



FY2017 NOFA FAQ

1. Can Transitional Housing funded by DSHS be served in PSH DedicatedPLUS after their 12 months expires?

Answer: *According to the NOFA, the DedicatedPLUS definition is as follows. Not knowing the details of the DSHS transitional housing, according to the definition, the household would have had to meet the definition of chronically homeless at the time they entered transitional housing to qualify for DedicatedPLUS.*

- d. DedicatedPLUS project. A permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless youth, that at intake are:
- (1) experiencing chronic homelessness as defined in 24 CFR 578.3;
 - (2) residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
 - (3) residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
 - (4) residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
 - (5) residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
 - (6) receiving assistance through a Department of Veterans Affairs(VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

2. Can clients from TH/RRH move to PSH if they are Chronically Homeless at entry?

Answer: *According to the NOFA;*

“CoCs may create new permanent supportive housing projects that meet the requirements of DedicatedPLUS as defined in Section III.A.3.d. of this NOFA or new permanent supportive housing projects where 100 percent of the beds are dedicated to chronic homelessness.”

HUD’s definition for chronically homeless can be found on the HUD Exchange:

<https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>



Any new PSH projects funded through the SARAH CoC would be required to accept referrals through Coordinated Entry. A household who is currently in a TH/RRH project and who met the definition of chronically homeless prior to participation in the TH/RRH project, could qualify to live in a PSH project that targets the DedicatedPLUS target population.*

**See question 1 above for DedicatedPLUS definition.*

3. What level of supportive services are required for PSH?

Answer: *The NOFA does not specify the exact level of services. However, the threshold criteria for PSH includes that services should ensure successful retention or help obtaining permanent housing and addresses that program participants will be connected for mainstream services and employment programs.*

(1) To be considered as meeting project quality threshold, new permanent housing—permanent supportive housing and rapid rehousing—project applications must receive at least 3 out of the 4 points available for the criteria below. New permanent housing project applications that do not receive at least 3 points will be rejected.

(a) Whether the type of housing, number, and configuration of units will fit the needs of the program participants (e.g., two or more bedrooms for families) (1 point);

(b) Whether the type of supportive services that will be offered to program participants will ensure successful retention or help to obtain permanent housing—this includes all supportive services, regardless of funding source (1 point);

(c) Whether the specific plan for ensuring that program participants will be individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible to apply meets the needs of the program participants (e.g., Medicare, Medicaid, SSI, Food Stamps, local Workforce office, early childhood education) (1 point); and

(d) Whether program participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g., provides the participant with some type of transportation to access needed services, safety planning, case management, additional assistance to ensure retention of permanent housing) (1 point).

Additional guidance maybe found in the HUD Interim Rule regarding the PSH service requirements:

<https://www.hudexchange.info/resources/documents/CoCProgramInterimRule.pdf>

4. Can a veteran who has maxed out SSVF or VA-funded TH move into CoC RRH?

Answer: *The definition of the eligible populations for newly funded RRH includes:*

(2) CoCs may create new rapid rehousing projects that will serve homeless individuals and families, including unaccompanied youth, who meet the following criteria:

- (a) residing in a place not meant for human habitation;
- (b) residing in an emergency shelter;
- (c) persons meeting the criteria of paragraph (4) of the definition of homeless, including persons fleeing or attempting to flee domestic violence situations;
- (d) residing in a transitional housing project that was eliminated in the FY 2017 CoC Program Competition;
- (e) residing in transitional housing funded by a Joint TH and PH-RRH component project (see Section III.A.3.h. of this NOFA); or
- (f) receiving services from a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

Those households could qualify if they met one of the designated criteria prior to intake of the VA program. The CoC NOFA expands the eligibility for Rapid Rehousing.

