

## SUMMARY OF THE 2018 CONTINUUM OF CARE NOTICE OF FUNDING AVAILABILITY (COC NOFA)

This summary includes highlights from the 2018 CoC NOFA, the HUD email announcement regarding its release, and a Change Log that HUD published the same day. Some relevant information is not included in the NOFA, but will be apparent once HUD opens *e-snaps* and releases the Detailed Instructions.

### BACKGROUND

The CoC Program (24 CFR Part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless; and to optimize self-sufficiency among those experiencing homelessness.

Each year the U.S. Department of Housing and Urban Development (HUD) releases a Notice of Funding Availability (NOFA), signifying the beginning of a funding competition among approximately 450 Continuums of Care (CoC), the community stakeholder groups that guide local responses to homelessness. The 2018 CoC NOFA was released on June 20, 2018, opening the competition making available **APPROXIMATELY \$2.1 BILLION NATIONALLY** to serve people experiencing homelessness. The information in the NOFA sets forth the competition rules and processes for 2018. This summary includes the highlights of the NOFA -- additional guidance will be shared as it is made available.

Before the application is submitted to HUD, the CoC is required to hold a local competition to determine which projects will be included in the consolidated application, along with their relative priority. The results of the local competition dictate which projects the CoC will seek to fund. Additional information about project application requirements and standards will be available at the upcoming Technical Assistance Workshop. Additional details about anything in this summary can be found in the NOFA, available at:

<https://www.hudexchange.info/resource/5719/fy-2018-coc-program-nofa/>

### KEY THEMES IN THIS YEAR'S NOFA

As described in more detail below:

- CoCs may apply for DV Bonus Projects to serve survivors of domestic violence, dating violence, and stalking.
- Reallocation and Bonus funding may be combined, and Bonus funding may be used to fund HMIS or Coordinated Entry projects, not just permanent housing
- Applicants may transition their project(s) from one CoC Program Component to another over a one-year grant cycle.
- Applicants may consolidate two, three, or four eligible renewal projects into one project during the application process.
- Applicants may apply for new funding to expand CoC-Program-funded or non-CoC-Program-funded projects.

- HUD had added a policy priority indicating that CoCs should work to develop partnerships with Public Housing Authorities (sometimes called PHAs) to work toward helping CoC Program participants exit Permanent Supportive Housing through Housing Choice Vouchers (formerly Section 8 vouchers) and other available housing options.
- HUD has underscored that efforts to prevent and end homelessness should consider and address racial inequities to achieve positive outcomes for all persons experiencing homelessness.

#### IMPORTANT HUD-REQUIRED DATES

- **WEDNESDAY, JUNE 20, 2018**: 2018 CoC Program NOFA release date
- On or after **THURSDAY, JUNE 28, 2018**: *e-snaps* will be available.
- On or before **SUNDAY, AUGUST 19, 2018** (30 days prior to submission deadline): All project applications are required to be submitted to the CoC.
- On or before **MONDAY, SEPTEMBER 3, 2018** (15 days prior to submission deadline): The CoC is required to notify all project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC.
- On or before **SUNDAY, SEPTEMBER 16, 2018** (2 days prior to submission deadline): CoCs must post on their website (or a partner’s website) all parts of the CoC Consolidated Application – including the CoC Application attachments, the completed Priority Listing, and the Project Applications – and notify community members and key stakeholders that the Consolidated Application is available.

**SUBMISSION DEADLINE:**

**TUESDAY, SEPTEMBER 18, 2018 AT 8:00 PM EDT/6:00 PM CDT/5:00 PM PDT**

- HUD may issue up to two conditional funding announcements.
- **SEPTEMBER 30, 2020**: All conditional funds awarded in this competition must be obligated.
- **SEPTEMBER 30, 2025**: Obligated funds must be expended.

