
FY19 CoC Program NOFA Summary

Prepared by Technical Assistance Collaborative, Inc. ([TAC](#))

On July 3, 2019, HUD published its [Fiscal Year \(FY\) 2019 Continuum of Care \(CoC\) Program Notice of Funding Availability \(NOFA\)](#). Additional notices and sections of the NOFA (e.g., [FY19 CoC Registration](#)) have been released previously and are found online.

This summary highlights some of this year's new areas; however CoCs and project applicants are strongly encouraged to review not only the NOFA and related e-snaps application components such as the detailed instructions, but also the [CoC Program interim rule](#) and other competition materials (FAQs and NOFA related broadcasts) that will be made available on the [HUD Exchange website](#).

KEY DATES

TASK	DATE
✓ New Project Applications submitted to CoC	<i>Due to BHS NO later than August 15, 2019 by 4:00 pm (Thursday)</i>
✓ All Project Applicants notified by CoC of acceptance, rejection or reduction of project application	<i>No later than August 27, 2019 (Tuesday)</i>
✓ Post CoC Consolidated Application to website and Notify stakeholders: CoC Application and Priority Listing	No later than September 18, 2019 (Wednesday)
✓ Submit to HUD Deadline	Targeting September 23, 2019

CO C CONSOLIDATED APPLICATION

The application components are available through [e-snaps](#) and the instructional guides are available on the [HUD Exchange](#). All CoC Consolidated applications must be submitted from a Collaborative Applicant on behalf of the CoC online through [e-snaps](#) by the HUD established deadline.

The process for submitting the CoC Consolidated Application includes three-parts:

1. *FY19 CoC Application* (formerly known as Exhibit 1)
2. *FY 19 Project Application(s)* (formerly known as Exhibit 2 and includes new and renewal applications)
3. *FY19 CoC Priority Listing*

CoC Application Scoring Criteria

The NOFA includes very comprehensive information about how the application will be scored and how each point is allocated. CoCs and project applicants are strongly encouraged to review the NOFA carefully.

The CoC application will be scored out of 200 points this year.

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1. Project Capacity, Review and Ranking = 29 points
2. System Performance = 60 points (*increased by 4*)
 1. Reduction of LOT homeless went from 3 to 6 points
 2. PH placement or retention went from 2 to 4 points
 3. Returns to homeless went from 2 to 4 points
 4. Increasing employment question is now stand-alone performance worth 3 points **(NEW)**
3. HMIS = 9 points (*reduced by 4*)
4. Point-in-Time Count = 6 points
5. Performance and Strategic Planning = 40 points (*decreased by 8 (decreased by 12 in FY18)*)
6. CoC Coordination and Engagement = 56 points (*increased by 8*)
7. CoC Merger BONUS points = 25 points

CoC Application Attachments in e-snaps

- FY2019 CoC Competition Report
- 1C-4.PHA Administration Plan–Moving On Multifamily Assisted Housing Owners’ Preference
- 1C-4.PHA Administration Plan Homeless Preference
- 1C-7. Centralized or Coordinated Assessment System
- 1E-1. Public Posting – 15 Day Notification Outside of e-snaps – Projects Accepted
- 1E-1. Public Posting – 15 Day Notification Outside of e-snaps – Projects Rejected or Reduced
- 1E-1. Public Posting - 30 Day Local Competition Deadline
- 1E-4. Public Posting– Local Competition Announcement
- 1E-4. Public Posting CoC-Approved Consolidated Application
- **3A. Written Agreement with Local Education or Training Organization (NEW)**
- **3A. Written Agreement with State or Local Workforce Development Board (NEW)**
- 3B-3. Summary of Racial Disparity Assessment
- 4A-7.a. Project List–Persons Defined as Homeless under Other Federal Statutes (if applicable)

The following may be required attachments but further HUD Guidance is needed because they are listed in full NOFA, the but not in CoC Application attachment list or e-snaps. In the past HUD as required and scored CoCs on the following attachments. It is currently unclear if these attachments are required, so we suggest CoCs attach as they have in the past.

