



2019 Central MS CoC Program Competition

Application Guidelines for New and Renewal CoC Projects

Description: 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, family, youth and persons fleeing domestic violence, dating violence, sexual assault, and stalking, while minimizing the trauma and dislocation caused by homelessness; to promote access to an effective utilization of mainstream programs by the homeless; and to optimize self-sufficiency among those experiencing homelessness.

Authority: The CoC Program is authorized by subtitle C of the title IV of the McKinney-Vento Homeless Assistance Act, (42 U.S.C. 11381-11389) (the Act).

Summary: Central Mississippi Continuum of Care (CoC) Program Competition and 2019 Applications for New and Renewal Projects

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 2019 CoC NOFA was released on July 3, 2019, opening the competition making available approximately \$2.3 billion nationally to serve people experiencing homelessness. **Information and additional details about the HUD CoC NOFA is available at:**

<https://www.hudexchange.info/resource/5842/fy-2019-coc-program-nofa/>

Before the application is submitted to HUD the Central MS CoC is required to hold a local competition to determine which projects will be included in the consolidated application, along with their relative priority. **All applicants interested in applying for CoC Funding must participate in the local competition described herein.**

CoC Application Posting Date: July 12, 2019

CoC Project Application Due Dates:	Letters of Intent	-	July 22, 2019 4:00 p.m.
	Project Applications	-	August 5, 2019 4:00 p.m.

Letters of Intent Submission Requirements:

A Letter of Intent (LOI) describing the funding amount requested, type of program, and number/type of clients to be served may be emailed to Christianna Knights at cknights@ms500coc.org on or before July 22, 2019 by 4:00pm.

Application Submission Requirements:

One (1) original and three (3) hard copies of the application must be received in full no later than 4:00 p.m. central time on August 5, 2019. Applications must be mailed or hand delivered to the Collaborative Applicant at the following address:

Stewpot Community Services
1100 West Capitol Street
Jackson, MS 39203

Eligible Applicants: Local Governments, Public Housing Authorities or Non-Profit organizations having 501c3 status with the IRS for a minimum of two (2) years. For-profit entities are not eligible to apply for grants or to be sub-recipients of grant funds. See General Information for additional threshold and eligibility requirements.

General Information

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Section A: General Information

<p>Purpose</p>	<p>This Notice of Fund Availability (NOFA) has been issued by Stewpot Community Services, as Collaborative Applicant for the Central MS CoC, to seek new and renewal applications from non-profit organizations and public entities to provide coordinated community based services to homeless individuals, families, unaccompanied youth and persons fleeing domestic violence, dating violence, sexual assault and stalking in the Central Mississippi region. This includes Hinds County, Rankin County, Madison County, Warren County, and Copiah County. Program services are designed to quickly re-house the homeless while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by the homeless; and to optimize self-sufficiency among those experiencing homelessness.</p>
<p>Availability of Funds</p>	<p>The Central MS CoC is eligible to apply for the following amounts: CoC estimated Annual Renewal Demand: \$1,368,126</p> <ul style="list-style-type: none"> • Estimated Tier 1 of Annual Renewal Demand: \$1,311,424 • Estimated Tier 2 (Balance of ARD) \$250,897 <p>Estimated Bonus Amount: \$194,195 Estimated DV Bonus Amount \$214,490 (up to 3 projects) Estimated Planning Grant Amount \$64,347 (not ranked)</p>
<p>Use of Funds</p>	<p>24 CFR 578.37 through 578.63 identifies the eligible projects for which funding can be requested through the FY 2019 Continuum of Care (CoC) Program Competition. CoC funds may be used to pay for the eligible costs listed in 24 CFR 578.37 through 578.63 when used to establish and operate the following projects:</p> <ol style="list-style-type: none"> 1. Permanent Housing (PH) ; The CoC Program funds two types of permanent housing: Permanent Supportive Housing for Persons with Disabilities (PSH) and Rapid Re-housing (RRH). These activities provide homeless individuals and families with the assistance they need to obtain and maintain stable housing while allowing them to live as independently as possible. 2. Transitional Housing 3. Joint Transitional Housing and PH-Rapid Re-Housing 4. Supportive Services Only (SSO) 5. HMIS <p><i>See Glossary for a full description of components and allowable costs</i></p> <p>Requests for ineligible costs or populations will be rejected.</p>
	<p>New project applications may be created through the reallocation process as a bonus project or DV bonus.</p>