#### AVAILABLE FUNDING FOR OUR COC

This year, in our CoC, the eligible application amounts are as follows:

- CoC’s estimated Annual Renewal Demand: **\$725,047**
  - Estimated Tier 1 (94% of Annual Renewal Demand): **\$681,544**
  - Estimated Tier 2 (remainder of Annual Renewal Demand + Bonus amount): **\$87,006**
    - Estimated Bonus amount (6% of Final Pro Rata Need): **\$43,503**
- Estimated DV Bonus amount (10% of Preliminary Pro Rata Need or a minimum of \$50,000, whichever is greater, or maximum of \$5 million, whichever is less): **\$50,000<sup>1</sup>**
- Estimated CoC Planning amount (3% of Final Pro Rata Need or \$1,250,000, whichever is less): **\$21,751** (not ranked)

<sup>1</sup> 2018 PPRN has not yet been released; Napa’s 2017 PPRN was \$156,037. Ten percent of that PPRN is \$15,603 so \$50,000 will be close to the estimated DV Bonus.

## 2018 HUD COC POLICY PRIORITIES

CoCs will be evaluated based on the extent to which they further HUD's policy priorities. The policy priorities listed this year are:

**1. ENDING HOMELESSNESS FOR ALL PERSONS**

- a. CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
- b. CoCs should measure their performance based on local data taking into challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, and those experiencing chronic homelessness).
- c. CoCs should have a comprehensive outreach strategy to identify and continuously engage all unsheltered individuals and families.
- d. CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.
- e. CoCs should use the reallocation process to create new projects that improve their overall performance and better respond to their needs.

**2. CREATING A SYSTEMIC RESPONSE TO HOMELESSNESS**

- a. CoCs should be using system performance measures such as the average length of homeless episodes, rates of return to homelessness, and rates of exit to permanent housing destinations to determine how effectively they are serving people experiencing homelessness.
- b. CoCs should be using their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent.

**3. STRATEGICALLY ALLOCATING AND USING RESOURCES**

- a. Using cost, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness.
- b. CoCs should review project quality, performance, and cost effectiveness.
- c. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness.
- d. **\*\*NEW THIS YEAR\*\*** CoCs should work to develop partnerships with Public Housing Authorities to work toward helping CoC Program participants exit Permanent Supportive Housing through Housing Choice Vouchers and other available housing options.
- e. CoCs should review all projects eligible for renewal in FY 2018 to determine their effectiveness in serving people experiencing homelessness, including cost effectiveness.

**4. USING A HOUSING FIRST APPROACH**

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

## APPLICATION STRUCTURE

The CoC Consolidated Application is made up of three parts:

1. **CoC Application** provides information about the CoC planning body, governance structure, overall performance, and the strategic planning process. This part of the application is scored and will determine the order in which CoCs are funded.
2. **Project Applications**
3. **CoC Priority Listing** ranks all project applications in order of priority.

## REVIEW AND RANK CHANGES AND REMINDERS

HUD requires CoCs to review and rank projects submitted by project applicants, except CoC planning projects, having them fall into two Tiers based on a financial threshold. All projects must pass HUD's eligibility and threshold requirements to be funded, no matter their priority.

### TIER 1

- In 2018, Tier 1 is equal to 94% of the CoC's FY 2018 Annual Renewal Demand.
- Tier 1 projects will be conditionally selected from the highest-scoring CoC to the lowest-scoring CoC, provided the project applications pass both eligibility and threshold review. In the event insufficient funding is available under this NOFA to award all Tier 1 projects, Tier 1 will be reduced proportionately, which could result in some Tier 1 projects falling into Tier 2. Therefore, CoCs should carefully determine the priority and ranking for all project applications in Tier 1 as well as Tier 2.

### TIER 2

- Projects in Tier 2 are less likely to be funded, and every Tier 2 project will be scored using a 100-point scale based on three factors that have not changed since last year's competition:
  - **COG SCORE.** Up to 50 of 100 points will be awarded in direct proportion to the score received on the CoC Application.
  - **COG PROJECT RANKING.** Up to 40 of 100 points for the CoC's ranking of the project application(s). To more evenly distribute funding across CoCs and take into account the CoC's ranking of projects, point values will be assigned directly related to the CoC's ranking of projects. Additional details are available in the NOFA.
  - **COMMITMENT TO HOUSING FIRST.** Up to 10 of 100 points for:
    - How the permanent housing project commits to applying the Housing First model;
    - How the Transitional Housing project, Joint Transitional Housing and Rapid Rehousing Component project, safe haven project, or Supportive Services Only project that is not for centralized or coordinated assessment demonstrates that it is low-barrier, prioritizes rapid placement and stabilization in permanent housing, and does not have service participation requirements or preconditions to entry (such as sobriety or a minimum income threshold); or
    - How the HMIS project or Supportive Services Only project for a centralized or coordinated assessment system will automatically receive 10 points.