- CoC Review, Score and Ranking Procedures (p44, CoC NOFA) (p.15, CoC Application detailed instructions guidance)
- HMIS Policy, Procedures and Agreements with the HMIS Lead (p.44 - 45 of NOFA)
- Governance Charter (HMIS Governance) (p.45 of NOFA)

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Project Listing Attachments

- HUD-2991, Certification of Consistency with Consolidated plan dated between May 1 , 2019 and September 30, 2019¹.
 - One form per project applicant for each jurisdiction with all applicable projects listed.

NEW ITEM and KEY CHANGES TO FY19 NOFA

Scoring and Funding New Items and Changes	<ul style="list-style-type: none"> • CoC Coordination and Engagement total increased by 8 points to be 56 • System Performance total increased by 4 points to be 60 • Performance and Strategic Planning decreased by 8 points to be 40 • UFA Costs raised to 3 percent of FPRN or \$1,250,000, whichever is less • Tier 1 calculation has changed to protect 1st time renewals
Policy Priorities	<ul style="list-style-type: none"> • Added <ul style="list-style-type: none"> ○ Using Evidence-Based Approach ○ Increasing Employment • Change to Housing First Requirements <ul style="list-style-type: none"> ○ Communities and projects may allow flexibility, without penalty, to use service participation requirements after people have been stabilized in housing
Youth Eligibility	<ul style="list-style-type: none"> • 2019 Consolidated Appropriations Act provided that youth aged 24 and under must not be required to provide 3rd party documentation of homelessness as a condition for receiving services funded in FY19 NOFA. • Youth-serving providers (see page 12 of NOFA) may serve unaccompanied youth aged 24 and under or families headed by youth 24 or under who have an unsafe primary nighttime residence and no safe alternative to that residence
RRH and Joint TH-RRH Eligible Participants	<ul style="list-style-type: none"> • Definition changed from FY2018 NOFA • May serve persons who qualify as homeless under Category 1, 2 or 4 of 24 CFR 578.3 • RRH participant eligibility categories expanded to include Category 2
Housing First	<ul style="list-style-type: none"> • Added option to use service participation requirements after people have stabilized in housing • Housing First Definition removed from Definitions and Concepts • Removed from Joint TH-RRH requirement and replaced with low barrier

¹ Note: page 3 of FY19 CoC Program NOFA states 9/30/19; page 40 of NOFA states 8/22/19 and page 46 states 9/30/19. There is inconsistency in the NOFA regarding which date to use for the Con Plan end date. Your CoC may want to submit an AAQ question if you need further guidance.

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<p style="text-align: center;">CoC Application Content Changes</p>	<ul style="list-style-type: none"> • Employment and non-employment income performance is now two parts • Employment question about performance point value increased and is restricted to only employment achievements • Promoting and increasing employment question added with requirements for written agreements and the following activities <ul style="list-style-type: none"> ○ Written agreement with state or local workforce development board that includes prioritized access to employment or co-enrollment in workforce and homeless assistance programs ○ Steps to partner and access employment through private employers and employment agencies (job fairs, outreach, partnership with staffing agencies) ○ Written agreement with local education and training organizations which include prioritized access ○ Providing meaningful employment opportunities to people in PSH ○ Steps to increase employment opportunities and income • Steps to increase volunteering and community service for people experiencing homelessness • Non-employment question added worth 3 points • AHAR submission now LSA submission • Removed <ul style="list-style-type: none"> ○ Prioritizing people experiencing chronic homelessness ○ PSH beds for chronic homelessness • Increased value of data performance in reducing chronic homelessness (+4 points) • Increased points for written agreements for educational services for children 0-5 • Increased points for formal partnerships with McKinney-Vento local education authorities • Increased points for Addressing Racial Disparities • Emphasis on effective and accessible communication methods for collaboration efforts
<p style="text-align: center;">CoC Application Key New/Revised Questions</p>	<ul style="list-style-type: none"> • Protecting Against Discrimination (1C-5) – revised from FY18 • Local CoC Competition (1E)– revised questions and format streamlining information request • Domestic violence question revisions for CoC and project level need and experience (1F) • Average length of time homeless (3A-2) and employment and non-employment data (3A-5) are standalone questions • Employment Focused Questions about access, partnerships and written agreements (3A-5a, 5b, 5c) • Employment, Volunteerism, and Community Service efforts (3A-5d) • Lowering Barriers to Entry (formerly Housing First data) (4A-2) • Racial Disparity Assessment (3B-3) revised chart and strategy list

