

**DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**[Docket No. FR-5700-N-31A]**

**Notice of Fiscal Year (FY) 2014 Opportunity to Register and Other Important Information  
for Electronic Application Submission for the FY 2014 Component of the 2013-2014  
Continuum of Care (CoC) Program Competition**

**AGENCY:** Office of Community Planning and Development (CPD), HUD.

**ACTION:** Notice.

**SUMMARY:** On November 22, 2013, HUD published the Notice of Funding Availability (NOFA) for the Fiscal Years 2013 and 2014 Continuum of Care (CoC) Program Competition (FY 2013-FY 2014 CoC Program Competition NOFA). As stated in Section I.B.2.a, HUD will require the Collaborative Applicant from each Continuum of Care (CoC) to complete a *modified registration* in advance of applying for the approximately \$1.79 billion of FY 2014 funding available.<sup>1</sup> Collaborative Applicants must complete the registration using *e-snaps*, a web-based portal accessible at [www.hud.gov/esnaps](http://www.hud.gov/esnaps). CoC Registration will not be available at [www.grants.gov](http://www.grants.gov).

This Notice is intended to provide Collaborative Applicants with an outline of the functions and requirements of the registration process in *e-snaps*. It also provides Collaborative Applicants and project applicants with information necessary to continue implementation of the amendments to the McKinney-Vento Act (the Act) made by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. HUD strongly recommends referring to the CoC Program interim rule and the FY 2013 – FY 2014 CoC Program Competition NOFA in conjunction with this Notice. The registration process described within this Notice applies only to Collaborative Applicants who will register to submit project applications for FY 2014 CoC Program funds.<sup>2</sup> This registration process does not apply to project applicants or private individuals. HUD does not provide funding to private individuals. Therefore, such individuals should not attempt to complete the registration process, or apply for FY 2014 funding under the FY 2013 – FY 2014 CoC Program Competition.

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<sup>1</sup> Unless otherwise stated, all references to “registration” in this notice refer to the modified registration process described in Section I.B.2a of the 2013-2014 CoC Program Competition NOFA, and found at [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/grants/fundsavail/nofa13/coc](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail/nofa13/coc) (please see page 7). Certain technical corrections were made to this NOFA on December 23, 2013, which can be found at <https://www.onecpd.info/resource/3309/fy2013-fy2014coc-program-nofa/>.

<sup>2</sup> All references to FY 2014 CoC Program funds or FY 2014 funds refer to the funds made available under the FY 2013 – FY 2014 CoC Program Competition.

HUD will issue the Notice of Funding Availability (NOFA) for the Fiscal Year (FY) 2014 Component of the FY 2013 – FY 2014 Continuum of Care Program Competition (FY 2014 CoC Funding Notice) that will publish the deadlines for submitting the FY 2014 CoC Priority Listing and Project Applications as well as any additional information that may be required by HUD. CoCs and project applicants should refer to the FY 2013 – FY 2014 CoC Program Competition NOFA for additional information.

**DATES:** The registration deadline is 7:59:59 p.m. Eastern Time on **August 6, 2014**.

Registration submission must be received in *e-snaps* on or before the registration deadline. HUD will not accept registration submissions from Collaborative Applicants that do not submit a registration in *e-snaps* on or before the registration deadline. Failure to submit a registration in *e-snaps* by the deadline will result in the Collaborative Applicant being unable to access the FY 2014 CoC Priority Listing, which means they will be unable to rank project applications for new reallocated projects, renewal projects, CoC Planning projects, and Unified Funding Agency (UFA) costs, if applicable. Consequently, the CoC will be unable to apply for funds. Therefore, it is imperative that ALL Collaborative Applicants meet this registration deadline. Collaborative Applicants that receive HUD approval of their registration submission must acknowledge that approval in *e-snaps*. Collaborative Applicants that do not receive HUD approval of their registration submission will be notified via *e-snaps* and will not be permitted to access or submit the FY 2014 CoC Priority Listing. HUD will notify and remind Collaborative Applicants of the registration deadline through its websites located at [www.hud.gov](http://www.hud.gov) and [www.onecpd.info](http://www.onecpd.info) and via the CoC Program email-based listserv. Visit the following website to join the listserv: <https://onecpd.info/maillinglist/>.

**FOR FURTHER INFORMATION CONTACT:** HUD staff will be available to provide general clarification on the content of this Notice, and information regarding the HEARTH Act amendments to the McKinney-Vento Act. However, HUD staff is prohibited from assisting any applicant in preparing its registration or application in *e-snaps*.

- A. Local HUD CPD Field Office.** For further guidance on the registration submission requirements, including the FY 2014 Grant Inventory Worksheet(s) (GIWs), and the requirements imposed under the Act and the CoC Program interim rule, Collaborative Applicants may contact the HUD CPD field office serving their area listed at: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/about/staff/fodirectors](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/staff/fodirectors).
- B. Training and Resources.** Collaborative Applicants that need assistance completing the registration process in *e-snaps* or understanding the program requirements under the CoC Program may access the CoC Program interim rule, training materials, and program resources via the [OneCPD Resource Exchange www.onecpd.info](http://www.onecpd.info).
- C. The OneCPD Ask A Question (AAQ).** Collaborative Applicants that require information and technical support concerning this Notice and the registration in *e-snaps* may submit an electronic inquiry via the OneCPD Ask A Question at [www.onecpd.info/ask-a-question](http://www.onecpd.info/ask-a-question). AAQ is accessible 24 hours daily. Starting on the day prior to the registration submission deadline, the AAQ Help Desk will respond only to emergency technical support questions up to the deadline.

Additionally, Collaborative Applicants and project applicants that have questions about the Act or CoC Program interim rule should submit these questions to AAQ.

- D. HUD Homeless Assistance Listserv.** HUD will notify and remind Collaborative Applicants of registration availability and deadline including the availability of the FY 2014 CoC Funding Notice through its websites located at [www.hud.gov](http://www.hud.gov) and [www.onecpd.info](http://www.onecpd.info), and via the CoC Program email-based listserv. Visit the following website to join the listserv: [www.onecpd.info/maillinglist](http://www.onecpd.info/maillinglist).

## **FULL TEXT OF ANNOUNCEMENT**

This Notice is divided into five sections. Section I provides background information on the CoC Program, including information about funding limitations for FY 2014, since the amount of FY 2014 funding was not yet known at the time the FY 2013- FY 2014 CoC Program Competition NOFA was published. Section II contains key terms used throughout this Notice and the registration process. Section III provides detailed information on completing the CoC registration process in *e-snaps*. Section IV provides information about policies being implemented for the FY 2013-FY 2014 CoC Program Competition and certain requirements that all applicants should consider. Section V provides registration resources to help Collaborative Applicants to successfully complete the registration process and to prepare for submission. This Notice includes citations to the CoC Program interim rule (24 CFR part 578); applicants and stakeholders should read the interim rule to increase their understanding of the CoC Program requirements.

## **I. OVERVIEW INFORMATION**

### **A. Background**

The CoC Program interim rule (24 CFR part 578) provides the requirements for implementation and administration of the CoC Program found in Subtitle C of Title IV of the Act. This regulation governs the FY 2013–FY 2014 CoC Program Competition including the FY 2014 Registration process and the application process for FY 2014 CoC Program funds. The CoC Program improves administrative efficiency, enhances coordination requirements to better address the needs of homeless persons, and formalizes the CoC and the CoC’s planning process.