## IMPORTANT COC STRATEGY REMINDERS

- CoCs cannot receive grants for new projects, other than through reallocation, unless the CoC competitively ranks projects based on how they improve system performance.
- HUD is increasing the share of the CoC score that is based on performance criteria.
- HUD will prioritize funding for CoCs that have demonstrated the ability to reallocate resources to higher performing projects.

## NEW HUD POLICIES RELATED TO PROJECT APPLICATIONS IN 2018

### TRANSITION GRANTS

- Applicants may transition renewal projects from one CoC Program component (e.g. Transitional Housing to Rapid Rehousing, Rapid Rehousing to Permanent Supportive Housing) to another using the CoC Program Competition.
- To be eligible to receive a transition grant, the renewal project applicant must have the consent of its CoC.
- To create a transition grant, the CoC must wholly eliminate one or more projects and use those funds to create the single, new transition grant.
- For a new project to be considered a transition grant, the applicant for the new project must be the same recipient for the eligible renewal grant(s) being eliminated, and the applicant must provide the grant number(s) of the projects being eliminated to create the new project and attach a copy of the most recently awarded project application (e.g., if the project was last funded in the FY 2017 CoC Program Competition, a copy of the FY 2017 CoC Program Competition project application must be attached to the project application).
- No more than 50% of each transition grant may be used for costs of eligible activities of the program component originally funded. All remaining funds awarded must be used for eligible activities awarded under the new component for the project.
- Transition grants conditionally awarded in the FY 2018 CoC Program Competition will have one year to fully transition from the original component to the new component and this will take place during the transition grants normal operating year.
- The project's operating start date will be the day after the end of the previous grant term for the expiring component, i.e., the transition grant will have the same operating year as the expiring component project. For transition grants reallocated from more than one project, the operating start day of the transition grant will be the day after the end of the earliest expiring grant term.
- By the end of the FY 2018 operating year, the transition grant must be operating under the new component and will be eligible to apply for renewal in the next CoC Program Competition under the component to which it transitioned.
- If HUD determines that a new project that applied to be a transition grant does not qualify to be a transition grant, but meets all other new project requirements, then HUD may award the project as a new project that is not a transition grant. In these instances, the recipient will not be permitted to expend any FY 2018 funds on activities not included in the new project application.

### CONSOLIDATED PROJECTS

- Eligible renewal project applicants may consolidate two, three, or four eligible renewal projects into one project application during the application process.

- This means that a CoC Program recipient no longer must wait for a grant agreement amendment to be executed to consolidate two or more grants before it can apply for a single consolidated project in the CoC Program Competition. However, prior to beginning the consolidation process in the project application, the applicant should consult with the local HUD field office to ensure it is eligible to consolidate the projects.
- The projects being combined during a grant consolidation will continue uninterrupted.
- To be eligible for consolidation, projects must have the same recipient and be for the same component; and they will be funded in this competition only with FY 2018 funds (meaning no funds recaptured from prior years will be awarded to the project).
- HUD will not permit projects to consolidate if they have:
  - Outstanding audit or monitoring findings;
  - Outstanding obligation to HUD that is in arrears;
  - Unresolved construction delays;
  - History of poor financial management or drawdown issues;
  - History of low occupancy levels, or lack experience in administering the project type; or
  - Other capacity issues.
- To apply for a consolidated grant, applicants must submit separate renewal project applications for each of the grants that are proposed to be consolidated, and an application for the new consolidated grant with the combined budget and information of all grants proposed for consolidation. Project applications for the grants that are proposed to be consolidated will be ranked, and if all those grants are selected, HUD will award the single consolidated grant. If one of the grants proposed to be consolidated is found to be ineligible for consolidation or is not selected, HUD will award all grants that are eligible for renewal and selected as separate grants.
- The start date for the consolidated grant, if conditionally awarded, will be the day after the expiration date of the eligible renewal project with the earliest expiration date. The expiration date for the consolidated grant will be calculated by averaging the expiration dates for all expiring grants included in the consolidated grant weighted by the size of each expiring grant.

