

# Balance of State Continuum of Care 2018 NOFA Competition New Project Applicant Meeting

Webinar #1 July 16, 2018 / 10:00 am

Webinar #2 July 19, 2018 / 11:00 am

To access either Webinar Meeting, please register at:

<https://attendee.gotowebinar.com/register/3289458806730666755>

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DCA, Collaborative Applicant

# DISCLAIMER



- ❑ This is a GENERAL overview of the CoC Program and Application (for eligible new projects to be scored and ranked under Georgia's BoS CoC competition).
- ❑ Applicants are responsible for reading the NOFA, regulations, and other related information as it is released on HUD's web site, HUD Exchange to see program and eligibility requirements.  
(<https://www.hudexchange.info>)

# 2018 Balance of State CoC Process



- ❑ HUD released the Notice of Funding Availability (NOFA) (6/20/18)
- ❑ The Standards, Rating & Project Review Committee (7/6/18) established and the Balance of State CoC Board (7/11/18) approved:
  - ❑ The 2018 Georgia BoS CoC NOFA Competition Policy, Process, Application Documents, Addendum, Scoring Criteria, and Other Materials for the NOFA including:
    - ❑ Program priorities according to type (Permanent Supportive Housing) and according to population served
    - ❑ Reallocation process
  - ❑ Updates to the 2018 BoS CoC Review Application – New Applicant documents
  - ❑ Scoring Criteria for the project application reviews
- ❑ Competition opened and all materials released on 7/11/18

# Policy Priorities Highlighted in NOFA

- ❑ Ending Homelessness for All Persons (taking into account challenges faced by Veterans, Youth, Families, and Chronically Homeless)
  - ❑ Increase units, Target beds and units to chronically homeless, Align with CPD 16-011 Prioritizing Persons Experiencing Chronic Homelessness, low barrier
  - ❑ Prioritizing Veterans & Youth-headed households
- ❑ Create a Systematic Response to Ending Homelessness
  - ❑ Criteria to measure System Performance, Coordinated Entry, participant choice w/Housing First, project performance emphasis in reducing homelessness & serving most vulnerable, plan as a system, and make delivery of homeless assistance more open, inclusive, and transparent
- ❑ Strategic Resource Reallocation
  - ❑ Comprehensive Review of Projects, performance, Reallocation of underperforming projects, reduction of underspending projects, project impact on system performance
- ❑ Using a Housing First Approach
  - ❑ Remove Barriers, Rapid Placement into Housing, Voluntary Services, Coordinated Assessment System, Client-centered Service Delivery, Prioritizing Households Most in Need, Inclusive Decision Making

# Policy Priorities from the HUD NOFA and Proposed Responses

## 1. Ending Homelessness for All Persons (taking into account challenges faced by Veterans, Youth, Families, and Chronically Homeless)

- ❑ Prioritization of 85% of non-dedicated PSH beds for people who are chronically homeless
- ❑ Bonus points for projects currently providing PSH
- ❑ Bonus points for projects that commit to low-barriers models
- ❑ New PSH, RRH, & Joint Th & PH-RRH projects for individuals and families
- ❑ Bonus points for PSH projects that increased chronic beds & projects that serve chronically homeless
- ❑ Bonus points for projects serving/dedicated to Veterans and Youth-headed households

# Policy Priorities from the HUD NOFA and Proposed Responses (continued)



## 2. Create a Systematic Response to Ending Homelessness

- Criteria to measure system performance
- Participant choice w/Housing First
- Project performance emphasis in reducing homelessness
- Project performance serving most vulnerable
- Plan as a system

# Policy Priorities from the HUD NOFA and Proposed Responses (continued)

## 3. Strategic Resource Reallocation

- ❑ Underspending projects (returning \$10,000 or more) may be subject to reduction or reallocation (with exception of projects recently transferred or with a pending transfer)
- ❑ Underperforming PSH and RRH projects may be reduced, reallocated, and/or placed in lower grouping in Tier 2.
- ❑ The two lowest scoring renewal RRH and PSH projects determined to be significantly underperforming or operating under capacity may be subject to replacement by new projects, provided the applications pass the threshold review and score highly enough.
  - Project level performance will be further assessed to determine impact on CoC System Performance Measures as part of decisions to reallocate.

# Policy Priorities from the HUD NOFA and Proposed Responses (continued)



## 4. Using a Housing First Model

- Bonus points for projects that utilize the HF Model
- Bonus points for projects that commit to low-barriers models
- Applications scored through a HF/low-barrier lens



# Other Important Highlights of the HUD NOFA and Proposed Responses (continued)

## 2. Tiered Approach

- Tier 1 = top 94% of funding available to the CoC
- Tier 2 = remaining 6% of funding available to the CoC and amounts available for PH bonus
- In response
  - BoS CoC may reduce or reallocate projects currently providing PSH or RRH for underutilization or significant capacity issues
    - Grant utilization
    - Operating Under Capacity
    - Performance
  - Consideration of Returns to Homelessness (prioritize PSH for people with disabilities)
  - Consideration of maintaining or increasing units for chronically homeless OR changing to DedicatedPLUS
- Bonus Funds Available
  - Permanent Housing Bonus - Up to 6% (\$1,185,157 available)
  - Domestic Violence (DV) Bonus Up to 10% (\$1,975,162 available for 1 RRH, 1 Joint TH-RRH Component, and 1 SSO-CE)
  - BoS CoC will apply for bonus project funding, provided appropriate high-scoring new project applications are submitted

# Balance of State CoC Competition (cont'd.)

- ❑ CoCs cannot receive bonus projects unless they competitively rank projects based on how they improve system performance.
- ❑ HUD prioritizes funding for CoCs that demonstrate ability to reallocate lower performing projects to higher performing projects.
- ❑ In response
  - ❑ Reallocation
    - Low grant utilization
    - Operating under capacity
    - Lower performing projects
  - ❑ System Performance
  - ❑ Performance Based Criteria
    - Special populations
    - Project effectiveness
  - ❑ Alignment with CoC and HUD priorities

# Eligible New Projects



- ❑ Funds for new projects will be available through bonus funds available to CoCs that receive a high enough score.
- ❑ Possible new projects available as a result of the reallocation of funding from existing projects (not expected at this time).
- ❑ There are four types of new project applications that will be accepted:
  - ❑ Permanent Supportive Housing (PSH) project
  - ❑ Rapid Re-Housing (RRH) project
  - ❑ Joint TH and PH-RRH Component projects
  - ❑ Supportive Services Only Coordinated Entry (SSO-CE) under DV Bonus only

# Eligible New Projects (continued)

- New projects (1-yr term unless additional funding available permanent housing bonus ONLY):
  - RRH
  - PSH (100% Chronic or 100% DedicatedPLUS)
    - Not eligible under DV Bonus
    - No capital costs in this competition
  - Joint TH and PH-RRH Component
    - Operating/Leasing and Rental Assistance
    - No capital costs in this competition
  - SSO-CE (under DV Bonus ONLY)
    - Applicant must focus on DV
    - Expected up to \$150,000
- Reallocated funds used first if available (PSH, RRH, Joint TH-RRH only)

