NOFA 2018- New Features and Highlights

- **Important Deadlines:**
  - 30 days from Sept 18. (Aug 19 – Sunday) all project applications MUST be submitted in e-snaps.
    - Must be part of public notification of competition
  - Notify applicants not later than 15 days within application deadline – Monday Sept 3 – Labor Day
    - Whether project will be accepted and ranked
    - Where application is rejected or reduced, must indicate reasons for rejection
      - Must be notified in writing outside of e-snaps – with an explanation for the decision
  - Attachments to the CoC application must show the deadline for applications within the window set by HUD and written responses to ranked and non-ranked projects within the window specified by HUD.

- **Tier 1/Tier 2**
  - 94% of ARD = Tier 1
  - No changes in tier process from 2017
  - As before, projects ranked in Tier 1, pretty much assured of funding; Tier 2 projects will compete nationally for funding based on project application scores

- **Project application scores**
  - 50 points based on CoC 200 possible points
  - 40 points project rank
  - 10 points Housing First Commitment

- **Allowable new projects:**
  - **PH – Permanent supportive housing**
    - All units must either be dedicated to chronic homeless or ‘dedicatedPLUS’
  - **PH – Rapid Rehousing**
    - May serve individuals or families including unaccompanied youth; must be literally homeless on program entry – Category 1
    - Meeting Category 4 – DV – homeless definition
    - Residing in TH being eliminated
    - Residing in TH in a joint TH-RRH project
    - Receiving services from a VA funded entity and met the above at initial intake to VA homeless assistance
  - **Joint TH-RRH projects**
    - TH component is considered ‘crisis housing’
    - At least twice the housing resources should be in the RRH component (twice as many RRH units as TH or a RRH budget double that of the TH budget)
    - Eligible populations:
      - Literally homeless – sheltered or unsheltered – Category 1
• Meeting Category 4 – DV – homeless definition
• Residing in TH being eliminated
• Residing in TH in a joint TH-RRH project
• Receiving services from a VA funded entity and met the above at initial intake to VA homeless assistance
  o HMIS – dedicated projects – only HMIS lead may apply
  o SSO projects to support CE (Coordinated Entry)
  o New projects can be created either through reallocated funds or bonus funds
    ▪ Same activities eligible under bonus and reallocation (or a combination)

• Bonus Funds
  No longer the ‘permanent housing bonus’, bonus funds can be used for any eligible new project.
  o Bonus funding is equal to 6% of the final pro rata need allocation which is equal to the greater of the ARD (Annual Renewal Demand) or PPRN (preliminary pro rata need). The ARD, PPRN and FPRN will be posted on the HUDExchange website.
  o One or more projects may be submitted for bonus funds.
  o Only if the CoC has ‘demonstrated the ability to reallocate lower performing projects to create new higher [sic] projects’ will it be able to apply for bonus funds. Also, “CoCs cannot receive grants for new projects, other than through reallocation, unless the CoC competitively ranks projects based on how they improve system performance.”
  o There is no difference between projects funded through bonus or reallocation funds

• Reallocation
  o Permitted again in 2018
  o Current CoC grants can be reallocated in whole or in part
  o Only projects that have been previously renewed may be relocated – all grants must be renewed at least once before being eligible to be reallocated
  o Funds freed up by reallocation can be awarded to any new project provided it is for one of the eligible new project types

• Planning and UFA
  o Max planning = 3% of FPRN or $1,250,000 whichever is less
  o Max UFA = 2% of FPRN or $750,000 whichever is less
  o Only the collaborative applicant may apply for these funds.
  o Neither planning nor UFA funding needs to be ranked.