It is imperative that Collaborative Applicants and project applicants read the CoC Program interim rule to gain an understanding of the requirements of this program before applying for funding.

### **B. FY 2014 Funding Limitations**

The appropriation for this program made available through the Consolidated Appropriations Act, 2014 (Public Law 113-76, approved March 17, 2014) the “HUD Appropriations Act” is insufficient to implement all authorized increases. While the Act and CoC Program interim rule authorize increases in project administrative costs, leasing, rental assistance, and operating funds for renewal projects, HUD will not fund all of these increases at the maximum authorized levels. Although the maximum amount authorized for CoC planning funds is 3 percent, Collaborative Applicants may only request CoC planning costs up to 1.25 percent of the FY 2014 Final Pro Rata Need (FPRN) or \$250,000, whichever is less, in the FY 2013- FY 2014 CoC Program

Competition. As a reminder, HUD will consider only one CoC planning application per CoC, and the organization applying for the funds must be designated by the CoC. In addition, although the maximum amount authorized for Unified Funding Agency costs is 3 percent, Collaborative Applicants that are designated as UFAs in the FY 2014 Registration may only request 0.50 percent of the FPRN or \$100,000, whichever is less.

### C. Summary of Registration

Each Collaborative Applicant must complete and submit a registration on behalf of the CoC in *e-snaps*. Registration in *e-snaps* allows:

1. Collaborative Applicants to review the CoC geographic area approved in the FY 2013 CoC Registration; however, Collaborative Applicants will not be able to change the geographic code(s) listed in *e-snaps* as this screen will be read-only;
2. HUD to apportion “Preliminary Pro Rata Need” (PPRN) dollars associated with the CoC’s geographic area;
3. Collaborative Applicants to identify grants that are eligible for renewal funding with FY 2014 funds and record the Annual Renewal Demand (ARD) through the use of the GIW;
4. HUD to calculate the Collaborative Applicant’s FPRN amount for FY 2014 funds;
5. HUD to inform each CoC of the amount available for CoC Planning funds;
6. Collaborative Applicants to apply for a UFA designation;
7. HUD to inform Collaborative Applicants designated as a Unified Funding Agency (UFA) of the amount available for UFA costs; and
8. Collaborative Applicants to confirm their intent to submit project applications for FY 2014 funds on behalf of the CoC.

HUD advises Collaborative Applicants to immediately register in *e-snaps* after carefully reading this Notice in conjunction with the General Section of HUD’s FY 2013 NOFAs for Discretionary Programs (General Section), which was posted to [www.grants.gov](http://www.grants.gov) on August 8, 2012, and the CoC Program interim rule (24 CFR part 578), which is posted on the [OneCPD Resource Exchange](#). The General Section, including certain technical corrections to the General Section is also available on HUD’s website.<sup>3</sup> All project applicants are also required to register with Dun and Bradstreet (DUNS) if they have not already, and to complete or renew their registration in the Central Contractor Registration (CCR)/System for Award Management (SAM) registration. More information on DUNS numbers and CCR/SAM registration can be found at: <http://portal.hud.gov/portal/page/portal/HUD/topics/grants>.

Collaborative Applicants must fully complete and update all parts of the CoC Applicant Profile in *e-snaps* during the CoC Registration process. Although the CoC Registration process does not apply to project applicants, HUD encourages project applicants to immediately begin the process of verifying and updating information contained in the *e-snaps* Project Applicant Profile in order to be ready to apply for FY 2014 funds when the project applications become available in *e-*

<sup>3</sup> See HUD’s website at <http://portal.hud.gov/hudportal/documents/huddoc?id=2013nofagensec.pdf>.

*snaps*. The CoC and Project Applicant Profiles are available for Collaborative Applicants and project applicants in *e-snaps* both during and outside of the competition period.

As an alternative to the electronic registration in *e-snaps*, Section III.E of this Notice provides specific instructions for Collaborative Applicants:

1. located in one or more areas declared to be major disaster areas by President Obama under Title IV of the Robert T. Stafford Act; **and**
2. that intend to complete project application process for FY 2014 funds, but do not have the ability to complete and submit the registration in *e-snaps* by the deadline established in this Notice.

#### **D. CoC Program**

The CoC Program interim rule includes detailed requirements for the CoC Program, including standards for application review, standards used in award selection, requirements for grant execution, eligible uses of CoC Program funds and matching funds, recipient reporting requirements, and standards for compliance monitoring. The CoC Program interim rule will govern the FY 2013 – FY 2014 CoC Program Competition and the administration of all grants funded in the FY 2013 – FY 2014 CoC Program Competition.

The Collaborative Applicant approved by HUD during the FY 2014 registration process must be the same entity that submits the CoC Priority Listing and the project application for CoC Planning and UFA Costs, if applicable. CoCs should not attempt to change Collaborative Applicants during the FY 2014 portion of the FY 2013-FY 2014 CoC Program Competition period without HUD's prior approval. HUD will approve Collaborative Applicant changes after the registration process under certain circumstances that include:

1. an error made by the Collaborative Applicant when entering the Collaborative Applicant's name in the CoC Applicant Profile,
2. the Collaborative Applicant chosen by the CoC is no longer in business,
3. the Collaborative Applicant withdrew, or
4. the CoC selected a new Collaborative Applicant.

In cases where the CoC needs to change the Collaborative Applicant approved during registration, the CoC must notify the local HUD CPD field office in writing stating the reason for the Collaborative Applicant change. The notice to HUD must provide documentation of the CoC's approval of the change (e.g., a copy of the meeting minutes, to include the date and attendees).

CoC Program funds may be used for projects under five program components: permanent housing; transitional housing; supportive services only; Homeless Management Information System (HMIS); and homelessness prevention. Homelessness prevention is only an allowable component in CoCs designated as a High Performing Community (HPC), since only designated HPCs may carry out homelessness prevention activities through the CoC Program. There are currently no CoCs designated as an HPC.

For FY 2014 funds, project applicants may request project administrative costs up to 10 percent of the total project budget. However, if the CoC was awarded the bonus points outlined in Section VII.A.8.a of the FY 2013-FY 2014 CoC Program Competition NOFA as part of its score for the FY 2013/FY 2014 CoC Application, the project applications in that CoC are limited to requesting administrative costs up to 7 percent as the score applied to both FY 2013 and FY 2014 funding. Project applicants in CoCs that were not awarded these bonus points may increase project administrative requests to the 10 percent allowed in 24 CFR 578.59, but must move funds from other budget line items (e.g., operations, supportive services, etc.), therefore decreasing the amount of funds used by the project for housing and services to the homeless.