# Expansion



- ❑ *Expansion.* The process by which a renewal project applicant submits 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. There are two types of expansion:
  - ❑ Expanding CoC Program Projects
    - To expand current operations of an eligible renewal project
    - Current project must receive an award to receive funding
  - ❑ Expanding a non-CoC Program funded Project
    - New application
    - CoC-funds prohibited from replacing state and local funds

# Other Important Highlights of the HUD NOFA and Proposed Responses (continued)

## □ BoS CoC ranking priorities

- Renewal PSH and RRH projects that have been operational for over a year w/out significant capacity or performance issues and HMIS and Coordinated Assessment renewals
- New RRH and PSH projects awarded in the 2015 and 2016 competition (not operational for a year)
- New PSH, RRH, & Joint TH-RRH Component projects designated to utilize reallocated funds, if available
- Renewal PSH & RRH projects determined to be significantly underperforming or significantly operating under capacity
- New PH Bonus PSH, RRH and Joint TH & TH-RRH projects
- New DV Bonus RRH and Joint TH & TH-RRH projects
- New DV Bonus SSO-CE project

# Additional BoS CoC NOFA Priorities and Policies (continued)

- ❑ New applicants should submit a proposal outline to indicate their intention to apply for a new project (doesn't commit to applying)
- ❑ No late new applications will be accepted
- ❑ All applications must pass a threshold review to move forward to the scoring portion. Threshold factors include, but are not limited to:
  - ❑ Financial Management Capacity and Experience
  - ❑ Past performance, if applicable
  - ❑ Lack of match or leverage dollars
  - ❑ Use of HMIS (or HMIS comparable system, if a DV provider)
  - ❑ Incomplete or late (for new projects) applications
  - ❑ Ineligible populations, activities, location, etc.
  - ❑ Failure to obtain Certificate of Consistency (Local Approval)
  - ❑ Submission of Required certifications as specified in NOFA
  - ❑ Application outside of Balance of State's 152 counties

## Additional BoS CoC NOFA Priorities and Policies (continued)



- ❑ Applicants must commit to following Written Standards, VAWA Policy, and utilizing Coordinated Entry System
- ❑ RRH & PSH projects awarded for the first time in 2015 & 2016 (that haven't been operational for a year) will receive the median performance points for like applications. Those points will be averaged with that project's original application score (2015 or 2016) score to account for project design and other factors related to implementation of that project
- ❑ PSH projects that classify as DedicatedPLUS are required to include households with children to qualify as a DedicatedPLUS project.



# 2018 HUD NOFA Competition



- ❑ As in past years, the application process is a two step process
  - ❑ Review Application and Addendum for New project ranking
    - Mailed or dropped off at DCA (with all required attachments)
      - Application and Addendum due no later than 5:00pm, July 25, 2018
    - Applications will be scored and ranked by an application review subcommittee
  - ❑ HUD Application in *E-SNAPS*
    - This is required for ALL project applications
    - Must be complete, with all required attachments, no later than 5:00pm, August 15, 2018



# Program and Project Applications

# Project Size

- ❑ Average proposal size for new PSH, RRH, or Joint TH and PH-RRH Component project will depend on the area & coverage of proposed program
  - ❑ Average size of a large regional or metro area application to be approximately \$250,000
  - ❑ Average size of a smaller program in southern or rural parts of the State must be a minimum of \$100,000
- ❑ Average proposal size for new SSO-CE project is not expected to exceed \$150,000
- ❑ New Project Criteria:
  - ❑ Project Applicant in good standing with HUD
  - ❑ Demonstrate plan for rapid implementation of program
  - ❑ Demonstrate connection to mainstream service systems
  - ❑ Participate/agree to participate in CoC's Coordinated Assessment System & HMIS
  - ❑ Must administer programs or activities in the most integrated setting appropriate to the needs of qualified homeless with disabilities

# PSH Project Application - HUD Threshold



Permanent Supportive Housing (permanent housing for people that are chronically homeless and have a disability)

- ❑ Must be 100% dedicated for individuals and families who are chronically homeless
- OR
- ❑ Must meet requirements of DedicatedPLUS as defined in Section III.A.3.d. of the HUD NOFA

# Eligible Expenses for New PSH Projects

- ❑ Rental Assistance (see § 578.51 for full guidance)
  - ❑ 25% Match Requirement
  - ❑ Fair Market Rent (FMR) to rent individual units to provide housing (based on FMR for location)
  - ❑ Utility allowance included in FMR
- ❑ Leasing (see § 578.49 for full guidance) – **Cannot be combined with Rental Assistance**
  - ❑ No Match Requirement
  - ❑ Can lease individual units to provide housing
  - ❑ Based on Fair Market Rent for location
  - ❑ No utilities unless they are included in the actual rent amount
- ❑ Operating Costs (see § 578.55 for full guidance) – **Cannot be combined with Rental Assistance**
  - ❑ 25% Match Requirement
  - ❑ Utilities to support Leasing (IF utilities not covered in rent)
  - ❑ Furniture
  - ❑ Equipment
- ❑ Supportive Services (see § 578.53 for full guidance)
  - ❑ Eligible Service Costs Limited (see NOFA)
  - ❑ 25% Match
- ❑ Administrative Costs (§ 578.59)
  - ❑ Up to 10% of Grant Amount (10% of subtotal)
  - ❑ Costs associated with general management, oversight, and coordination; training on Continuum of Care requirements; and environmental review
  - ❑ Administrative costs cannot be used for staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57
- ❑ HMIS (see § 578.57 for full guidance)
  - ❑ Data entry staff
  - ❑ Other

Please see full CoC Interim Regulations at:

[https://www.hudexchange.info/resources/documents/CoCProgramInterimRule\\_FormattedVersion.pdf](https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf)

# RRH Project Application - HUD Threshold

- ❑ Rapid Re-Housing (RRH) projects funded through the 2018 NOFA must serve homeless individuals and families, including unaccompanied youth, who meet the following criteria:
  - ❑ residing in a place not meant for human habitation;
  - ❑ residing in an emergency shelter;
  - ❑ persons meeting the criteria of paragraph (4) of the definition of homeless, including persons fleeing or attempting to flee domestic violence situations;
  - ❑ residing in a transitional housing project that was eliminated in the FY 2017 CoC Program Competition; (N/A – BoS has zero TH meeting this criteria)
  - ❑ residing in transitional housing funded by a Joint TH and PH-RRH component project (see Section III.C.3.m1 of this NOFA); **OR**
  - ❑ receiving services from a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

# Eligible Expenses for New RRH Projects

- ❑ Rental Assistance (see § 578.51 for full guidance)
  - ❑ 25% Match Requirement
  - ❑ Fair Market Rent (FMR) to rent individual units to provide housing (based on FMR for location)
  - ❑ Utility allowance included in FMR
- ❑ Supportive Services (see § 578.53 for full guidance)
  - ❑ Eligible Service Costs Limited
  - ❑ 25% Match
- ❑ Administrative Costs (§ 578.59)
  - ❑ Up to 10% of Grant Amount (10% of subtotal)
  - ❑ Costs associated with general management, oversight, and coordination; training on Continuum of Care requirements; and environmental review
  - ❑ Administrative costs cannot be used for staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57
- ❑ HMIS (see § 578.57 for full guidance)
  - ❑ Data entry staff
  - ❑ Other