### EXPANSION PROJECTS

- A renewal project applicant may submit a new project application to expand its current operations by adding units, beds, persons served, services provided to existing program participants, or in the case of HMIS, increase the current HMIS grant activities within the CoC's geographic area.
- There are two types of expansions:
  - Expanding a CoC-Program-funded Project. Expansion in which a project applicant submits a new project application to expand the current operations of an eligible renewal project for which it is the recipient by adding additional CoC Program funds. Under this type of expansion, for the new expansion project to be selected for conditional award the renewal project application must also be selected for conditional award.
  - Expanding a non-CoC Program funded project. Expansion in which a project applicant submits a new project application that requests CoC Program funds to add to a current homeless project that is funded from sources other than CoC Program funds. Note that project applicants are prohibited from using CoC Program funds to replace state and local funds.

### REALLOCATION

## NAPA CONTINUUM OF CARE

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

## ELIGIBLE NEW PROJECTS

- **\*\*NEW THIS YEAR\*\*** CoCs may submit new projects created through reallocation, bonus, or a combination of reallocation and bonus, new DV Bonus projects, CoC planning project.
  - Because new project applications may be created through the reallocation or bonus processes, if HUD determines that a project applicant or a CoC incorrectly classified one or more new projects as reallocation or bonus, HUD may reclassify the project(s) as either reallocation or bonus if the CoC exceeded either its reallocation or bonus amount.
  - If a project applicant uses both reallocation and bonus amounts to create a single new project but did not have sufficient amounts available from either source, HUD will reduce the project to the amount available, if any.

## DOMESTIC VIOLENCE (DV) BONUS

- Due to up to \$50 million set aside in the FY2018 HUD Appropriations Act, CoCs will be able to apply for a DV Bonus for Rapid Rehousing projects, Joint Transitional Housing and Rapid Rehousing Component projects, and Supportive Services Only projects for Coordinated Entry. A CoC may apply for up to 10% of its PPRN, or a minimum of \$50,000, whichever is greater, or a maximum of \$5 million, whichever is less, to create up to three DV Bonus projects with 1-year grant terms.
- A CoC may apply for **ONE OF EACH** of the following types of projects:
  - Rapid rehousing projects that must follow a housing first approach.
  - Joint Transitional Housing and Rapid Rehousing component projects that must follow a housing first approach.
  - Supportive Services Only Projects for Coordinate Entry 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.
- A CoC can only submit one project application for each of the project types above. If a CoC submits more than one project application for each project type, HUD will only consider the highest ranked project that passes eligibility and quality threshold review for the DV Bonus and will consider any other project for funding as a regular bonus project.
- A CoC may apply to expand an existing renewal project that is not dedicated to serving survivors of domestic violence, dating violence, sexual assault, or stalking to dedicate additional units, beds, persons served, or services provided to existing program participants to this population.
- CoCs are required to rank all DV Bonus projects on the New Project Listing of the CoC Priority Listing with a unique rank number. If a project application designated as DV Bonus is conditionally selected by HUD with DV Bonus funds, HUD will remove the ranked DV Bonus project from the New Project Listing and all other project applications ranked below the DV Bonus project will slide up one rank position. If the DV Bonus project application is not conditionally selected with DV Bonus funds, the project application will remain in its ranked position and will be considered for conditional award under the regular bonus amount available to the CoC.
- For projects the CoC indicates it would like considered as part of the DV Bonus, HUD will award a point value to each project application combining both the CoC Application score and responses to the DV-Bonus-specific questions in the CoC Application using the following 100-point scale:

## NAPA CONTINUUM OF CARE

- For Rapid Rehousing and joint Rapid Rehousing and Transitional Housing component projects:
  - **CO C SCORE.** Up to 50 points in direct proportion to the score received on the CoC Application.
  - **NEED FOR THE PROJECT.** Up to 25 points based on the extent the CoC is able to quantify the need for the project in its portfolio, the extent of the need, and how the project will fill that gap.
  - **QUALITY OF THE PROJECT APPLICANT.** Up to 25 points based on the previous performance of the applicant in serving survivors of domestic violence, dating violence, sexual assault, or stalking, and their ability to house survivors and meet safety outcomes.
- For Supportive Services Only projects for Coordinated Entry:
  - **CO C SCORE.** Up to 50 points in direct proportion to the score received on the CoC Application.
  - **NEED FOR THE PROJECT.** Up to 50 points based on the extent to which the CoC is able to demonstrate the need for a Coordinated Entry system that better meets the needs of survivors of domestic violence, dating violence, sexual assault, or stalking, and how the project will fill this need.

