

## FY 2017 Continuum of Care (CoC) Program Competition NOFA

### What’s New, Changes, and Highlights

The FY 2017 CoC Program Competition NOFA has several changes and new information that are important for CoCs and applicants as they consider the next steps of the local competition process and how these changes and new information affect their overall FY 2017 CoC Program Competition processes on the local level. We are providing a list of the high-level changes and new information with citations to the FY 2017 CoC Program Competition NOFA in a single, easy to use document. All citation references refer to the FY 2017 CoC Program Competition NOFA, unless otherwise stated. The citations listed may not include all the instances where a topic is mentioned; but rather, directs you to the main section or sections of the NOFA that provides the complete information you need to determine the course of action you as the CoC, Collaborative Applicant, or project applicant wants to take in this year’s CoC Program Competition.

<b>Topic</b>	<b>FY 2017 CoC Program Competition NOFA Section(s)</b>	
<b>Local Competition Deadlines</b>	J. Local Competition Deadlines; II.B.9; and VII.A.2.d.	<p>While the CoC Program Competition NOFAs have required that project applicants to submit to their project applications to the CoCs no later than 30 days before the application deadline and CoCs to notify, in writing and outside of e-snaps, no later than 15 days before the application deadline regarding whether their project applications would be included as part of the CoC Consolidated Application submission.</p> <p>New in FY 2017, CoCs are required to notify, in writing and outside of e-snaps, all project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC within 15 days of the FY 2017 application deadline.</p>
<b>Policy Priorities</b>	II.A.	The information provided in the policy priorities are not as extensive as previous years; however, upon close read you will find that the goal of ending homelessness remains our

		target. Policy priorities continue to focus on: 1) ending homelessness for all persons; 2) creating a systemic response to homelessness, 3) strategically allocating and using resources, and 4) use of a Housing First approach.
<b>New projects created through reallocation</b>	II.B.2. a; and III.A.3.i.	Types of new project applications permitted through the reallocation process are: <ol style="list-style-type: none"> <li>1. permanent supportive housing projects that meet requirements of DedicatedPLUS or the standard 100 percent dedicated for chronically homeless individuals and families;</li> <li>2. rapid rehousing projects that served individuals and families, including unaccompanied youth who meet the criteria outlined in the NOFA;</li> <li>3. Joint TH and PH-RRH component projects;</li> <li>4. dedicated HMIS; and</li> <li>5. supportive services to develop or operate a new centralized or coordinated assessment system.</li> </ol>
<b>New projects created through permanent housing bonus</b>	II.B.2. b; and III.A.3.j.	Types of new project applications permitted through the permanent housing bonus, which is 6 percent of a CoC's Final Pro Rata Need (PPRN) are: <ol style="list-style-type: none"> <li>1. permanent supportive housing projects that meet requirements of DedicatedPLUS or the standard 100 percent dedicated for chronically homeless individuals and families;</li> <li>2. rapid rehousing projects that served individuals and families, including unaccompanied youth who meet the criteria outlined in the NOFA; and</li> <li>3. Joint TH and PH-RRH component projects.</li> </ol>
<b>Expanding CoC Program-funded projects</b>	II.B.3.	HUD introduced a new way to expand CoC Program-funded projects which will allow an eligible renewal project to expand units, beds, persons, or services (dedicated HMIS projects can expand HMIS activities) through the reallocation process or permanent housing bonus. A new project application is required and only available to the type of projects allowed under the reallocation process or permanent housing bonus. Not applicable to: transitional housing, supportive services only (non-coordinated entry) and Safe Haven projects as these types of