Please see full CoC Interim Regulations at:

<https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/#regulations>

# Joint TH & PH-RRH Component Project Application - HUD Threshold



- ❑ HUD guidance for Joint TH and PH-RRH Component Projects (SNAPS In Focus):
  - ❑ Not intended to replace transitional housing projects that have been reallocated or lost funding in recent years
  - ❑ Provides new way to meet some of the pressing challenges that communities are facing
  - ❑ Provide a safe place for people to stay – crisis housing – with financial assistance and wrap around supportive services determined by program participants to help them move to permanent housing as quickly as possible
  - ❑ Stays in the crisis housing portion of these projects should be brief and without preconditions, and participants should quickly move to permanent housing
- ❑ Projects can Help Address (SNAPS In Focus):
  - ❑ Communities with large number of unsheltered homelessness and unsheltered youth homelessness



# Joint TH & PH-RRH Component Project Application - HUD Threshold

- Threshold factors for Joint TH and PH-RRH component projects include:
  - Projects must serve people who meet the homeless definition as defined under the NOFA
  - Joint component projects must:
    - 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.
    - Have low-barriers to entry and accommodate people with possessions, partners, pets, or other needs.
    - 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.

# Joint TH & PH-RRH Component Project Application – Additional HUD & CoC Threshold



- Threshold factors for Joint TH and PH-RRH component projects include (cont'd):
  - Joint component projects must:
    - Provide or connect participants to resources that help them improve their safety and well-being and achieve their goals.
    - Target and prioritize people experiencing homelessness with higher needs and who are most vulnerable.
  - Joint component projects must also:
    - Target people who are living in unsheltered locations or homeless youth in areas in which the PIT demonstrates a need for more housing options for homeless households.
    - Demonstrate that the proposed service area is not covered by any crisis housing, has a street outreach team or in which Coordinated Entry planning is occurring.

# Eligible Expenses for New Joint TH & PH-RRH Component Projects

- ❑ TH Portion: Leasing (see § 578.49 for full guidance) – Cannot be combined with Rental Assistance
  - ❑ No Match Requirement
  - ❑ Can lease individual units to provide housing
  - ❑ Based on Fair Market Rent for location
  - ❑ No utilities unless they are included in the actual rent amount
- ❑ TH Portion: Operating Costs (see § 578.55 for full guidance) – Cannot be combined with Rental Assistance
  - ❑ 25% Match Requirement
  - ❑ Utilities to support Leasing (IF utilities not covered in rent)
  - ❑ Furniture
  - ❑ Equipment
- ❑ RRH Portion: Rental Assistance (see § 578.51 for full guidance)
  - ❑ 25% Match Requirement
  - ❑ Fair Market Rent (FMR) to rent individual units to provide housing (based on FMR for location)
  - ❑ Utility allowance included in FMR
- ❑ Both: Supportive Services (see § 578.53 for full guidance)
  - ❑ Eligible Service Costs Limited
  - ❑ 25% Match

# Eligible Expenses for New Joint TH & PH-RRH Component Projects (cont'd)

- ❑ Administrative Costs (§ 578.59)
  - ❑ Up to 10% of Grant Amount (10% of subtotal)
  - ❑ Costs associated with general management, oversight, and coordination; training on Continuum of Care requirements; and environmental review
  - ❑ Administrative costs cannot be used for staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57
- ❑ HMIS (see § 578.57 for full guidance)
  - ❑ Data entry staff
  - ❑ Other

Please see full CoC Interim Regulations at:

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# Domestic Violence (DV) Bonus

- ❑ RRH, Joint RRH-TH Component, or SSO-CE
- ❑ Only 1 application per type, limited to 1-year funding
- ❑ Housing First required
- ❑ RRH and Joint TH-RRH DV Bonus
  - Highest ranked that passes eligibility and quality threshold DV Bonus
  - Additional DV focused housing projects ranked with other new projects
  - Expansions apply
- ❑ Supportive Services Only Coordinated Entry (SSO-CE)
  - Only 1 SSO-CE will be included in final CoC ranking submitted to HUD
  - Proposal required that details how listed criteria will be addressed, which includes a budget request itemizing requested funds

# Domestic Violence (DV) Bonus (cont'd)

- Supportive Services Only Coordinated Entry (SSO-CE) (cont'd.)
  - Highest ranked that passes organizational threshold and demonstrates ability 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;
    - Include planning where the centralized or coordinated assessment system will easily available/reachable for all persons within the CoC's geographic area;
    - Be accessible for persons with disabilities within the CoC's geographic area;
    - Include a advertising strategy designed specifically to reach homeless persons with highest barriers;
    - Utilizes a standardized assessment process;
    - Ensures program participants are directed to appropriate housing and services that fit their needs; and
    - Cover the entire 152-county Balance of State CoC jurisdiction.

# Domestic Violence (DV) Bonus (cont'd)



- ❑ CoCs submitting projects under DV Bonus must:
- ❑ Describe the data the CoC uses to assess the scope of community needs related to domestic violence, dating violence, sexual assault, and stalking, including data from a comparable database.
- ❑ Describe:
  - How many DV survivors CoC is currently serving in the CoC's geographic area;
  - Data source the CoC used for the calculations; and
  - How the CoC collected the data.

# Domestic Violence (DV) Bonus (cont'd)



## □ Based on that information, CoC must:

- Describe the unmet need for housing and services for DV survivors, or if the CoC is applying for an SSO-CE project, describe how the current Coordinated Entry is inadequate to address the needs of DV survivors;
- Quantify the unmet need for housing and services for DV survivors;
- Describe data source the CoC used to quantify the unmet need for housing and services for DV survivors; and
- Describe how the CoC determined the unmet need for housing and services for DV survivors.



# Domestic Violence (DV) Bonus (cont'd)



- ❑ CoC must also address the capacity of each project applicant applying for DV bonus projects to implement a DV Bonus project by describing:
  - Rate of housing placement of DV survivors;
  - Rate of housing retention of DV survivors;
  - Improvements in safety of DV survivors; and
  - How the project applicant addresses multiple barriers faced by DV survivors.

# Domestic Violence (DV) Bonus (cont'd)

- Application narratives for RRH & PH-RRH requests under DV Bonus should:
  - Describe and Quantify the unmet need for housing and services for DV survivors;
  - Describe data source used to quantify the unmet need for housing and services for DV survivors;
  - Rate of housing placement of DV survivors;
  - Rate of housing retention of DV survivors;
  - Improvements in safety of DV survivors; and
  - How the project applicant addresses multiple barriers faced by DV survivors.
- SSO-CE proposals should describe how the current Coordinated Entry is inadequate to address the needs of DV survivors.