<p>Who May Apply</p>	<p>All Applicants (New and Renewal) must meet the following threshold requirements to be eligible for consideration in the local Continuum of Care NOFA Application process.</p> <ul style="list-style-type: none"> • Eligible applicants include Local Governments, Public Housing Authorities or Non-Profit organizations having 501c3 status with the IRS for a minimum of two (2) years. For-profit entities are not eligible to apply for grants or to be sub-recipients of grant funds. • Agency is a current recipient in good standing with local, state, or federal funding awarded under a competitive, substantive grant process that requires detailed financial and beneficiary reporting. • Participation in a Continuum of Care (Central MS or other Jurisdiction) Homeless Collaborative. • Agency has an active, all volunteer board, where no voting member of the board receives any financial or in-kind remuneration from the organization and meets a minimum of four (4) times per year. • Agency has provided homeless assistance services or housing for at least two (2) years. • Agency must have had an outside audit by a CPA within the last twelve (12) months. • Agency must have a minimum annual operating budget of \$100,000. • Agency must have or obtain local approval. • Agency must satisfy all match requirements.
<p>Grant Awards</p>	<p>Applicants submitting more than one proposal must demonstrate that the agency has the capacity and resources to meet all requirements including the match requirement. Current award utilization and contract performance may impact award limits for renewal applicants.</p> <ul style="list-style-type: none"> • New projects will only be funded through reallocation of funds from existing eligible renewal project(s), as a Bonus or DV Bonus project.
<p>Match</p>	<p>Match (Cash or In-Kind Resources) Except for leasing, match resources must equal to at least 25% of the total requested HUD funding, including project and administrative costs. Please note, Cash and In-Kind Match must qualify as eligible program expenses under the CoC interim rule at 24 CFR 578.72 – CFR 578.73.</p>
<p>Submission Requirements and Deadline</p>	<p>Letters of Intent – Monday, July 22, 2019 at 4:00 p.m.</p> <p>Project Applications – Monday, August 5, 2019 at 4:00 p.m.</p> <p>Applicants are required to submit <u>one original and three copies of all required documentation.</u></p> <p>Faxed or partial proposals will not be accepted.</p> <p>All required components must be received and formatted as specified.</p>