## ELIGIBLE TYPES OF NEW PROJECTS CREATED THROUGH REALLOCATION AND/OR BONUS

- **PERMANENT HOUSING-PERMANENT SUPPORTIVE HOUSING PROJECTS** that meet the requirements of DedicatedPLUS or where 100% of the beds are dedicated to individuals and families experiencing chronic homelessness, as defined in 24 CFR 578.3.
- **PERMANENT HOUSING-RAPID REHOUSING PROJECTS** that will serve homeless individuals and families, including unaccompanied youth.
- **JOINT TRANSITIONAL HOUSING AND RAPID REHOUSING COMPONENT PROJECTS** to better serve homeless individuals and families, including individuals or families fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who meet the following criteria:
  - Residing in a place not meant for human habitation;
  - Residing in an emergency shelter;
  - Person meeting the criteria of paragraph (4) of the definition of homeless, including persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking;
  - Residing in a Transitional Housing project that is being eliminated;
  - Residing in Transitional Housing funded by a Joint Transitional Housing and Rapid Rehousing Component project; 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.
- **DEDICATED HMIS PROJECTS** for the costs at 24 CFR 578.37(a)(2) that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant, and that is listed on the HMIS Lead form in the CoC Applicant Profile in *e-snaps*.
- **SUPPORTIVE SERVICES ONLY PROJECTS FOR COORDINATED ENTRY** to develop or operate a centralized or coordinated assessment system.

## IMPORTANT POINTS FOR RENEWAL PROJECTS

## NAPA CONTINUUM OF CARE

- **DEDICATED PLUS PROJECTS.** A renewal project that is Permanent Supportive Housing 100% dedicated to chronically homeless people may either become a DedicatedPLUS project or may continue to dedicate 100% of its beds to chronically homeless individuals and families. If a renewal project that has 100% of its beds dedicated to chronically homeless individuals and families elects to become a DedicatedPLUS project, the project will be required to adhere to all fair housing requirements at 24 CFR 578.93.
  - **\*\*NEW THIS YEAR\*\*** Projects that were awarded as DedicatedPLUS in the FY 2017 CoC Program Competition are required to include households with children to qualify as a DedicatedPLUS project in the FY 2018 CoC Program Competition.
- **RENEWAL GRANTS PER UNIT COST.** Applicants requesting renewal of grants for rental assistance are permitted to request a per-unit amount less than the Fair Market Rent (FMR), if the actual rent per unit under lease is less than the FMR. This will help reduce the number of projects receiving rental assistance that have large balances of unspent funds remaining at the end of the operating year. Renewal project applicants must ensure the amount requested will be sufficient to cover all eligible costs as HUD cannot provide funds beyond the amount awarded through this Competition.
  - **\*\*NEW THIS YEAR\*\*** The Applicants must provide copies of the leases to establish the actual rents.
- **RAPID REHOUSING ELIGIBILITY.** Certain renewal Rapid Rehousing projects may be allowed to serve participants beyond those proposed in the initial funding application. For example, if a renewing Rapid Rehousing project was originally funded to serve only families with children, that project, through the FY 2018 project application, may be able to also serve individuals if it so chooses, depending on whether the original application was a Bonus project

