

**Alameda County CoC Local Application Process**  
**2019 HUD Continuum of Care NOFA**  
**FREQUENTLY ASKED QUESTIONS**  
**7/25/2019 – 8/2/2019**

**Questions from Bidder’s Conference on 7/30/2019:**

- 1) What does it mean to have flexible low-barrier policies?  
A: HUD’s added new policy priority for Flexibility for Housing First with service participation requirements (NOFA, Page 6) continues to emphasize priority for housing placement with no preconditions regarding “income, work effort, sobriety or any other factor.” Once in housing, participants “never face requirements to participation in services as a condition of retaining housing.” This NOFA provides communities and programs with flexibility to use service participation requirements to promote important positive housing outcomes once a person has been stably housed. For example, RRH projects can set the expectation that participants check in with a housing navigator weekly about progress on plan to increase income but cannot discontinue participant from the program if participant does not meet regularly with housing navigator.
  
- 2) Can a PSH project ask for an expansion grant of an existing project serving DV survivors to fund 2 unfunded units and at the same time expand services for DV survivors in all units at the site, or projects are only allowed to fund services for the 12 units funded through CoC funds?  
A: Expansion of existing services is allowed for renewing project applicants to add units, beds, persons served, and services provided to existing participants (NOFA, Page 18 and AAQ HUD Exchange response on 7/25). We will submit an additional AAQ to HUD to determine if expansion of services for participants residing in non-CoC units is permitted, and we encourage projects to do the same.
  
- 3) Why is PSH not an eligible project type for the Domestic Violence (DV) bonus? We do not need more RRH units but rather PSH exits for DV survivors. We are not sure we need more rapid rehousing in Alameda County.  
A: Since HUD’s inclusion of the DV Bonus in 2018, permanent supportive housing has not been an eligible project type – only the Permanent Housing-Rapid Rehousing (PH-RRH) and Joint TH and PH-RRH component projects (NOFA, Page 7). HUD has reported that in many CoCs DV providers believe RRH has been a highly successful model to house DV survivors nationwide, and highly recommends the TH and PH-RRH model. Existing CoC funded DV providers that administer PSH projects can propose to expand units, beds, persons served, and services provided to existing survivors under the CoC available Bonus.
  
- 4) Does the CoC Committee have a recommendation on the number of projects to be funded through the DV Bonus? If there are several proposals, how will you decide to allocate the funds?  
A: The 2019 Strategic Direction of the HUD CoC Committee indicates that the CoC is soliciting applications from CoC and non-CoC grantees to apply “for the maximum amount allowed under the Domestic Violence (DV) Bonus for housing and services” targeting domestic violence survivors. Instructions for the 2019 Local Application for New Projects also indicate that all

eligible applicants can submit a DV Bonus new project application(s) not to exceed the available DV Bonus amount of **\$1,061,972** (Funding Opportunities, Page 2). Since the CoC can submit any number of applications for RRH and Joint TH and PH-RRH DV projects, the NOFA committee will review all competitive DV Bonus projects and requested amounts. If combined the eligible applications exceed the allowable DV Bonus amount, the NOFA Committee may invite all competitive projects to resubmit their proposal under a lower amount, or may choose to include in the consolidated application the DV Bonus project application(s) in order of priority according to the approved Rating and Ranking Policy, up to the amount of the DV Bonus available for the CoC.

5) What is a Joint TH and PH-RRH project?

A: The Joint TH and PH-RRH component project combines two existing program components—transitional housing and permanent housing—rapid rehousing—in a single project to serve individuals and families experiencing homelessness. Recipients should prioritize those with the highest needs using an evidence-based approach designed to provide stable housing and services that, to the greatest extent possible, move the participant towards self-sufficiency and independence. Program participants may only receive up to 24-months of total assistance (NOFA, page 18). EOH staff has posted a cheat-sheet from 2017 when the new Joint Component project type was first developed by HUD. Please refer to Everyone Home website at <http://everyonehome.org/our-work/hud-coc-nofa/>.

6) Under the DV bonus, are trafficking survivors eligible?

A: A DV Bonus project is a project that is dedicated to survivors of domestic violence, dating violence, or stalking who qualify under paragraph (4) of the definition of homelessness under 24 CFR 578.3. HUD has clarified that persons who are fleeing or attempting to flee human trafficking, including sex trafficking, may qualify as homeless under paragraph (4) of the homeless definition, and therefore, the individuals may be eligible for certain forms of homeless assistance under the CoC program (NOFA, Page 18).

See below 24 CFR 578.3 Paragraph 4:

**(4)** Any individual or family who:

**(i)** Is fleeing, or is 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;

**(ii)** Has no other residence; and

**(iii)** Lacks the resources or support networks, *e.g.*, family, friends, and faith-based or other social networks, to obtain other permanent housing.

7) In the DV Bonus, the SSO-CE project type is for coordinated entry for DV survivors? Since we are not yet coordinating the two systems (CoC and DV) could we apply for another project to provide training and technical assistance or an expansion of the recently awarded SSO-CE to try to solve that problem?

