HUD Homeless Assistance
FY 2018 Continuum of Care
NOFA Competition

Technical Assistance (TA) Handbook

July 17th, 2018

CONTEXT

The 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 Continuums of Care (CoC), the community stakeholder groups that guide local responses to homelessness. The 2018 CoC NOFA was released on June 20, 2018, opening the competition making available approximately $2.1 billion nationally to serve people experiencing homelessness. The information in the NOFA sets forth the competition rules and processes for 2018.

The FY2018 CoC Competition consolidated application responses to the NOFA 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. This CoC TA Workshop is intended to help projects prepare for the 2018 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 this meeting 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 materials provided today will answer any questions you have about number one, and this TA Handbook will answer the other two. **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.

SUMMARY: 2018 NOFA COMPETITION OVERVIEW AND FUNDING AVAILABLE

On June 20, 2018, the U.S. Department of Housing and Urban Development (HUD) released a Notice of Funding Availability (NOFA) for the Fiscal Year (FY) 2018 Continuum of Care program competition. In 2018, the Stanislaus CoC expects to be eligible to apply for approximately $3,135,250 in funding to support housing and services for homeless households, and approximately $102,947 for CoC Planning Funds.

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 Coordinated Entry Supportive Service Only projects.	$3,135,250
Bonus Funding: This funding supports Permanent Supportive Housing, Rapid Rehousing, Joint Transitional Housing/Rapid Rehousing, HMIS, or Coordinated Entry Supportive Service Only projects.	$205,893
Domestic Violence Bonus Funding: New in 2018, this funding supports Rapid Rehousing, Joint Transitional Housing/Rapid Rehousing, or Supportive Services Only Projects for Coordinated Entry.	$343,155
CoC Planning Funds: This funding supports CoC planning activities, and only the Collaborative Applicant, City of Modesto, may apply for it. **The planning grant will not be ranked in this year's competition and is not competitive with housing or service projects.** As such, this Handbook does not include information about applying for planning grants.	$102,947

Anticipated Tier 1 Amount: $2,947,135
Anticipated Tier 2 Amount: $394,008

In 2018, 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 assessment)

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 being 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 2018, the amount of funding available for Tier 1 is equal to 94 percent of the CoC's FY 2017 Annual Renewal Demand (ARD). (In 2017 it was the greater of 94 percent OR up to $1,000,000 in permanent housing or HMIS projects, in 2016 it was 93 percent; in 2015 it was 85 percent.) 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 CoC score
- **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, however, the formula used to award points gives a disincentive for large projects.
- **Commitment to Policy Priorities**: Up to 10 of 100 points for Housing First commitment
  - For Permanent Housing: Will receive points based on how the project commits to applying the Housing First model
  - Homeless Management Information System and Supportive Services Only for Coordinated Entry System projects: Will automatically receive 10 points
  - Transitional Housing, Joint Transitional Housing/Rapid Rehousing Component projects (Joint TH and PH-RRH), Safe Haven and other Supportive Services Only projects: Will receive points based on how the project demonstrates that it is low-barrier, prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions to entry (such as sobriety or a minimum income threshold).

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:

- The FY2018 CoC NOFA
- The CoC Program Interim Rule.

Links to each of these documents can be found in the Resources section at the end of this Handbook.

C. HIGHLIGHTS THE 2018 NOFA THAT WILL IMPACT GRANT RECIPIENTS

- **DV Bonus:** In addition to Bonus funding available annually, due to up to $50 million set aside nationally in the FY2018 HUD Appropriations Act, in 2018, project applicants may apply for Domestic Violence Bonus Projects to serve survivors of domestic violence, dating violence, sexual assault, and stalking.
- **Bonus grant changes:** Reallocation and Bonus funding may be comingled and Bonus funding may be used to fund HMIS or Supportive Services Only for Coordinated Entry projects, not just housing projects.
- **Transition Grants:** Applicants may transition their project(s) from one CoC Program Component to another over a one-year grant cycle.
- **Consolidated Grants:** Applicants may consolidate two, three, or four eligible renewal projects into one project during the application process.
- **Expansion Grants:** Applicants may apply for new funding to expand CoC-Program-funded or non-CoC-Program-funded projects.
- **FY 2018 FMRs Will Apply:** Because the CoC Consolidated Application is due prior to the publication of the final FY 2019 FMRs, the FY 2018 FMRs will be used for funding amounts.
- **Website Posting**: On or before September 16, 2018, CoCs must post the CoC Consolidated Application on their website (or a partner's website) and notify community members and key stakeholders that the Consolidated Application is available. ****NEW THIS YEAR**** CoCs must include Project Applications (in addition to the CoC Application attachments and the completed Priority Listing) when posting the CoC Consolidated Application.
- **Trafficking**: HUD is clarifying that persons who are fleeing or attempting to flee human trafficking may qualify as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3. HUD will consider an individual or family as homeless under paragraph 4 of the homeless definition under the following circumstances where an individual or family is fleeing or attempting to flee human trafficking that has: (1) either taken place within the individuals or family's primary night-time residence; (2) made the individual or family afraid to return to their primary night-time residence; and the individual or family has no other residence; or (3) the individual or family lacks the resources or support networks to obtain other permanent housing.

DESIGNING YOUR PROJECT

1. 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. Aligned with *Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness*, the policy priorities set forth in the 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.
   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 also encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness.
   d. ****NEW THIS YEAR**** CoCs should work to develop partnerships with Public Housing Authorities (PHAs) to work toward helping CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options.
   e. CoCs should review all projects eligible for renewal to determine their effectiveness in serving people experiencing homelessness as well as their cost effectiveness.

4. Use a Housing First approach.
   a. CoC Program funded projects should help individuals and families move quickly into permanent housing, and the CoC should measure and help projects reduce the length of time people experience homelessness.
   b. CoCs should engage landlords and property owners, remove barriers to entry, and adopt client-centered service methods.

2. ELIGIBLE NEW PROJECTS

New projects may apply for three funding streams:
- Reallocation of funding for renewal projects or
- Bonus funding or
- Domestic Violence Bonus funding.

NEW THIS YEAR Projects may also apply for a combination of reallocation and bonus funding.

Requirements, eligibility, amounts and processes differ among the types of funding, so potential applicants should consider both carefully. However, new permanent housing projects will be evaluated using the same criteria regardless of whether the CoC has identified them as bonus or reallocation projects.

A. NEW PROJECT FUNDING OPTIONS

NEW PROJECTS CREATED BY REALLOCATION OR BONUS OR COMBINATION

Applicants may apply for **reallocated funds** from renewal projects or **Bonus** funding or a **combination of reallocated funds and Bonus funding** for**:**
1. New permanent supportive housing projects where 100 percent of the beds are dedicated to chronically homeless individuals and families or DedicatedPLUS populations.
2. New rapid re-housing to serve homeless individuals and families, including unaccompanied youth
3. Joint TH and PH-RRH component projects, which will include transitional housing and permanent housing-rapid rehousing in a single project to serve individuals and families experiencing homelessness, including victims of domestic violence (with certain limitations described below in "B. Overview of Eligible New Project Types" on page 3)
4. New dedicated Homeless Management Information System (HMIS) project (can only be carried out by the HMIS lead)
5. New Supportive Services Only (SSO) 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 Panel.

CoCs may only reallocate eligible renewal projects that have previously been renewed under the CoC Program.