# Project Quality



- ❑ Whether type, scale, and location of the housing fit the needs of program participants
- ❑ Whether type and scale of the supportive services fit the needs of program participants
- ❑ Whether the specific plan for ensuring program participants will be individually assisted to obtain mainstream benefits meet the needs of participant
- ❑ Whether program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs

# Match and Leveraging Documentation

- ❑ All New project Review Applications are required to have documentation dated between May 1, 2018 and September 18, 2018, in order for the commitment to count for match or leverage.
- ❑ While match and leverage can be either cash or in-kind, please note that submitting only in-kind sources may call into question the strength and fiscal capacity to administer the project.
- ❑ Designated match and leveraging cannot be duplicated across applications.
- ❑ Review NOFA and HUD's Renewal Project Detailed Instructions to determine what the match documentation requirements are for e-snaps applications.
- ❑ **Note:** If third-party is listed in e-snaps application, a separate 7A attachment screen will appear that should be used to attach MOU(s) documentation that confirms the in-kind match commitment. If the MOU documentation is not available at application submission, it will be a condition for grant execution, if HUD conditionally awarded.

# Match and Leveraging Requirements

- ❑ 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 for eligible costs.
- ❑ Match must be for eligible activities within the same category
  - ❑ HMIS dollars are not eligible match for Supportive Service Costs
- ❑ Examples of Eligible Sources of Cash Match include:
  - ❑ Applicant/Project Sponsor's own cash
  - ❑ Federal government grants/contracts (excluding CoC funds)
  - ❑ State and local government grants/contracts
  - ❑ Private grants or contributions
  - ❑ Program Income (see NOFA pages 2-3 and 22)
- ❑ Examples of Eligible Sources of Non-cash Match include:
  - ❑ In-kind donations
  - ❑ Volunteer time
  - ❑ Donated services
  - ❑ Donated Property
- ❑ For the project application in *E-Snaps*, there are new questions concerning program income. Agencies should list type of match and source. FORMAL documentation required at technical submission and MAY be a required attachment.
- ❑ Review application are scored on amount of match and leveraging listed with a goal of 150 percent match & leveraging (for maximum points.)



# Eligible Populations

# Populations Served Through Continuum of Care

## Homeless Individuals & Families

- ❑ Originally from the streets or emergency shelters (or as expanded by NOFA).
- ❑ Homeless Verification - A household is homeless if you can prove with adequate documentation.
- ❑ All families served by new PSH or RRH projects **MUST** meet HUD definition of homelessness (or as expanded by NOFA) and agencies **MUST** complete/provide homeless verification on ALL people served.
- ❑ Example of Documentation format on DCA ESG web page at <https://dca.ga.gov/housing/homeless-special-needs-housing/emergency-solutions-grants/esg-resources-current-0>
- ❑ Families with children include ALL families with children.
- ❑ Equal access.

# New Permanent Supportive Housing (Chronically Homeless)

PSH Projects MUST serve 100% Chronically Homeless Individuals or Families.

- (1) A “homeless individual with a disability” as defined in the Act, who
  - ❑ Lives in a place not meant for human habitation, a safe haven, or emergency shelter; and
  - ❑ Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months
    - Occasions separated by a break of at least 7 nights
    - Stays in an institution of fewer than 90 days do not constitute a break
- (2) An individual who has been residing in an institutional care facility (hospital, jail, etc.) for fewer than 90 days and met all of the criteria above of this definition, before entering the facility; or
- (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) and (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless

\*\*2018 Georgia Balance of State Point-in-Time Count\*\*:

- ❑ 212 (of 266) Chronically Homeless **Individuals** (80%)
- ❑ 54 (of 266, in 19 HH) Chronically Homeless Families (20%)



# New Permanent Supportive Housing (DedicatedPLUS)

Or PSH projects must meet requirements of DedicatedPLUS as defined in Section III.A.3.d. of the HUD NOFA, where:

- ❑ 100% of beds dedicated to serve:
  - ❑ Chronic Homeless
  - ❑ CoC TH to be eliminated (**N/A**)
  - ❑ Living on street or in shelter, but chronic & had been admitted & enrolled in PH in last year and unable to maintain placement
  - ❑ In Joint TH and PH-RRH component project & chronic prior to entry
  - ❑ Living on street or in shelter for at least 12 months in last 3 years, but not on 4 separate occasions **OR**
  - ❑ Receiving assistance through a VA-funded homeless program and met one of the above criteria at initial intake to VA homeless program

# Final Definition of Chronically Homeless

(Amends 24 CFR 91.5 and 24 CFR 578.3)

## Summary of Major Changes

- ❑ Four occasions must total 12 months
- ❑ Replaced “disabling condition” with “homeless individual with a disability”
- ❑ “Occasion” is defined by a break of at least 7 nights not residing in an emergency shelter, safe haven, or residing in a place not meant for human habitation (e.g, staying with a friend, in a hotel/motel paid for by a program participant)
- ❑ Stays in institution of fewer than 90 days does not constitute as a break and count toward total time homeless
- ❑ New Recordkeeping Requirements under CoC Program
- ❑ Effective – CoC Program Recipients must comply for participants admitted after January 15, 2016

# Definition of Disability

(as it relates to Chronically Homeless)



- The individual or family has a head of household with a diagnosable substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability.

# Documenting Chronic Homeless Status: Disability (as it relates to Chronically Homeless)

- ❑ Must be third party, and includes:
  - ❑ Written verification from a professional licensed by the State to diagnose and treat the disability and certification that the disability is expected to be long-continuing or of an indefinite duration and substantially impedes the individual's ability to live independently
  - ❑ Written verification from SSA
  - ❑ The receipt of a disability check
  - ❑ Intake staff-recorded observation of a disability that is accompanied by evidence above within 45 days
- ❑ \*\*Documentation also required for homeless status and length of time homeless/occasions of homelessness

# Homeless Verification

- ❑ A person is Chronically Homeless if you can prove with adequate documentation.
- ❑ All individuals served in New PSH projects MUST meet HUD definition of chronic homelessness and agency MUST complete/provide homeless verification on ALL persons served.
- ❑ HUD Guidance at <https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>

# Examples of Persons NOT Eligible



- ❑ Persons with resources for housing
- ❑ In housing paying excessive rent, in substandard or overcrowded housing
- ❑ Living long-term with immediate family, relatives or friends
- ❑ Living in a congregate living facility (other than a shelter)
- ❑ Living in a hospital or institution (for > 90 days) where the institution has a policy that requires housing placement at discharge
- ❑ Youth or adults in state custody

# New Rapid Re-Housing Projects

- ❑ Rapid Re-Housing (RRH) projects funded through the 2018 NOFA (bonus or reallocated funds) must serve homeless individuals and families, including unaccompanied youth, who meet the following criteria:
  - ❑ residing in a place not meant for human habitation;
  - ❑ residing in an emergency shelter;
  - ❑ persons meeting the criteria of paragraph (4) of the definition of homeless, including persons fleeing or attempting to flee domestic violence situations;
  - ❑ residing in a transitional housing project that was eliminated in the FY 2017 CoC Program Competition; (**N/A** – BoS has zero TH meeting this criteria)
  - ❑ residing in transitional housing funded by a Joint TH and PH-RRH component project (see Section III.A.3.h. of this NOFA); **OR**
  - ❑ receiving services from a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.
- ❑ **\*\*Homeless Verification also required.**