1. *First-Time CoC Program Renewals.* Projects that are requesting renewal under the CoC Program for the first time may request project administrative funds from HUD in an amount up to 7 percent of the total project budget without being required to move funds from another budget line item. This increase in the amount previously authorized under the Supportive Housing (SHP) and Shelter Plus Care (S+C) Programs will be funded by HUD. First-time renewal project applicants in CoCs that were not awarded the bonus points for limiting administrative costs to 7 percent or less may request project administrative costs greater than 7 percent (up to the 10 percent maximum allowed in 24 CFR 578.59) may move an amount from another budget line item to add to the project administrative cost line item to be expended for allowable project administrative costs. Applicants should note that the movement of funds from another line item may adversely impact the ability to carry out the activities related to that line item. While project applicants are permitted to move funds *from* another budget line item to add to the project administrative cost budget line item, project applicants **are prohibited from** moving funds *from* the project administrative cost budget line item to another budget line item.
2. *CoC Program Renewal Projects.* Those projects funded under the CoC Program in FY 2013 that intend to increase their project administrative requests to greater than the amount approved in FY 2013 (up to the 10 percent maximum allowed in 24 CFR 578.59) may move an amount from another budget line item to add to the project administrative cost line item, provided that the total annual renewal amount for the project application does not increase. In CoCs that were awarded the bonus points for limiting administrative costs to 7 percent or less, all project applicants are prohibited from requesting more than 7 percent administrative costs. Applicants of renewing rental assistance projects may move funds out of the rental assistance line item to increase the project administrative cost line item up to 10 percent; however, applicants are prohibited from reducing the number of units assisted contained in the grant being renewed. Applicants should note that the movement of funds from another line item may adversely impact the ability to carry out the activities related to that line item. While project applicants are permitted to move funds *from* another budget line item to add to the project administrative cost budget line item, a project applicant **are prohibited from** moving funds *from* the project administrative cost budget line item to another budget line item.
3. *New Projects.* As registration does not affect new projects, HUD will provide information regarding administrative cost requests for new projects created through reallocation in the FY 2014 CoC Funding Notice.

Project administrative costs may only be used for the administration of the awarded grant as outlined in §578.59 of the CoC Program interim rule. Applicants are prohibited from reducing the administrative budget line item in order to increase the amount in another approved budget line item (e.g., supportive services).

Additionally, CoCs may request up to 1.25 percent of the FY 2014 FPRN amount or \$250,000, whichever is less, for CoC planning costs. Collaborative Applicants that are designated as a UFA may request up to an additional 0.50 percent of FPRN or \$100,000, whichever is less, for UFA costs. To apply for funding in FY 2014, the Collaborative Applicant for each CoC must complete its GIW and submit to the local HUD CPD field office for review and conditional approval to determine the CoC's ARD, which must be recorded in *e-snaps* by the registration submission deadline. The GIW must include all eligible renewal projects and reflect accurate budget amounts. For the FY 2014 CoC Registration process, the GIW is not a required attachment in *e-snaps*. However, the final HUD-approved GIW will be a required submission as part of the Collaborative Applicant's FY 2014 CoC Priority Listing submission and CoCs will be held to the final HUD-approved ARD amount. See Section III.A.1 of this Notice for additional information.

## II. KEY TERMS USED AS PART OF THE REGISTRATION PROCESS

**A. Definitions.** The key terms contained in this Notice are important for Collaborative Applicants to understand and complete the FY 2014 registration in *e-snaps* on behalf of the CoC. A more extensive list of definitions can be found in the CoC Program interim rule at 24 CFR 578.3.

1. The following terms are defined in 24 CFR part 578. Applicants must refer to the CoC Program interim rule for the definitions contained in this section.
  - a. ***Annual Renewal Amount (ARA)***
  - b. ***Centralized or Coordinated Assessment System.***
  - c. ***High Performing Community (HPC)***
  - d. ***Subrecipient***
  - e. ***Unified Funding Agency (UFA)***
2. **CoC Registration Notice Definitions and Concepts.** The following terms are not found in 24 CFR 578.3 but are used in this FY 2014 CoC Registration Notice to define concepts that pertain specifically to the CoC Registration process:
  - a. ***Annual Renewal Demand (ARD).*** The ARD is the sum of the ARA amounts for projects eligible for renewal with FY 2014 CoC Program funds. ARD incorporates funding only for eligible activities—operating, supportive services, leasing, rental assistance, Homeless Management Information Systems (HMIS), and project administrative costs—that were funded in the original grant (or the original grant as amended), less the non-renewable activities—new construction, acquisition, rehabilitation, and any project administrative costs related to these activities.

CoCs that fail to list any eligible renewal project on their GIW, risk losing funding for that project.

Any funding for new construction, acquisition, or rehabilitation, and any project administration costs related to those activities, is not renewable and; therefore, should not be calculated in the project ARA. If the grant being renewed includes these non-renewable activities, project administrative costs must be recalculated to reduce the amount for such related activities. Project administrative costs must not exceed 10 percent of the grant awarded, the maximum allowed in 24 CFR 578.59. See Section I.D. of this Notice for further information on project administrative costs.

- b. *Continuum of Care Final Pro Rata Need (FPRN).*** The higher of PPRN or ARD for the CoC is the FPRN, which is the basis for the maximum award amount available for the CoC.
- c. *Continuum of Care Preliminary Pro Rata Need (PPRN).*** The amount of funds a CoC could receive based upon the claimed geographic areas HUD approved in the FY 2013 CoC Program Registration. To determine the homeless assistance need of a particular jurisdiction, HUD will use the formula set forth in the CoC Program interim rule at §578.17(a). These amounts are published annually on the OneCPD website. A CoC's PPRN is determined by adding together the published PPRN of each jurisdiction within the HUD-approved CoC.
- d. *Continuum of Care Registration.*** The first step in the CoC Program application process, which requires that each CoC review its geographic area, appoint a Collaborative Applicant that will be responsible for submitting the electronic application in *e-snaps* and for completing the GIW, which must be reviewed and updated in order to obtain the ARD amount that must be recorded in the registration forms in *e-snaps*.  
  
This process establishes the CoC's FPRN amount, CoC planning, and UFA costs that CoCs are eligible to request. The process also confirms the Collaborative Applicant's intent to submit and rank project applications for FY 2014 CoC Program funds on behalf of the CoC.
- e. *Changes in the Continuum of Care's Geographic Area.*** As stated in the FY 2013-FY 2014 CoC Program Competition NOFA, for the modified FY 2014 CoC Registration, changes in claimed geography from those claimed in FY 2013 CoC Registration will not be allowed.
- f. *Establishing Reductions in Awards.*** If FY 2014 CoC Program funds available are less than the amount required to renew all projects eligible for renewal, HUD will follow the process described in the CoC Program interim rule at §578.17(a)(4) and will inform CoCs of the amount that every CoC will be required to deduct from renewal projects.
- g. *Grant Inventory Worksheet (GIW).*** The GIW is an inventory of all projects within a CoC's geographic area eligible for renewal in a particular year submitted on a HUD-issued Excel spreadsheet. The GIW is a tool that is used to determine

which projects are eligible to receive renewal funding and to ensure an accurate calculation of the CoC's ARD. The Collaborative Applicant will be required to upload the final HUD-approved GIW to the CoC Application into *e-snaps* prior to submitting the CoC's Priority Listing for FY 2014. HUD will make adjustments where the amount requested by the CoC exceeds the ARD amount listed in the final HUD-approved GIW.

The GIW must include the correct line item budget information for each project and the correct unit configuration for rental assistance projects in order to calculate the ARD for the CoC. HUD will only approve project budget requests submitted in the project application that reflect the information exactly as submitted on the final HUD-approved GIW.

The applicants are responsible for ensuring that the renewal budget and total number of units for all renewal projects match the amounts and units approved by HUD on the GIW. HUD will apply all Fair Market Rent (FMR) updates to the operating, leasing, and rental assistance line items after the competition closes, but before grants are conditionally awarded. As necessary, HUD will reduce the requested budgets and units to match the budgets and total number units on the CoC's final HUD-approved GIW(s).