DOMESTIC VIOLENCE BONUS (DV BONUS)

Applicants may apply for **Domestic Violence Bonus** funding for**:**
1. Rapid Re-housing (PH-RRH) projects that must follow a Housing First approach.
2. Joint TH and PH-RRH component projects that must follow a Housing First 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 each of the project types above. If a CoC submits more than one project application for each project type, HUD will only consider the highest ranked project that passes eligibility and quality threshold review for the DV Bonus and will consider any other project for funding as a regular bonus project.

A CoC may apply 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:
  - o **For Rapid Rehousing and Joint Transitional Housing/Rapid Rehousing component projects**:
    - 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 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.
    - o **Quality of the Project Applicant.** Up to 25 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.
  - 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.

EXPANSION PROJECTS THROUGH REALLOCATION, BONUS, OR DV BONUS

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.

There are two types of expansions:

- **Expanding a CoC-Program-funded Project**. Expansion in which a project applicant submits a new project application to expand the current operations of an eligible renewal project for which it is the recipient by adding additional CoC Program funds. Under this type of expansion, for the new expansion project to be selected for conditional award the renewal project application must also be selected for conditional award.
    - o If the new expansion project will expand an existing eligible CoC Program renewal project HUD will not fund capital costs (i.e., new constructions, rehabilitation, or acquisition) and HUD will only allow a 1-year funding request.
    - o 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.
    - o Project applicants that intend to submit a new project application for the purposes of expanding an eligible CoC Program renewal project must:
        - ▪ enter the grant number of the project that is eligible for renewal that the project applicant requests to expand on the new project application;
        - ▪ 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
        - ▪ ensure the funding request for the expansion grant is within the funding parameters allowed under the reallocation or bonus funding amounts available.
- **Expanding a non-CoC Program funded project**. Expansion in which a project applicant submits a new project application that requests CoC Program funds to add to a current homeless project that is funded from sources other than CoC Program funds. Note that project applicants are prohibited from using CoC Program funds to replace state and local funds.

B. OVERVIEW OF ELIGIBLE NEW PROJECT TYPES

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

- Project must serve either:
    - o Exclusively (100%) chronically homeless individuals and/or households with children as defined in 24 CFR 578.3, OR
    - o A DedicatedPLUS population, **slightly redefined since 2017**, in which 100 percent of the beds are dedicated to serve individuals, households with children, and unaccompanied youth that at intake are:
        - 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 prior to entering the project;
  - 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 27):
  - Acquisition
  - Rehabilitation
  - New Construction
  - Leasing
  - Operations
  - Rental Assistance
  - Supportive Services
  - HMIS
  - Indirect Costs
  - 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.
  - Project may, but do not have to, require participating in non-disability related services. (Disability-related services include but are not limited to mental health services, outpatient health services, etc.)
  - Substance abuse treatment projects may require participation in substance abuse treatment services as a condition of continued participation in the project.
- 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)

- Project must serve certain populations:
  - Projects applying for Bonus or Reallocation funding must serve homeless individuals and families, including unaccompanied youth who are defined as homeless at 24 CFR 578.3.
  - 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 27):
  - 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*** projects may be created to better serve homeless individuals and families. 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.
- Project must serve certain populations:
  - o Projects applying for Bonus or Reallocation funding must serve homeless individuals and families, including individuals or families fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who are defined as homeless at 24 CFR 578.3 who meet the following criteria:
    - residing in a place not meant for human habitation;
    - residing in an emergency shelter or coming directly from the streets;
    - persons who qualify under paragraph (4) of the definition of homelessness, including persons fleeing or attempting to flee domestic violence situations

- residing in a transitional housing project that was eliminated;
- residing in transitional housing funded by a Joint TH and PH-RRH component project (See Section III.C.3.l of this NOFA); or
- receiving services through a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.
    - 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 27):
    - 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 2018, 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.
- 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.
- 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.
- At a minimum, project should:
    - o Use a Housing First approach with client-driven service models and a focus on helping people move to permanent housing as quickly as possible – participants cannot be required to participate in treatment or services to receive assistance;
    - o Have low barriers to entry and accommodate people with possessions, partners, pets, and other needs;
    - o Incorporate client choice by helping participants find permanent housing based on their unique strengths, needs, preferences, and financial resources – participants will choose when they are ready to exit the crisis housing portion of the project and move to permanent housing, with providers assisting participants with this move.
    - o Provide or connect participants to resources that help them improve their safety and well-being and achieve their goals; and
    - o Target and prioritize people experiencing homelessness with higher needs and who are most vulnerable, especially those who are unsheltered, have experienced long or multiple episodes of homelessness, have higher barriers to exiting homelessness, and are more likely to be victims of violence or harm.

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 27):
  - HMIS
  - Indirect Costs
  - 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)

- 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 27):
  - Supportive services
  - Indirect Costs
  - Administration.

3. NEW PROJECT BASIC DESIGN REQUIREMENTS

A. 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 subsection D below)
- Demonstrate 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
- Show that the project is cost-effective, with costs not deviating substantially from the norm in that locale for similar project activities
- Agree to participate in HMIS (except for victim service providers who must use a comparable database and planning/UFA grant recipients)

MINOR CHANGES THIS YEAR 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 new permanent housing projects, applications must receive at least 3 out of 4 possible points 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 offered will help to obtain and retain permanent housing, including all supportive services regardless of funding source.
    - The proposed project has a specific plan for ensuring program participants will be individually assisted to obtain the benefits of mainstream health, social, and employment programs for which they are eligible to apply meets the needs of program participants (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 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 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 for ensuring program participants will be individually assisted to obtain the benefits of mainstream health, social, and employment programs for which they are eligible to apply meets the needs of program participants (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 adheres to a Housing First model.

- For new Supportive Services Only projects for centralized or coordinated assessment systems, applications must receive at least 2 out of 4 possible points 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.

- 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)
    - Resolution of Civil Rights Matters
    - Outstanding Delinquent Federal Debts
    - Debarments and/or Suspensions
    - Pre-selection Review of Performance
    - Sufficiency of Financial Management System
    - False Statements
    - Mandatory Disclosure Requirement
    - Conducting Business in Accordance with Ethical Standards/Code of Conduct
    - Prohibition Against Lobbying Activities
    - Equal Protection for Faith-based and Community Organizations

B. FUNDING LEVELS & LIMITS

Each year's Notice of Funding Availability (NOFA) will state 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 FY2018, HUD will use FY2018 FMRs.
- If the recipient has a subrecipient, it is required to share at least 50 percent of project administrative funds with its subrecipient(s).

C. 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.
- For recipients of funds for rehabilitation or new construction:
    - Construction activities must begin within 9 months of the later of signing of the grant agreement or of signing an addendum to the grant agreement authorizing use of grant funds for the project.
    - Construction activities must be completed within 24 months of signing the grant agreement.
    - Activities that cannot begin until after construction activities are completed must begin within 3 months of the date that construction activities are completed.

- 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.

D. 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.

E. 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).
- 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.

F. MATCH REQUIREMENT

- See "Match Requirements" section of this handbook on page **Error! Bookmark not defined.** for more detail.

4. RENEWAL PROJECTS DESIGN 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, 2018, and the current grant must expire between January 1 and December 31, 2019.
- The applicant must be the entity that signed the expiring grant agreement with HUD.