<https://www.hudexchange.info/resources/documents/fy-2017-coc-program-competition-nofa-whats-new-changes-and-highlights.pdf>

5. Is there guidance that you must place a client in RRH within 30 days?

Answer: *There is no specific rule, other than households should be placed in housing as quickly as possible. This HUD brief on Rapid Rehousing indicates that efficient programs should house households within 30 days:*

<https://www.hudexchange.info/resources/documents/Rapid-Re-Housing-Brief.pdf>

One of the scoring items for SARAH, as the CoC in the Collaborative Application, will be if they have a strategy that re-houses households with children within 30 days of those families becoming homeless.

6. Are there studies proving the viability of Housing First?

Answer: *Yes, for more information visit:*

- <https://www.hudexchange.info/resources/documents/Housing-First-Permanent-Supportive-Housing-Brief.pdf>
- <https://www.usich.gov/solutions/housing/housing-first>
- <https://endhomelessness.org/resource/housing-first/>

7. The Budget in E-Snaps defaults to 12 months, but what if you are only serving clients for 6 months maximum?

Answer: *While you may serve households for less than 12 months, the budget is a 12 month budget. Households are anticipated to enter and leave during that 12 month time period. The budget is not based off of each client or household, but on the amount of budget needed to serve all of the households in the project during the 12 months.*

8. How do agencies notify the CoC if they are going to voluntarily reallocate?

Answer: *SARAH has requested that renewal projects interested in reallocating notify SARAH by August 11th.*

9. If someone has income, must they pay a percentage of their income towards the rent?

Answer: *For Rapid Rehousing, the HUD Interim Rule requires each CoC in their COC written standards to create standards about payment of income towards rent. See the SARAH current written standards on their website: <http://www.sarahomeless.org/wp-content/uploads/2017/06/CoC-ESG-Written-Standards-FINAL.pdf>*

The CoC written standards currently indicate:

“The maximum occupancy charge will not exceed the highest of 30% of the household’s adjusted income or 10% of the total monthly income.”

SARAH is currently in the process of updating these written standards.



10. What percentage of income can you charge? Is it based on the local CoC Written Standards?

Answer: (see question 9)

11. What is the process of transferring a grant to a different agency?

Answer: A transfer cannot take place during the NOFA. If a project is no longer viable within an agency, it can be reallocated. Another agency can create a new project that is similar to the project being ended, but there is no guarantee that the project will be ranked highly by the IRT.

12. Can two agencies partner to do a new TH/RRH project?

Answer: Yes, but one must be the applicant, and the other the sub recipient. According to the NOFA, the project as a whole must be able to provide both components:

When a program participant is enrolled in a Joint TH and PH-RRH component project, the recipient or subrecipient must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all participants. A program participant may choose to receive only the transitional housing unit or the assistance provided through the PH-RRH component, but the recipient or subrecipient must make both types of assistance available.

13. What specific steps do I take if we decide to submit an application for the Joint TH-RRH funding opportunity?

Answer: Agencies interested in submitting an application for joint TH-RRH funding must submit a new application through esnaps by August 16th at 5:00pm. See the Application Procedures section of the 2017 New Application on the SARAH website:

<http://www.sarahomeless.org/wp-content/uploads/2017/05/2017-RFP-for-New-Projects.pdf>

14. Does Scattered Site RRH require a match?

Answer: Yes – all project line items, except for leasing, require a 25% cash or in-kind match. Details regarding the matching requirements can be found the HUD CoC Interim Rule, 578.73 Matching requirements.

https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

15. What if an existing CoC funded agency is interested in applying for TH/RRH?

Answer: For Reallocation, notify SARAH by August 11th if you are going to reallocate and submit a new RRH/TH application according to the SARAH RFP on the website. If you are applying for NEW RRH/TH and not reallocating, all you must do is submit your new project application in e-snaps by August 16th, 2017 at 5:00pm.

See the RFP here: <http://www.sarahomeless.org/wp-content/uploads/2017/05/2017-RFP-for-New-Projects.pdf>

16. If an existing transitional housing CoC funded project wishes to reallocate to the new TH/RRH, what is the process for applying for bonus funds to ensure enough operating funding?