A: For DV Bonus projects, eligible project types include proposed new Rapid Rehousing (RRH) and new Joint Transitional Housing and Permanent Housing – Rapid Rehousing component types (TH and PH-RRH) to serve individuals and families fleeing or attempting to flee DV, dating violence, sexual assault, stalking and trafficking (New Projects Local Application Instructions, page 2). Although the SSO-CE DV Bonus Project awarded in the FY 2018 competition technically

could apply for an expansion (see NOFA Section II.B.3, page 7), it is not yet under contract and has not been implemented. The NOFA Committee is not inviting an expansion of this project type at this time.

8) Do you need to have site control for the application?

A: Yes, evidence of site control is required for any proposed Direct-Grantee Site-Based projects for which HUD would be paying leasing, operating or rehabilitation cost on a building, both residential and service delivery sites (New Projects Local Application Instructions, Page 3). HUD requires evidence of site control prior to making an award; see NOFA Section VI.C.1 (page 42) and Section IX.C.3.a (page 73) for additional project information that HUD will request from conditionally selected applicants. The CoC requires evidence of site control be submitted with the proposed project applications. Please contact Everyone Home via email at [info@everyonehome.org](mailto:info@everyonehome.org) if you have questions regarding what documentation is required.

9) Would you reconsider not inviting the expansion of our CE project? A significant portion is now funded by AC3 Care Connect funds, which are going away in December 2020.

A: The NOFA Committee will allow an application for an SSO-CE expansion project in the 2019 Local competition. The SSO-CE expansion will not receive incentive points at this time. In addition to meeting HUD's rating factors for SSO-CE new projects (NOFA, Page 37), the proposal must articulate: 1) How CE project funds have been used over the past year, 2) How expansion funds would be used, 3) How the proposed CE expansion funds would address CE service gaps identified by the CoC, 4) How proposed CE expansion funds will improve the CoC's system performance.

10) How much could be subject to involuntary reallocation?

A: The Involuntary Reallocation Policy establishes that grants that have a history of significant underspending will be candidates to have their grant amount reduced involuntarily by the NOFA Committee. Significant underspending is defined as a minimum of three years of grant underspending of 10% or greater (2019 Review and Ranking Policy, Page 4). The NOFA Committee has discretion to recommend projects for involuntary reallocation (2019 Review and Ranking Policy, Page 5) and will determine the projects' funding reallocation amount based on the project's underspending, its overall performance and ranking, the CoC guiding principles, and community needs to assure the submission of a competitive CoC package. Any project subject to involuntary reallocation will have the opportunity to meet with the NOFA Committee at the rating and ranking session.

11) Can you clarify who are considered Eligible Applicants that can apply for a new PSH or RRH project (not expansion or transition)?

A: Any eligible applicant, whether currently administering a CoC-funded project or not, can apply for a new PSH or new RRH project. To apply for a new project, Applicants must be a non-profit or entity of local government and must demonstrate financial and management capacity and appropriate qualifications, including prior experience managing projects and performing activities like those proposed in the application, prior performance on relevant grants, and experience in utilizing government funds (New Projects Local Application Instructions, page 1).

12) Can you give clarification on the HUD Timeliness Standards in the Threshold Criteria?

A: Project applicants must demonstrate they will be able to meet all timeliness standards per 24 CFR 578.85. For the FY2019 NOFA competition, awarded applicants will need to execute the grant agreement with HUD before the end of calendar year 2020. Once in contract, the CoC requires new projects to be fully operational (i.e. leased up or placed participants in scattered site units) and expending grant funds within 12 months of the contract date. (NOFA, Page 74).

13) If Lead Applicant isn't in HMIS or have an APR, but a project partner who will provide services is an HMIS user, can you use the partner's APR?

A: Yes, applicants proposing new projects can submit up to two (2) Annual Performance Reports (APRs) or comparable reports (New Projects Local Application Instructions, Page 3). These can be from any of the proposed project partners who have experience with the proposed project type and services.

14) Can you give clarification with what APR or comparable reports should be submitted if we are an existing grantee proposing new projects? Does it have to be one or two?

A: For CoC funded applicants who are proposing an expansion of an existing project servicing the same population with the same activities, only one APR is required. EveryOne Home will use the APR submitted with the renewal application for the new project expansion. CoC funded applicants who are converting to a different project type or propose expanding the project to a different population should attach an additional APR or comparable report from the project type proposed. (New Projects Local Application Instructions, 3.HMIS Page 3). Please contact EveryOne Home via email at [info@everyonehome.org](mailto:info@everyonehome.org) if you have questions about which reports to attach.

15) If we are not a CoC grantee, how will you compare a report if you have no benchmarks?

A: HUD wants agencies to have a comparable database. We will be looking for data from a verifiable data base that corresponds to the HUD performance factors. The CoC has established benchmarks for these factors. The New Project Application Form, Section 3, and the supplemental calculator tool (on the EveryOne Home website <http://everyonehome.org/our-work/hud-coc-nofa/>) include the CoC benchmarks and how they are calculated. The charts walk you through the data points that are used and how the outcomes are measured. Please contact EveryOne Home via email at [info@everyonehome.org](mailto:info@everyonehome.org) if you have questions about which reports to submit.