		<p>projects do not fall under eligible new project application types.</p> <p>Project applicants can also expand a project under the traditional method, e.g., expand an existing project funded through other sources with the request of CoC Program funds to add persons, units, or services.</p>
<b>CoC Merger</b>	<p>II.B.5.;</p> <p>III.A.3.c.;</p> <p>VII.A.3.c.;</p> <p>and</p> <p>VII.A.7.</p>	<p>Encourage merges and mitigate potential adverse scoring implications that may occur when a high performing CoC merges with one or more lower performing CoCs. CoCs that merged between the final funding announcement for FY 2016 and the FY 2017 CoC Program Registration deadline are eligible for the merger bonus points mentioned in the NOFA.</p>
<b>Tier 1 and Tier 2</b>	<p>D. Available Funds;</p> <p>II.B.15.;</p> <p>II.B.16: and</p> <p>III.A.3.a.</p>	<p>Tier 1 is equal to the greater of the combined amount of Annual Renewal Amount (ARA) for all permanent housing and HMIS projects eligible for renewal up to \$1,000,000 or 94 percent of the CoC's Annual Renewal Demand (ARD).</p>
<b>Tier 2</b>	<p>II.B.16</p>	<p>HUD has removed project type from the Tier 2-point scale, meaning project applications that are ranked in Tier 2 will no longer be scored on the project type (e.g., PH, TH). The 100-point scale is based on: 1) CoC Score, 2) CoC Project Ranking, and 3) Commitment to Housing First.</p>
<b>DedicatedPLUS</b>	<p>III.A.3.d.</p>	<p>A permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless youth, that at intake are:</p> <ol style="list-style-type: none"> <li>1. experiencing chronic homelessness as defined in 24 CFR 578.3;</li> <li>2. 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;</li> <li>3. residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable</li> </ol>

		<p>to maintain a housing placement;</p> <p>4. 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 prior to entering the project;</p> <p>5. residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or</p> <p>6. 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.</p> <p>Project applicants may use DedicatedPLUS when creating a new project application through reallocation or permanent housing bonus and renewal project applications may choose to change a 100 percent dedicated project to a DedicatedPLUS project in the FY 2017 CoC Program Competition.</p>
<b>Joint TH and PH-RRH Component Project</b>	III.A.3.h.; and V.G.2.c.(2).	The Joint TH and PH-RRH component project includes two existing program components—transitional housing and permanent housing-rapid rehousing—in a single project to serve individuals and families experiencing homelessness.
<b>Rapid Rehousing</b>		<p>Rapid Rehousing is not a new in the FY 2017 CoC Program Competition; however, there is a significant change to the persons who can be served by a rapid rehousing project. Rapid rehousing projects may serve individuals and families, including unaccompanied youth, who meet the following criteria:</p> <p>1. residing in a place not meant for human habitation;</p> <p>2. residing in an emergency shelter;</p> <p>3. persons meeting the criteria of paragraph (4) of the definition of homeless, including persons fleeing or attempting to flee domestic violence situations;</p>

		<p>4. residing in a transitional housing project that was eliminated in the FY 2017 CoC Program Competition; or</p> <p>5. residing in transitional housing funded by a Joint TH and PH-RRH component project; or</p> <p>6. receiving services from a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA’s homeless assistance system.</p> <p>The persons who are provided housing and services through rapid rehousing has been expanded. You will also notice the NOFA no longer requires renewing rapid rehousing projects continue to serve only those participants who were in a rapid rehousing category when the project was initially funded. Therefore, if a renewing rapid rehousing project was originally funded to serve only families with children, that project, through the FY 2017 project application, may indicate it will also serve individuals if it so chooses.</p>
<b>System Performance</b>	VII.A.5.	The system performance measures will be scored based on a CoC system-wide performance related to reducing homelessness within the CoC defined geographic area as reported to HUD via HDX comparing FY 2016 information to FY 2015 information unless noted otherwise for each measure. You should carefully read through this section of the NOFA as it pertains to the CoC Application as you will see that points will be considered based on the information reported to HDX.
<b>HUD-2991, Certification of Consistency with the Consolidated Plan, HUD-50070, Certification for Drug-Free Workplace, and SF LLL Disclosure of Lobbying</b>	VI.C.2.f. - h.	These forms are no longer attachment requirements to the Project Application Profile. HUD has hard-coded these forms into the project applications in <i>e-snaps</i> and project applicants will not have access to the actual project application until these forms are reviewed for accuracy and certified. See the Project Application Detailed Instructions for information on completion and certification of the forms in <i>e-snaps</i> . This will reduce delays in grant agreement execution for projects if they are selected for conditional award.