The list of potential projects eligible for renewal in FY 2018 for our CoC is provided as a separate handout 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 2018 NOFA

- **Dedicated Plus 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. ****NEW THIS YEAR**** Projects that were awarded as DedicatedPLUS in the FY 2017 CoC Program Competition are required to include households with children to qualify as a DedicatedPLUS project in the FY 2018 CoC Program Competition.
- **Renewal Grants Per Unit Cost**. 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. 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. ****NEW THIS YEAR**** The Applicants must provide copies of the leases to establish the actual rents.
- **Rapid Rehousing Eligibility.** Certain renewal Rapid Rehousing projects may be allowed to serve participants beyond those proposed in the initial funding application. For example, if a renewing Rapid Rehousing project was originally funded to serve only families with children, that project, through the FY 2018 project application, may be able to also serve individuals if it so chooses, depending on whether the original application was a Bonus project.

B. NEW GRANT OPTIONS FOR RENEWALS IN 2018: TRANSITION GRANTS, CONSOLIDATIONS, EXPANSION GRANTS

In 2018, renewal projects applicants have three options that have not been available in past competitions. 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 2018 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 2017 CoC Program Competition, a copy of the FY 2017 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 2018 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 2018 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.
- This means that a CoC Program recipient no longer must wait for a grant agreement amendment to be executed to consolidate two or more grants before it can apply for a single consolidated project in the CoC Program Competition. However, prior to beginning the consolidation process in the project application, the applicant should consult with the local HUD field office to ensure it is eligible to consolidate the projects.
- 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 2018 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.
  - The 2018 NOFA includes both of the following italicized statements about funding of grants that are proposed to be consolidated. Further guidance from HUD is being sought in order to best interpret these statements.
    - *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:
  - Consolidating projects are the same component;
  - Budgets for the consolidated project application submitted exactly match the sum of the budgets for each of the individual projects as they appear on the GIW posted to the HUD Exchange;
  - Expiring grant numbers and operating start and end dates for the projects that are consolidating are provided;
  - Operating end dates end in CY 2019;
  - 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.
  - The previous year's project application to the FY 2018 project application forms are attached.

EXPANSION PROJECTS

- 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 in the case of HMIS, increase the current HMIS grant activities within the CoC's geographic area. See page 10 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, however, 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.

NEW LANGUAGE THIS YEAR In evaluating applications for funding, HUD will consider an applicant's past performance in managing funds. Items HUD may consider include, but are not limited to:
- The ability to account for funds appropriately;
- Timely use of funds received from HUD;
- Timely submission and quality of reports submitted to HUD;
- Meeting program requirements;
- Meeting performance targets as established in the grant agreement;
- The applicant's organizational capacity, including staffing structures and capabilities;
- Time-lines for completion of activities and receipt of promised matching or leveraged funds; and
- The number of persons to be served or targeted for assistance.

HUD may deduct points from the rating score or establish threshold levels. Whenever possible, HUD will obtain past performance information from staff with the greatest knowledge and understanding of each applicant's performance. If this evaluation results in an adverse finding related to integrity or performance, HUD reserves the right to:
- Deny funding, or with a renewal or continuing award, consider suspension or termination of an award immediately for cause;
- Require the removal of any key individual from association with management or implementation of the award; and
    - Make provisions or revisions regarding the method of payment or financial reporting requirements.

E. FUNDING LEVELS & LIMITS

Each year's Notice of Funding Availability (NOFA) will state 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 ****NEW THIS YEAR**** 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). All adjustments will be made prior to award announcement. Because the application deadline falls in FY2018, HUD will use FY2018 FMRs.
- 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 **Error! Bookmark not defined.** for more detail.

5. 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. A useful version of the CoC Program Interim Rule can also be found at: https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

If you would like a document that clarifies eligible costs in an easy-to-read format, please contact your HomeBase Local Team member and one will be provided to you.

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.
- Non-profit organizations have permanent authority to administer rental assistance projects for permanent housing projects.
- 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. As of last year, 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.
- 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 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.

6. 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, 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. (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, 2018 and September 18, 2018.

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, projects must list the type of source and the value of each match commitment, but will NOT be required to attach the match letter. 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 application should be accurate, with a commitment letter(s) in place that includes the amount(s) listed.

B. FORM OF MATCH LETTER **(REVISED IN 2018)**

[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 contribution will support	
Fiscal year contribution will support	
Name of grant recipient and/or subrecipient	
Date the contribution will be available***	[_____], 2019 OR [_____], 2020
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 18, 2018

* 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 2019-2020 operating year.**

C. EXAMPLES OF MATCH RESOURCES

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

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

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

7. 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 2018, these requirements are detailed in the 2018 CoC Program NOFA and the CoC Interim Program Rule (24 CFR 578). **All grant recipients and subrecipients should read these documents carefully.**

A. NEW PROJECTS

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

B. ALL PROJECTS

- **Annual Audits:** Any recipient expending $750,000 or more in a year in Federal Funds must conduct a single or program-specific audit for that year in accordance with the provisions of OMB Circular No. A-133.
- **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

- o **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.
- o **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.
- **Housing First:** Any housing project application that indicates it will use a Housing First approach, that is awarded CoC Program funds will be required to operate as a Housing First project.
- **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 required 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:** Supportive housing programs must provide meals or meal preparation facilities, and residential supervision. 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 in HUD Programs Regardless of Sexual Orientation or Gender Identity, 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.
- ****NEW FOCUS THIS YEAR** Meaningful Participation:** Applicants must identify the steps they will take to ensure that traditionally marginalized populations (such as racial and ethnic minorities and persons with disabilities) will be able to meaningfully participate in the planning process. The applicant must identify the specific populations that it will include, identify community organizations that represent these populations, and describe how these populations will be included in the planning process.
  - For capital investment projects, grantees should commit to and demonstrate plans to employ low-income and very-low-income persons and/or utilize Section 3 businesses at levels beyond those required by Section 3.
  - In seeking public participation, applicants and recipients must ensure that all communications are provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 and, as applicable, the Americans with Disabilities Act.
  - In addition, Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d and Executive Order 13166 require that grantees take reasonable steps to ensure meaningful access to services, programs, and activities by persons with Limited English Proficiency (LEP persons).

C. TIMELINESS

All projects must adhere to certain timeliness standards in order to receive this funding.

- Recipients conditionally awarded funds in the 2018 CoC funding round must be obligated by September 30, 2020 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. To get started in e-snaps, follow the steps below.

A. FIRST THINGS FIRST: TRAINING MODULES

Please review the HUD Training Modules BEFORE accessing e-snaps or attempting to enter data. They may save you time since they offer very detailed instructions and very useful tips.

They can be accessed on this webpage:

https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources/

The following e-snaps Training Materials are available:

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

Updating Project Application Information
- Project Applicant Authorized Representative Update
- Project Applicant Profile Navigational Guide
- Putting the Project Application in Edit Mode
- How to Complete the 2880 in *e-snaps*
- DUNS Number and SAM Resource

Submitting Applications for Project Funding
- How to Access the Project Application
- Transferring an Existing Project
- Renewal Project Application Detailed Instructions and Instructional Guide
- Consolidating Eligible Renewals During the FY 2018 CoC Program Competition
- New Project Application Detailed Instructions and Navigational Guide

B. STEPS TO COMPLETING YOUR PROJECT APPLICATION

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.

2. Recipients should complete the Applicant Profile (see the next section of this Handbook "Recipient Documents" for guidance). 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.

3. 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.
   a. **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.

4. Do NOT hit submit on your application until after the local competition when you've been instructed to do so!

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, 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.

- 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 Training Modules and by using the correct browser.