<p>Application Review Rating</p>	<p>All applications will receive a threshold review and may be denied for any of the following reasons:</p> <ul style="list-style-type: none"> • Agency does not meet HUD’s eligibility criteria • Agency lacks adequate capacity to carry out grant • Proposes ineligible costs or activities • Proposes to serve ineligible populations • Does not show required match • Current contract compliance or performance concerns • Project does not demonstrate adequate impact or cost effectiveness • Other, as may be identified by reviewing staff / team. <p>All applications must pass a qualifying threshold compliance review.</p> <p>Compliance Review</p> <p>Eligible project applications will be reviewed and evaluated based on submission criteria set forth in the Application and Application Guidelines. Components of the compliance review are as follows:</p> <ul style="list-style-type: none"> • All applications must be received by the published deadline. • All documents are accurately identified in the format specified. • All documents include required elements and satisfy proposal criteria. • Format – All Applications must be completed in its entirety in eSnaps. • Required application components: <ul style="list-style-type: none"> o Agency Information o Project Information o Project Narrative o Performance and Service Capacity o Operating Budget o Supportive Service Budget o Program Summary Budget o Match Documentation o Certification • Required Documentation <ul style="list-style-type: none"> o IRS Documentation of 501c3 status o Board Documentation o Match Commitment o Audit or Financial Statements o ELOCCS (Renewals Only) o APRs (Renewals Only) <p>Applications that do not meet ALL compliance review criteria will be disqualified from further consideration. Applications that meet all compliance criteria undergo a qualitative review.</p>
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	<p>Qualitative and Quantitative Review</p> <ul style="list-style-type: none"> • Each proposal is read and evaluated by the Central MS CoC Ranking and Review Committee. This review includes a comprehensive evaluation of the responsiveness of the proposal to the HUD funding and policy priorities identified in the NOFA, as well as an evaluation of each proposal component including, but not limited to: <ul style="list-style-type: none"> o Project Narrative o Target Population and Prioritization o Organizational Capacity o Program Design o Project Performance/ System Performance o Fund Utilization o HMIS Data Quality o Cost Effectiveness o Budget(s) <p>Applications that meet all proposal compliance review criteria in addition to meeting qualitative review standards will be eligible for ranking and tier placement.</p>
<p>Ranking and Review</p>	<p>HUD requires CoCs to review and rank projects submitted by project applicants, except CoC planning projects, having them fall into two Tiers based on financial threshold. All projects must pass HUD’s eligibility and threshold requirement specified above, no matter their priority.</p> <p>Tier 1</p> <p>Tier 1 is equal to 100% of the CoCs FY 2019 Annual Renewal Amounts for all projects eligible for renewal for the first time plus 94% of the combined Annual Renewal Amounts for all other projects eligible for renewal. 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</p> <p>Tier 2</p> <p>Projects in Tier 2 are less likely to be funded, and every Tier 2 project will be scored by HUD using a 100 point scale based on three factors:</p> <ul style="list-style-type: none"> • CoC Score: Up to 50 of 100 points will be awarded in direct proportion to the score received on the CoC Application. • CoC Project Ranking: Up to 40 of 100 points for the CoC’s ranking of the project application. • Low Barriers to Entry: Up to 10 of 100 points for: <ul style="list-style-type: none"> o How the project application demonstrates that it is low barrier, prioritizes rapid placement and stabilization in permanent housing, and does not have preconditions to entry (such as sobriety or a minimum income threshold). o HMIS projects or SSO projects for Coordinated Assessment will automatically receive 10 points.

Technical Assistance	<p>Central MS CoC NOFA technical assistance will be available during the period July 22 – Aug. 1, 2019.</p> <p>Requests for assistance must be made in advance and emailed to: cknights@ms500coc.org</p>
Award Notification	<p>Award Notifications will be made on or before August 21, 2019. Project Applicants will be notified by Central MS CoC of their application rating and tier ranking. Applicant will also be notified if the project application will be submitted with the CoC Consolidated Application to HUD.</p>
Local Appeals	<p>Project applicants that believe they were denied the opportunity to participate in the local CoC planning process in a reasonable manner and were rejected or reallocated by the CoC may appeal the rejection directly to the Collaborative Applicant for review and determination by the CoC Board. Specific guidance, forms and submission guidelines for local appeal process are available upon request to the Collaborative Applicant.</p>
Solo Applicants	<p>Project applicants that believe they were denied the opportunity to participate in the local CoC planning process in a reasonable manner and were rejected or reallocated by the CoC may appeal the rejection directly to HUD by submitting a Solo Applicant project application in e-snaps prior to the application deadline of September 30, 2019 by 8:00 p.m. eastern time.</p>

SECTION B

HUD'S HOMELESS POLICY AND PROGRAM PRIORITIES

CoCs will be evaluated based on the extent to which they further HUD's policy priorities

ENDING HOMELESSNESS FOR ALL PERSONS

- CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
- CoCs should measure their performance based on local data taking into account challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, and those experiencing chronic homelessness).
- CoCs should have a comprehensive outreach strategy to identify and continuously engage all unsheltered individuals and families.
- 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.
- CoCs should use the reallocation process to create new projects that improve overall performance and better response to identified needs.

