

FY2015 NOFA Competition Summary
Review by MaineHousing
9-21-15

Deadlines:

- The deadline for submitting applications to HUD for the FY 2015 Continuum of Care (CoC) Program Competition (CoC Program Competition) is **7:59:59 p.m. eastern time, November 20, 2015.**
- The due date of final HUD approval for FY 2015 GIW changes is **September 28, 2015 by 5:00 p.m.,** local time of the applicant.
- **Local Competition Deadlines.** Project Applications: All project applications are required to be submitted to the CoC no later than 30 days before the application deadline of November 20, 2015.
- **CoC Notification to Project Applicants:** The CoC must notify all project applicants no later than 15 days before the 2015 application deadline regarding whether their project applications will be included as part of the CoC Consolidated Application submission.

CoC Transparency. In order to receive the maximum number of points available in Section VII.A.2.b., each CoC must have in place a process to make all parts of the CoC Consolidated Application (which are the CoC Application and CoC Priority Listing with all project applications accepted and ranked, or rejected) available on its website to its community for inspection and to notify community members and key stakeholders that the CoC Consolidated Application is available.

CoC Review of Project Applications. HUD expects each CoC to implement a thorough review and oversight process at the local level for both new and renewal project applications submitted to HUD in the FY 2015 CoC Program Competition. Specifically, CoCs are expected to closely review information provided in each project application in order to ensure that:

- all proposed program participants will be eligible for the program component type selected;
- the proposed activities are eligible under the 24 CFR part 578;
- each project narrative is fully responsive to the question being asked and that it meets all of the criteria for that question as required by this NOFA and included in the detailed instructions provided in *e-snaps*;
- the data provided in various parts of the project application are consistent; and
- all required attachments correspond to the attachments list in *e-snaps* and the attachments contain accurate and complete information, and are dated between July 1, 2015 and November 20, 2015.

CoC Program Implementation. In the FY 2015 CoC Program Competition, in addition to requests for renewal projects and CoC planning and UFA Costs project requests, CoCs

may submit requests for new projects through the process of reallocation or the permanent housing bonus.

1. Through the reallocation process CoCs may create the following type of new projects:
 - a. CoCs may create new permanent supportive housing projects where all beds will be dedicated for use by chronically homeless individuals and families, as defined in 24 CFR 578.3.
 - b. CoCs may create new rapid re-housing projects for homeless individuals and families who enter directly from the streets or emergency shelters, youth up to age 24, and persons who meet the criteria of paragraph (4) of the definition of homeless.
 - c. CoCs may create a new Supportive Services Only (SSO) project specifically for a centralized or coordinated assessment system.
 - d. CoCs may create a new dedicated Homeless Management Information System (HMIS) project for the costs at 24 CFR 578.37 that must be carried out by the HMIS Lead.

2. CoCs may create new projects through the permanent housing bonus up to 15 percent of the CoC's FPRN for the following types of new projects:
 - a. CoCs may create new permanent supportive housing projects that will serve 100 percent chronically homeless families and individuals, and
 - b. CoCs may create new rapid re-housing projects that will serve homeless individuals and families coming directly from the streets or emergency shelters, and includes persons fleeing domestic violence situations and other persons meeting the criteria of paragraph (4) of the definition of homeless.

Rental Assistance Projects: Eligible renewal projects requesting rental assistance are permitted to request a per-unit amount less than the Fair Market Rent (FMR), based on the actual rent costs per unit. This will help to reduce the number of projects receiving rental assistance that have large balances of unspent funds remaining at the end of the operating year. Renewal project applicants must ensure that the amount requested will be sufficient to cover all eligible costs as HUD cannot provide funds beyond what is awarded through the competition.

Prioritizing CH: CoCs will be evaluated on the extent to which they are prioritizing chronically homeless individuals and families in all CoC Program-funded permanent supportive housing—not just those units that are dedicated to this population. CoCs should prioritize chronically homeless individuals and families for placement as units become available through turnover.

Consultation with ESG recipients: CoCs must consult with Emergency Solutions Grants (ESG) recipients within the geographic area on the plan for allocating ESG funds and reporting on and evaluating the performance of ESG recipients and subrecipients. Each CoC will be required to describe how it is coordinating, or if coordination is not already occurring, how coordination with ESG recipients will occur and what processes are required to be in place at the CoC level to ensure this requirement is met.