- h. *Homeless Management Information Systems (HMIS) (§§578.3 and 578.57).***  
 An HMIS is a computerized data collection application designed to capture client-level information over time on the characteristics of housing and service needs of men, women, and children experiencing homelessness, while also protecting client confidentiality. An HMIS aggregates client-level data to generate an unduplicated count of clients served within a community's system of homeless services, and can provide data on client characteristics and service utilization. HUD will only allow only one applicant for all HMIS dedicated grants within a CoC. This applicant must be the HMIS Lead designated by the CoC and must be listed under the HMIS Lead form in the CoC Applicant Profile in *e-snaps*. HUD may reject the project application without review if the HMIS Lead in the CoC Applicant Profile does not match the organization that submits the dedicated HMIS project application.
- i. *Homeless Management Information Systems (HMIS) Lead (§578.3).*** The HMIS Lead is designated by the CoC as the responsible entity to manage the CoC's HMIS. The HMIS Lead is the only entity eligible to apply for dedicated HMIS funds including leasing a structure in which the HMIS project is located, and for HMIS costs related to establishing, operating, and customizing a CoC's HMIS.
- j. *Project Applicant.*** The project applicant is the entity that completes a project application for funding to operate a housing or service project.
- k. *Reallocation.*** A CoC may reallocate funds in whole or part from existing eligible renewal projects to create one or more projects. All CoCs may use the reallocation process, regardless of their funding status. In FY 2014 CoCs may only use reallocation to create new permanent supportive housing projects that serve the chronically homeless or to create new rapid re-housing projects for

households with children coming from streets or emergency shelter. CoCs may choose to eliminate or reduce one or more projects to create one or more reallocated projects. The amount eliminated or reduced for the purposes of reallocation will be retained by the CoC, provided that the new proposed project(s) meets eligibility and quality thresholds established by HUD in order to be conditionally selected for funding. The selection criteria were described in the FY 2013 – FY 2014 CoC Program Competition NOFA. Additionally, CoCs are prohibited from reallocating administration costs to create new projects.

### III. COMPLETING THE REGISTRATION PROCESS

Accessing and completing the registration process in *e-snaps* will include the following steps:

#### A. Step One: Obtain and Complete the HUD-issued Grant Inventory Worksheet (GIW).

1. **Identifying Projects to be Included on the GIW.** Before beginning the registration process in *e-snaps*, CoCs must produce an inventory of all projects eligible for FY 2014 renewal funding, which are projects expiring during Calendar Year (CY) 2015 (between January 1, 2015 and December 31, 2015). CoCs must enter the inventory on the HUD-issued Excel spreadsheets. HUD Headquarters will email the GIWs to the appropriate CoC contacts, with a copy to the appropriate local HUD field office, as listed in the CoC Applicant Profile in *e-snaps*.

Collaborative Applicants must submit the GIW to the appropriate HUD CPD field office for review within 2 weeks of recipient receipt from HUD Headquarters. The local HUD CPD field office will review and approve no later than 1 week prior to submission deadline of the CoC Registration in *e-snaps*. Collaborative Applicants will use the GIW to establish the CoC's FY 2014 ARD, which must be recorded in the Maximum Funding Need form in *e-snaps*. The GIW will be used by HUD as the basis for award amounts approved for all eligible renewal projects. Any changes to the GIW after CoC Registration must be approved by the local HUD CPD field office, in consultation with HUD Headquarters, within 7 days after FY 2014 project applications and Priority Listing are made available in *e-snaps*. Collaborative Applicants will be required to attach the HUD-approved GIW that contains the final HUD-approved ARD to the FY 2014 Priority Listing. No changes to the GIW will be considered after the 7-day grace period.

Collaborative Applicants are responsible for ensuring that the GIWs accurately list all projects eligible for renewal funding with FY 2014 CoC Program funds. In order to finalize the GIW for HUD approval, the Collaborative Applicant must reconcile the GIW with the local HUD CPD field office. To assist in this process, HUD has pre-populated the GIWs with the grants that were awarded 1 year of funding (renewal and new) in FY 2013 under the FY 2013-FY 2014 CoC Competition and grants that might not have been submitted for renewal funding yet from the FY 2008 CoC Competition. This initial listing may be incomplete or inaccurate, therefore the Collaborative Applicant, in consultation with the local HUD CPD field office, must ensure that the following eligible projects are included on the GIWs:

- a. Grants awarded prior to the FY 2013 CoC Program Competition (i.e., CoC, SHP or S+C grants) that expire in CY 2014 (January 1, 2015 through December 31, 2015).
  - b. Any renewal grants that received 1 year of FY 2013 funding through the FY 2013 – FY 2014 CoC Program Competition.
  - c. Any new 1-year grants awarded under the FY 2012 CoC Program Competition that will expire in CY 2015.
  - d. Any S+C grants awarded prior to FY 2002 for which funding is expected to run out in CY 2015, and which has never received renewal funding.
  - e. Any grant originally awarded in the FY 2008 CoC Homeless Assistance Grants Competition, that has funds expiring in CY 2015 or later and has not been renewed in a previous competition. Funds for these grants will expire and will no longer be available after September 30, 2015. Therefore, renewal funding is imperative for continued project operations. Funds from these expiring grants will be recaptured and returned to the U.S. Treasury and will no longer be available for expenditure, regardless of whether the end date established in the grant agreement is beyond September 30, 2015. Grants awarded in the FY 2008 CoC Homeless Assistance Grants Competition are not eligible for renewal with FY 2014 CoC Program funds if they expire in CY 2014 (January 1, 2014 through December 31, 2014), and were not renewed in a previous competition, or were not approved for extension into CY 2015 or later.
- 2. *First-Time TRA and SRA Renewals.*** For applicants with projects previously funded as Tenant Based (TRA) and Sponsor Based (SRA) components of S+C that renew with FY 2014 funds for the first time and request more units than approved in the original application, the number of renewable units is determined by the number of units under lease at the time of submission of the GIW to HUD. To support the addition of units beyond the initial award, the applicant must provide the local HUD CPD field office with copies of all executed leases at the time of submission of its GIW. HUD will consider the additional units under lease at the time of GIW submission to determine the maximum number of units that can be renewed in FY 2014. Renewal projects that increase the number of units are subject to the requirements for renewals as stated in §578.33(d) of the CoC Program interim rule. For additional information about that provision, please refer to HUD's December 18, 2012, webinar entitled *Homeless Programs: Transition Policies and Changes* which can be found at: <https://www.onecpd.info/resource/2727/homeless-programs-transition-policies-and-changes-webinar/>.
- 3. *Failure to Include Renewal Projects on the GIW.*** If the CoC fails to include a project on its GIW, this could result in the project not receiving renewal funding from HUD. Including a project on the GIW does not guarantee that the project will receive funding in FY 2014, as the project must meet the threshold requirements detailed in the NOFA. Applicants must submit a project application in *e-snaps* for FY 2014 CoC Program renewal funding. HUD will not fund projects that fail to submit a project application in *e-snaps* by the project submission deadline regardless of whether the project was included on the GIW and/or priority listing. HUD retains the discretion to withhold

funding, in whole or part, for any project that has significant capacity issues related to performance, financial management, or other unresolved audit or monitoring findings.

4. ***Special Instructions for CoCs without Expiring Renewal Grants.*** CoCs that do not have any projects within their geographic area that are eligible for renewal funding in the FY 2013-FY 2014 CoC Program Competition and that **will not** request UFA status or funding for CoC planning or UFA costs in FY 2014 are not required to complete the registration. However, CoC Registration is strongly encouraged so that HUD is informed of the CoC's active status.
5. ***CoCs Merged via the Merger Process in FY 2013.*** CoCs that merged using the ARD merger process described in the FY 2013-FY 2014 CoC Program Competition NOFA may continue to use this process in FY 2014 to determine FPRN.
6. ***Submit the Completed GIW to the Appropriate HUD Field Office for Review.***  
Collaborative Applicants must submit the completed GIW to local HUD CPD field office prior to submission of CoC Registration.