# Examples of Persons NOT Eligible

- ❑ Persons in Transitional Housing that is NOT a VA or Joint TH-RRH project
- ❑ Persons housed or with resources for housing
- ❑ In housing paying excessive rent, in substandard or overcrowded housing
- ❑ Living long-term with immediate family, relatives or friends
- ❑ Living in a congregate living facility (other than a shelter)
- ❑ Living in a hospital or institution (for > 90 days) where the institution has a policy that requires housing placement at discharge
- ❑ Youth or adults in state custody



# New Joint TH & PH-RRH Component Projects



- ❑ Joint TH and PH-RRH Component projects funded through the 2018 NOFA (bonus or reallocated funds) must serve homeless individuals and families, including unaccompanied youth, who meet the who meet the homeless definition from the following locations:
  - ❑ Residing in a place not meant for human habitation
  - ❑ Residing in an emergency shelter
  - ❑ Persons meeting the criteria of paragraph (4) of the definition of homeless, including persons fleeing or attempting to flee domestic violence situations.
- ❑ \*\*Homeless Verification also required.
- ❑ Individuals entering Joint TH-RRH projects lose Chronic Homeless Status



# Grant Requirements

# Certification of Consistency with Consolidated Plan



- ❑ Each project must have a Certification of Consistency from jurisdiction(s) where projects are located
- ❑ CoCs must submit Certificate for all grantees in a jurisdiction combined in **one** form (and submit certifications in CoC Application)
- ❑ DCA staff will email local Consolidated Plan representatives and cc Renewal Project Applicants
- ❑ In order to go forward in the application process and be included in the CoC application to HUD, local jurisdictions need to review/approve all projects
- ❑ Applicants **MUST** follow-up with respective jurisdictions!

# Certification of Consistency with Consolidated Plan (continued)

- ❑ Local Consolidated Planning Jurisdiction will need to review project application to determine if proposed project is consistent with their Consolidated Plan . Con Plan jurisdictions within the BoS CoC are:
  - ❑ Albany
  - ❑ Brunswick
  - ❑ Dalton
  - ❑ Gainesville
  - ❑ Hinesville
  - ❑ Macon-Bibb County
  - ❑ Rome
  - ❑ Valdosta
  - ❑ Warner Robins
  - ❑ Cherokee County
  - ❑ Clayton County
  - ❑ Gwinnett County
  - ❑ Henry County
- ❑ All other cities and counties fall under the State's Consolidated Planning jurisdiction.

# Grant Requirements



Applicants are expected to read and understand HUD's CoC Interim Regulations and the 2018 CoC NOFA to ensure ability to comply with ALL requirements which include, but are not limited to:

- ❑ Match
- ❑ Leveraging
- ❑ Homeless Verification
- ❑ Disability Verification (if applicable)
- ❑ HMIS Participation
- ❑ Collaboration with McKinney Education Liaison (if applicable)
- ❑ Site Control
- ❑ Environmental Review
- ❑ Technical Submission
- ❑ Annual Performance Report
- ❑ Support Service Provision
- ❑ Certifications listed in NOFA
- ❑ Program Eligibility
- ❑ Etc...

# 2018 NOFA Educational Assurances



- ❑ Project Applicants must demonstrate that project has established policies and practices consistent with the laws related to the provision of educational and related services to individuals & families experiencing homelessness; and
- ❑ Projects serving families must demonstrate in application that a staff person has been designated to ensure that children are enrolled in school and receiving educational services, as appropriate (can include early childhood programs such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney-Vento education services); and
- ❑ Must address non-compliance (if applicable).
- ❑ Formal BoS CoC Educational Policy released in 2015 for CoC and ESG funded projects.

# 2018 Compliance with Violence Against Women Act (VAWA) Rule

- ❑ November 16, 2016, HUD published its VAWA final rule (81 FR 80798), which provides various protections to victims of domestic violence, dating violence, sexual assault, and stalking under the CoC Program and other HUD programs.
- ❑ Grants awarded under 2017 NOFA were the first CoC Program grants required to comply with the VAWA rule as provided in 24 CFR 578.99(i)(3).
- ❑ To enable full compliance with this rule, BoS CoC established (6/20/17) an emergency transfer plan under 24 CFR 578.7(d) and made related updates to the written standards for administering CoC program assistance under 24 CFR 578.7(a)(9)(ii), (iii) and (v).
- ❑ All CoC-funded projects must follow the *Georgia Balance of State CoC Violence Against Women Act (VAWA) Policies and Procedures* established on 6/20/17, and be fully compliant by execution of first FY 2017 grant agreement in CoC.

# Executive Order 12372



- ❑ The State of GA is no longer operating the Clearinghouse.
- ❑ DCA's guidance is to select "b. Program subject to...but has not been selected for review." and then do not enter a date.
- ❑ The Notice is located at:  
<http://opb.georgia.gov/state-clearinghouse>

HUD's detailed instructions on addressing the 'State Executive Order 12372' requirements within the Project Application is located within the project applicant detailed instructions guide on page 8.



# HMIS Participation



- ❑ Mandated by HUD through Continuum of Care Process
- ❑ All non-DV agencies participating in the Balance of State CoC must actively participate in Homeless Management Information Systems (HMIS) through use of CoC Designated HMIS
  - ❑ DV agencies required to use a comparable system (\***ClientTrack available**)
- ❑ HMIS Data is reported to HUD on an annual basis through Annual Homeless Assessment Report (AHAR)
  - ❑ This AHAR data is used by Congress to determine future funding levels
- ❑ Data used by Continuum and Statewide for planning
- ❑ System Performance Data HUD's HDX system (Submitted May 31<sup>st</sup>)

# Georgia BoS CoC HMIS Policy

- ❑ Enter all clients into HMIS
  - ❑ Authorization for Consent to Share in HMIS should be attempted for all clients
- ❑ ENROLL and DISCHARGE clients in a timely manner
- ❑ Comply with current privacy and security standards
- ❑ DCA staff monitor compliance with policy through:
  - ❑ Site Visits
  - ❑ System Utilization Reports
- ❑ Family Violence Providers are to use and submit HUD APRs from the a comparable system\* (**\*ClientTrack available**)
- ❑ The most recent HMIS Policy, Forms, Training resources and other information/resources are on DCA Website:
  - ❑ <https://dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/homeless-management-information-system-hmis>

# Annual Performance Report



- ❑ Must report to HUD annually on the performance of the project
- ❑ Particularly interested in:
  - ❑ Increasing Housing Stability
  - ❑ Increased Income
- ❑ Report is based on data from HMIS and is reported through the Sage HMIS Reporting Repository

# Overall System Performance



FY2018 NOFA - Increased Emphasis on Performance

Continuums Reporting System Performance (as compared to last year):

