Balance of State Continuum of Care
2019 NOFA Competition
New Project Applicant Meeting

Webinar #1 July 29, 2019 / 10:00 am
Webinar #2 August 1, 2019 / 1:00 pm

To access either Webinar Meeting, please register at:

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Georgia® Department of
Community Affairs

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)

2019 Balance of State CoC Process

❑ HUD released the Notice of Funding Availability (NOFA) (7/3/19)

❑ The Standards, Rating & Project Review Committee (7/19/19) established and the Balance of State CoC Board (7/24/19) approved:

  ❑ The 2019 Georgia BoS CoC NOFA Competition Policy, Process, Application Documents, Certification Policy Addendum, Coordinated Entry Policy 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 2019 BoS CoC Review Application – New Applicant documents

  ❑ Scoring Criteria for the project application reviews

❑ Competition opened and all materials released on 7/24/19

Policy Priorities from the HUD NOFA and CoC Responses

1. Ending Homelessness for All Persons (taking into account challenges faced by Veterans, Youth, Families, and Chronically Homeless
2. Create a Systematic Response to Ending Homelessness
3. Strategic Resource Reallocation
4. Using an Evidence-Based Approach
5. Increasing Employment
6. Providing Flexibility for Housing First with Service Participation Requirements

Policy Priorities from the HUD NOFA and CoC Responses

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

   ❑ Prioritization of 90% of non-dedicated PSH beds for people who are chronically homeless; Bonus points for projects currently providing PSH, projects that commit to low-barriers models; serving chronically homeless; PSH projects that increased chronic beds; projects serving or dedicated to Veterans/Youth-headed households; criteria for populations served; & Participation in Coordinated Entry

2. Create a Systematic Response to Ending Homelessness

   ❑ Criteria to measure system performance; Participant choice w/Housing First; project performance emphasis in reducing homelessness and serving most vulnerable; participation in Coordinated Entry; & planning as a system

Policy Priorities from the HUD NOFA and CoC Responses (continued)

3. Strategic Resource Reallocation

- ❑ Comprehensive review of project performance & impact on system performance

- ❑ Underspending projects (returning $10,000 or more) may be subject to reduction or reallocation (with exception of projects 2017 or later)

- ❑ 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, operating under capacity, or operating significantly out of compliance 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 CoC Responses (continued)

4. Using a an Evidence-Based Approach

- ❑ Criteria largely performance-based for renewals
  - Measure rate of positive housing outcomes
  - Measure returns to homelessness
  - Measure improvements in employment and income

5. Increasing Employment

- ❑ Employment criteria updated to measure increases
- ❑ Applicants required to submit information showing work with local employment agencies and employers, or plans to do so

Policy Priorities from the HUD NOFA and CoC Responses (continued)

6. Providing Flexibility for Housing First with Service Participation Requirements

- ❑ Bonus points for projects that utilize the HF Model
- ❑ Bonus points for projects that commit to low-barriers models
- ❑ Bonus points for projects that updated policies to reflect individuals are rapidly placed and stabilized in permanent housing without preconditions regarding income, work effort, sobriety, or other
- ❑ Applications scored through a HF/low-barrier lens

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

2. Tiered Approach
- ❑ Tier 1 = top 94.3% of funding available to the CoC
- ❑ Tier 2 = remaining 5.7% of funding available to the CoC <u>and</u> amounts available for PH bonus

- ❑ In Response
  - ❑ BoS CoC may reduce or reallocate projects currently providing PSH or RRH for underperformance, underutilization, or significant capacity issues
    - ◼ Grant utilization
    - ◼ Operating Under Capacity
    - ◼ Performance
    - ◼ Operating significantly out of Compliance
  - ❑ 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% ($997,708 available)
  - ❑ Domestic Violence (DV) Bonus Up to 10% ($1,995,416 available for RRH, Joint TH-RRH Component, and 1 DV-focused 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
    - Operating significantly out of Compliance
  - 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 (possible, but amount unknown 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-Coordinated Entry (Collaborative Applicant)
    - Expected up to $200,000
  - SSO-CE (under DV Bonus ONLY)
    - Applicant must focus on DV
    - Expected up to $150,000
- Reallocated funds used first if available (SSO-CE New Expansion, PSH, RRH, Joint TH-RRH only)
- New projects requesting 1 year of funding may request an initial grant term of 12 months to 18 months to allow for the additional start-up process (page 27 of the NOFA).