CREATING A SYSTEMIC RESPONSE TO HOMELESSNESS

- 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 we are serving people experiencing homelessness.
- 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.

STRATEGICALLY ALLOCATING AND USING RESOURCES

- Using cost, performance, and outcome data, to improve how resources are utilized to end homelessness
- CoCs should review project quality, performance, and cost effectiveness
- HUD encourages CoCs to maximize the use of mainstream and other community-based resources to serve persons experiencing homelessness
- CoCs should work to develop partnerships with Public Housing Authorities and other government, faith-based, and nonprofit resources specializing in areas such as treating mental illness, treating substance abuse, job training, life skills, or similar activities to help CoC Program participants exit permanent supportive housing.
- CoCs should review all projects eligible for renewal in FY 2019 to determine effectiveness in serving people experiencing homelessness, including cost effectiveness.

USING AN EVIDENCE-BASED APPROACH

- CoCs should prioritize project that employ strong use of data and evidence, including the cost-effectiveness and impact of homelessness programs on positive housing outcomes, recovery, self-sufficiency, and reducing homelessness.
- CoCs may use measures to evaluate projects that include, but are not limited to: rates of positive housing outcomes, such as reduced length of time homeless and reduced rates of return to

homelessness; improvements in employment and income; and improvements in overall well-being, such as improvements in mental health, physical health, connections to family, and safety.

INCREASING EMPLOYMENT

- CoCs and CoC Program funded projects recognize that employment provides people experiencing homelessness with income to afford housing and improves recovery outcomes for individuals with mental illness or addiction.
- CoCs and CoC-funded projects should work with local employment agencies and employers to prioritize training and employment opportunities for people experiencing homelessness.
- CoCs should also promote partnerships with public and private organizations that promote employment.

PROVIDING FLEXIBILITY FOR HOUSING FIRST WITH SERVICE PARTICIPATION REQUIREMENTS

- CoC Program funded projects should help individuals and families move quickly into permanent housing without any preconditions regarding income, work effort, sobriety or any other factor. This important priority ensures that federal funds are allocated to providers that serve the most vulnerable homeless individuals.
- CoC Program funded projects may allow service participation requirements once a person has been stably housed, which may promote important outcomes (e.g., employment, increase income, reduced substance use, and strengthened social connections). This provides communities and programs with flexibility, without penalty, to use service participation requirements after people have been stabilized in housing.

SECTION C: Application Guidelines

All information is required. The Central MS CoC reserves the right not to review incomplete applications or projects that do not meet eligibility requirements.

Required Application Components and Format

Application Instructions:

All project applications must be completed in eSnaps (esnaps.hud.gov) for consideration. The application in eSnaps must be printed and included with the following documents:

Additional Required Documents – New Applicants:

- IRS Documentation of Non-Profit Status
- Non Profit Board Documentation
 - Include Board structure, list of current board members, meeting schedule for the past 12 months, and minutes from the last four board meetings
- Audit or Financial Statement, including management letter (must be within the past 12 months)

Required Application Components – Renewal Applicants ONLY:

- IRS Documentation of Non-Profit Status
- Non Profit Board Documentation
 - Include Board structure, list of current board members, meeting schedule for the past 12 months, and minutes from the last four board meetings
- Audit or Financial Statement, including management letter
- Two most recent HUD Annual Performance Reports (APR)
- Line of Credit Control System (LOCCS) expenditure information

Important Points for All Project Applicants:

- **DUNS/SAM REGISTRATION.** All project applicants must have a DUNS number and an active SAM registration.
- **REQUIRED READING.** Project applicants should read the CoC NOFA, COC Program Interim Rule, and the General NOFA.
- **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 eSnaps.
- **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.

- **2019 FAIR MARKET RENTS WILL APPLY.** Because the CoC Consolidated Application is due prior to the publication of the final FY 2020 FMRs, the FY 2019 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 2019 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 predetermined 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.