**B. Step Two: Log in to *e-snaps* to Access the Registration Forms.** Any Collaborative Applicant primary contact person, who has accessed the registration forms in *e-snaps* in previous competitions, is referred to by HUD as a "returning *e-snaps* user". These users will have access to the FY 2014 registration forms in *e-snaps*. For FY 2014, returning users may use the same username and password previously created. First-time users of *e-snaps* must create an *e-snaps* user account by completing the *e-snaps* user profile information. Each person who creates a user account for the first time must be granted permission by the primary authorized *e-snaps* user of the Collaborative Applicant in order to access the FY 2014 registration forms.

OneCPD AAQ is also available to provide assistance with adding and deleting users in *e-snaps*. For instruction on contacting the AAQ, see Section C of the "FOR FURTHER INFORMATION CONTACT" section at the beginning of this Notice.

**C. Step Three: Complete/Update Applicant Profile.** The Applicant Profile allows CoC and project applicants to update the contact information for the primary and alternate contacts to ensure that HUD has up-to-date information on file. The information in the Applicant Profiles is available for updates throughout the year and applicants are strongly encouraged to keep the contact information updated as changes occur. Returning Collaborative Applicants must update, as necessary, the CoC Applicant Profile in *e-snaps*. This will include any required changes to the Collaborative Applicant Primary and Alternate contacts, HMIS Lead and Contact Person, and Homeless Resources Contact Person. Collaborative Applicants representing new CoCs must complete the Applicant Profile information in full. Information on how to complete or update the Applicant Profile can be found at: [www.onecpd.info](http://www.onecpd.info).

**D. Step Four: Complete the Registration Forms.** All Collaborative Applicants registering, returning or for the first time, must input all information relevant to the FY 2014 registration. The CoC Registration Training Guide provides instruction on how to complete this process. The rest of this section highlights information that must be entered into *e-snaps* to complete and submit the registration.

1. **CoC Type.** CoC Applicants will have the option to register as a Collaborative Applicant or a Collaborative Applicant applying for Unified Funding Agency (UFA) designation. HUD will notify Collaborative Applicants of the final approved designation as Collaborative Applicant or UFA during the CoC Registration process. CoC Applicants requesting UFA designation must meet the selection criteria as outlined in 24 CFR 578.11 of the CoC Program interim rule and have financial systems that meet the standards set forth in 24 CFR 84.21 (for nonprofit organizations) and 24 CFR 85.20 (for State and local governments). Collaborative Applicants requesting UFA designation must fully answer all questions in the FY 2014 CoC Registration forms and attach all required documents in order to submit the registration in *e-snaps*. If the Collaborative Applicant is unable to answer all questions or attach the required documentation it will be required to change the designation request from UFA to Collaborative Applicant before the forms may be submitted.
2. **Review the CoC's Geographic Area.** All Collaborative Applicants must notify HUD of the geographic area(s) included in the CoC. This notification is completed in *e-snaps* during CoC Registration. Each geographic area is associated with a PPRN amount. HUD has posted a list of each geographic area and the associated PPRN amount at [www.onecpd.info](http://www.onecpd.info).

For the FY 2014 CoC Registration process, Collaborative Applicants will be able to review the geographic areas pre-populated in *e-snaps*; however no changes to claimed geography from the FY 2013 CoC Registration will be allowed in FY 2014.

If a new CoC, as described in 24 CFR 578.5, is formed within an existing CoC given geographic area, and that new CoC intends to compete with the existing CoC for FY 2014 funds, the new CoC's Board Chair or equivalent must submit a letter of intent to compete to Ann Marie Oliva, Director, Office of Special Needs Assistance Programs, U.S. Department of Housing and Urban Development, 451 Seventh Street, SW Room 7262, Washington, DC 20024. The letter of intent must, at a minimum, include the following information:

1. The CoC name and number of the CoC that claim the existing geographic codes.
2. The names of the members of the newly formed CoC;
3. The geographic area, including the respective geographic codes, it intends to claim. Because changes in claimed geography from the FY 2013 Registration are not allowed in 2014, the new CoC must claim the same geographic area claimed by the existing CoC in the FY 2013 Registration;

4. The Collaborative Applicant selected by the new CoC; and
  5. The governance charter.
3. **Capacity.** Collaborative Applicants are required to provide information concerning the current capacity of the CoC to implement the CoC Program. HUD will use this data for information purposes only.
4. **UFA Designation.** Collaborative Applicants requesting UFA designation, including those Collaborative Applicants designated as UFA in the FY 2013 registration process, will be required to complete the UFA forms in *e-snaps* and attach the CoC's written policies, procedures, and plans that document responses provided in registration. HUD will assess all submitted responses and required documents to determine if the Collaborative Applicant is currently performing the required duties of a UFA or has the capacity to perform all of the required functions of a UFA. Collaborative Applicants that meet all requirements will be designated as a UFA and will be allowed by HUD to apply as such during the FY 2014 CoC Program Application process. UFA designation is only effective for one year as the UFA costs are non-renewable; therefore, Collaborative Applicants designated as a UFA in the FY 2013 registration process must re-apply for designation in the FY 2014 registration process.
- a. **Criteria.** Collaborative Applicants will be assessed based on a 65 point scale. In order to receive UFA designation, a Collaborative Applicant must receive a minimum of 22 out of 25 points in the UFA Capacity–CoC Responsibilities section, and 40 out of 40 points in the UFA Financial Management and Subrecipient Responsibilities sections. Therefore, the minimum score a Collaborative Applicant must receive in order to be designated as a UFA is 62 points. Regulatory citations have been added to the requirements in this section so that Collaborative Applicants can easily refer to the CoC Program interim rule for additional information.
  - b. **UFA Capacity.** CoC Responsibilities will be reviewed and scored on the following criteria with a possible total of 25 points available. In order to be designated as a UFA, the Collaborative Applicant must be able to clearly demonstrate that the CoC is in compliance with the requirements of §578.7.
    - (1) **CoC Structure (5 points).** HUD will award up to a total of 5 points for Collaborative Applicants that demonstrate that the CoC holds meetings of the full membership (including published agendas) at least semi-annually (§578.7(a)(1)), has an open invitation process for new members to join at least annually (§578.7(a)(2)), and that the CoC has adopted and is following a written process to select the Board of Directors to act on behalf of the CoC (§578.7(a)(3)). The Collaborative Applicant must submit documentation that lists all committees, subcommittees, and workgroups that are active in the CoC (§578.7(a)(4)). That documentation may be the CoC governance charter, if the governance charter includes this information. Collaborative Applicants cannot receive maximum points for these criteria unless they clearly demonstrate

meetings are held at least semiannually by attaching meeting agendas between July 1, 2012 and July 1, 2013.

- (2) Governance Charter (§578.7(a)(5)) (1 point). HUD will award up to 1 point for Collaborative Applicants that attach a governance charter that was developed in consultation with the Collaborative Applicant and HMIS Lead, clearly showing that the parties involved follow the governance charter and that this document is updated at least annually. In order to receive the full points, the governance charter must be attached to registration in *e-snaps* and include the following:

- (a) Date of the last update to the governance charter;
- (b) the policies and procedures needed to comply with subpart B of 24 CFR part 578 and with 2010 HMIS Data Standards; and
- (c) a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board.