Ranking: CoCs will be required to rank all projects, except CoC planning and UFA Costs, submitted

by project applicants in *e-snaps*: renewal, new projects created through reallocation, and permanent housing bonus.

HUD will continue the Tier 1 and Tier 2 funding process; however the process in the FY 2015 CoC Program Competition is completely different from the past CoC Program Competitions; therefore, CoCs and applicants should ensure there is thorough understanding of the information provided in the NOFA. HUD will establish each CoC's Tier 1 and Tier 2 amounts based on the final HUD-approved GIW.

A report that lists each CoC's ARD Tier 1 amount, Tier 2 amount, and permanent housing bonus amount available will be posted to the HUD Exchange website no earlier than October 9, 2015.

Tier 1 is equal to 85 percent the CoC's ARD amount approved on the final HUD-approved GIW and projects in this tier will be conditionally selected from the highest scoring CoC to the lowest scoring CoC, **provided the project applications pass both eligibility and threshold review**. Any type of new or renewal project application can be placed in Tier 1. However, in the event HUD is required to drastically reduce the total amount of funds available under this NOFA, the Tier 1 amount per CoC will be reduced proportionately among all CoCs which could result in some Tier 1 projects falling into Tier 2. Therefore, CoCs should carefully determine the priority and ranking for all project applications in Tier 1 as well as Tier 2, which is described below.

Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for the permanent housing bonus (before adjustments are made to permanent housing leasing, operating, and rental assistance line items based on changes to FMR) as described in Section II.B.3. of this NOFA. This does not include the amounts available for CoC planning and UFA Costs. Project applications that are in Tier 2 will be selected for FY 2015 CoC Program funding using the process described in Section II.B.16. of this NOFA. Projects placed in Tier 2 will be assessed for eligibility and threshold requirements, and funding will be determined using the CoC Application score as well as the factors listed in Section II.B.16. of this NOFA.

Straddling Tier 1 and 2: If a project application straddles the Tier 1 and Tier 2 funding line, HUD will conditionally select the project up to the amount of funding that falls within Tier 1 as stated above; and then, using CoC score and other factors described in Section VIII.2.d. of this NOFA, HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award project funds at the reduced amount provided the project is still feasible with the reduced funding (e.g., is able to continue serving homeless program participants effectively).

The only components that will be funded in the FY 2015 CoC Program Competition are:

1. Permanent Housing;
2. Transitional Housing;
3. Supportive Services Only; and
4. HMIS.

Distribution of Funds. The distribution of funds will depend largely on CoC locally determined priorities and HUD selection priorities, overall demand, and renewal eligibility.

- **Renewals.** Awards made under the CoC Program, Supportive Housing Program (SHP), and Shelter Plus Care (S+C) are eligible for renewal for FY 2015 funds if they have an executed grant agreement by December 31, 2015 and have an expiration date that occurs in Calendar Year (CY) 2016 (the period between January 1, 2016 and December 31, 2016). **Grant agreements for FY 2014 funds must be executed by December 31, 2015 in order to be eligible for renewal.**
- **New Projects.** CoCs may submit new projects created through reallocation, permanent housing bonus projects, CoC planning, and UFA Costs (if applicable).

Certification of Consistency with the Consolidated Plan. For each applicant that is not a State or unit of local government, the applicant must submit a certification by the jurisdiction in which the proposed project will be located that the applicant's application for funding is consistent with the jurisdiction's HUD-approved consolidated plan.

Content and Form of Application Submission. The CoC Consolidated Application for funds under this NOFA includes FY 2015 CoC Application, which describes the CoC's plan for ending homelessness, its system-level performance, and addresses the selection criteria specified in Section VII of the NOFA. The CoC Priority Listing includes the reallocation forms, all Project Applications submitted to the CoC for funding consideration that are either approved and ranked or rejected, the final HUD-approved GIW attachment, and the form HUD-2991–Certification of Consistency with the Consolidated Plan.

