUNTS MUST MATCH GIW __EXACTLY__ UNLESS REALLOCATING*<br>***Note: Make sure any changes to your budget through grant agreement, amendment, or reallocation are included in your final application.*** | |
| 5. Select the costs for which funding is being requested | Must match GIW |
| **6B/6C. Leased Units Budget Detail/Rental Assistance Budget Detail** | |
| FMR area: | Sacramento--Roseville--Arden-Arcade, CA HUD Metro FMR Area |

| Question | Renewal Project Answer and/or Notes |
|---|---|
| Number of units | • Must be equal to GIW amounts/units (as applicable)<br>• Units should align with Pages 4B/5A/5B as applicable |
| **6E. Summary Budget** | |
| 3, 4, 5, 7. Budget Amounts | **MAKE SURE FILLED IN AND MATCHES GIW** |
| **Submission Without Changes** | |
| 1. Are the requested renewal funds reduced as a result of reallocation? | For local competition, please leave blank unless you are choosing to apply for less than your grant amount. |
| **8B. Submission Summary** | |
| | Make sure nothing reads "Please Complete" |

## D.    OTHER TYPES OF APPLICATIONS: CONSOLIDATION, EXPANSION, AND TRANSITION

For more information regarding how to complete applications for consolidations, expansions, and transitions in e-snaps, please refer to the "Renewal Project Application Detailed Instructions and Navigational Guide" and "New Project Application Detailed Instructions and Navigational Guide", along with the resources under the "Special Topics" resources found here: https://www.hudexchange.info/programs/e-snaps/

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

### FAQS

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

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

**Will choosing to use an indirect cost rate change my CoC project's funding award?** No. The indirect cost rate does not increase or decrease the amount of funding your project receives from HUD. Instead, the indirect cost rate gives you more flexibility about how to spend that money.  For new projects, indirect costs should be included in your detailed project budget in e-snaps.

**What is an Indirect Cost Rate Agreement?**   An indirect cost rate agreement is an agreement between

(1) a branch of the federal government and (2) a nonprofit, local government, or state government. The agreement sets the percentage of a federal grant that can be used on "indirect costs" like accounting and human resources.

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

**What if I don't have an Indirect Cost Rate Agreement?** If you or your primary recipient <u>already</u> has an indirect cost rate agreement on file, then you need to use that agreement. Government departments receiving more than $35 million in federal funding must have a negotiated indirect cost rate in order to draw down indirect costs for CoC grants.

However, if you are a nonprofit organization or a government agency receiving less than $35 million in federal funding and you don't have a signed agreement on file yet, that is <u>not</u> a problem! You <u>do not</u> need an Indirect Cost Rate Agreement. HUD will allow you to use a 10% de minimis rate even with no agreement.

**What is a "de minimis" indirect cost rate?**
The 10% de minimis indirect cost rate is an alternative to a negotiated rate that is only available to recipients that ***have never had a negotiated indirect cost rate with any cognizant agency***. Nonprofit recipients that have never had a negotiated indirect cost rate may elect to obtain a negotiated rate or to use the 10% de minimis rate.
For recipients using the 10% de minimis rate, the amount of indirect costs is calculated as:

$$10\% \times \text{Modified Total Direct Costs (MTDC)} = \text{Amount of Indirect.}$$

**What are Modified Total Direct Costs (MTDC)?**
MTDC is a subset of all of your CoC grant direct costs and is the direct cost base for recipients using the 10% de minimis rate.
- ***Includes:*** all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards and subcontracts up to the first $25,000 of each subaward of subcontract.
    - o Administrative costs that fall within the above categories may be included in MTDC; however, grantees must be careful not to draw down twice for administrative costs. For example, if a portion of an Executive Director salary is included in the Admin budget as a direct cost, that salary may not also be included in MTDC.
    - o Eligible rental assistance costs of administering rental assistance, including processing rental payments, calculating client income, unit inspection, etc are included in MTDC.
    - o Operating costs for salaries/wages, benefits and furniture are included.
    - o Supportive services costs for salaries/wages, benefits, materials and supplies, and travel are generally included.
- ***Excludes:*** equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of $25,000.
    - o ***Leasing costs*** are generally excluded from MTDC.
    - o Rental assistance costs for ***direct rental assistance payments*** are excluded.
    - o Certain supportive services costs may be excluded, if they are considered "patient care"

or "participant support costs."
- o Other items may only be excluded when necessary to avoid a serious inequity in distribution of indirect costs and with approval of cognizant agency. (2 CFR Part 200.68)

## HUD RESOURCES

- **2019 CoC NOFA**: https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notices

- **CoC Program Interim Rule (24 CFR part 578):** https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml#seqnum578.99

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

- **Funding Application (esnaps application system):** https://esnaps.hud.gov/

- **E-snaps Resources:** https://www.hudexchange.info/programs/e-snaps/

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

- **HUD Exchange Ask A Question (AAQ):** https://www.hudexchange.info/program-support/my-question/

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

- **General Administrative Requirements and Terms for HUD Financial Assistance Awards:** https://www.hud.gov/sites/dfiles/SPM/documents/Gen_Admin_Req_Terms-FY19-HUD.Assistance.Awards.docx