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)

C. RECIPIENT DOCUMENTS & 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.**

1. GENERAL INSTRUCTIONS

Review the following training modules at **httpstr://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources/** when you are completing the Applicant Profile on e-snaps

- Project Applicant Profile Navigational Guide
- How to Complete the 2880 in *e-snaps*

Follow the training module precisely.
They can be very helpful, but must be used slide by slide.

Information in this handout supplements the training modules by providing the local information you need to complete the forms. Use both side by side.

Tips:
- 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).**
    - 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.
    - If you have multiple funding opportunities, make sure to create the project application under the correct Funding Opportunity name.
- Complete the Applicant Profile on e-snaps at www.hud.gov/esnaps
- 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.

2. PAGE 2. 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 www.sam.gov. According to a HomeBase Local Team review of the SAM website, the following agencies have active registrations:

Agency	Active Registration on SAM?
City of Modesto	Active
Housing Authority of the County of Stanislaus	Active
Stanislaus County Affordable Housing Corp	Active
Turning Point Community Programs	Active
Center for Human Services	Active
Community Housing and Shelter Services	Active
Community Impact Central Valley	Active
We Care Program - Turlock	Active

In 2018, 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.

3. PAGE 4. ADDITIONAL INFORMATION: CONGRESSIONAL DISTRICTS AND CODE OF CONDUCT

1. Indicate applicant's congressional districts:
The congressional districts in this CoC include:
  - o CA-10

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?
City of Modesto	No
Housing Authority of the County of Stanislaus	No
Stanislaus County Affordable Housing Corp	No
Turning Point Community Programs	No
Center for Human Services	Yes
Community Housing and Shelter Services	Yes
Community Impact Central Valley	Yes
We Care Program - Turlock	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.

4. FIRST FORM/ATTACHMENT: 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.

Background on 2880s: HUD must provide CoC assistance in accordance with HUD subsidy layering requirements in section 102 of the Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545) and 24 CFR part 4, subpart A. An applicant must submit information in its application on other sources of governmental assistance that the applicant has received, or reasonably expects to receive, for a proposed project or activities. HUD's review of this information is intended to prevent excessive public assistance for proposed project or activities by combining (layering) assistance under this program with other governmental housing assistance from federal, State, or local agencies, including assistance such as tax concessions or tax credits.

Completing the form:
- Most of the information (Applicant name, EIN, address) will autopopulate from other portions of the Project Applicant Profile and the project applications (once completed)(e.g. *4. Amount of HUD Assistance Requested/Received* will populated from the Applicant's Summary Budget screen for each application upon completion.)
- **PART I, Question 2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of $200,000 during this fiscal year (Oct. 1 - Sep. 30)?**
  - Within the Project Applicant Profile, select "Yes" if the **combined total amount of all your agencies annual CoC Program project applications are more than $200,000**. If "Yes" is selected Part II and Part III of the form will appear and must be completed.
  - Select "No" if the combined total amount of all your agencies annual CoC project applications are $200,000 or less. If the answer is "No," Part II and Part III of the form will not appear and the form can be submitted after the "I agree" checkbox is selected.
- **If Yes to Question 2:**
  - **Part II. Other Government Assistance and Expected Sources and Uses of Funds**.
    - **A. Other Government Assistance.** Project applicants and recipients must report any other government funding or assistance involved in the project.
      - "Other government assistance" includes: any loan, grant,

guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance that is, or is expected to be made, available to the project.

- Sources of "other government assistance" include:
  - the Federal government (other than that requested from HUD in the CoC Program project application),
  - a State, or
  - a unit of general local government, or
  - any federal, state, or local agency or instrumentality thereof.
    - **B. Non-Government Assistance.** Note that the applicant and recipient disclosure report must specify all expected sources and uses of funds–both from HUD and any other source–that have been or are to be, made available for the project. Non-government sources of funds typically include (but are not limited to) foundations and private contributors.
- **Part III. Interested Parties.** Project applicants must provide information on:
  - 1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity; and
  - 2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds $50,000 or 10 percent of the assistance (whichever is lower).
  - **NOTE**: You must complete at least one row in Part III. If there are no interested parties to report, enter N/A in the first 3 columns and "0" in columns 4 and 5.

5. SECOND FORM/ATTACHMENT: CODE OF CONDUCT

If you determined you need to update or upload a Code of Conduct earlier in the Applicant Profile (see above) this is the screen where you upload it.

6. THIRD FORM/ATTACHMENT (FOR NON-PROFITS) 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.

- o (b) Records that identify adequately the source and application of funds for federally sponsored activities.
  - o (c) Effective control over and accountability for all funds, property and other assets.
  - o (d) Comparison of outlays with budget amounts.
  - o (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.
  - o (f) Written procedures for determining the reasonableness, allocability and allowability of costs.
  - o (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

7. FOURTH FORM/ATTACHMENT (FOR NON-PROFITS) SURVEY ON ENSURING EQUAL OPPORTUNITIES FOR APPLICANTS (SF-424 SUPP)

This form is for non-profits only. The form to download and complete on your computer can be found at:
https://www.hudexchange.info/resources/documents/Survey-on-Ensuring-Equal-Opporunity-for-Applicants.pdf

8. 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.

D. COMPLETING THE PROJECT APPLICATIONΩ

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.
- 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 selection of the common questions project applicants generally have trouble answering,** but **does not 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.

Question	New Project Answer and/or Notes
Page 1A Application Type 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.	
	Nothing to fill in on this page
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)	
15. Descriptive Title	If this is not the correct project name, you will need to edit in "Projects" form on e-snaps
16. Congressional District(s): b. Project:	Must reflect congressional district(s) in which the project will operate. Should be CA - 10
17a. Proposed Project start date	Please select a date in 2019 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 364 days after 17a
Page 1E. Compliance and Page 1F. Declaration	
19. Is the Application Subject to Review By State Executive Order 12372 Process?	Choose: b. Program is subject to E.O. 12372 but has not been selected by the State for review.
20. Delinquent debt	Project Applicants with an outstanding Federal debt will not be eligible to receive HUD funds, unless: (1) a negotiated repayment schedule is established and the repayment schedule is not delinquent, or (2) other arrangements satisfactory to HUD are made prior to the award of funds by HUD. The explanation of any debt owed and the repayment arrangements must be provided on Screen 1E. If arrangements satisfactory to HUD cannot be completed within 90 days of notification of selection, HUD will not execute a grant agreement with a project applicant.
Page 1G. HUD 2880	

Question	New Project Answer and/or Notes
Checkbox: I certify that this information is true and complete (* I AGREE)	• Verify that all project information is complete and accurate. • If any pre-populated information is incorrect, you must correct it in the Applicant Profile (see part C.4 of this section for details).
Page 1H. HUD 50070	
Checkbox: I hereby certify that all the information stated herein, as well as any information provided in this accompaniment herewith, is true and accurate.	• If any pre-populated information is incorrect, you must correct it in the Applicant Profile. • This screen replaces the need to upload a form as an attachment.
Page 1I. Certification Regarding Lobbying	
Checkbox: I hereby certify that all the information stated herein, as well as any information provided in this accompaniment herewith, is true and accurate.	• New this year, 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.
Page 1J. SF-LLL	
Does the recipient or subrecipient of this CoC grant participate in federal lobbying activities (including a federal administration or Congress) in connection with the CoC Program?	• Select Yes or No to reveal additional questions. • You should only select yes if you are a non-profit AND you engage in lobbying activities. Not many agencies should select yes.
Page 2A. Project Subrecipients	
Total Expected Sub Awards	• Add any amounts that are expected to be awarded to subrecipients, add information regarding expected subrecipients.
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	