SECTION D

Central MS CoC Review, Ranking, and Appeals Process

NOFA Project Application Review and Rating

All Project Applications will receive a proposal review using a scoring tool. Projects are evaluated for Application and Threshold Compliance then read by the Central MS CoC Ranking and Review Committee. All project information will be reviewed by each committee member during a series of committee meetings during the review period.

Reviewers will be provided a copy of the Project Application, the Application Guidelines and supporting documentation. Reviewers will also be provided a copy of the HUD eLOCCS, Agency Annual Performance Report (APR) and Data Quality reports to assist in the evaluation of renewal applications.

The collated data compiled from the scoring sheet will be considered by the CoC Executive Board. It should be noted that service providers on the Board shall not participate in the voting process. All potential conflicts of interest will be disclosed and any member with a conflict shall not participate in the voting process, as per the Central MS CoC Code of Conduct.

Based on the results of the committee review, project scores are rated and ranked from the highest proposal score down. Project applications are ranked, except CoC planning projects, having them fall into two Tiers based on financial threshold. All projects must pass HUD's eligibility and threshold requirement specified above, no matter their priority.

Applicant Notification

Project applicants accepted for inclusion in the consolidated CoC NOFA application will be notified in writing 30 days prior to the HUD Consolidation Application submission deadline. Applications rejected for inclusion in the consolidated plan have the right to appeal the CoCs decision. Specific guidance is provided regarding appeal to the Collaborative Applicant of the CoC's decision. If applicant complaint cannot be resolved at the local level, Project Applicants have the right to submit a Solo Applicant directly to HUD.

Appeals

Project applicants that believe they were denied the opportunity to participate in the local CoC planning process in a reasonable manner and were rejected or reallocated by the CoC may appeal the rejection directly to the Collaborative Applicant for review by the CoC Governance Board and determination. Specific guidance, forms and submission guidelines for local appeal process are available upon request to the Collaborative Applicant. If resolution at the local level is unsuccessful, Applicants can appeal directly to HUD by submitting a Solo Applicant project application in e-snaps prior to the application deadline of September 30, 2019 by 8:00 p.m. eastern time.

Glossary of Key Terms

CoC Program Components

- **Permanent Housing**

Permanent housing (PH) is defined as community-based housing without a designated length of stay in which formerly homeless individuals and families live as independently as possible. Under PH, a program participant must be the tenant on a lease (or sublease) for an initial term of at least one year that is renewable and is terminable only for cause. Further, leases (or subleases) must be renewable for a minimum term of one month.

The CoC Program funds two types of permanent housing: permanent supportive housing (PSH) for persons with disabilities and rapid re-housing. Permanent supportive housing is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability. Rapid re-housing (RRH) emphasizes housing search and relocation services and short- and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into permanent housing.

- **Transitional Housing**

Transitional housing (TH) is designed to provide homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing. Transitional housing may be used to cover the costs of up to 24 months of housing with accompanying supportive services. Program participants must have a lease (or sublease) or occupancy agreement in place when residing in transitional housing. The provisions of the CoC Program's TH program component have not changed significantly from the TH provisions under SHP.

- **Joint Transitional Housing and PH- Rapid Rehousing**

These projects provide low-barrier, temporary housing while individuals and families quickly move to permanent housing with a seamless program design. The joint TH and PH-RRH component combines two existing program components, TH and PH-RRH, into a single project to serve individuals and families experiencing homeless. Eligible costs include the following: Capital costs (i.e., new construction, rehabilitation, or acquisition) leasing of a structure or units, and operating costs to provide transitional housing; Short or medium-term tenant-based rental assistance on behalf of program participants to pay for the rapid re-housing portion of the project; Supportive services; HMIS; and Project administrative costs.

Joint TH and PH-RRH component projects that assist program participants must be able to provide both transitional housing assistance and rapid rehousing assistance to each program participant. HUD will require that applications for this program component demonstrate that the project will have capacity to provide both kinds of assistance as needed to each program participant.