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/Coordinated Entry, increase the current HMIS/Coordinated Entry 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
    - Can opt to combine (extra application required if combining projects)
  - 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 CoC Responses (continued)

- ❑ BoS CoC 2019 ranking priorities
  - Renewal PSH and RRH projects that have been operational for over a year w/out significant capacity, compliance, or performance issues, operational projects transferred in the last 12-months, HMIS <u>and</u> Coordinated Assessment projects
  - New RRH and PSH projects awarded in the 2018 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 or Open Monitoring Findings, 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
    - ❑ *Failure to provide a plan to coordinate mainstream resources

Additional BoS CoC NOFA Priorities and Policies (continued)

❑ Applicants must commit to following Written Standards, VAWA Policy, and utilizing Coordinated Entry System

❑ Projects awarded for the first time in 2018 (not 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 (2018) 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.

Additional BoS CoC NOFA Priorities and Policies (continued)

❑ PSH projects that classify as DedicatedPLUS are required to include households with children to qualify as a DedicatedPLUS project.

❑ Under the CoC Program, households with children may not be categorically excluded from any project based solely on the basis of their familial status. Because households with children may not be categorically excluded, a CoC Program-funded project may not choose to exclusively serve households without children or single adults; however, it could choose to limit participation only to households with children.

❑ Current recipients and project applicants need to ensure that eligibility criteria established for each project is not limited only to single adults or does not automatically exclude households with children.

2019 HUD NOFA Competition

❑ As in past years, the application process is a two step process

  ❑ Review Application and all required documents for New project ranking

    ■ Mailed or dropped off at DCA (hard copies with <u>all required attachments</u>)

      ■ Application and both Addendums due no later than 5:00pm, August 7, 2019

    ■ 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 27, 2019

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, DCA, or other
  - Demonstrate the financial and management capacity and experience to carry out the project and experience to administer federal funds
  - Applicant, subrecipient, project, and participant eligibility
  - Demonstrate connection to mainstream service systems
  - Participate/agree to participate in CoC's Coordinated Assessment System & HMIS (or comparable database)
  - 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 <u>cannot</u> 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

RRH Project Application - HUD Threshold

- Rapid Re-Housing (RRH) projects funded through the 2019 NOFA may serve homeless individuals and families, including unaccompanied youth, who meet the following criteria:
  - may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.

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 and PH-RRH Component Project Application - HUD Threshold

▢ Joint TH and PH-RRH Component (Joint TH-RRH Component) projects funded through the 2019 NOFA may serve homeless individuals and families, including unaccompanied youth, who meet the following criteria:

❑ may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.

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
  - ❑ Provide crisis housing with financial assistance and 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

❑ Projects must serve people who meet the homeless definition under categories (1), (2), and (4)

❑ 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 with higher needs and most vulnerable.

❑ Target people in unsheltered locations or homeless youth in areas in which the PIT demonstrates need for more housing options.

❑ Demonstrate proposed service area is not covered by crisis housing **and** have a street outreach team, <u>or</u> be in a location where 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 <u>cannot</u> 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

Domestic Violence (DV) Bonus

- Domestic Violence (DV) Bonus:
  - RRH, Joint RRH-TH Component, or SSO-CE
  - Only 1 SSO-CE, no limit to number of RRH or Joint RRH-TH Component, and limited to 1-year funding
  - Must demonstrate trauma-informed, victim-centered approaches
  - RRH and Joint TH-RRH DV Bonus
    - Highest ranked projects that pass eligibility and quality threshold as funding allows
    - DV focused housing projects may be ranked with other new projects for CoC Bonus or reallocated funds if available
    - Expansions apply
  - Supportive Services Only Coordinated Entry (SSO-CE)
    - Highest ranked that passes eligibility and quality threshold DV Bonus
    - 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)

□ 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, and the number needing housing or services;
    - Data source the CoC used for the calculations;
    - 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.
- Applicants experience in utilizing trauma-informed, victim-centered approaches and how funding will meet this need.