• CoC must do’s
  o Competition – must publicly advertise and promote competition
  o Ranking and rating factors – must publicly post ranking and rating factors and submit to HUD
  o At a minimum:
    ▪ Set internal competition deadline at least 30 days prior to NOFA deadline
- Notify all applicants in writing at least 15 days prior to NOFA deadline whether project will be included in collaborative application, rank, and amount of funding
- Post full application 2 days prior to submission
- Attach evidence of all of the above to CoC application

**Transition grants. New this year**
Allow one or more existing grants to be converted from current program component to an eligible new project. For example, a TH grant could be converted to a RRH grant. Or, a TH grant and a PSH grant can both be transitioned to a new joint TH-RRH project. To transition, the same organization must be the grantee for the original and the ‘transitioned’ grant. Transition projects are NEW projects.
- No more than 50% of funds in the transition year can be used for original purpose
- Will renew as replacement component
- CoC must consent to transition
- Transition grants must be converted to one of the eligible new project categories – the final component for the grant must be eligible for funding as a new project in the 2018 NOFA
- Must follow Housing First
- One year to fully transition
- To create a transition grant, the CoC must completely eliminate one or more renewal grants to create the single new transition grant
- Transition grants cannot be consolidated.

**DV Bonus – New this year**
CoCs may apply for an additional bonus to serve survivors of domestic violence, dating violence and stalking. Up to $50 million is available from a special pool of resources. All DV Bonus projects must be ranked with unique ranking – and will be funded based on a separate scoring methodology. If HUD accepts a DV bonus project as a DV bonus, it will be pulled from the ranking list and all projects below it moved up. If the project is not funded as a DV Bonus, it will remain on the ranking list and may be funded out of bonus or reallocation funds.
- Allowable projects for the DV bonus include:
  - RRH limited to DV survivors
  - Joint TH-RRH limited to DV survivors or
  - SSO for Coordinated Entry for DV
- 10% of PPRN (minimum $50,000, max $5 million)
- Only one application can be submitted for each project type (RRH, joint TH-RRH or SSO for CE). This is for the DV bonus; additional DV dedicated projects may be submitted but would have to be funded through reallocation or bonus funds.
- Can be used to expand an existing renewal project that is not dedicated to serving DV
- Score – 100 points maximum RRH and Joint TH-RRH
  - 50 points based on CoC score
COC NOFA 2018 HIGHLIGHTS AND NEW FEATURES

- 25 points based on CoC’s ability to quantify need for project – demonstrated in CoC application
- 25 points prior performance of applicant in serving DV survivors – demonstrated in project application
  - 100 points – SSO for Coordinated Entry
    - 50 points CoC score
    - 50 points – need for project – need for a CE system that better meets the needs of survivors – demonstrated in CoC application
  - All projects must be listed in New Projects List
  - DV bonus projects must follow Housing First

**Expansion Grants**
- Allowed again in competition
- Existing grantee may submit a new project application to expand a currently funded CoC grant
- Expansion grants must be the same project component and same grantee
- If the existing project is renewed and expansion is funded, HUD will execute a single, expanded grant

**Consolidation Grants – new in 2018**
- May combine between 2 and 4 renewal projects
  - Must be same component and same grantee
  - The budget line items for the grants being consolidated and the consolidated grant must exactly match
  - Must be the same total beds, persons served, units.
  - First time renewal grants can be consolidated in this competition
- Requires prior consultation with HUD Field Office
- Grants must meet minimum performance standards to be eligible to consolidate
- TH and PH-RRH cannot join to be a joint TH-RRH project
- Any project component type can be consolidated except Safe Havens – but only the same program components can be consolidated
- Complex application process
  - Must submit and rank each renewal grant separately
  - Must also submit a new project application for the consolidated grant
  - Only get funded if each individual renewal is selected for funding
- Must attach the previous year’s application to the FY 2018 project application forms
- Grantees can consolidate rental assistance grants that used actual and FMRs
  - Grant cannot exceed the combined ARA
- A consolidated grant is a renewal grant – combining multiple renewal grants