HUD will review the CoC governance charter to determine if it incorporates all elements required in (§578.7(a)(5)). Governance charters that do not meet the criteria established in the CoC Program interim rule will receive no points.

- (3) Project Performance (6 points). HUD will award up to 4 of the 6 points for Collaborative Applicants that have established performance targets for CoC-funded projects, and that can demonstrate that it has established, in consultation with recipients and subrecipients, performance targets appropriate for the population and program types, and how the CoC monitors performance, evaluates outcomes, and takes actions towards poor performing projects (§578.7(a)(6)). Additionally, the Collaborative Applicant must describe how it evaluates the outcomes for projects funded under the Emergency Solutions Grants (ESG) and CoC programs (§578.7(a)(7)). To receive the full points for this section, the descriptions must provide clear details on the successful method(s) the CoC uses to gather recipient and subrecipient information to determine appropriate performance targets for the population(s) served, how poor performing projects are mentored to improve performance, and the specific evaluation methods used to determine if the outcomes from ESG and CoC programs are sufficient to address the reduction of homelessness in the CoC's geographic area. Finally, HUD will award 2 of the 6 points to Collaborative Applicants who attach the written standards created and followed by the CoC, in consultation with ESG recipients (ESG-CoC Written Performance Standards), that include at the minimum information found in 24 CFR 578.7(a)(9)(i-vi).
- (4) Centralized or Coordinated Assessment System (§578.7(a)(8)) (1 point). HUD will award 1 point to Collaborative Applicants whose CoC has

established and operates a centralized or coordinated assessment system, in consultation with the ESG recipients, that covers the CoC's geographic area. The system must demonstrate how services and housing are matched to participants needs. A copy of a description of the centralized or coordinated assessment system must be attached to the registration that clearly demonstrates how the system used is successfully implemented, including details of the protocol used by the CoC within the geographic area to assist the homeless in obtaining the necessary referrals for housing and services. Additionally, the protocols must clearly state the CoC's specific policy on how the system addresses the specific needs of those who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers.

- (5) **HMIS Structure (4 points).** HUD will award up to 4 points for Collaborative Applicants that have a single HMIS that has been designated for the CoC (§578.7(b)(1)), and that clearly describe the process used to ensure consistent participation of recipients and subrecipients in the designated HMIS (§578.7(b)(4)), including how aggregate data from domestic violence service providers is handled. Additionally, the CoC must also designate the HMIS Lead (§578.7(b)(2)), and the HMIS Lead must have the following plans, approved by the CoC, in place: privacy plan, security plan, and data quality plan (§578.7(b)(3)). Additionally, Collaborative Applicants must clearly describe how they ensure the HMIS is administered in compliance with the 2010 HMIS Data Standards (§578.7(b)(5)).
- (6) **Coordination (6 points).** HUD will award up to 6 points for Collaborative Applicants that demonstrate that a Point-in-Time PIT count is conducted for sheltered (at least annually) and unsheltered (at least biennially) homeless by indicating the date of the most recent PIT count for both sheltered and unsheltered homeless (§578.7(c)(2)), and must demonstrate that a gaps analysis of needs and services is conducted by the CoC at least annually (§578.7(c)(3)). Additionally, the CoC must describe coordination efforts to implement a housing and service system that meets the needs of homeless individuals (including unaccompanied youth) and families (§578.7(c)(1)). The Continuum of Care plan developed by the CoC to address the coordination effort (CoC Housing and Services System/ Coordination Plan ) must be attached to the registration and clearly outline the methods for outreach, engagement, and assessment; shelter, housing, and supportive services; and prevention strategies. The Collaborative Applicant must document how the CoC actively participates in the jurisdiction(s) Consolidated Plan which includes the specific activities that it performs during the development or update of the jurisdiction(s) Consolidated Plan (§578.7(c)(4)). Finally, the Collaborative Applicant must provide a description of how the CoC consults with ESG Program recipients for the allocation of ESG funds

and document whether a plan has been developed for joint reporting guidelines for ESG recipients and subrecipients. If a plan has been developed, describe what is included in the plan that has been approved by both the CoC and ESG recipients (§578.7(c)(5)).

- (7) Monitoring Subrecipients (§578.11(b)(4)) (2 points). HUD will award up to 2 points to Collaborative Applicants that attach the CoC's comprehensive written policies and procedures for monitoring subrecipients (Monitoring Guide for Subrecipients) that include the frequency of monitoring, examples of forms used, samples of letters used to notify the subrecipient of concerns and/or findings, how these can be resolved, refusing to abide by corrective actions required to address deficiencies during monitoring, and any other CoC-approved requirements.

- c. **UFA Financial Management and Subrecipient Responsibilities** will be reviewed and scored on the following criteria with a possible 40 points available. In order to receive the available 40 points for these two sections, the Collaborative Applicant must clearly demonstrate through the written responses in *e-snaps* and required attachments adequate financial management practices.

- (1) UFA Financial Management (§578.11(b)(2)) (20 points). HUD will award 20 points to Collaborative Applicants that demonstrate financial management capacity by providing detailed information on internal procedures and an A-133 audit as detailed below. The criteria for this section will be evaluated on a pass/fail standard. For each of the 3 criteria below, Collaborative Applicants will receive the points indicated if the criterion is satisfied, or zero points if the criterion is not satisfied.

- (a) A-133 Audit (10 points). The collaborative applicant must demonstrate that it has a financial management system that meets the standards set forth in 24 CFR 84.21 (for nonprofit organizations) and 24 CFR 85.20 (for States or local governments). To receive full points for this section, the Collaborative Applicant must: provide a description that clearly details how the Collaborative Applicant is successful at meeting each of the requirements of 24 CFR 84.21(a)-(b) (for nonprofit organizations) and 24 CFR 85.20(a)-(b) (for States or local governments); and provide the most recent OMB Circular A-133 audit(s), which must indicate that the Collaborative Applicant has no material weaknesses, deficiencies, or concerns that HUD considers to be relevant to the financial management of the CoC Program. If the A-133 identified weaknesses or deficiencies, the Collaborative Applicant must provide documentation showing how those weaknesses have been removed or are being addressed. Collaborative Applicants must meet all the criteria to receive any points in this section.

- (b) The Collaborative Applicant must submit a copy of its written financial management policies and procedures, including an organizational chart that sets forth lines of responsibility. (5 points)
  - (c) Collaborative Applicants must submit written policies and procedures that detail how CoC Program funds will be distributed to subrecipients within 45 days of the subrecipient providing source documentation of eligible costs and that a process is in place to ensure CoC Program funds are drawn from LOCCS at least once per quarter. The written policies and procedures must be attached to the registration (LOCCS/Drawdown Procedures). (24 CFR 578.85(c)) (5 points)
- (2) Subrecipient Responsibilities (20 points). HUD will award 20 points to Collaborative Applicants that meet the criteria described below. The criteria for this section will be evaluated on a pass/fail standard. For each of the 4 criteria below, Collaborative Applicants will receive 5 points if the criterion is satisfied, or zero points if the criterion is not satisfied.
- (a) Collaborative Applicants must affirmatively indicate that they have obtained documentation evidencing approval (e.g., a letter from each potential subrecipient signed by the Authorized Official) from all potential subrecipients to which CoC program funds will be allocated, documenting that each organization will allow the UFA, if designated, to become the recipient for grant funds.
  - (b) Collaborative Applicants must provide a copy of written policies and procedures currently in place to bring noncompliant subrecipients into compliance.
  - (c) Collaborative Applicants must provide a copy of written policies and procedures to ensure “high risk” subrecipients receive proper oversight and monitoring.
  - (d) Collaborative Applicants must provide a copy of written policies and procedures to review for evidence of conflict of interest, either between the UFA and subrecipient or between the subrecipient and its contractor(s).
- d. Required Application Documents. The following is a list of attachments that will correspond to the UFA registration questions and will be required at time of submission for Collaborative Applicants requesting UFA designation. The information provided in response to the questions in registration must correspond to the information provided in the attached documents in order for a Collaborative Applicant to receive UFA designation. These documents must be uploaded as an attachment in *e-snaps* prior to the Collaborative Applicant’s registration submission.