Domestic Violence (DV) Bonus (cont'd)

❑ Application narratives for RRH & TH-RRH requests under DV Bonus should:

- Describe <u>and</u> 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;
- Provide data regarding rate of housing placement and rate of housing retention for DV survivors;
- Describe improvements in safety achieved for DV survivors; and
- Describe 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 (V.C.3.b & V.C.3.c HUD NOFA)

❑ 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 proposed project has a specific plan to coordinate and integrate with other mainstream health, social services, and employment programs and ensure that program participants are assisted to obtain benefits from mainstream programs for which they may be eligible.

❑ Whether program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs

❑ Also for Joint TH-RRH Component project, that the proposed project will provide enough rapid rehousing assistance that at any given time a participant may move from Th to permanent housing.

Match and Leveraging Documentation

❑ All <u>New project Review Applications</u> are required to submit documentation dated between May 1, 2019 and September 30, 2019, 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 <u>e-snaps</u> applications.

❑ **Note:** If third-party is listed in <u>e-snaps</u> 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://www.dca.ga.gov/node/1922/documents/10

❑ Families with children include ALL families with children.

❑ *Under the CoC Program, households with children may not be categorically excluded from any project based solely on the basis of their familial status.

❑ Equal access.

Participant Eligibility (NOFA pages 12-13)

Projects funded through the 2019 NOFA must have the following eligibility criteria for project participants:

- All projects must participate in coordinated entry, and selection of program participants must be consistent with the CoC's Coordinated Entry process.

- As provided by the Consolidated Appropriations Act, 2019, youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under this NOFA.

- Additionally, any youth-serving provider funded under this NOFA may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence.

  - HUD interprets "youth-serving provider" as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under.

  - HUD interprets "living in unsafe situations" as having an unsafe primary nighttime residence and no safe alternative to that residence. These youth-related requirements supersede any conflicting requirements

Participant Eligibility cont'd. (NOFA pages 12-13)

Project funded through the 2019 NOFA must have the following eligibility criteria for project participants (cont'd.):

❑ New Projects

  ❑ New PSH projects must serve one of the following:

   ▪ Persons who meet the definition of DedicatedPLUS where 100% units used to served DedicatedPLUS); or

   ▪ Persons experiencing chronic homelessness at the time they initially enrolled in project

  ❑ RRH and Joint TH-RRH Component projects may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.

Homelessness – Category 1

Category 1 – Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- ❑ Has a primary nighttime residence that is a public or private place not meant for human habitation;

- ❑ Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs; <u>or</u>

- ❑ Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Homelessness – Category 2

Category 2 – Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence, provided that:

- ❑ Residence will be lost within 14 days of the date of application for homeless assistance;
- ❑ No subsequent residence has been identified; <u>and</u>
- ❑ The individual or family lacks the resources or support networks needed to obtain other permanent housing

Homelessness – Category 4

Category 4 – Fleeing/Attempting to Flee DV

Any individual or family who:

- Is fleeing, or attempting to flee, domestic violence; dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

- Has no other residence; <u>and</u>

- (iii) Lacks the resources or support networks to obtain other permanent housing.

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.C.2.g. of the HUD NOFA

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

2019 Georgia Balance of State Point-in-Time Count:
- ❏ 267 (of 296) Chronically Homeless **Individuals** (90.2%)
- ❏ 12 (of 296, in 15 HH) Chronically Homeless Families (4.1%)
- ❏ 17 (of 296) Chronically Homeless HH with ONLY Children (5.7%)

New Permanent Supportive Housing (DedicatedPLUS)

Or PSH projects must meet requirements of DedicatedPLUS as defined in Section III.C.2.g. of the HUD NOFA (page 17), 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 <u>you can prove with adequate documentation</u>.

❑ All individuals and families with children served in New PSH projects MUST meet HUD definition of chronic homelessness or eligibility under DedicatedPLUS and agency MUST complete/provide homeless verification on ALL persons served.

❑ HUD Guidance at <u>https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/</u>

Examples of Persons NOT Eligible (PSH)

❑ 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

All projects must participate in coordinated entry, and selection of program participants must be consistent with the CoC's Coordinated Entry process.

New Rapid Re-Housing Projects & New Joint TH-RRH Component Projects

- Rapid Re-Housing (RRH) projects and Joint TH and PH-RRH Component projects funded through the 2019 NOFA may serve homeless individuals and families, including unaccompanied youth, who meet the following criteria:

  - may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.