- **Supportive Services Only**

The supportive services only (SSO) program component allows recipients and sub-recipients to provide services to homeless individuals and families not residing in housing operated by the recipient. SSO recipients and sub-recipients may use the funds to conduct outreach to sheltered and unsheltered homeless persons and families, link clients with housing or other necessary services, and provide ongoing support. SSO projects may be offered in a structure or structures at one central site, or in multiple buildings at scattered sites where services are delivered. Projects may be operated independent of a building (e.g., street outreach) and in a variety of community-based settings, including in homeless programs operated by other agencies.

- **Homeless Management Information System**

Funds under this component may be used only by Homeless Management Information System (HMIS) leads for leasing a structure in which the HMIS operates, for operating the structure in which the HMIS is housed, and/or for covering other costs related to establishing, operating, and customizing a CoC's HMIS. Other recipients and sub-recipients may not apply for funds under the HMIS program component, but may include costs associated with contributing data to the CoC's HMIS within their project under another program component (PH, TH, SSO, or HP).

- **Homelessness Prevention**

Recipients and sub-recipients located in HUD-designated High Performing Communities (HPCs) may use CoC Program funds for homelessness prevention assistance for individuals and families at risk of homelessness. The services under this component may include housing relocation and stabilization services as well as short- and medium-term rental assistance to prevent an individual or family from becoming homeless. Through this component, recipients and subrecipients may help individuals and families at-risk of homelessness to maintain their existing housing or transition to new permanent housing. Homelessness prevention must be administered in accordance with 24 CFR part 576. **Central MS CoC has not received HUD designation as a High Performing Community (HPC) therefore no applications will be accepted for this program component.**

Eligible Costs – See § 578.37(a)

The eligible costs under the CoC Program are summarized below:

- **Acquisition**

Acquisition of real property is an eligible cost category under the PH, TH, and SSO program components. Grant funds may be used for up to 100 percent of the cost of purchasing property for the purpose of providing permanent housing, transitional housing, and supportive services only activities.

- **Rehabilitation**

Rehabilitation of structures is an eligible cost category under the PH, TH, and SSO program components. Eligible rehabilitation costs include installing cost-saving energy measures and bringing a structure up to health and safety standards. Rehabilitation on leased properties is ineligible.

- **New Construction**

New construction of structures is eligible under the PH and TH program components. New construction may include building entirely new facilities, constructing an addition to an existing structure that increases the floor area by 100 percent or more, and the cost of land for construction. Projects must demonstrate that construction is more cost-effective than rehabilitation. Unlike the previous regulations, the CoC Program interim rule establishes no maximum grant limits for rehabilitation or new construction. CoC Program funds may be used for up to 100 percent of costs as long as the match requirement is met through other resources. New construction on leased properties is ineligible.

- **Leasing Costs**

Leasing is an eligible cost category under the PH, TH, SSO, and HMIS program components. Funds may be used to lease individual units or all or part of structures. Rents must be reasonable and, in the case of individual units, the rent paid may not exceed HUD-determined Fair Market Rents. Leasing funds may not be used for units or structures owned by the recipient, sub-recipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure without a HUD authorized exception. When leasing funds are used to pay rent on units, the lease must be between the recipient or the sub-recipient and the landowner, with a sublease or occupancy agreement with the program participant. The recipient may, but is not required to, charge the program participant an occupancy charge, consistent with the parameters specified in the interim rule. **2019 FAIR MARKET RENTS WILL APPLY FOR THE 2019 COC COMPETITION.**

- **Rental Assistance Costs**

Rental assistance is an eligible cost category under the PH and TH program components and may be tenant-based (TBRA), sponsor-based (SBRA), or project-based (PBRA), depending upon the component type.

Rental assistance may be short-term for up to 3 months; medium-term for 3 to 24 months; or long-term for more than 24 months. The length of assistance depends upon the component type under which the cost is funded. Recipients must serve as many program participants as identified in their funding application to HUD, but, if the amount reserved for the term of the grant exceeds the amount needed to pay actual costs, the excess funds may be used to cover property damage, rent increases, or the rental needs of a greater number of program participants.