**(1) Attachments to Satisfy CoC Program interim rule requirements:**

- (a)** CoC Meeting Agendas/Minutes (from III.D.5.b.(1) of this Notice, as applicable)
- (b)** CoC Governance Charter (from III.D.5.b.(2)) of this Notice
- (c)** ESG-CoC Written Performance Standards (from III.D.5.b.(3) of this Notice)
- (d)** Description of Centralized or Coordinated Assessment System (from III.D.5.b.(4) of this Notice)
- (e)** CoC Housing and Services System/Coordination Plan (from III.D.5.b.(6) of this Notice)
- (f)** Monitoring Guide for Subrecipients (from III.D.5.b.(7) of this Notice)

**(2) Other Required Attachments:**

- (a)** A-133 Audit (from III.D.5.c.(1)(a) of this Notice)
- (b)** Financial Management Systems Policies and Procedures (from III.D.5.c.(1)(b) of this Notice)
- (c)** LOCCS/Drawdown Procedures (from III.D.5.c.(1)(c) of this Notice)
- (d)** Policies and Procedures for Managing Non-Compliant Subrecipients (from III.D.5.c.(2)(b) of this Notice)
- (e)** Procedures for High-Risk Subgrantee Management (from III.D.5.c.(2)(c) of this Notice)
- (f)** Policies and Procedures for Subrecipient Conflict of Interest (from III.D.5.c.ii.(2)(d) of this Notice)
- (g)** Other attachments submitted by the CA (optional)

The CoC is responsible for creating all the documents listed above. If a committee, subcommittee, or workgroup developed the document, the CoC must provide a listing of the members who were involved in the development, along with their organization type (e.g., domestic violence, transitional housing, local government, etc.) and the last date the documents were reviewed and approved by the CoC membership.

- 5. *Submit Registration to HUD.*** All CoC applicants must submit their FY 2014 registration to HUD through *e-snaps* no later than **7:59:59 p.m. on August 6, 2014.** CoCs that fail to submit their registration by the designated deadline will not have access to the FY 2014 CoC Priority Listing

### **E. Special Registration Instructions for CoCs in Disaster Areas as Declared under Title IV of the Robert T. Stafford Act.**

CoCs located in areas declared to be major disaster areas by President Obama under Title IV of the Robert T. Stafford Act in the 12 months prior to the publication of this Notice may request that HUD submit their registration in *e-snaps* on their behalf, if the CoC's capacity to complete the registration process in *e-snaps* was degraded and/or destroyed, as a direct result of a major natural disaster. Collaborative Applicants may send this request via the AAQ at [www.onecpd.info/ask-a-question/](http://www.onecpd.info/ask-a-question/). Collaborative Applicants must include the following information in the request:

1. **Geographic areas claimed by the CoC.** List the geographic areas that are eligible to be covered by the CoC.
2. **Contact information.** Provide current contact information for the Collaborative Applicant so that HUD may contact the CoC in regard to this request, as needed.
3. **Grant Inventory Worksheet.** As stated in Section III.A. of this Notice, HUD Headquarters will email GIW (Excel spreadsheets) to all CoC lead agency contacts for the purpose of completing their grants inventory. HUD will pre-populate the GIWs with the renewal grants that received 1 year of funding and 1-year new grants funded with FY 2013 CoC Program funds. The initial GIW provided by HUD might not include a complete listing. Along with the request, disaster-affected CoCs must confirm, to the best of their knowledge, that the information on the GIW is accurate. If the CoC is able to identify any additional renewal grants, it should provide the previous grant number of any such renewals so that HUD can add it to the list. HUD Headquarters will work with the local HUD field office to identify any additional grants not identified by the Collaborative Applicant.

## **IV. HUD'S HOMELESS POLICY AND PROGRAM PRIORITIES**

**A. Policy Priorities.** Applications submitted to HUD for the FY 2013 – FY 2014 CoC Program Competition will be evaluated in part based on the extent to which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP)*. Specifically, the FY 2013 - FY 2014 CoC Program Competition prioritizes CoC and project applications that address the goals listed below:

- **Opening Doors:** End chronic homelessness by 2015;
- **Opening Doors:** End veteran homelessness by 2015;
- **Opening Doors:** End family and youth homelessness by 2020.

Below are HUD's policy priorities, related to these goals, as set forth in the NOFA for the FY 2013 – FY 2014 CoC Program Competition, at pages 9 through 12.

1. **Strategic Resource Allocation.** Each CoC must comprehensively review all existing projects within its geographic area, using CoC-approved scoring criteria and selection

priorities, to determine the extent to which each project is still necessary and addresses the listed policy priorities above. Funds for projects that are determined to be underperforming, obsolete, or ineffective should be reallocated to new projects that are based on proven or promising models.

## **2. Ending chronic homelessness.**

**a. *Increasing Beds*:** In order to increase the number of beds specifically for the chronically homeless and work towards the goal of ending chronic homelessness by 2015, CoCs will be able to apply for new projects created through reallocation for permanent supportive housing (PSH) that propose to exclusively serve the chronically homeless—which includes individuals and households with children—as defined in 24 CFR 578.3, as part of its comprehensive strategy to end chronic homelessness. Chronically homeless and permanent supportive housing are defined in 24 CFR 578.3. Consistent with the interim rule, the chronically homeless includes individuals and families who have a qualifying disabling condition and meet the criteria of chronic homelessness.

**b. *Targeting*:** The chronically homeless should be given priority for PSH beds as vacancies become available through turnover. PSH renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry.

**c. *Housing First*** is a model of housing assistance that is offered without preconditions (such as sobriety or a minimum income threshold) or service participation requirements, and rapid placement and stabilization in permanent housing are primary goals. Research shows that it is effective for the chronically homeless with mental health and substance abuse disorders, resulting in fewer inpatient stays and less expensive interventions than other approaches. PSH projects should use a Housing First approach in the design of the program.

## **3. Ending family homelessness.**

**a. *Rapid Re-Housing*** is a model of housing assistance that is designed to assist the homeless, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing. Rapid re-housing assistance is time-limited, individualized, and flexible, and is designed to complement and enhance homeless system performance and the performance of other homeless projects. While it can be used for any homeless person, preliminary evidence indicates that it can be particularly effective for households with children.

**b.** CoCs may apply for new projects created through reallocation for rapid re-housing to serve homeless households with children. Rapid re-housing projects must serve households with children living on the streets or in emergency shelter.

#### **4. Removing Barriers to CoC Resources.**

CoCs should review system and project level eligibility criteria to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

**a. *Centralized or Coordinated Assessment System:*** Centralized or coordinated assessment is a key step in assessing the needs of the homeless requesting assistance and matching the needs of those households to the most appropriate housing and service options. The CoC Program interim rule requires the implementation of a centralized or coordinated assessment system.