CoC Consolidated Application. An entire CoC Consolidated Application must be submitted by the Collaborative Applicant on behalf of the CoC. The application will include the following parts, all of which will be submitted electronically either through *e-snaps* or as an uploaded attachment to be considered for funding:

1. **The FY 2015 CoC Application, including:**
 - a. The CoC plan with all charts and narratives completed as applicable;
 - b. All required attachments, including:
 - (1) **CoC Review, Score, and Ranking Procedures**—The CoC's written procedures that are publicly posted for all interested stakeholders and applicants that clearly describe the project-level review and ranking process that is used by the CoC to determine how CoC Program project applications submitted to the CoC are reviewed, scored, and ranked.
 - (2) **CoC's Process for Reallocating**—The CoC's written and publicly posted process for how the CoC determines if a project(s) should be reduced and/or cut in order to create new projects through reallocation in the local CoC competition process;
 - (3) **Public Posting of FY 2015 Project Selections, Ranking, and CoC Application**—a screen shot of the CoC webpage(s) (or partner's webpage if the CoC does not have a website) that was made publicly available to all project applicants before the application deadline and that clearly displays the website's address;

(4) Governance Charter (HMIS Governance)–The section of the governance charter containing the policies and procedures used by the CoC to comply with the HMIS requirements prescribed by HUD. Alternatively, if the CoC has created a separate document (e.g., an HMIS Governance Agreement) to outline the policies and procedures related to HMIS governance and incorporated this document into the governance charter by reference, the CoC may attach that document.

(5) PHA Administrative Plan– If the CoC is seeking points under Section VII.A.1.d. of this NOFA, the relevant excerpt from a written plan, if any was developed between the CoC and the PHA(s) located within the CoC’s geographic area that clearly describes the PHA(s) homeless preference for housing. Instead of a relevant excerpt from the written plan, a letter from the PHA(s) may be attached that clearly describes the PHA(s) homeless preference for housing; and

(6) Projects to Serve Persons Defined as Homeless under paragraph 3–If the CoC is seeking to serve persons defined as homeless under paragraph 3 of the homeless definition, a list of projects that will serve persons defined as homeless under paragraph 3 of the homeless definition.

2. FY 2015 Project Application(s), including, for each project application:

- a.** Project application charts, narratives, and attachments;
- b.** SF-424 Application for Federal Assistance;
- c.** The SF-424 Supplement, Survey on Ensuring Equal Opportunities for Application is for private nonprofit applicants only and completion/submission of this survey is voluntary;
- d.** Documentation of Applicant and Subrecipient Eligibility–all project applicants must attach documentation of eligibility–subrecipient eligibility must also be attached to the project application;
- e.** Applicant Certifications;
- f.** Form HUD-2880, Applicant/Recipient Disclosure/Update Report must be attached for each project. Form HUD-2880 must include the correct amount of HUD assistance requested and must be dated between July 1, 2015 and September 1, 2015;
- g.** SF-LLL, Disclosure of Lobbying of Activities (if applicable);
- h.** Applicant Code of Conduct. The Code must be attached in *e-snaps* or on file with HUD at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/conduct;
- i.** Form HUD-50070, Certification for a Drug-Free Workplace dated no earlier than June 1, 2014 and;
- j.** If applicable, the certifications required under I.C.4 regarding grants that propose or expend funds in the geographic area(s) of one or more other CoCs.

3. The FY 2015 CoC Priority Listing, including:

- a.** Project reallocation forms (if applicable) that indicates the eligible renewal projects that are being reallocated in whole or part to create new project

applications for:

- (1) new permanent supportive housing project(s) for chronically homeless individuals and families;
 - (2) rapid re-housing project(s) for homeless individuals, families and unaccompanied youth coming directly from the streets or emergency shelters, or fleeing domestic violence or other persons that meet the criteria of paragraph (4) of the definition of homeless;
 - (3) dedicated HMIS projects; or
 - (4) SSO projects for centralized or coordinated assessment.
- b. New Project Listing;
 - c. Renewal Project Listing;
 - d. UFA Costs Project Listing;
 - e. CoC Planning Project Listing; and
 - f. Required Attachments:
 - (1) Final HUD-approved FY 2015 GIW; and
 - (2) Form HUD-2991–Certification of Consistency with the Consolidated Plan. Form HUD-2991 must be used and must include a list of all projects submitted for funding on the CoC Priority Listings–New, Renewal, UFA, and CoC Planning.