- ❑ Length of Time Homeless
- ❑ Returns to Homelessness
- ❑ Reduction in Number of Homeless Individuals and Families (PIT)
  - And Progress Ending Veteran, Family, Youth, Chronic Homelessness
- ❑ Employment and income growth
- ❑ Reduction in Number of First Time Homeless
- ❑ Successful Permanent Housing Placement or Retention
- ❑ Thoroughness of Outreach
  
- ❑ HMIS Data
  - ❑ Annual data should come directly out of HMIS
  - ❑ Point-in-Time data should come directly out of HMIS
  - ❑ Project performance measured in HMIS (and data quality)
  - ❑ CoC System Performance measured in HMIS



# Application Scoring

# Application Scoring



- There is one scoring criteria document for New Projects. The scores from this document will make up the total score for each New project review Application.
  - *2018 Georgia BoS CoC NEW Project Scoring Form*

# All New Project Threshold

- ❑ Agency meets HUD's eligibility criteria
- ❑ Agency demonstrates adequate capacity to carry out grant (with proper documentation).
- ❑ Project meets eligible costs or activities requirements.
- ❑ Project sufficiently demonstrates eligible populations will be served.
- ❑ Project shows required match & sufficient commitments for leveraging to implement project.
- ❑ Agency does not have serious compliance or performance issues on current projects.
- ❑ Project demonstrates adequate impact or cost effectiveness.
- ❑ Project meets HUD Joint TH & PH-RRH Component Minimum Standards or SSO-CE DV Bonus Minimum Standards
- ❑ Project for Balance of State CoC's 152 county jurisdiction
- ❑ Complete application, which includes all required documents, certifications, etc.
- ❑ Other, as identified by reviewers.

# Additional New Project Threshold for Joint TH-RRH Component (see both NOFAs)



- ❑ Project must target people living in unsheltered locations or homeless youth in areas the PIT demonstrates a need for more housing options for homeless households.
- ❑ Applicant must demonstrate proposed service area is not covered by crisis housing **and** either have a street outreach team or be in a location where Coordinated Entry planning is occurring.
- ❑ Project must target and prioritize people with higher needs and most vulnerable.
- ❑ Project must use a Housing First approach with client driven models.
- ❑ Must have low-barriers to entry and accommodate people with possessions, partners, pets, or other needs.
- ❑ Must incorporate client-choice, by finding appropriate PH, assist participants move to PH as clients are ready to move from crisis housing.



# Review Application 5b & 5c

- Review Application 5: Housing Type and Location and Project Participants
- Review Application 5c:
  - If proposing to dedicate 30% or more of the units/beds for either Veterans or Youth-headed households, please describe in 5c (section on proposed project participants).
- Related scoring criteria: #14 Prioritization - New projects should sufficiently demonstrate need, targeting, and related partnerships (in the size and scope proposed).
  - Response fully demonstrates need and will dedicate units/beds for serving people who are veterans or unaccompanied youth at 100% = 10
  - Response fully demonstrates need and will dedicate units/beds for serving people who are veterans, or unaccompanied youth at 70-99% = 7
  - Response adequately demonstrates need and will dedicate units/beds for serving people who are veterans, or unaccompanied youth at 50-69% = 5
  - Response adequately demonstrates need and will dedicate units/beds for serving people who are veterans, or unaccompanied youth at 30-49% = 1
  - Response indicates no dedicated units/beds for prioritization and a low or no percentage of subpopulations, or response is unclear or incomplete = 0

# 2018 New Project Scoring (145 Possible Points)

- ❑ Agency Capacity – 20 points
- ❑ Homeless and PSH/RRH/Joint TH-RRH Experience – 20 points
- ❑ Leasing, Rental Assistance, Services & HMIS Experience – 5 points
- ❑ Program Description (& Project Expansion if applicable) – 8 points
- ❑ Estimated Schedule (project implementation timeliness) – 6 points
- ❑ Harm Reduction & Housing First – 3 points
- ❑ Housing First - Entry Requirements – 7 points
- ❑ Housing First - Reasons for Termination – 6 points
- ❑ Determinations by Project Type – 6 points
- ❑ Educational Liaison – 5 points
- ❑ Permanent Housing Stability (services) – 5 points
- ❑ Increase in Employment and/or Income (services) – 5 points
- ❑ Supportive Services – 5 points
- ❑ Prioritization – 10 points
- ❑ Housing Stability Performance Measures – 3 points
- ❑ Income Performance Measures – 3 points
- ❑ Budget – 10 points
- ❑ Project Match – 5 points
- ❑ Project Leveraging – 9 points
- ❑ Monitoring Findings or Concerns – 2 points
- ❑ Project Evaluation – 2 points

## 2018 New PSH Project Bonus Scoring (30 Possible Points)



- ❑ Veteran Prioritization\* (\*100% dedicated beds) – 5 points
- ❑ Youth Prioritization\* (\*100% dedicated beds to youth-headed households aged 18-24 yrs old) – 5 points
- ❑ Housing First - 10 points
- ❑ 2017 Homeless Count Coordinator - 10 points

# Combined 2018 New PSH Project Scoring (175 Possible Points)



- ❑ Total possible points
  - ❑ 145 possible points – Project Application Score
  - ❑ 30 possible points – Bonus Score
  
- ❑ Please note – all new projects will be ranked against each other
  
- ❑ Highest scoring DV Bonus eligible project will be submitted by CoC as the DV Bonus

# Overall HUD CoC Scoring



- ❑ As in past years, HUD looks not only at the individual project applications but at the CoC, as a whole.
  - ❑ Coordination and engagement
  - ❑ Project Ranking, review and capacity
  - ❑ HMIS
  - ❑ Point-in-Time Count
  - ❑ System Performance
  - ❑ Performance and Strategic Planning
  - ❑ Bonus Points (CoC Merger in 2018) – N/A

# Other Highlights of HUD CoC Scoring



- ❑ Housing First & Low Barrier Projects
- ❑ Prioritization of Chronically Homeless for PSH
- ❑ Dedicated PSH beds for Chronically Homeless
- ❑ Prioritization of Families and Unaccompanied Youth
- ❑ Ending Veteran & Chronic Homelessness
- ❑ Severity of Needs in project review, ranking and selection
- ❑ Performance Monitoring
  - ❑ Utilization
  - ❑ Housing Stability
  - ❑ Participant Eligibility
  - ❑ Length of time homeless
  - ❑ Timely draw downs
  - ❑ Mainstream benefits



# Application Process

# Application Process & Timeline

(just to reiterate for New projects)