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<p>Project Application New Items and Changes</p>	<ul style="list-style-type: none"> • <u>Bonus Projects</u> – 5% of FPRN or 25% of PPRN minus ARD • <u>DV Bonus Projects</u> - Multiple RRH and Joint TH-RRH DV Bonus projects are allowed this year. (see DV Bonus below for more details) • <u>New Projects</u> <ul style="list-style-type: none"> ○ any youth-serving provider funding under FY19 NOFA may serve unaccompanied youth aged 24 and under or families headed by youth aged 24 or under who have an unsafe nighttime residence and no safe alternative to that residence. ○ New projects may request a grant term of 12 -18 months to allow for typically start-up process to establish project. • <u>Expansion Projects</u> – Application submission process has changed to required additional application submissions (See page 31 of NOFA and page 5 of Renewal Project Detailed Instructions and page 2 of the New Project Detailed Instructions) <ul style="list-style-type: none"> ○ If chosen, the expansion project application will take place of original renewal application in the ranking • <u>New SSO – Coordinated Entry</u> – Increased eligibility threshold score and added new eligibility threshold requirement that is required or project will be rejected <ul style="list-style-type: none"> ○ Project has a specific plan to coordinate and integrate with other mainstream health, social services and employment programs and ensure that participants are assisted to obtain benefits from the mainstream program for which they may be eligible • <u>YHDP Renewal Project</u> - are allowed to apply and will have separate instruction documents • <u>Renewal application (non-YHDP)</u> <ul style="list-style-type: none"> ○ Added operation budget replacement reserve question and attachment (if applicable to project) • Removed question 5C. Outreach to Participants – project must use established coordinated entry process • Youth aged 24 and under must not be required to provide third-party documentations homeless status as a condition for receiving services • Defined a youth serving provider and their ability to serve youth who have an unsafe primary nighttime residence and no safe alternatives • RRH new and renewal eligible participant definition changed to persons who qualify as homeless under category 1, 2 or 4 for 24 CFR 578.3 • Joint TH-RRH new and renewal eligible participants definition changed to persons who qualify as homeless under category 1, 2 or 4 for 24 CFR 578.3
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DV Bonus	<ul style="list-style-type: none"> • May apply for any number of RRH or Joint TH-RRH projects with minimum application being \$25,000 • FY2018 awarded DV Bonus projects are eligible for renewal if operating end date is between 1/1/2020 and 12/31/2020
YHDP	<ul style="list-style-type: none"> • FY 2016 YHDP projects are eligible for renewal provided they meet the requirements of the CoC Program and if operating end date is between 1/1/2020 and 12/31/2020 <ul style="list-style-type: none"> ○ If operating with a waiver it needs to be resubmitted with renewal ○ Not eligible for reallocation process ○ No consolidations with non-YHDP project • No use of expansion process

PROJECT APPLICATIONS

The following project applications types are allowed during the FY19 NOFA:

- Renewal projects
- Youth Homelessness Demonstration Project (YHDP) renewal projects (NEW)
- New Reallocation funding projects including transition grants (see page 22 of NOFA and page 6 of New Project Detailed Instructions)
- New Bonus funding projects
- New Reallocation and Bonus funding combined projects
- New Domestic Violence (DV) Bonus projects
- CoC Planning projects (*Collaborative Applicant only*)
- UFA projects (*Collaborative Applicant only*).

Basic Requirements for Project Application Process

- CoCs must ensure a fair and inclusive process for soliciting projects. As part of the solicitation projects, CoCs must establish local deadlines; compliance with these deadlines will be considered when the application is scored. (*See Key Dates chart on first page*)
- All accepted, accepted and reduced and rejected project applications must be notified in writing outside of the e-snaps system by the CoC. Accepted and reduced and rejected must indicate the reason(s) for the action.