Answer: If an existing transitional housing projects wishes to reallocate to TH/RRH, the budget must consider the needs of both the transitional housing and the rapid rehousing components. An agency can apply for more funds for TH/RRH to hopefully close the gap under the permanent housing bonus, but that project would be scored and ranked separately. Agencies who are currently administering both transitional housing and RRH could reallocate both of those and combine them to a joint TH/RRH project.

An agency would not be guaranteed that both HUD would fund their new and reallocation applications. All projects first must be reviewed by an Independent Review Team (IRT) who would rank both of those new project applications, or could choose to reduce or reject them. The SARAH Board makes the final ranking determination. Once submitted by SARAH, there is no guarantee what HUD will fund, including any additional bonus projects.

Agencies have until August 11th to decide if they want to reallocate. Current renewals will see their IRT score, as well as the average application score the week of August 7th, that can give them more information about the competitiveness of their renewal



application. Any new or reallocation applications must be received by August 16th at 5pm.

17. I am interested in the RRH new project. It would not be for leasing projects, if that means we lease our properties to Veterans. It would be rental assistance, etc, for Veterans who have exited or do not qualify for SSVF. Is that a new project?

Answer: Yes, that would be a new RRH project under the Permanent Housing bonus. Keep in mind that referrals for CoC programs must come through Coordinated Entry too. Please see the instruction guide for more information.

<https://www.hudexchange.info/resource/2909/coc-project-application-instructions-for-new-projects/>

18. Are Matching funds required? Can we match it using other governments such as SSVF?

Answer: Yes, see question 14. Please see the HUD Interim Rule for eligible matching sources.

19. Does the grant cover indirect/admin costs?

Answer: Yes, HUD defines eligible administrative costs under 24 CFR 578.33(d)(1).

20. What are the desired outcomes/reporting back to HUD?

Answer: The project performance measures are reported in the HUD Annual Performance Report. They include exits to PH, recidivism rates, increasing income, and reducing length of time homeless. Please contact Katie Vela for a sample APR report. Project performance measures are then included as part of overall system performance measures. The COC Collaborative application (SARAH's application) measures how the CoC is ending homelessness. The collaborative application score determines the ordering of how HUD considers Tier II projects.

21. What is the Code of Conduct form and where do we find it?

Answer: *The Code of Conduct is a required form by HUD. First, check to see if you already have it on file here:*

https://portal.hud.gov/hudportal/HUD?src=/program_offices/spm/gmomgmt/grantsinfo/conduct *If HUD already has it on file, you do not need to attach it.*

If not, it must be part of your applicant profile here (as an attachment):

<https://www.hudexchange.info/resource/2958/instructions-for-updating-the-project-applicant-profile/>

Here is also a FAQ about the Code of Conduct:

<https://www.hudexchange.info/faqs/3260/our-coc-submitted-a-code-of-conduct-which-was-listed-on-huds-website/>

22. I am working on the match funds for our application and was wondering if a certain funding source is allowed?

Answer: *Review the match requirements in the CoC Interim Rule to determine if they meet the requirements.*

https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

23. We are attempting to start the renewal applications in eSnaps but we have not been able to locate where the actual renewal is located. Your help is greatly appreciated.

Answer: *HUD puts together guides of who to use the esnaps system. This one is how to find your renewal:*

<https://www.hudexchange.info/resources/documents/How-to-Access-the-Project-Application.pdf>

All of the resources for completing your application can be found here:

<https://www.hudexchange.info/programs/e-snaps/guides/coc-program-competition-resources/#coc-program-competition--project-applicants>

24. What is HUD's definition of Veteran in the NOFA?

Answer: *In the NOFA, this is the DedicatedPLUS definition. The Veteran definition would be up to the VA to meet their homeless assistance programs.*