Question	New Project Answer and/or Notes
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 federal funds and performing the activities proposed in the application, given funding and time limitations.	• Describe why the applicant, subrecipients, and partner organizations (e.g., developers, key contractors, subcontractors, service providers) are the appropriate entities to receive funding.
	• Provide concrete examples that illustrate their experience and expertise in the following:
	   o Working with and addressing the target population's identified housing and supportive service needs;
	   o Developing and implementing relevant program systems, services, and/or residential property construction and rehabilitation;
	   o Identifying and securing matching funds from a variety of sources; and
	   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.
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 • Include the organization and management structure of the applicant **and** all subrecipients • Make sure to include a description of internal and external coordination and • Include 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 – 510 Turlock, Modesto/Stanislaus County CoC
1b. CoC Collaborative Applicant Name	City of Modesto
3. Project Status	Correct answer: Standard

Question	New Project Answer and/or Notes
4. Component Type:	Choose: PH (for PSH and RRH), Joint TH and PH-RRH, HMIS, or SSO (if a Coordinated Entry grant)
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.
6 a/b. Is this new project application requesting to transition from eligible renewal project(s) that were awarded to the same recipient and fully eliminated through reallocation in the FY 2018 CoC Program Competition?	Indicate whether this new application is for a project you wish to transition to a different CoC program type. New in FY 2018, an existing eligible renewal project can change its current project component to an eligible new project component. To facilitate this change, the project applicant must work with the CoC to use the reallocation process to fully eliminate the renewal project and transition the grant funds to the new project application. Please note, you should discuss this with the Collaborative Applicant and/or HomeBase and must have CoC approval. If yes, is selected for question 6, list all expiring projects (at least one and up to four grants) and provide a detailed description of how the project will be transitioned from the renewal project to the new project. The description must include: • A detailed description of how the project applicant will reduce activities in the project(s) that is/are transitioning, including the plan for ensuring existing program participants do not become homeless, while increasing activities in the new component; • The amount of funds that will be used to wind down the project that is transitioning if the project is selected for conditional award as a transition grant (including how no more than 50 percent of each transition grant may be used for costs of the original program component(; and • The estimated timeline, within the 1-year grant period, that the new project will be fully operating. Other than the questions above, the new project application must be filled out only as related to the new project being requested. For all expiring projects listed above, be sure to attach a copy of the most recently approved project application(s) on Screen 7A.

Question	New Project Answer and/or Notes
Page 3B. Project Description (questions differ by project type)	
1. Provide a description that addresses the entire scope of the proposed project	All project applicants must provide a clear and concise project description. ***References to ineligible activities or failing to provide an adequate description of the project may result in rejection of the project application.*** The project description should address the entire scope of the project and include: • Community needs • A clear picture of the target population(s) to be served • The plan for addressing the identified needs/issues of the CoC target population(s) • Projected outcome(s), • Coordination with other source(s)/partner(s), and • Reason why CoC Program support is required. o The program description should describe the project at full operational capacity. o **Project applicants MUST match this description to all other parts of the application** including Part 5 and budgets in Part 6 **For Joint TH/RRH**: Be sure to describe how both the TH and PH-RRH portions of the project will be utilized. For example, the project will house participant in leased units for the TH portion up to X months and then will move participants to PH-RRH TRA units providing X services. If CoC Program funds will not be requested for both TH and PH-RRH units, the description must include the number of TH and PH-RRH units from other funding source(s) and how TH and PH-RRH assistance will be provided for all participants.
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.	Applicants must be able to begin assistance within 12 months of conditional award. Provide the number of days from the execution of the grant agreement in which you expect to achieve the described milestones. 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**.**

Question	New Project Answer and/or Notes
3. Will your project participate in a CoC Coordinated Entry process?	HUD and the CoC expect you to respond Yes.
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. 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. *Note*: It is <u>not</u> in your best interest to overpromise to these questions.
5. Housing First. a. Will the project quickly move participants into permanent housing	HUD's preference is Yes. HUD expects new Joint TH and PH-RRH Component Projects to adopt a Housing First approach.
b. Does the project ensure that participants are not screened out based on the following items?	HUD's preference is that you check the first four boxes.
c. Does the project ensure that participants are not terminated from the program for the following reasons?	HUD's preference is that you check the first four boxes.
d. Will the project follow a Housing First approach?	HUD's preference is Yes. If you answered the questions above in alignment with HUD's preferences, this will autopopulate Yes. 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	Yes/No. Site-based projects should say Yes. (For TH/RRH, if either part is site-based, say Yes.)
7a.. If yes, how and why	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

Question	New Project Answer and/or Notes
	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). Narrative should explain why the applicant has chosen to enforce this requirement for participants. 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.
9. (**PSH Only)** Indicate whether the project is "100% Dedicated" or "DedicatedPLUS"	A new project that is permanent supportive housing must choose: • To become a DedicatedPLUS project. Projects that select "DedicatedPLUS" will be required to fill all vacancies with persons meeting these criteria and should only select "DedicatedPLUS" if the project applicant intends to use all or some of their beds to serve individuals and families that meet the broadened criteria. • To become a 100% dedicated to chronically homeless individuals and families project. Please see part II.D.2 of this Handbook for details regarding DedicatedPLUS. Regardless of the project applicant choice above, the project can still dedicate beds to individuals and families experiencing chronic homelessness on Screen 4B, and those beds dedicated to chronic homelessness must continue to operate in accordance with Section III.A.3.b. of the FY 2017 NOFA.
Page 3C. Expansion - All project applicants must complete the first question on Screen 3C except for those who selected "Yes" to the transition grant question on screen 3A and this screen will not appear.	
1. Will the project use an existing homeless facility or incorporate	Yes/No. Only projects wishing to expand a current CoC renewal project or another non-CoC funded project will say Yes.

Question	New Project Answer and/or Notes
activities provided by an existing project?	
2. Is this new project application requesting a "Project Expansion" of an eligible CoC Program renewal project of the same component type?	Yes/No. Applicants can apply for an expansion project to expand existing eligible renewal CoC projects that will increase the number of units in the project, or allow the recipient to serve additional persons, and have one grant agreement for both projects at contracting stage. Can also expand to provide additional services or bring facilities up to state/local government health and safety standards. Select No if requesting to expand a non-CoC program funded project.
3. Select the activities below that describe the expansion project, and click on the "Save" button below to provide additional details.	The selection of each item will correspond with additional questions.
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. 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 plans to move program participants quickly into permanent housing, and plans to ensure that program participants stabilize in permanent housing. An acceptable response will: • Acknowledge the needs of the target population • 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.

| Question	New Project Answer and/or Notes
	• Good strategies should be specifically tailored–as related to this application–for individuals, older adults, youth, families, etc. • 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 and how the project applicant or subrecipient will ensure that rents are reasonable. • Established arrangements and coordination with landlords and other homeless services providers should be detailed in the narrative. Landlord engagement is a critical piece of the strategy and will be explained in a good response. 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. **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. Describe specifically how participants will be assisted both to increase their employment and/or income and to maximize their ability to live independently.	Narrative should: • Address the needs of the target population, • Address the required supportive services, • Address the availability and accessibility of those supportive services, • Address any coordination with other homeless services providers and mainstream systems, • Describe how service delivery directly leads to program participant employment, • Describe how service delivery leads directly to program participants accessing SSI, SSDI, or other mainstream services, • Describe how the requested funds contribute to program participants becoming more independent. NOTE:

Question	New Project Answer and/or Notes
	• Education plays an important role in the personal development of program participants and should be considered a strategy to maximize their ability to live independently. • HUD encourages project applicants to explain how education will address the encampment and unsheltered homelessness and survivors of DV.
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. The list presented is both exclusive and exhaustive according to 24 CFR 578.53. Only the activities listed will be considered eligible activities with respect to the Project Application. Note: Having services that still say "Select" is acceptable and indicates service is not provided. Do not overpromise in this section.
5. Questions about activities to increase access to mainstream benefits	The project application responses to these questions will be aggregated into the CoC application. NOTE: • 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. • 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.