**Homeless Verification also required.

- Individuals entering Joint TH-RRH projects lose Chronic Homeless Status

Examples of Persons NOT Eligible (RRH and Joint TH/RRH)

- ❑ 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 temporary shelter or transitional housing for homeless)
- ❑ Living in a hotel/motel (unless paid for by charitable organization or government program)
- ❑ 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

All projects must participate in coordinated entry, and selection of program participants must be consistent with the CoC's Coordinated Entry process

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 2019 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…

2019 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.

2019 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(j)(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, and if awared, New projects will need to meet this by the execution of the FY 2019 grant agreement in CoC.

Executive Order 12372
(Screen 1E. SF-424)

❑ The State of GA does not participate in the intergovernmental review process.

❑ On Screen 1E, select "b" if your organization is located within a state that has chosen not to participate in EO 12372…"

❑ Applicants wanting to verify can find Georgia's notice located at: http://opb.georgia.gov/state-clearinghouse

HUD's detailed instructions on addressing the 'Executive Order 12372' requirements within the Project Application is located within the project applicant detailed instructions guide on pages 10-11.

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 the Longitudinal System Analysis (LSA)

  - LSA data is used by HUD to prepare the Annual Homeless Assessment Report (AHAR), which Congress uses to determine future funding levels

- Data used by Continuum and Statewide for planning

- System Performance Data HUD's HDX system (Submitted May 31st)

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://www.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 and Mainstream Benefits*
- ❑ Report is based on data from HMIS and is reported through the Sage HMIS Reporting Repository

*New projects must provide a plan to coordinate with mainstream resources

Overall System Performance

FY2019 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.

　❑ *2019 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

All New Project Threshold

- Complete application, which includes all required documents, certifications, etc.

- Proposed has a specific plan to coordinate and integrate with other mainstream health, social, and employment programs to ensure that program participants are assisted to obtain benefits from the mainstream programs for which they may be eligible (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education).

- Utilization, or commitment to utilize, ClientTrack HMIS (or a comparable family violence HMIS alternative) to capture client-level data on all clients in the project.

- Agency is following, or committed to following the Balance of State CoC's Coordinated Entry System policy and process.

- Project is able to demonstrate compliance with the Fair Housing Act and 24 CFR 5.105(A)(2) – Equal Access to HUD.

- 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.

- ❑ Demonstrate project will be Low Barrier and prioritize rapid placement and stabilization in permanent housing

- ❑ 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.

2019 New Project Scoring
(161 Possible Points)

- Agency Capacity – 20 points
- Homeless and PSH/RRH/Joint TH-RRH Experience – 20 points
- Leasing, Rental Assistance, Services & HMIS Experience – 5 points
- Monitoring Findings or Concerns – 4 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
- Coordinated Entry Participation – 9 points
- Educational Liaison – 5 points
- Permanent Housing Stability (services) – 5 points
- Increase in Employment and/or Income (services) – 10 points
- Supportive Services – 5 points
- Prioritization – 10 points
- Housing Stability Performance Measures – 3 points
- Income Performance Measures – 3 points
- Project Evaluation – 2 points
- Budget – 10 points
- Project Match – 5 points
- Project Leveraging – 9 points

2019 New PSH Project Bonus Scoring (50 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

- ❑ 2019 Homeless Count Coordinator - 10 points

- ❑ Coordinated Entry Implementation (only agencies that are currently managing the assessment, prioritization, & referral process) – 20 points

Combined 2019 New PSH Project Scoring (211 Possible Points)

❑ Total possible points
  ❑ 161 possible points – Project Application Score
  ❑ 50 possible points – Bonus Score

❑ Please note – all new projects will be ranked against each other
❑ The highest scoring DV focused SSO-CE project that meets eligibility will be submitted under DV Bonus.
❑ Highest ranked DV focused housing projects may be ranked under the DV Bonus as funding allows, or ranked with other new projects for CoC Bonus or reallocated funds if available.

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

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

- July 26th & 30th, 2019 - Informational Webinar for Renewal PSH & RRH Applicants, and materials from the webinar posted/distributed

- July 29th & August 1st, 2019 - Informational Webinars for NEW PSH, RRH, Joint TH & PH-RRH, and SSO-CE applicants and materials from the webinar posted

- July 31, 2019 – **Proposal Outlines for NEW PSH, RRH, Joint TH & PH-RRH, SSO-CE projects Due**

- August 6, 2019 – Review Application Packages deadline for Renewal Applicants (full details in NOFA policy)

- **August 7, 2019** - **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 27, 2019 – 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 29, 2019 - Standards, Rating, and Review Committee meeting to approve and recommend ranking of projects held.