- d. DedicatedPLUS project. A permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless youth, that at intake are:
- (1) experiencing chronic homelessness as defined in 24 CFR 578.3;
 - (2) residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
 - (3) residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
 - (4) residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
 - (5) residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
 - (6) receiving assistance through a Department of Veterans Affairs(VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

There are also points for ending Veterans homelessness:

- d. Ending Veteran Homelessness. HUD will award up to 15 points to CoCs for progress towards ending veteran homelessness. HUD will award:
- (1) Up to 8 points to CoCs that demonstrate a decrease in the total number of homeless veterans in the CoC, as reported in the 2017 PIT count, compared to 2016.
 - (2) Up to 4 points to CoCs that demonstrate the total number of homeless households with children and youth has decreased as reported in the 2017 PIT count compared to 2016.
 - (3) Up to 3 points to CoCs that demonstrate they identify, assess, and refer homeless veterans who are eligible for Veterans Affairs services and housing to appropriate resources such as HUD-VASH, Supportive Services for Veterans Families (SSVF), and Grant and Per Diem (GPD).

25. What if we need to use rents lower than FMR in our Rapid Rehousing Rental Assistance Budget in order to be consistent with the GIW?

Answer: According to the NOFA, renewals can use less than FMR: (NOFA, pg. 13)

7. Eligible renewal projects requesting rental assistance are permitted to request a per-unit amount less than the Fair Market Rent (FMR), based on the actual rent costs per unit. This will help reduce the number of projects receiving rental assistance that have large balances of unspent funds remaining at the end of the operating year. Renewal project applicants must ensure that the amount requested will be sufficient to cover all eligible costs as HUD cannot provide funds beyond what is awarded through this Competition. Project applications for rental assistance cannot request more than 100 percent of the published FMR. New project applications must adhere to 24 CFR 578.51(f) and must request the full FMR amount per unit. See Section VIII.B. of this NOFA for additional information regarding FMR adjustments for projects receiving funds for rental assistance.

According to the Renewal Application Detailed Instructions, (pg. 32), you can use less than FMR: <https://www.hudexchange.info/resource/2910/coc-project-application-instructions-for-renewal-projects/>

Does the applicant request rental assistance funding for less than the area's per unit size fair market rents? Choose whether to request rental assistance funding at or below the per unit size FMRs. Information entered should

match the CoC's FY 2017 GIW unless the CoC is reducing the project due to reallocation. By selecting "No," the table described below will automatically calculate based on the number of units per unit size entered multiplied by the corresponding FMR. **By selecting "Yes," the values entered into the "HUD Paid Rent" (also known as Actual Rent) column for each corresponding unit size must be less than the FMR amount for that unit size.** If the project applicant requested and was awarded actual rent in the FY 2016 or previous CoC Program Competition, then the project applicant cannot request FMR. The exceptions to this is if HUD approved the change from actual rent to FMR on the final FY 2017 GIW, project is reduced due to reallocation, or if the FMR is now below the value of the actual rent previously requested. Applicants that are switching to actual rents as part of this application process must ensure that the amount of rental assistance requested, if below the published FMR, will be sufficient to cover all rental assistance costs because HUD cannot provide funds beyond what is awarded through the competition.

Also, the FY17 Budgets Project Application Instructional Guide, page 43 has additional instructions for the rental assistance budget:

<https://www.hudexchange.info/resources/documents/FY-2017-Budgets-Project-Application-Instructional-Guide.pdf>

26. Can we combine 2 renewal applications into one new application and what are the disadvantages of that compared to submitting the 2 renewal applications?

Answer: To combine two projects, you would need to reallocate both projects. You would then be eligible to apply for a new project using those reallocation funds. The advantage or disadvantage would depend on where the ranking of the renewal projects would fall compared to a new project. The Independent Review Team (IRT) scored the renewal applications and renewal applications will receive their project scores this week along with the average score for all renewal applications. This will help an agency know how competitive a renewal project will be. IRT will score new projects and then make any ranking policy recommendations to the SARAH Board, who is anticipated to adopt the final ranking of projects during a closed board session on August 31st.