A **POINT-IN-TIME** COUNT CAPTURES THE PEOPLE WHO ARE IN YOUR PROGRAM ON ANY ONE NIGHT.

(Use a Point-in-Time Count for Screens 5A and 5B)
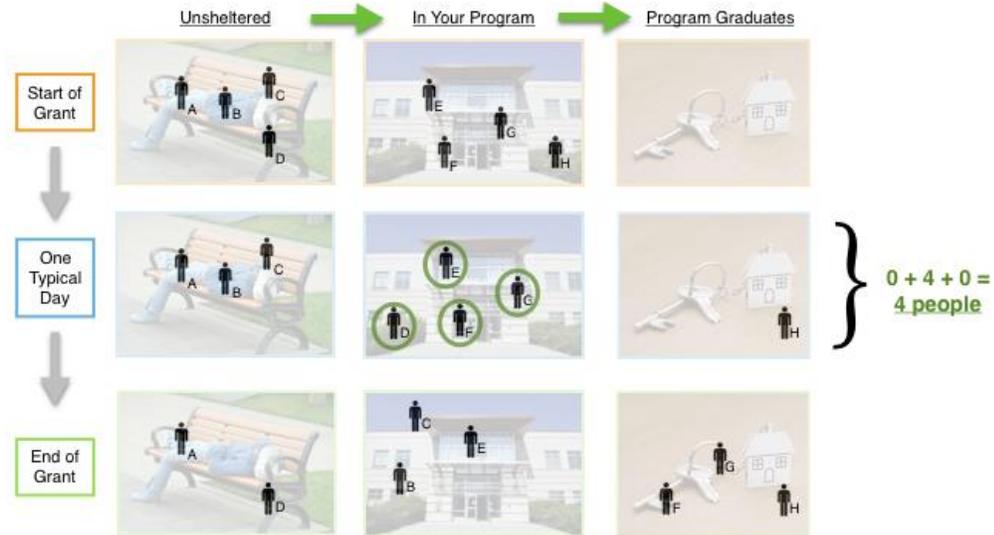
A **Point-in-Time Count** taken on **One Typical Day** would show **4 people** in your program. It does not matter that several other people have passed through your program — for a Point-in-Time Count, you should only look at how many people are in your program on one typical day.

Question	New Project Answer and/or Notes
Page 4B. Housing Type and Location (not for HMIS or CE)	
Total Units: Total Beds: Total Dedicated CH Beds: (Additional columns for Joint TH/RRH projects)	• Answer should reflect beds supported by CoC funds at full capacity on a single day • Should align with Screen 3B, 5A and 5B, budgets and the CoC point in time count for this project. • If a PSH project that is 100% Dedicated, dedicated CH beds must equal total beds • If a PSH project that is DedicatedPLUS, number of dedicated CH beds is up to the project. • 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)	

Question	New Project Answer and/or Notes
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. • If PSH project, must have a disabled adult in the family • If a project for chronically homeless, must reflect disabled adults and chronic homelessness. Should reflect the number of households or persons served at **single point in time at maximum occupancy** • Should NOT be the number served over the course of a year or grant term 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**.
Page 5C. Outreach for Participants (all projects except HMIS or CE)	
1. Enter the percentage of project participants that will be coming from each of the following locations:	Percentages must add up to 100 percent in order to submit. Consider participant eligibility for program type: • If a new PSH project for CH, need to come from streets, shelter, or safe haven. • If a new DedicatedPLUS project, need to come from streets, shelter, safe haven, TH eliminated in 2017 competition, TH portion of Joint TH and PH-RRH project, or VA-funded homeless assistance program. • If new RRH, need to come from street, shelter, safe havens, DV, TH eliminated in 2017 competition, TH portion of Joint TH and PH-RRH project, or VA-funded homeless assistance program. • If new Joint TH and PH-RRH, need to come from street, shelter, safe haven, imminent risk of losing night time residence within 14 days, DV, TH, or a VA funded homeless program. If people you will serve will spend 90 consecutive days or less in an institution, use homeless status from before the institutional stay, or describe the population in the text

Question	New Project Answer and/or Notes
	box.
2. Describe the outreach plan to bring these homeless participants into the project	For projects participating in a CoC's coordinated entry process, simply explain that coordinated entry will provide outreach and access and describe the specific coordination and referral process between coordinated entry and this project. Explain how program participants will be identified and connected with the offered housing and services.

6A. Funding Request	
2. What type of CoC funding is this project applying for in the 2018 CoC Competition?	New in FY 2018, 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. New PH-PSH and HMIS projects are NOT eligible for DV Bonus funds. Transition grants may only apply for reallocation funds.
3. Does this project propose to allocate funds according to an indirect cost rate?	Please see the Indirect Cost Rate subsection below.
4. Select a grant term	1 Year. (Could be more, but rarely chosen.)
5. Select the costs for which funding is being requested	Project Applicants may NOT have any of the following combinations in a single structure or housing unit: • Acquisition and/or rehabilitation with new construction • Leasing with acquisition, rehabilitation, or new construction* • Rental assistance with acquisition, rehabilitation, or new construction* • Leasing and rental assistance* • Rental assistance and operations* * Joint TH and PH-RRH component may have budgets that reflect these combinations, but not in a single structure or housing unit.

6C/6E. Leased Units Budget Detail/Rental Assistance Budget Detail	
FMR area:	Efficiency: $727 One Bedroom: $809 Two Bedroom: $1,035 Three Bedroom: $1,478 Four Bedroom: $1,772
Units	Units should align with Pages 4B/5A/5B as applicable

Question	New Project Answer and/or Notes
6F/6G/6H Supportive Services/Operating/HMIS Budget Detail	
Operations/Services Quantity Description	Make sure 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.** Request should be equal to one year of the relevant cost.
6I. Sources of Match	
Sources of Match	The match information should be based on the current commitment at time of project application and NOT based on projections. HUD expects the amount(s) listed on this form to be accurate, with a commitment letter with the amount listed to be in place. "Date of written commitment" refers to the date the commitment was signed, not the date it will be available. See "Match Requirements" section of this Handbook for additional information.
Program Income	Program income may be counted as match for CoC Program funds. HUD has added questions for projects that generate program income and plan to use it as match, including source (e.g. "rent") and amount (estimated amount).
6J. Summary Budget	
8. Admin	**MAKE SURE FILLED IN**. Admin cannot exceed 10% of program costs.
12. Total Match	25% match required (including admin, excluding leasing)
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"

There have been several <u>important changes</u> in e-snaps recently for renewal applications:

- **Again this year, HUD is allowing renewal applications to be submitted without changing the information in most screens, if that information is accurate.**   When considering making changes to a FY 2018 renewal project application; in general, HUD discourages applicants from making annual updates such as updating annual data included in the program description. 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."
    - o After you complete Part 1, the following screens are open for review:
        - ▪ Information about Submit Without Changes
        - ▪ Recipient Performance
        - ▪ Grants Consolidation
        - ▪ 3A. Project Detail
        - ▪ 7A. Attachments
        - ▪ 7B. Certification
        - ▪ 8B. Submission Summary
    - o 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.
    - o 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.**
    - o 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.**
    - o 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.
    - o For applicants seeking to consolidate multiple grants through the FY 2018 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.
- **New for the FY 2018 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) 2019, as confirmed on the FY2018 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).
    - o **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:

- o
- **Also new for 2018, 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.**

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!
Pages 1B. Legal Applicant (all fields prepopulated from Applicant Profile)	
a. Legal Name	Must match GIW (prepopulated from Applicant Profile).