16) Can you give clarification on the requirement for site control?

A: Please see the response to #8 above. We recommend that you review HUD requirements for executing grant agreements for site-based projects, including site control, environmental review, etc. This has been an ongoing local requirement in order to ensure that the project will be able to execute a grant agreement with HUD, begin operations and expend the funds within the NOFA funding timeline. If you have any questions regarding what documents can be used to demonstrate site control, please contact EveryOne Home via email at [info@everyonehome.org](mailto:info@everyonehome.org).

17) Can you clarify the purpose of the narrative budget question for Joint TH and PH-RRH projects?

A: When a program participant is enrolled in a Joint TH and PH-RRH component project, the recipient or subrecipient must be able to provide both components, including the units

supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all participants (See NOFA Section III.C.2.n, Page 19). Since HUD scores Joint TH and PH-RRH new projects on their ability to provide enough rapid rehousing assistance to ensure that at any given time a program participant may move from transitional housing to permanent housing. This may be demonstrated by identifying a budget that has twice as many resources for the rapid rehousing portion of the project than the TH portion, by having twice as many PH-RRH units at a point in time as TH units, or by demonstrating that the budget and units are appropriate for the population being served by the project. (See NOFA Section V.C.3.c Rating Factors, page 36).

18) Can the screenshots we provide to demonstrate timely APR submission be from Sage? We no longer use esnaps.

A: Yes, if your project has transitioned to Sage for APR reporting, provide the screenshot from that system that includes the information to demonstrate you meet the scoring criteria. If you have used esnaps screenshots in prior years for APR reporting, please submit those as well.

19) For renewal projects that consolidated last year, can you clarify which APR we should submit and will be used to score?

A: Projects that consolidated during the FY 2018 process are still required to apply. However, this will be limited to one renewal application and can be a project of your choice (within the consolidation). The project selected must have a full twelve months of data since October 1, 2017 to be evaluated (Renewal Instructions, Page 1).

20) Are any of the HUD CoC projects that are currently funded master-leased?

A: Please review HUD Continuum of Care program eligibility requirements. Leasing is an eligible cost category under the PH, TH, SSO, and HMIS program components. Funds may be used to lease individual units or all or part of structures. Rents must be reasonable, and, in the case of individual units, the rent paid may not exceed HUD-determined Fair Market Rents. Leasing funds may not be used for units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure without a HUD-authorized exception. When leasing funds are used to pay rent on units, the lease must be between the recipient or the subrecipient and the landowner, with a sublease or occupancy agreement with the program participant. The recipient may, but is not required to, charge the program participant an occupancy charge, consistent with the parameters specified in the interim rule.

<https://www.hudexchange.info/programs/coc/coc-program-eligibility-requirements/>

**Questions received via e-mail 7/25/2019 – 8/1/2019:**

21) Are projects that reallocated from TH to TH and PH-RRH considered “new projects.” Do they need to submit an application, and/or do they qualify for automatic position on Tier 1 under the new Ranking Policy?

A: Projects that recently reallocated from general Transitional Housing (TH) to the Joint TH and PH-RRH component are required to submit a renewal application and be evaluated according to their existing general Transitional Housing data for the corresponding period (See Renewal

Project Instructions, page 1). The NOFA Committee has recommended that any project (whether recently reallocated, consolidated or expanded) that has access to data will be evaluated for their performance using such data. Over the next year, we will have a collaborative discussion on how should the CoC evaluate joint component projects with dual data (TH and RRH) moving forward.

22) In the Incentive Points section, I notice two points are awarded in 5b if the “Project applies to Consolidate one or more CoC-funded projects or if already consolidated in prior year.” However, in 5a, if the project “voluntarily reallocates unspent funds,” points do not appear to be awarded if this has happened in the prior year, as in the case of consolidation. Will EOH consider making this “or in the prior year” apply to both 5a and 5b?

A: No, points awarded in the 2019 Renewal Application Scoring Tool Section 5 are for new voluntary reallocation in the 2019 NOFA local renewal application process, not for reallocation that occurred in previous years.

23) Regarding 5b, Fiscal Management: What is the timeframe for the findings that should be addressed in this section of the application?

A: Thank you for noticing that we have missed to indicate the time frame for Audits (including findings) required to be submitted for renewing and new projects. The time frame for Audits (or Financial Statement) is for fiscal year ending on 6/30/18 or more recently.

24) Regarding the involuntary reallocation: I learned from EOH at the Bidders’ Conference that the NOFA Committee will be moving forward with the involuntary reallocation policy. If a program is consistently underspend by 10+% over three years, how will the amount of the reallocation be calculated? Will it be the amount of the underspending in the 3<sup>rd</sup> (most recent) year? Or the amount of the underspending averaged across all three years? Some other method?

A: Please refer to answer on Question #10.