**b. *Transitional Housing:*** HUD recognizes that transitional housing can be an effective tool in many communities for addressing the needs of specific subpopulations—such as homeless youth, domestic violence survivors, and the homeless with substance abuse issues. However, recent research shows that transitional housing is generally more expensive than other housing models serving similar populations, it is often more service-intensive than most homeless households need, and that the criteria for entry into many transitional housing programs are so rigorous that transitional housing beds are under-utilized because homeless households cannot overcome the barriers to entry. HUD is strongly encouraging CoCs and recipients to carefully review the transitional housing models within the geographic area for cost-effectiveness, performance, and for the number and type of criteria used to determine eligibility for the program and determine if rapid re-housing may be a better model for the CoC's geographic area.

**c. *Prioritizing Households Most in Need:*** CoCs should prioritize those who are identified as most in need (e.g., those who have been living on the street the longest, homeless households with children living in unsheltered situations, those that are considered most medically vulnerable) for placement into appropriate housing.

#### **5. Maximizing the use of mainstream resources.**

**a.** HUD strongly encourages CoCs and project applicants to ensure that they are maximizing the use of all mainstream services available. While the CoC Program interim rule allows for the payment of certain supportive service costs and Supportive Services Only projects, it is more efficient for CoCs to use mainstream resources where possible and use HUD funds for housing-related costs. CoCs should proactively seek and provide information to recipients within the geographic area about mainstream resources and funding opportunities.

**b.** CoCs should be actively preparing for implementation of the Affordable Care Act by determining how these funds may be used by recipients to serve the homeless. While this will vary by state, CoCs should also be encouraging project recipients to participate in enrollment and outreach activities to ensure eligible households take advantage of new healthcare options.

## 6. Building partnerships.

**a.** CoCs should proactively seek to engage in partnerships with Public Housing Agencies (PHA) within their geographic area. HUD encourages CoCs to partner with PHAs, for example, to create homeless preferences or adopt strategies to assist current program participants to access PHA housing resources as they become ready to do so. CoCs and PHAs are encouraged to read and use the following HUD Notice (PIH 2013-15) published June 10, 2013: *Guidance on housing individuals and families experiencing homelessness through the Public Housing and Housing Choice Voucher Programs.*

**b.** CoCs should assess the extent to which philanthropy plays a role within the community. CoCs and project recipients should consider how to engage with philanthropic organizations in a way to maximize resources and increase progress towards ending homelessness.

**7. Other Priority Populations:** While new funding opportunities through reallocation will only be available for the chronically homeless and homeless households with children, HUD also expects CoCs to consider the needs of other homeless populations that may be prevalent in the CoC's geographic area, especially the needs of veterans and their families and unaccompanied youth (section VII.A.1.f of this NOFA). The CoC Program Competition will include points on the extent to which the FY 2013/FY 2014 CoC Application demonstrates that these populations are served:

**a. Veterans:** CoC Program funded projects should, to the extent possible, prioritize veterans who are ineligible for VA services and their families. CoCs should work closely with the local Department of Veterans Affairs (VA), and coordinate CoC resources with VA-funded housing and services (e.g., HUD-VASH, Supportive Services for Veteran Families (SSVF)).

**b. Homeless Youth:** CoCs should be able to identify and describe the needs of homeless youth within the geographic area and the current programs designed to serve this population, including performance.

**B. CoC Program Implementation.** The following list highlights important information that applicants should consider to prepare for FY 2014 CoC Registration and the remainder of the FY 2013 – FY 2014 CoC Program Competition. This is not an exhaustive list of considerations or requirements—all applicants and CoC stakeholders should carefully review the CoC Program interim rule.

1. Projects and activities that were eligible under SHP and S+C but are no longer eligible under the CoC Program (e.g., safe havens, projects limited to persons with specific disabilities or diagnoses), will continue to be eligible for renewal under the original grant terms as long as the recipient does not significantly change the project after submission of the FY 2014 project application. HUD has determined that this protection is necessary to continue housing and services to vulnerable populations that will be at-risk if funding is withdrawn.
2. The CoC Program interim rule describes in detail the difference between costs used for leasing and those used for rental assistance (24 CFR 578.49 and 578.51). Recipients with grants that include a leasing budget should carefully review the nature of the project to

determine if a change should be made from leasing to rental assistance for the project. In accordance with 24 CFR 578.49(b)(8), leasing funds will be renewed as rental assistance if the funds are used to pay rent on units where the lease is between the program participant and the landowner or sublessor. Under this type of agreement, the project applicant may change the budget information from leasing to rental assistance and use the area(s) Fair Market Rent (FMR) amount to determine the budget amount. Project applicants that are eligible to change the budget from leasing to rental assistance must provide copies of the lease to the local HUD CPD field office prior to the close of the FY 2014 CoC Program Registration process.

A project application is prohibited from including both leasing and rental assistance unless the project is paying for a structure to provide supportive services (i.e., leasing a structure for a case management office) in addition to units in a different structure in which the program participants hold the lease with the landlord. The only other exception is when a project has leased units in a structure and within the same structure separate units utilizing rental assistance funds. In this case, both leasing and rental assistance funds cannot be used in the same unit. HUD provided training materials and conducted a broadcast on September 4, 2012, to specifically address how current leasing projects will determine eligibility that will result in the change from leasing to rental assistance.

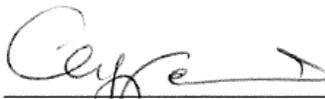
3. HUD will continue to limit the grant term for renewal grants to 1 year of funding. Requests for multiple years of funding will be reduced to 1-year amounts.
4. HUD will continue the Reallocation process. All CoCs may reduce and/or eliminate funds for renewal projects, including first-time renewal projects formerly funded under the S+C program, to develop new projects. CoCs may use the reallocation process to create new permanent supportive housing projects for the chronically homeless, or for rapid re-housing projects for households with children living on the streets or in emergency shelter.
5. CoCs will be required to rank all projects submitted by project applicants in e-snaps: renewal and new projects created through reallocation, CoC planning projects and UFA cost projects. HUD will not review any project that is rejected by the CoC. Only one CoC planning application and one UFA cost application (if UFA designation is approved) may be submitted per CoC, and they must be submitted by the Collaborative Applicant.
6. HUD will continue the Tier 1 and Tier 2 funding process. Tier 1 is equal to the CoC's ARD amount approved in Registration, less the national percentage funding cut as identified in the FY 2014 Funding Notice. Tier 2 is the amount between a CoC's Tier 1 and the CoC's ARD, plus any approved amounts for CoC planning and UFA costs.

## **V. GETTING INFORMATION AND ASSISTANCE**

**One CPD Website.** Prospective Collaborative Applicants are advised to review the numerous resources available online at [www.onecpd.info](http://www.onecpd.info), to help successfully complete the registration

process, prepare for application submission, and understand CoC Program requirements. All *Federal Register* publications, user guides, and other resources related to the registration process, the FY 2013 CoC Program Competition, and the CoC Program may be obtained from the OneCPD website. HUD will also post on this website responses to frequently asked questions regarding the registration process. CoC applicants are advised to reference this site and its resources to all persons that will be working on the registration process or completing the CoC Application.

Date: JUL 18 2014

  
\_\_\_\_\_  
Clifford Taffet  
Assistant Secretary (Acting)  
for Community Planning and Development

[FR-5700-N-31A]