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. The applicant must also be the recipient of record for the grant requesting renewal, not a new agency taking over the grant. |
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)	
15. Descriptive Title	If this title is not correct, you will need to edit in "projects" form on e-snaps
16. Congressional District(s): b. Project:	Must reflect congressional district(s) in which the project operates. Should be CA - 10
17a. Proposed Project start date	Must be the date 364 days before 17b. Must be the first day of the month and match eLOCCS.

Question	Renewal Project Answer and/or Notes
17b. Proposed Project end date	Must match GIW (and eLOCCS) but the date should be in **2019 (may autopopulate 2018, 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?	Choose: b. Program is subject to E.O. 12372 but has not been selected by the State for review.
20. Delinquent debt	Project Applicants with an outstanding Federal debt will not be eligible to receive HUD funds, unless: (1) a negotiated repayment schedule is established and the repayment schedule is not delinquent, or (2) other arrangements satisfactory to HUD are made prior to the award of funds by HUD. The explanation of any debt owed and the repayment arrangements must be provided on Screen 1E. If arrangements satisfactory to HUD cannot be completed within 90 days of notification of selection, HUD will not execute a grant agreement with a project applicant.

Page 1G. HUD 2880	
Checkbox: I certify that this information is true and complete (* I AGREE)	• Verify that all project information is complete and accurate. • If any pre-populated information is incorrect, you must correct it in the Applicant Profile (see part C.4 of this section for details)

Page 1H. HUD 50070	
Checkbox: I hereby certify that all the information stated herein, as well as any information provided in this accompaniment herewith, is true and accurate.	• If any pre-populated information is incorrect, you must correct it in the Applicant Profile. • This screen replaces the need to upload a form as an attachment.

Page 1I. Certification Regarding Lobbying	
Checkbox: I hereby certify that all the information stated herein, as well as any information provided in this accompaniment herewith, is true and accurate.	• New this year, 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

Question	Renewal Project Answer and/or Notes
	Certification Regarding Lobbying form are federally-recognized Indian tribes because of each tribe's sovereign power.
Page 1J. SF-LLL	
Does the recipient or subrecipient of this CoC grant participate in federal lobbying activities (including a federal administration or Congress) in connection with the CoC Program?	• Select Yes or No to reveal additional questions. • You should only select yes if you are a non-profit AND you engage in lobbying activities. Not many agencies should select yes.
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).
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 Consolidation Screen – New for the FY 2018 CoC 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. • If you answer yes, indicate whether this is the individual or fully consolidated application.
Information About Submission without Changes (New in 2017) - 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.*	

Question	Renewal Project Answer and/or Notes

Page 2A. Project Subrecipients

	• If there is a subrecipient(s), this should be completed with their information. If no recipient, can be left blank. • Congressional districts should be same as or a subset of 16b above. • Total subrecipient grant amount should not include the admin amount kept by the recipient (cannot exceed 50% of admin)

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.

2a. CoC Number and Name	CA – 510 Turlock, Modesto/Stanislaus County CoC
2b. CoC Collaborative Applicant Name	City of Modesto
4. Project Status	Correct answer: Standard
5. Component Type:	Must match GIW.
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.
7. Expansion Grant	Yes/No. Applicants can apply for an expansion project to expand existing eligible renewal projects that will increase the number of units in the project, or allow the recipient to serve additional persons, and have one grant agreement for both projects at contracting stage. Can also expand to provide additional services or bring facilities up to state/local government health and safety standards.

Page 3B. Project Description

1. Provide a description that addresses the entire scope of the proposed project	All project applicants must provide a comprehensive and concise project description. ***References to ineligible activities or failing to provide an adequate description of the project may result in rejection of the project application.*** The project description should address the entire scope of the project and include: • Community needs • A clear picture of the target population(s) to be served • The plan for addressing the identified needs/issues of the CoC target population(s) • Projected outcome(s), • Coordination with other source(s)/partner(s), and • Reason why CoC Program support is required o The program description should describe the project at full operational capacity.

Question	Renewal Project Answer and/or Notes
	o **Project applicants MUST match this description to all other parts of the application** including Part 5 and budgets in Part 6 HUD recommends using more general dates (e.g., this project will serve 10 persons over the term of the grant) rather than using specific dates (e.g., in FY 2018 this project will serve 10 persons) to reduce the need to change project descriptions for renewal projects. **Joint TH and PH-RRH:** If CoC Program funds will not be requested for both TH and PH-RRH units, the description should include 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.
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). *Note*: It is not in your best interest to overpromise to these questions. However, please match your answer to prior applications. 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, and if our CoC is more Housing First oriented, our score will increase. **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.** Please note that saying yes to these questions creates a contractual obligation to operate in this manner for your project.
Page 3C. Dedicated Plus (PSH projects only)	
1. Indicate whether the project is "100% Dedicated", "DedicatedPLUS", or "N/A"	A renewal project that is permanent supportive housing must choose: • (If it hasn't been 100% Dedicated to Chronically Homeless before) To continue serving a non Chronically Homeless population by selecting 'N/A' • To become a 100% DedicatedPLUS project • To become/remain a 100% dedicated to chronically

| Question	Renewal Project Answer and/or Notes
	homeless individuals and families project. If a renewal project that has 100 percent 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. Please see part II.D.2 of this Handbook for details regarding DedicatedPLUS. Regardless of the project applicant choice above, the project can still dedicate beds to individuals and families experiencing chronic homelessness on Screen 4B, and those beds dedicated to chronic homelessness must continue to operate in accordance with Section III.A.3.b. of the FY 2017 NOFA. *Changing the number of beds dedicated to chronically homeless people may affect the CoC's score in future competitions.*

Page 4A. Supportive Services for Participants (all projects except HMIS)	
1. 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 services for provided for 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. Note: Having services that still say "Select" is acceptable and indicates service is not provided. Do not overpromise in this section.
2. Questions about activities to increase access to mainstream benefits	The project application responses to these questions may be aggregated into the CoC application.

A **POINT-IN-TIME** COUNT CAPTURES THE PEOPLE WHO ARE IN YOUR PROGRAM ON ANY ONE UNDERLINE NIGHT.