- September 4, 2019 - CoC Board meeting to approve ranking recommended by the Standards, Ratings, and Review Committee held.

- September 10, 2019 - Notification given to applicants of placement in scoring and ranking for all projects (due 9/15/19).

- September 17, 2019 - Corrections and resubmission of application in *e-snaps* due by 2:00pm.

- September 26, 2019 - Estimated public posting of CoC Application (due 9/28/19)

- September 27, 2019 - Estimated date to submit to HUD (due 9/30/19)

Review Application Packet

- ❑ Application Packages Due to be in DCA's office (hard copies) for scoring on **August 7, 2019 (by 5:00 pm) to include:**
  - ❑ Five (5) copies of the Review Application (New Project Review Application for PSH, RRH, or Joint TH-RRH Component) OR SSO-CE Proposal (including Match/Leveraging documentation, Certification Policy Addendum, & Coordinated Entry Policy Addendum documents in each of the copies)
  - ❑ 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 August 7th (hard copies)
- ❑ Then HUD Application due in e-snaps on August 27th

Certification Policy 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)

Coordinated Entry Policy 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)

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)
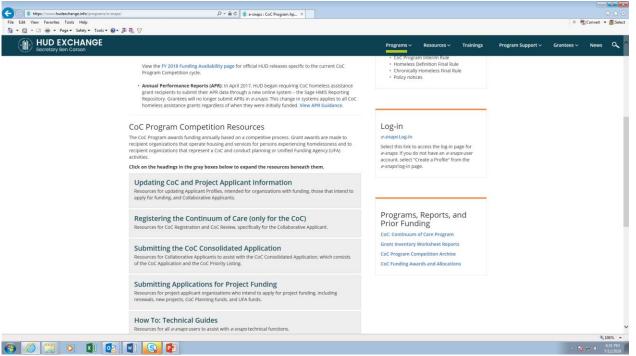
E-SNAPS Submission

- 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 27, 2019

- 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 17, 2019

- 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

- Applicants should reference HUD's detailed instructions to make sure responses are complete (e-snaps questions vary from review app.)

- **Applicant Profiles should have all required documents.

E-SNAPS Submission

□ Instruction Guides available at:

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

❑ CoC *Program* Competition Resources

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 45-46 of the HUD NOFA)

- ****Any required attachments correspond to the attachments list in *e-snaps* and the attachments contain accurate and complete information, and are dated between May 1, 2019 and September 30, 2019. (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 <u>AND</u> Subrecipient Eligibility
  - Applicant Certifications
  - Form HUD-2880, Applicant/Recipient Disclosure/Update Report (for <u>each</u> project)
  - SF-LLL – Disclosure of Lobbying Activities (if applicable)
  - HUD-50070 – Certification of a Drug-free Workplace

- Within Applicant Profile
  - Applicant Code of Conduct

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:
  - 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, 2019 and September 30, 2019.

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 24 & 72-73 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
  - Economic Opportunities for Low- and Very Low-income Persons (Section 3)
  - Improving Access to Services for Persons with Limited English Proficiency (LEP)
- Equal Access to Housing Regardless of Sexual Orientation or Gender Identity

HUD Requirements for Compliance with Administrative, National, & Department Policy (page 72-73 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. Participation in HUD-Sponsored Program Evaluation.
3. OMB Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
4. Drug-Free Workplace.
5. Safeguarding Resident/Client Files.
6. Compliance with the Federal Funding Accountability and Transparency Act of 2006 (Pub. L.109-282) (Transparency Act), as amended.
7. Physical Accessibility.
8. Violence Against Women Act.
9. Conducting Business in accordance with Ethical Standards/Code of Conduct.
10. All Federal statutes, including federal immigration and criminal law, must be followed.

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
     April Woods
     (404) 679-0651
     April.Woods@dca.ga.gov

Resources

❑ Balance of State CoC

https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/georgia-balance-state-continuum-care

Balance of State CoC 2019 Competition page

https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/georgia-balance-state-continuum-care/2019

❑ 2019 Continuum of Care NOFA & CoC Competition page

https://www.hudexchange.info/programs/e-snaps/fy-2019-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® Department of Community Affairs