- ❑ July 18, 2018 – **Proposal Outlines for NEW PSH, RRH, Joint TH & PH-RRH, SSO-CE projects Due**
- ❑ July 12<sup>th</sup> & 17<sup>th</sup>, 2018 - Informational Webinar for Renewal PSH & RRH Applicants, and materials from the webinar posted/distributed
- ❑ July 16<sup>th</sup> & 19<sup>th</sup>, 2018 - Informational Webinars for NEW PSH, RRH, Joint TH & PH-RRH, and SSO-CE applicants and materials from the webinar posted
- ❑ July 24, 2018 – Review Application Packages deadline for Renewal Applicants (full details in NOFA policy)
- ❑ **July 25, 2018 - Review Applications for NEW PSH, RRH, and Joint Component projects, & SSO-CE, as well as all required copies and supplemental documents, due by 5:00 pm.**
- ❑ **August 15, 2018 – ALL project applications (renewal PSH, RRH, HMIS, CoC Planning, & Coordinated Assessment; and NEW PSH, RRH, Joint TH-RRH, & SSO-CE) must be entered into e-snaps by 5:00pm.**
- ❑ August 20, 2018 - Standards, Rating, and Review Committee meeting to approve and recommend ranking of projects held.
- ❑ August 22, 2018 - CoC Board meeting to approve ranking recommended by the Standards, Ratings, and Review Committee held.
- ❑ August 28, 2018 - Notification given to applicants of placement in scoring and ranking for all projects (due 9/3/18).
- ❑ September 5, 2018 - Corrections and resubmission of application in e-snaps due by 2:00pm.
- ❑ September 12, 2018 - Estimated public posting of CoC Application (due 9/16/18)
- ❑ September 14, 2018 - Estimated date to submit to HUD (due 9/18/18)



# Review Application Packet

- ❑ Application Packages Due to be in DCA's office for scoring on **July 25, 2018 (by 5:00 pm) to include:**
  - ❑ Five (5) copies of the Review Application (New PSH, New RRH, or New TH-RRH) OR SSO-CE Proposal (including Match/Leveraging documentation, & the required Addendum document in each copy)
  - ❑ One (1) copy of 501(c)(3) documentation for applicants & sub-recipients (if applicable)
  - ❑ One (1) copy Current Board Member list
  - ❑ One (1) copy Current Financial audit
  - ❑ One (1) copy Current IRS Form 990 in each package
- ❑ Packages must contain a complete response
- ❑ **MUST** be received by July 25<sup>th</sup>
- ❑ Then HUD Application due in e-snaps on August 15<sup>th</sup>

# Review Application Packet



- Mail or drop off materials to:

Georgia Department of Community Affairs  
Office of Homeless and Special Needs Housing  
60 Executive Park South, NE  
Atlanta, GA 30329  
Attn: Tina Moore/CoC Application

**MUST** be received by DCA on or before deadline.



# *E-Snaps* Information

(Electronic Formal Application to HUD)

# E-SNAPS Submission

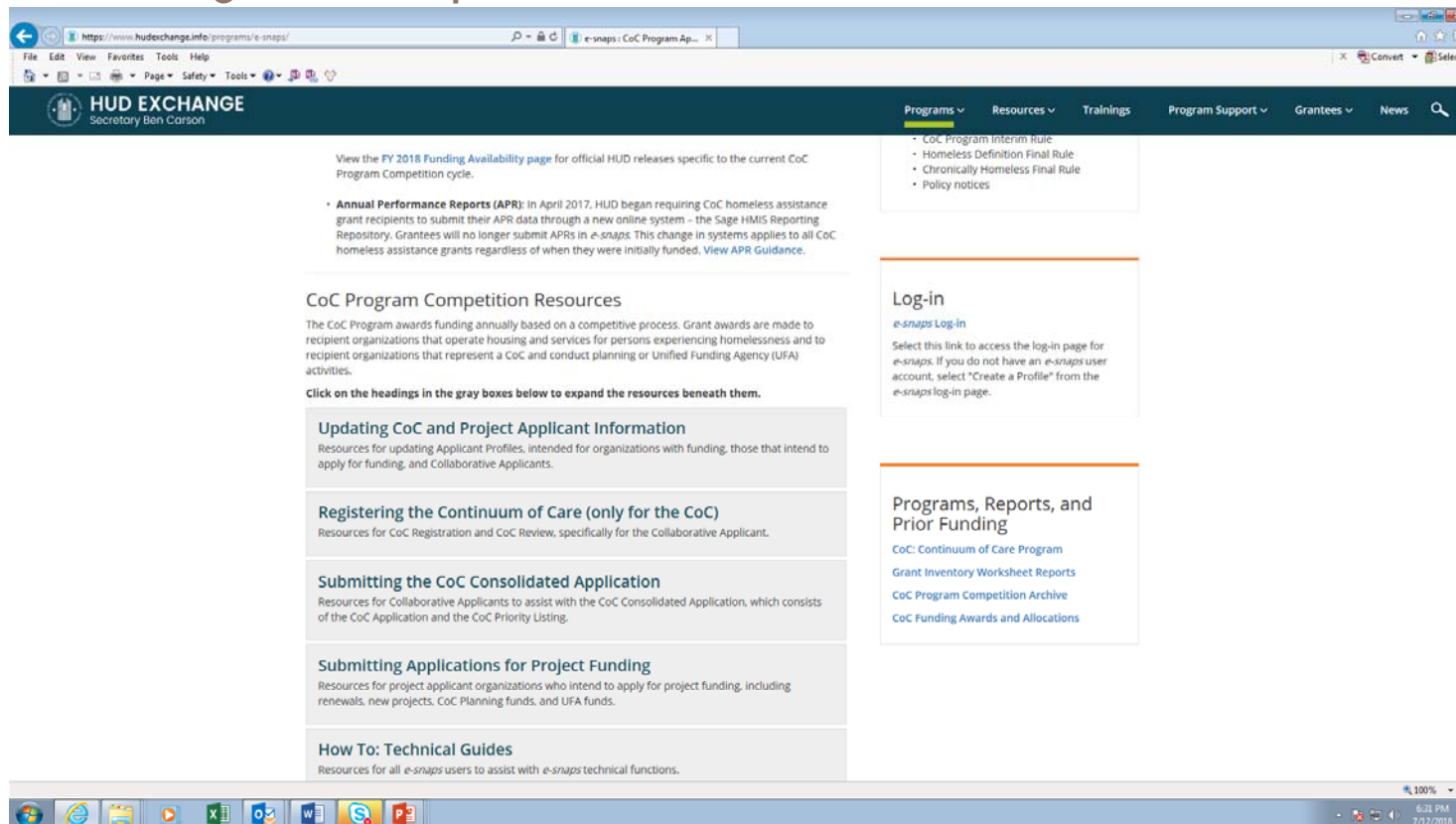
- In addition to the review application (and supporting materials), agencies **MUST** complete and submit CoC Project Application electronically in *e-snaps*
  - <https://www.hudexchange.info/programs/e-snaps/>
- This must be completed by August 15, 2018
- There will be a general review of the submissions for completeness and accuracy and agencies will be expected to make any required corrections no later than September 5, 2018
- Failure to complete the *e-snaps* portion of the application process and/or failure to respond and make the necessary corrections may result in a project not being included in the BoS CoC application to HUD
- **\*\*Applicant Profiles should have current certifications (Addendum).**

# E-SNAPS Submission

- Instruction Guides available at:

<https://www.hudexchange.info/programs/e-snaps/>

- CoC Program Competition Resources



The screenshot displays the HUD Exchange website's 'CoC Program Competition Resources' page. The page features a navigation menu with 'Programs', 'Resources', 'Trainings', 'Program Support', 'Grantees', and 'News'. The main content area includes a section titled 'CoC Program Competition Resources' with a brief overview and a list of resources. The resources are presented in gray boxes with expandable headings:

- Updating CoC and Project Applicant Information**: Resources for updating Applicant Profiles, intended for organizations with funding, those that intend to apply for funding, and Collaborative Applicants.
- Registering the Continuum of Care (only for the CoC)**: Resources for CoC Registration and CoC Review, specifically for the Collaborative Applicant.
- Submitting the CoC Consolidated Application**: Resources for Collaborative Applicants to assist with the CoC Consolidated Application, which consists of the CoC Application and the CoC Priority Listing.
- Submitting Applications for Project Funding**: Resources for project applicant organizations who intend to apply for project funding, including renewals, new projects, CoC Planning funds, and UFA funds.
- How To: Technical Guides**: Resources for all e-snaps users to assist with e-snaps technical functions.