**CoC Merger Bonus** – Similar to last year
- Merger from period CoC Registration Deadline 2016 to FY 2018 CoC program registration deadline.
  - 5 points to grants that merged
• 10 points where one of the merging grants had a CoC application score of 140 points or below in either the FY 2016 or FY 2017 CoC program
  o Grants eligible for and receiving merger bonus in 2017 competition likely to also obtain bonus in 2018

• DedicatedPLUS – same eligible populations as 2017
  o Projects awarded as DedicatedPLUS in FY 2017 are required to include households with children to qualify as a DedicatedPLUS in the 2018 competition (NOFA page 17 of 84). Explanation from HUD: “Under the CoC Program, households with children may not be categorically excluded from any project based solely on the basis of their familial status. Because households with children may not be categorically excluded, a CoC Program-funded project may not choose to exclusively serve households without children or single adults; however, it could choose to limit participation only to households with children.”
  o Eligible populations for DedicatedPLUS:
    ▪ Chronically homeless
    ▪ Residing in a TH project that will be eliminated and met the chronic homeless definition on admission to the TH project
    ▪ Now homeless, living in shelters or unsheltered, had been admitted to PH but could not maintain housing placement and met the chronic homeless definition prior to entering the PH
    ▪ Residing in TH funded as part of a joint TH-RRH project and were chronic homeless prior to entering the project
    ▪ Currently homeless and has been homeless for at least 12 months but has not done so on four separate occasions and meet the definition of a ‘homeless individual with a disability’
    ▪ Receiving assistance from a VA funded homeless assistance program and met one of the above criteria at initial intake into the VA homeless system

• Limitation for PSH – for non-dedicated beds
  o The only persons who may be served by non-dedicated PSH beds are those who come from the streets, emergency shelters, safe havens, institutions (if length of stay was 90 days or less and came from streets/shelters prior to admission), or transitional housing (provided they originally came from the streets/shelters)

• Limitation for RRH – not including DV bonus RRH
  o May serve individuals and families including unaccompanied youth who:
    ▪ Category 1 Literally homeless – streets/shelters
    ▪ Category 4 homeless – DV
    ▪ Residing in TH that was eliminated
    ▪ Residing in the TH component of a joint TH-RRH
    ▪ Receiving services through a VA funded program and met eligibility criteria upon entry to VA system
• Eligible renewals
  o Expiration date in CY 2019
  o Grant agreement executed by 12/31/18
  o One year term only
  o Must be consistent with GIW for 2018 – total project cost cannot exceed ARA as shown on GIW

• Indirect costs
  o Nonprofits with a Federally negotiated rate must provide documentation and may claim indirect costs
  o Those without a negotiated rate may claim the de minimis rate of 10% but it must be applied consistently for all Federal awards
  o Costs must be consistently charged as either direct or indirect cost but may not be double charged or inconsistently charged as both.
  o Once an organization elects to use the de minimis rate, the organization must apply this methodology consistently for all Federal awards until the organizations chooses to negotiate for a rate
  o Renewal grants may elect to charge indirect costs including the de minimis rate – the ARA nor should the total budget line items be changed because of the inclusion of indirect costs.

• Required attachments to CoC application
  o CoC Review, Score and Ranking procedures (must be publicly posted)
  o HMIS policy, procedures and agreements
  o Governance charter
  o PHA admin plans to document homeless preference
  o If seeking to serve people under other ‘Federal definitions’
  o The FY 2018 CoC Competition HDX Report
  o Project applications must attach nonprofit documentation for sub-recipients
  o Certification of consistency with CON plan included as part of the Project Priority list.
    ▪ Each project must have a certification of consistency
    ▪ It must be dated between May 1, 2018 and September 18, 2018

• Scoring for CoC applications– 200 points plus possible merger bonus points
  o Coordination and engagement – 48
    ▪ NEW – addressing racial disparities in homelessness (3)
  o Project capacity, review and ranking – 18
  o HMIS – 13
  o System performance – 56 (increase)
  o Performance and strategic planning – 48
  o Merger bonus - 25