Project Application Attachments – New and Renewal (p45 of NOFA)

- Documentation of Applicant and Subrecipient Eligibility
- Applicant Code of Conduct – verify if listed on [HUD website](#), if not listed attach updated file that is in compliance with 2 CFR 200 requirements to project application
- The following are now built into e-snaps and required for all project applications
 - SF-424 Application for Federal Assistance (*built into e-snaps*)
 - SF-424 Supplemental, Survey on Ensuring Equal Opportunities (*built into e-snaps*)

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- Form HUD-2880 Applicant/Recipient Disclosure dated between May 1, 2019 and September 3-, 2019 (*built into e-snaps*)
- SF-LLL, Disclosure of Lobbying Activities (*built into e-snaps*)
- Form HUD-50070, Certification for Drug-Free Workplace (*built into e-snaps*)
- Disclosure of Lobbying Activities
- Transition Projects additional attachments (NEW)
 - A copy of the most recently awarded project application from e-snaps

Funding for New and Renewal Projects

- Projects will be funded in the following order until no more funds are available:
 - CoC Planning projects that pass eligibility and threshold review
 - UFA Cost projects that pass eligibility and threshold review
 - DV Bonus projects that pass eligibility and threshold review
 - Projects fully in Tier 1 that pass eligibility and threshold review
 - Projects in Tier 2 in order of point value that pass eligibility and threshold review.
- Project applications that straddle Tier 1 and Tier 2 selected using the above criteria for Tier 1 and Tier 2. The portion of the project in each Tier will be evaluated separately and project feasibility of the Tier 1 portion will be reviewed if the Tier 2 project portion is not funded.
- CoCs that receive a higher score have a better chance of being awarded projects ranked in Tier 2.

	Amount	Selection Criteria
Tier 1	100% of combined ARA for eligible 1 st time renewals PLUS 94% of ARA for all other eligible renewal projects (NEW)	Projects in this tier will be conditionally selected based on CoC score ranked from highest to lowest.
Tier 2	Difference between Tier 1 and the CoC's ARD plus any amount available for the CoC Bonus projects (not the DV Bonus projects)	Projects in this tier will be conditionally selected by assigning a point value to each new and renewal project using a 100-point scale. <ul style="list-style-type: none"> ● <i>CoC Score</i>: up to 50 points in direct proportion to the score receive on the CoC application ● <i>CoC Project Ranking</i>: up to 40 points for the CoC's ranking of the project application. The calculation of point values will be 40 times the quantity (1-x) where x is the ration of the cumulative funding requests for all projects or portions of projects ranked higher by the CoC in Tier 2 plus one half of the funding of the project of interest to the total amount of funding available in Tier 2. ● <i>Low Barriers to Entry</i>: up to 10 points for how the project demonstrates it is low barrier and prioritized rapid placement and stabilization in

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		permanent housing, does not have preconditions to entry. (NEW language)
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Renewal Projects

- Renewal project applications can request only 1 year of funding.
- Eligible renewal projects requesting rental assistance will be permitted to request a per-unit amount less than the FMR, based on actual rent costs per unit.
- Total request for each renewing project cannot exceed the ARA approved by HUD for that project
- CoCs can request renewal funding for:
 - CoC Program and S+C projects that have a signed grant agreement and will expire in calendar year 2020
 - S+C renewals project that were awarded prior to FY02 and are expected to run out of funds in calendar year 2020 and have never applied for renewal funding
- PSH renewals may choose to change a project to 100% DedicatedPLUS.

Bonus Funding

- CoCs can request up to 5% of its Final Pro Rata Need (FPRN) or 25% of PPRN minus ARD for new Bonus project(s) provided it has demonstrated the ability to reallocate lower performing projects and demonstrated that all project applications are evaluated and ranked based on the degree to which they improve the CoC's system performance.
 - HUD issued a report containing the CoC's Preliminary Pro Rate Need (PPRN), Final Pro Rata Need (FPRN) and Annual Renewal Demand (ARD).
- CoCs can choose to submit one or more projects for the Bonus, but the total amount requested by all the Bonus projects cannot exceed 5% of the CoC's FPRN.

Reallocation Funding

- CoC may shift funds in whole or part from existing renewal projects to create one or more new projects.