27. If we ask for additional funding above the total of the combined budgets of 2 renewals can it come from the Bonus funding? Can you tell us about the process of how to ask for bonus funding?

Answer: If you want to apply for additional funding in addition to the new application for your reallocation funds, your agency could additionally apply separately for a Permanent Housing Bonus project. All renewals and new applications are due to SARAH on August 16th by 5:00pm. See the RFP on the SARAH website for more information on how to apply for bonus funding. <http://www.sarahomeless.org/reports-dashboards/>

28. What are maximum allowable costs for administration and for case management on new project applications?

Answer: *For the FY2017 CoC Program Competition, project applicants may request up to 10 percent of the total project budget for 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.*

HUD has not set a guideline in the NOFA for maximum allowable costs for case management, eligible under supportive services. However, it is clear that housing is the focus and previous guidance has suggested that the majority of funds should be focused on housing and specific housing related activities. In past NOFAs the guidance was that 70 or 80 percent should be focused on housing and 20-30 percent on supportive services. However, they are no longer as prescriptive.

29. If the project becomes Dedicated Plus, does this mean that we will be required to accept chronically homeless non-veterans into the program? Since the plus model states that 100% of the beds must be dedicated to serve individuals with disabilities, does this mean that a chronically homeless individual would take priority over a literally homeless veteran (for entry)?

Answer: *All of the clients that are referred to your program would have to meet the Dedicated Plus definition, but you could specify that you serve veterans that meet the Dedicated Plus definition. You will get referrals to your program through Coordinated Entry who meet those requirements. Also, you should review the CoC Interim Rule that discusses the fair housing requirements of serving a subpopulation to make sure you are in compliance with this for serving veterans:*

§ 578.93 Fair Housing and Equal Opportunity.

(a) Nondiscrimination and equal opportunity requirements. The nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) are applicable.

(b) Housing for specific subpopulations. Recipients and subrecipients may exclusively serve a particular homeless subpopulation in transitional or permanent housing if the housing addresses a need identified by the Continuum of Care for the geographic area and meets one of the following:

(1) The housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex;

- (2) The housing may be limited to a specific subpopulation, so long as admission does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR 5.105 (e.g., the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless persons and families).
- (3) The housing may be limited to families with children.
- (4) If the housing has in residence at least one family with a child under the age of 18, the housing may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the project so long as the child resides in the housing.
- (5) Sober housing may exclude persons who refuse to sign an occupancy agreement or lease that prohibits program participants from possessing, using, or being under the influence of illegal substances and/or alcohol on the premises.
- (6) If the housing is assisted with funds under a federal program that is limited by federal statute or Executive Order to a specific subpopulation, the housing may be limited to that subpopulation (e.g., housing also assisted with funding from the Housing Opportunities for Persons with AIDS program under 24 CFR part 574 may be limited to persons with acquired immunodeficiency syndrome or related diseases).
- (7) Recipients may limit admission to or provide a preference for the housing to subpopulations of homeless persons and families who need the specialized 105 supportive services that are provided in the housing (e.g., substance abuse addiction treatment, domestic violence services, or a high intensity package designed to meet the needs of hard-to-reach homeless persons). While the housing may offer services for a particular type of disability, no otherwise eligible individuals with disabilities or families including an individual with a disability, who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

30. On the housing type and location details screen (4B) what address do I list if we are doing scattered site apartments and I am not sure where clients will be living?

Answer: *When filling out the application, it can be helpful to have both the Detailed Instruction and the Instructional Guide printed to reference.*

You can find them here: <https://www.hudexchange.info/resource/2910/coc-project-application-instructions-for-renewal-projects/>

When you reference the Instructional Guide under 4b (Page 66) they say:

For scattered-site housing, enter the address where the majority of beds are located, where most beds are located as of the date you submit the application, or an administrative address.