(Use a Point-in-Time Count for Screens 5A and 5B)
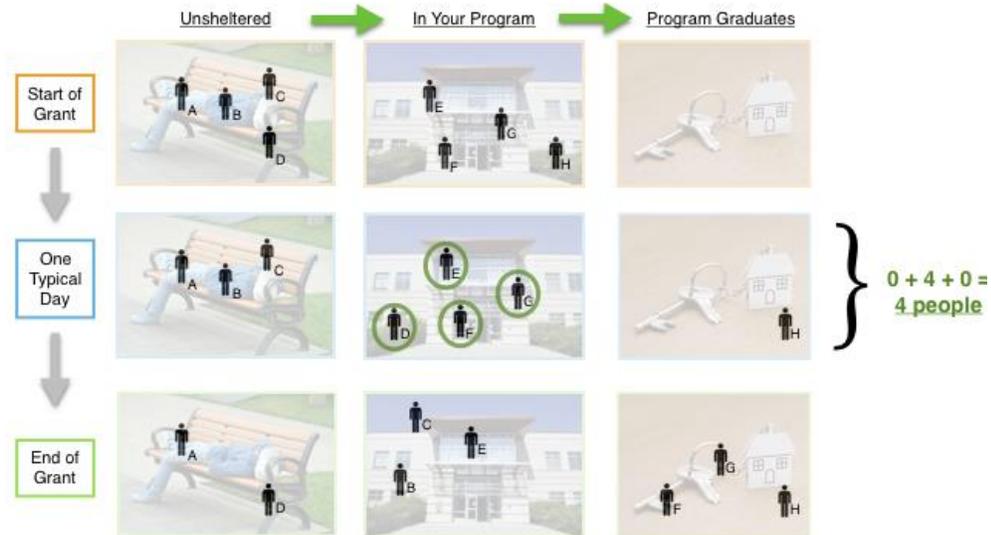
A **Point-in-Time Count** taken on **One Typical Day** would show **4 people** in your program. It does not matter that several other people have passed through your program — for a Point-in-Time Count, you should only look at how many people are in your program on one typical day.

Page 4B. Housing Type and Location (all projects except SSO and HMIS)	

Total Units:
 Total Beds:
 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
	 • Total CH Dedicated beds: Should include all beds dedicated <u>and</u> prioritized for chronically homeless people
	      o If chose 100% Dedicated on 3C, the number of Total Dedicated should match Total Beds
	      o If chose DedicatedPLUS on 3C, applicant may choose to dedicate beds to chronically homeless people here.
	 • Should generally Screens 5A and 5B
	 • 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.
	• If PSH project, you must have a disabled adult in each family
	• If a project for chronically homeless (see Page 4B), you must reflect disabled adults and chronic homelessness.
	Should reflect the number of households or persons served at single point in time at maximum occupancy
	• Should NOT be the number served over the course of a year or grant term
	• Should align with last year's contracted amount (hint: see last year's application)
	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**.
	Note that if funds are reduced in a project due to reallocation, these numbers can be reduced proportionally.
Page 5C. Outreach for Participants (all projects except HMIS)	
1. Enter the percentage of project participants that will be coming from each of the following locations:	Percentages must add up to 100 percent.
	Consider participant eligibility for program type (**see chart on next page for full breakdown**):
	• If PH project, people need to come from: the streets, emergency shelters, Safe Havens, or transitional housing.
	• If a PSH bonus project, dedicating units for CH, or **prioritizing CH for units**, need to come from streets, shelter, or safe haven.
	• If a TH or SSO project, remember that you cannot serve people exiting an institution where they have lived more than 90 days
	• Homeless under other federal statutes—serving requires HUD approval of CoC request. **NO** CoCs have approval.
	If a person recently spent 90 consecutive days or less in an institution, use his or her homeless status from before the institutional stay, or describe the population in the text box.

	PH-PSH	PH-RRH	TH	SH	SSO	Joint TH & PH-RRH
Directly from the street or other locations not meant for human habitation	X	X	X	X	X	X
Directly from emergency shelters	X	X	X	X	X	X
Directly from safe havens	X	X	X	X	X	X
Persons fleeing domestic violence	X	X	X	X	X	X
Directly from the TH Portion of a Joint TH and PH-RRH Component project		X	X			
Persons receiving services through a Department of Veterans Affairs (VA)-funded homeless assistance program		X	X			X
Directly from transitional housing eliminated in the FY 2018 CoC Program Competition		X			X	
Persons at imminent risk of losing their night time residence within 14 days, have no subsequent housing identified, and lack the resources to obtain other housing (TH and SSO projects only)			X		X	X
Directly from transitional housing			X		X	X

6A. Funding Request- *RENEWAL BUDGET AMOUNTS MUST MATCH GIW <u>EXACTLY</u> UNLESS REALLOCATING* *Note: Make sure any changes to your budget through grant agreement, amendment, or reallocation are included in your final application.*	
3. Does this project propose to allocate funds according to an indirect cost rate?	Please see the Indirect Cost Rate subsection below.
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:	Efficiency: $727 One Bedroom: $809 Two Bedroom: $1,035 Three Bedroom: $1,478 Four Bedroom: $1,772
Number of units	• Must be equal to GIW amounts/units (as applicable) • Units should align with Pages 4B/5A/5B as applicable
Leased Structures, Supportive Services, Operating, HMIS Budget Detail	
n/a	**New in 2017,** renewal projects do not require the submission of detailed information for the leased structures, supportive services, operating, or HMIS budgets. There are no separate screens for these budgets; instead, the requested funding amounts are located on the Summary Budget screen, 6E.

In general, HUD expects the details of the most recent approved budgets as amended to be the base of renewal grant expenses. However, any reasonable and eligible costs within each CoC cost category can be expended and HUD verify them during monitoring.

6D. Sources of Match	
Sources of Match	The match information should be based on the current commitment at time of project application and NOT based on projections. HUD expects the amount(s) listed on this form to be accurate, with a commitment letter with the amount listed to be in place. "Date of written commitment" refers to the date the commitment was signed, not the date it will be available. See "Match Requirements" section of this Handbook for additional information.
Program Income	Program income may be counted as match for CoC Program funds. This screen includes questions for projects that generate program income and plan to use it as match, including source (e.g. "rent") and amount (estimated amount).
6E. Summary Budget	
3, 4, 5, 7. Budget Amounts	**MAKE SURE FILLED IN AND MATCHES GIW**
11. Total Match	25% match required (including admin, excluding leasing)
8. Total Assistance plus Admin Requested	Must match GIW.
7A. Attachment(s)	
All attachments	Any attachment necessary will be uploaded here (e.g. additional information for 2880, third party in-kind match MOU)
Subrecipient Nonprofit Documentation	Required if the applicant and project subrecipient are different entities, and the subrecipient is a nonprofit organization
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. If you are choosing to apply for less than your grant amount, please notify the Collaborative Applicants as soon as possible to discuss.
2. Do you wish to submit this application without making changes? (Choose: Submit without changes or Make changes)	Choosing "Submit without changes" indicates to HUD that project applicants have not made changes and are requesting to renew your project per the project details as brought forward from your prior approved renewal grant agreement (or amendment agreement) into your 2018 application. This question excludes Part 1, 3A, 7A and 7B which must be edited. Choose "Make changes" if you must make edits.

3. Specify which screens require changes by clicking the checkbox next to the name and then clicking the Save button. Provide a brief description of the changes that will be made.	Once project applicants have clicked a checkbox and saved the screen, the checked box will become read-only and cannot be unchecked. Only check boxes next to screens that project applicants are certain require changes, as unlocking screens that will not change may cause significant delays in HUD's project application assessment process.

Be specific but brief about all changes you propose to make (bullets are fine). If you check a box in error, note that too.

First Time Renewals: Note that you are a first time renewal in the explanation box. |
| **8B. Submission Summary** | |
| | Make sure nothing reads "Please Complete" |

E. 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. 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 you 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 already 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 not a problem! You do not 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% x Modified Total Direct Costs (MTDC) = 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](#))

RESOURCES

- **2018 CoC NOFA**: https://www.hudexchange.info/resource/5719/fy-2018-coc-program-nofa/

- **CoC Program Interim Rule (24 CFR part 578):** **https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version**

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

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

- **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**