Bonus and reallocation projects may be one of the following types:

- Permanent Supportive Housing (PSH) with 100% of beds designated to DedicatedPLUS (see definition in chart)
- Permanent Supportive Housing (PSH) with 100% of beds dedicated to people experiencing chronic homelessness
- Rapid Re-Housing (RRH) (see criteria below), or
- Joint Transitional Housing and Rapid Re-Housing (TH-RRH) project (see criteria below)
- Dedicated Homeless Management Information System (HMIS) project; or
- Supportive Services Only (SSO-CES) project specifically for a coordinated assessment system
- Bonus and reallocation projects may create new projects or expand renewal projects to add capacity to increase units and/or serve more people

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CoC Planning

- Up to 3% of the FPRN or \$1,250,000, whichever is less, is available for CoC planning projects

UFA Costs

- Up to 3% of the FPRN or \$1,250,000, whichever is less, is available for UFA costs for approved CoCs

Domestic Violence (DV) Bonus Funding

- CoCs can request up to 10% of its Preliminary Pro Rata Need (PPRN) for new DV Bonus projects.
 - HUD issued a [report](#) containing the CoC's Preliminary Pro Rate Need (PPRN).
- Each project must be at least \$25,000 and have a 1-year grant term.
- CoCs may apply for the following types of projects:
 - Rapid Re-Housing (RRH) (see criteria below),
 - Joint Transitional Housing and Rapid Re-Housing (TH-RRH) project, or
 - SSO for Coordinated Entry Systems (SSO-CE) (one project application per CoC)
- DV Bonus funds may apply to expand an existing renewal project that is not dedicated to DV to dedicated additional units, beds, persons served or services to this population
- DV Bonus projects must be ranked on the New Project Listing
- Projects will be chosen based on CoC Application score and response to specific question in the application on a 100-point scale
 - RRH and Joint TH-RRH:
 - CoC Score – up to 25 points in direct proportion to the CoC Application score (Revised from FY2018)
 - Need for Project – up to 25 points based on ability to quantify the need for the project, the extent of the need, and how the project will fill the gap (1F and sub questions)
 - Quality of the Project Applicant – up to 50 points based on previous performance of applicant in serving population AND their ability to house survivors and meet safety outcomes (Revised from FY18)
 - SSO – Coordinated Entry:
 - CoC Score – up to 50 points in direct proportion to the CoC Application score
 - Need for the Project – up to 50 points based on the extent to which the CoC is able to demonstrate the need for a CES that better meets the needs of survivors of DV AND how the project will fill the need

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New Project Funding Opportunity	Eligible Project Types	Eligible Participant Populations
<p>Bonus Funding</p> <p><i>(Available amount set by HUD and funding may be used by one or more projects)</i></p> <p>AND</p> <p>Reallocation Funding</p> <p><i>(Available amount dependent on CoC reallocations and funding may be used by one or more projects)</i></p>	<p>PSH</p> <p>Rapid Re-Housing</p> <p>Joint TH and RRH</p> <p>Dedicated HMIS</p> <p>SSO for Coordinated Entry Systems</p>	<p>PSH</p> <ul style="list-style-type: none"> • 100% bed designated as DedicatedPLUS OR • People experiencing chronically homeless <p>DedicatedPLUS projects - 100% of beds are dedicated to serve individuals, families and unaccompanied youth that are:</p> <ul style="list-style-type: none"> • Experiencing chronic homelessness • Residing in TH that will be eliminated and were experiencing chronically homelessness at TH entry • In place not meant for human habitation, shelter or safe haven BUT were experiencing chronic homelessness AND had been in permanent housing (PH) project within last year and were unable to maintain housing placement • Residing in TH funded by Joint TH-RRH component project AND were experiencing chronically homelessness prior to entering the project • In place not meant for human habitation, shelter or safe haven for at least 12 months in the last 3 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 • In a Department of Veteran Affairs (VA)-funded homeless assistance program AND met one of the above at initial intake to the VA homeless assistance system <p>RRH and Joint TH-RRH (NEW)</p> <ul style="list-style-type: none"> • Persons who qualify as homeless under paragraphs 1, 2, or 4 of 24 CFR 578.3
<p>Domestic Violence Bonus</p> <p><i>Available amount set by HUD.</i></p> <p><i>Funding may be used by one CES project and other housing projects.</i></p> <p><i>There is no limit on RRH and Joint TH-RRH projects.</i></p>	<p>Rapid Re-Housing</p> <p>Joint TH and RRH</p> <p>SSO for Coordinated Entry Systems for People Experiencing DV</p>	<p>All projects types dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking as defined in paragraph (4) at 24 CFR 578.3</p>