4. Solo applicants—eligible project applicants that attempted to participate in the CoC planning process in the geographic area in which they operate, that believe they were denied the right to participate in a reasonable manner—may submit an application to HUD and may be awarded a grant from HUD by following the procedure found in 24 CFR 578.35. Solo applicants must submit their project application to HUD by **7:59:59 p.m. eastern time, November 20, 2015**, which must include the CoC’s notification of rejection of the project in the local competition as an attachment to the Solo Applicant’s project application. If the CoC fails to provide written notification, outside of *e-snaps*, the Solo Applicant must attach a statement that the CoC did not provide the Solo Applicant written notification of the CoC rejecting the project in the local CoC competition. See Section X.C. of this NOFA for additional information regarding the Solo Applicant appeal process.

Application Review Information:

Criteria: **CoC Consolidated Applications will be assessed on a 200 point scale, plus a possible 3 bonus points.**

- 1. CoC Coordination and Engagement.** HUD will award up to 49 points to CoCs that demonstrate coordination with other systems of care that serve homeless individuals and families, including sources of funding other than the CoC Program; an inclusive and outcome-oriented community process, including an organization structure(s) and decision-making process for developing and implementing a CoC strategy that is inclusive of representatives from both the private and public sectors, has a fair and impartial project review and selection process; and has created, maintained, and built upon a community-wide inventory of housing for homeless individuals and families.
- 2. Project Ranking, Review, and Capacity.** HUD will award up to 26 points to CoCs that clearly demonstrates the existence of a coordinated, inclusive, and outcome-oriented community process for the solicitation, objective review, ranking, and selection of CoC Program project applications that includes a GIW that does not require revisions that would have increased the CoC's ARD after the 10-day grace period described in the Section, "Additional Overview Information, C. Amendments to FY 2015 CoC Program Registration" to accurately reflect those projects eligible for renewal, and a process by which renewal projects are reviewed for performance and compliance with 24 CFR part 578.
- 3. Homeless Management Information System.** HUD will award up to 18 points to CoCs that clearly demonstrate the existence of a functioning HMIS that facilitates the collection of information on homelessness using residential and other homeless services and stores that data in an electronic format.
- 4. Point-in-Time Count.** HUD will award up to 9 points to CoCs related to the collection, use, and submission of 2015 PIT count data.
- 5. System Performance.** HUD will award up to 38 points based on CoC system-wide performance related to reducing homelessness within the CoC's defined geographic area.
- 6. Performance and Strategic Planning.** HUD will award up to 60 points based on the CoC's plan for and progress towards reducing homelessness within its geographic area and decreasing the number of recurrences of homelessness.
- 7. Bonus Points.** HUD will award 3 bonus points to CoCs that submit the FY 2015 CoC Consolidated Application by 7:59:59 p.m. eastern time on November 19, 2015. In order to receive these points, the Collaborative Applicant must submit the CoC Consolidated Application–CoC Application **and** CoC Priority Listing with all project applications either accepted and ranked or rejected–no later than 7:59:59 p.m. eastern time on November 19, 2015.

Administrative and National Policy Requirements:

Federal agencies are required to measure the performance of their programs. HUD captures this information not only from monitoring visits and APRs, but also on the data gathered in annual competitions. HUD's homeless assistance programs are being measured in FY 2015 by the objective to "end chronic homelessness and to move the homeless to permanent housing." HUD has chosen six indicators which directly relate to the CoC Program.

These six indicators, as described below, will be collected in the FY 2015 CoC Application:

1. The creation of new PSH beds for chronically homeless individuals and families;
2. The decrease in the number of chronically homeless individuals and families in the CoC's geography;
3. The increase of employment of the homeless residing in or exiting HUD homeless assistance projects;
4. The increase of the use of mainstream resources for the homeless residing or exiting from HUD homeless assistance projects;
5. The percentage of turnover in CoC Program-funded PSH not dedicated to chronically homeless that will be prioritized to serve chronically homeless individuals and families; and
6. The percentage of individuals and households with children that are served in rapid re-housing that came from unsheltered locations.