## IMPORTANT POINTS FOR ALL PROJECT APPLICANTS

- **DUNS/SAM REGISTRATION.** All project applicants must have a DUNS number and an active SAM registration. **\*\*NEW THIS YEAR\*\*** SAM registration requires additional steps this year, and applicants should begin their registration process immediately.
- **REQUIRED READING.** Project applicants should read the CoC NOFA, CoC Program Interim Rule, and the General NOFA.
- **NO LEVERAGE.** No leverage again this year!
- **CODES OF CONDUCT.** All applicants must have a current HUD-approved Code of Conduct. Be sure to review the [Code of Conduct for HUD Grant Programs](#) page on HUD's website to ensure your organization is listed (which means you have submitted an approved Code of Conduct). If you do not see your organization on the list, be sure to attach a current and complete Code of Conduct to your Project Applicant Profile in *e-snaps*.
- **ESTIMATE AMOUNT OF PROGRAM INCOME AS MATCH.** Project applicants that intend to use program income as match must provide an estimate of how much program income will be used for match.
- **EFFECT OF PROGRAM REGULATION AMENDMENTS.** The grant agreements will be subject to the program regulation as it may be amended from time to time. Recipients will be subject to regulatory revisions as they come into effect, without having to wait until the grant is renewed in a future competition.
- **2018 FMRS WILL APPLY.** Because the CoC Consolidated Application is due prior to the publication of the final FY 2019 FMRs, the FY 2018 FMRs will be used for funding amounts.

- **HOUSING FIRST.** Any housing project application that indicates it will use a Housing First approach, that is awarded FY 2018 CoC Program funds will be required to operate as a Housing First project.
- **ENVIRONMENTAL REQUIREMENTS.** All scattered-site projects where program participants choose their own unit and are not restricted to units within a pre-determined specific project site or sites are categorized in 24 CFR 58.35(b)(1) as CENST. This now includes both tenant-based rental assistance and tenant-based leasing projects where program participants choose their own unit. Previous guidance included only Tenant Based Rental Assistance as eligible CENST projects. The Exempt/CENST form is only required for each project, not every unit. Previous guidance instructed recipients to complete an Exempt/CENST form for each unit.
- **\*\*NEW THIS YEAR\*\* ELIGIBILITY REQUIREMENTS FOR APPLICANTS OF HUD'S GRANTS PROGRAMS.** Evidence of the following issues may prevent an award from being granted to otherwise successful applicants. Detailed information on each requirement is posted on [HUD's Funding Opportunities Page](#)
  - Resolution of Civil Rights Matters
  - Outstanding Delinquent Federal Debts
  - Debarments and/or Suspensions
  - Pre-selection Review of Performance
  - Sufficiency of Financial Management System
  - False Statements
  - Mandatory Disclosure Requirement
  - Conducting Business in Accordance with Ethical Standards/Code of Conduct
  - Prohibition Against Lobbying Activities
  - Equal Protection for Faith-based and Community Organizations
- **\*\*NEW THIS YEAR\*\* PAST PERFORMANCE.** In evaluating applications for funding, HUD will consider an applicant's past performance in managing funds. Items HUD may consider include, but are not limited to:
  - The ability to account for funds appropriately;
  - Timely use of funds received from HUD;
  - Timely submission and quality of reports submitted to HUD;
  - Meeting program requirements;
  - Meeting performance targets as established in the grant agreement;
  - The applicant's organizational capacity, including staffing structures and capabilities;
  - Time-lines for completion of activities and receipt of promised matching or leveraged funds; and
  - The number of persons to be served or targeted for assistance.

HUD may deduct points from the rating score or establish threshold levels. Whenever possible, HUD will obtain past performance information from staff with the greatest knowledge and understanding of each applicant's performance. If this evaluation results in an adverse finding related to integrity or performance, HUD reserves the right to:

  - Deny funding, or with a renewal or continuing award, consider suspension or termination of an award immediately for cause;
  - Require the removal of any key individual from association with management or implementation of the award; and
    - Make provisions or revisions regarding the method of payment or financial reporting requirements.