- o **TBRA.** Program participants select any appropriately sized unit within the CoC's geographic area, although recipients or sub-recipients may restrict the location under certain circumstances to ensure the availability of the appropriate supportive services. Except for victims of domestic violence, program participants may not retain their rental assistance if they relocate to a unit outside the CoC's geographic area.
- o **SBRA.** Program participants must reside in housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization.
- o **PBRA.** Program participants must reside in housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Program participants may not retain their rental assistance if they relocate to a unit outside the project.
- o When rental assistance funds are used to pay rent on units, the lease must be between the program participant and the landowner. Each program participant, on whose behalf rental assistance payments are made, must pay a contribution toward rent consistent with the requirements of the interim rule.

- **Supportive Services Costs**

Supportive services are eligible costs under the PH, TH, and SSO program components. The CoC Program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. As in the past, services must be offered to residents of PSH and TH for the full period of their residence. RRH programs must require program participants to meet with a case manager at least monthly.

Services may be provided to formerly homeless individuals for up to six months after their exit from homelessness, including the six months following exit from a transitional housing project. Recipients and sub-recipients are required to perform an annual assessment of the service

needs of their program participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services.

- **Operating Costs**

Operating costs are eligible under the PH, TH, and HMIS program components. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units, including maintenance (such as scheduled replacement of major systems), repair, building security (when CoC Program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes. These costs may not be combined with rental assistance costs within the same unit or structure, and operating costs are not eligible under the SSO program component.

- **HMIS Costs**

Costs related to contributing client data to or maintaining data in the CoC's HMIS or a comparable database for victim services providers or legal services providers are eligible costs under the PH, TH, SSO, and HMIS program components. Eligible HMIS costs include hardware, equipment and software costs; training and overhead; and staffing costs associated with contributing data to the HMIS designated by the CoC for its geographic area. .

- **Project Administration**

Recipients and sub-recipients may use up to 10 percent of any grant, excluding the amount for CoC planning and Unified Funding Agency (UFA) costs, established through the CoC Program NOFA for project administrative costs. These costs include expenses related to the overall administration of the grant (24 CFR part 578.59), such as management, coordination, monitoring, and evaluation activities and environmental review.

- **Match**

Match is actual cash or in-kind resources contributed to the grant. All costs paid for with matching funds must be for activities that are eligible under the CoC Program, even if the recipient is not receiving CoC Program grant funds for that activity. All grant funds must be matched with an amount no less than 25% of the awarded grant amount (excluding the amount awarded to the leasing budget line item) with cash or in-kind resources. Match resources may be from public (not statutorily prohibited by the funding agency from being used as a match) or private resources.

- **Leverage**

Leverage is the non-match cash or non-match in-kind resources committed to making a CoC Program project fully operational. This includes all resources in excess of the required 25 percent match for CoC Program funds as well as other resources that are used on costs that are ineligible in the CoC Program.

Leverage funds may be used for any program related costs, even if the costs are not budgeted or not eligible in the CoC Program. Leverage may be used to support any activity within the project provided by the recipient or sub-recipient.

HUD RESOURCES:

- 2019 CoC NOFA: <https://www.hudexchange.info/resource/5842/fy-2019-coc-program-nofa/>
- COC Program Interim Rule (24 CFR part 578)
<http://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version>
- E-snaps application
<https://esnaps.hud.gov>
- HUD Websites:
<https://www.hud.gov>
<https://www.hudexchange.info>
- eSnaps Guidance: <https://www.hudexchange.info/programs/e-snaps/>
- Training and Resources: <https://www.hudexchange.info/homelessness-assistance/>
- HUD Exchange Ask A Question (AAQ): <https://www.hudexchange.info/program-support/my-question/>
- Listserv: <https://www.hudexchange.info/maillinglist>