Additional resources listed on the right side of the page include:

- CoC Program Interim Rule
- Homeless Definition Final Rule
- Chronically Homeless Final Rule
- Policy notices
- Log-in (e-snaps Log-in)
- Programs, Reports, and Prior Funding
  - CoC Continuum of Care Program
  - Grant Inventory Worksheet Reports
  - CoC Program Competition Archive
  - CoC Funding Awards and Allocations

# E-SNAPS Submission (continued)

- Read ALL directions
  - <https://www.hudexchange.info/programs/e-snaps/>
- Questions about the *e-snaps* application should go to HUD through Virtual Help Desk (“Ask a Question”)
  - <https://www.hudexchange.info/get-assistance/my-question/>
- Please remember that online systems can freeze up and slow down with excessive traffic
  - Do not wait until the last minute

# E-SNAPS Attachments (pages 47 of the HUD NOFA)

- ❑ \*\*All required attachments correspond to the attachments list in e-snaps and the attachments contain accurate and complete information, and are dated between May 1, 2018 and September 18, 2018. (Applicant Responsibility)
- ❑ Within project applications:
  - ❑ Project application charts, narratives, and attachments
  - ❑ SF-424 Application for Federal Assistance
  - ❑ SF-424 Supplement , Survey on Ensuring Equal Opportunities for Applicants (non-profits only & survey is voluntary)
  - ❑ Documentation of Applicant AND Subrecipient Eligibility
  - ❑ Applicant Certifications
  - ❑ Form HUD-2880, Applicant/Recipient Disclosure/Update Report (for each project)
  - ❑ SF-LLL – Disclosure of Lobbying Activities (if applicable)
  - ❑ HUD-50070 – Certification of a Drug-free Workplace
- ❑ Within Applicant Profile
  - ❑ Applicant Code of Conduct

# Addendum (due w/Review Application)



- ❑ Bed Prioritization for Chronically Homeless Policy
- ❑ Low Barrier Housing
- ❑ Housing First
- ❑ BoS Written Standards Policy
- ❑ BoS Violence Against Women Act (VAWA) Policy
- ❑ Projects Classified as DedicatedPLUS
- ❑ Application Submission Assurances
  - ❑ Code of Conduct submitted as required in E-snaps (if not on list)
  - ❑ Certification of Consistency (follow up with providing project information to local government following DCA's email)



# CoC Project Review in E-snaps

- ❑ CoC to implement a thorough review and oversight process at the local level for both new and renewal project applications submitted to HUD
- ❑ CoCs are expected to closely review information provided in each project application in order to ensure that:
  - ❑ Eligibility of participants
  - ❑ Eligibility of activities
  - ❑ Narratives are fully responsive to question and that it meets all criteria for that question as required by NOFA and included in detailed instructions
  - ❑ Data consistent in application
  - ❑ All required attachments correspond to attachments list in E-snaps and the attachments contain accurate and complete information and are dated between May 1, 2018 and September 18, 2018.

# Nonprofit Documentation



- ❑ Documentation of Applicant and Subrecipient Eligibility. Project applicants must attach appropriate documentation for each private nonprofit subrecipient organization identified as a nonprofit.
- ❑ Private nonprofit status is documented by submitting either:
  - ❑ IRS 501(c)(3) form or
  - ❑ Certification from licensed CPA that the organization meets each component of the definition of a private nonprofit organization as defined by 24 CFR 578.3

# HUD Eligibility Requirements for Applicants of HUD's Grants Programs (pages 16 & 27 in NOFA)

- ❑ Resolution of Civil Rights Matters
- ❑ Outstanding Delinquent Federal Debts
- ❑ Debarment and/or Suspension
- ❑ 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 of Faith-Based and Community Organizations
- ❑ Affirmatively Furthering Fair Housing
- ❑ Compliance with Non-discrimination and Related Requirements
- ❑ Economic Opportunities for Low- and Very Low-income Persons (Section 3)
- ❑ Real Property Acquisition and Relocation

# HUD Requirements for Compliance with Fair Housing and Civil Rights Laws (page 74 in NOFA)

1. Compliance with Non-discrimination and Related Requirements. (Unless otherwise specified, these non-discrimination and equal opportunity authorities and other requirements apply to all NOFAs.)
  - ❑ Compliance with Fair Housing and Civil Rights Laws Non-Tribal.
  - ❑ Improving Access to Services for Persons with Limited English Proficiency (LEP).
2. Equal Access to Housing Regardless of Sexual Orientation or Gender Identity.
3. Participation in HUD-Sponsored Program Evaluation.
4. OMB Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
5. Drug-Free Workplace.
6. Safeguarding Resident/Client Files.
7. Compliance with the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. 109-282) (Transparency Act), as amended.
8. Physical Accessibility.
9. Violence Against Women Act.
10. Conducting Business in accordance with Ethical Standards/Code of Conduct.

# Questions



- ❑ Questions about the *e-snaps* application, technical issues, & password issues should go to HUD through Virtual Help Desk (“Ask a Question”)
  - ❑ <https://www.hudexchange.info/program-support/my-question/>
  
- ❑ General BoS CoC/Application submission questions
  - ❑ Tina Moore
    - (404) 327-6870
    - Tina.moore@dca.ga.gov
  - ❑ Mike Thomas
    - (404) 679-0571
    - Michael.Thomas@dca.ga.gov

# Resources



- ❑ Balance of State CoC
  - ❑ <https://dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/georgia-balance-state-continuum-care>
- ❑ Balance of State CoC 2018 Competition page
  - ❑ <https://dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/georgia-balance-state-continuum-care/2018>
- ❑ 2018 Continuum of Care NOFA & CoC Competition page
  - ❑ <https://www.hudexchange.info/programs/e-snaps/fy-2018-coc-program-nofa-coc-program-competition/#nofa-and-notices>
- ❑ CoC Interim Regulations
  - ❑ <https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/#regulations>
- ❑ HUD Exchange
  - ❑ <https://www.hudexchange.info/>



Questions?



Georgia<sup>®</sup> Department of



# Community Affairs