## COMMUNITY-LEVEL CHANGES AND REMINDERS

- **RACIAL DISPARITIES.** Research has found racial disparities in rates of homelessness. Specifically, blacks and Native Americans experience homelessness at disproportionately higher rates. Efforts to prevent and end homelessness should consider and address racial inequities to achieve positive outcomes for all persons experiencing homelessness (e.g., receiving necessary services and housing to exit homelessness).
- **ANNUAL RENEWAL DEMAND** is no longer calculated based on the final GIW for each CoC posted on the HUD Exchange. The NOFA defines Annual Renewal Demand as, “The total amount of all the CoC’s projects that will be eligible for renewal in the FY 2017 CoC Program Competition, before any required adjustments to funding for leasing, rental assistance, and operating budget line items based on FMR changes. The Annual Renewal Demand will be calculated by combining the total amount of funds requested by eligible renewal projects on the Renewal Project Listing combined and the eligible renewal project amount(s) that were reallocated.”
- **COMPLIANCE WITH VIOLENCE AGAINST WOMEN ACT (VAWA) RULE.** On 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. The grants to be awarded under this must comply with the VAWA rule as provided in 24 CFR 578.99(j). To enable full compliance with this rule, each CoC must have established an emergency transfer plan under 24 CFR 578.7(d) and make related updates to the written standards for administering CoC program assistance under 24 CFR 578.7(a)(9)(ii), (iii) and (v). These tasks were required to be completed by the time the local CPD Field Office issued the first FY 2017 grant agreement for a project in the CoC’s geographic area for projects awarded funds in the FY 2017 CoC Program Competition.
- **\*\*NEW THIS YEAR\*\* MEANINGFUL PARTICIPATION.** Applicants must identify the steps they will take to ensure that traditionally marginalized populations (such as racial and ethnic minorities and persons with disabilities) will be able to meaningfully participate in the planning process. The applicant must identify the specific populations that it will include, identify community organizations that represent these populations, and describe how these populations will be included in the planning process. For capital investment projects, grantees should commit to and demonstrate plans to employ low-income and very-low-income persons and/or utilize Section 3 businesses at levels beyond those required by Section 3. In seeking public participation, applicants and recipients must ensure that all communications are provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 and, as applicable, the Americans with Disabilities Act. In addition, Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d and Executive Order 13166 require that grantees take reasonable steps to ensure meaningful access to services, programs, and activities by persons with Limited English Proficiency (LEP persons).
- **COG MERGERS.** To encourage CoC mergers and mitigate the potential adverse scoring implications that may occur when a high performing CoC merges with one or more lower performing CoC(s), HUD is awarding up to 25 bonus points to CoCs that completed a merger in the period between the FY 2016 CoC Program Registration deadline and the FY 2018 CoC Program Registration deadline. CoCs may want to consider undertaking mergers next year prior to the Registration deadline.

## NAPA CONTINUUM OF CARE

- **CATEGORY 3.** As in past years, CoCs may request that up to 10% of funding for the fiscal year awarded under this NOFA be approved to serve homeless households with children and youth defined as homeless under other federal statutes who are unstably housed (paragraph 3 of the definition of homeless found at 24 CFR 578.3). Additional details are available in the NOFA.
- **ALL RELEVANT SUBPOPULATIONS.** HUD is defining “all relevant subpopulations” to mean families, youth, veterans, persons fleeing domestic violence, dating violence, sexual assault, and stalking, persons who are unsheltered, and chronically homeless individuals and families.
- **COG TRANSPARENCY.** On September 16, 2018, CoCs must post the CoC Consolidated Application on their website (or a partner’s website) and notify community members and key stakeholders that the Consolidated Application is available.
  - **\*\*NEW THIS YEAR\*\*** CoCs must include Project Applications (in addition to the CoC Application attachments and the completed Priority Listing) when posting the CoC Consolidated Application.

## RESOURCES:

- 2018 CoC NOFA: <https://www.hudexchange.info/resource/5719/fy-2018-coc-program-nofa/>
- CoC Program Interim Rule (24 CFR part 578):  
<https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version>
- E-snaps application system: <https://esnaps.hud.gov>
- HUD Websites:
  - [www.hud.gov](http://www.hud.gov)
  - [www.hudexchange.info](http://www.hudexchange.info)
- Funding Application: <https://www.hudexchange.info/programs/e-snaps/>
- Training and Resources: [www.hudexchange.info/homelessness-assistance/](http://www.hudexchange.info/homelessness-assistance/)
- HUD Exchange Ask A Question (AAQ): <https://www.hudexchange.info/program-support/my-question/>
- Listserv: [www.hudexchange.info/maillinglist](http://www.hudexchange.info/maillinglist)