<b>Activities (if applicable)</b>		
<b>Certification Regarding Lobbying</b>	New Form	<p>Federal agencies require the submission of a signed Certification Regarding Lobbying to ensure applicants acknowledge the requirements in Section 319 of Public Law 101-121, 31 U.S.C. 1352, (the Byrd Amendment) and 24 CFR part 87 before receiving a federal award. These statutes and regulation prohibit the use of federal award funds for lobbying the executive or legislative branches of the Federal government in connection with a specific award. This requirement is different and separate from the requirement for applicants to report lobbying activities using the SF-LLL form. The SF-LLL form must still be submitted by applicants that lobby or intend to lobby using non-federal funds. The only applicants excepted from submitting the Certification Regarding Lobbying form are federally-recognized Indian tribes because of each tribe's sovereign power.</p> <p>This form has also been hard-coded in e-snaps for project applicants and will need to be completed and certified in e-snaps before you have access to the actual project application.</p>
<b>Code of Conduct</b>	Change	<p>If your organization's Code of Conduct is no longer listed on HUD's website yes, you must attach an updated Code of Conduct to your Project Applicant Profile. Due to the implementation of 2 CFR part 200, many Codes of Conduct that were listed on HUD's website were removed as the Codes were not in compliance with (2 CFR 200.318(c)(1)).</p> <p>Codes of Conduct must:</p> <ol style="list-style-type: none"> <li>1. Be written covered by a letter on company letterhead that provides the name and title of the responsible official, mailing address, business telephone number and email address;</li> <li>2. Prohibit real and apparent conflicts of interest that may arise among officers, employees or agents, or any member of his or her immediate family, his or her partner or an organization that employs any of the indicated parties;</li> <li>3. If applicable, the standards must also cover organizational conflicts of interest;</li> <li>4. Prohibit the solicitation and acceptance by employees, of gifts or gratuities in excess of minimum value; and</li> </ol>

		<p>5. Provide for administrative and disciplinary actions to be applied for violations of such standards.</p> <p>The Office of Grants Management within HUD has reached out to organizations to obtain Codes of Conduct to ensure all HUD-funded projects are in compliance with 2 CFR part 200. If your organization is not appearing on HUD’s website at <a href="https://portal.hud.gov/hudportal/HUD?src=/program_offices/spm/gmomgmt/grantsinfo/conduct">https://portal.hud.gov/hudportal/HUD?src=/program_offices/spm/gmomgmt/grantsinfo/conduct</a> indicating the Code of Conduct is on file and in compliance, HUD strongly recommends that you attach your organization’s Code of Conduct that meet all 5 of the criteria above to your Project Applicant Profile. Doing this now will prevent the need to resolve a condition for your CoC Program project if conditionally awarded.</p>
<b>Renewal Project Applications</b>	Change – for recurring renewal project applications only.	<p>Project applicants that have renewed at least once in a previous CoC Program Competition will have the opportunity to bring forward application details from the most recent Competition year and identify select screens to submit without changes. After the Standard Forms and Certifications are completed in Part 1, project applicants can review the grant’s imported data on the remaining screens in a “Read-Only” format. If the Applicant does not need to make updates, they can submit the FY 2017 application without any changes, reducing the amount of time for the project applicant to complete the project application and for HUD during its assessment of renewal applications. If the project applicant needs to make changes to the information on one or more screens, they can navigate to the “Submission Without Changes” Screen and check the box next to each relevant screen title to unlock screens for editing.</p>