SANTA MARIA / SANTA BARBARA CONTINUUM OF CARE
SUMMARY OF THE 2017 CONTINUUM OF CARE NOTICE OF FUNDING AVAILABILITY (COC NOFA)

This summary includes highlights from the 2017 CoC NOFA, the HUD email announcement announcing its release, and a Change Log that HUD published the same day. Some of the information included below is not included in the NOFA, but will be apparent once HUD opens eSNAPS and releases the Detailed Instructions.

BACKGROUND

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

Each year the U.S. Department of Housing and Urban Development (HUD) releases a Notice of Funding Availability (NOFA), signifying the beginning of a funding competition among approximately 450 Continuums of Care (CoC), the community stakeholder groups that guide local responses to homelessness. The 2017 CoC NOFA was released on July 14, 2017, opening the competition making available **approximately $2 billion** to serve homeless people nationally. The information in the NOFA sets forth the competition rules and processes for 2017. This summary includes the highlights of the NOFA; additional guidance will be shared as it is made available.

Before the application is submitted to HUD, the CoC is required to hold a local competition to determine which projects will be included in the consolidated application, along with their relative priority. The results of the local competition dictate for which projects the CoC will seek funding. Additional information about project application requirements and standards will be available at the July 28 TA Workshop**.** Additional details about anything in this summary can be found in the NOFA, available at: https://www.hudexchange.info/resource/5419/fy-2017-coc-program-nofa/

KEY THEMES IN THIS YEAR'S NOFA

- As described in more detail below, HUD has created new project types and expanded project eligibility for some project types. These changes should allow communities to have more flexibility in how CoC funding is used.
- HUD has also made some administrative changes that will streamline the application process, especially for renewal projects.

DETAILS

IMPORTANT HUD-REQUIRED DATES

- **Friday, July 14, 2017**: 2017 CoC NOFA release date
- On or after **Tuesday, July 18, 2017:** eSNAPS will be available
- On or before **Tuesday, August 29, 2017** (30 days prior to submission deadline): All project applications are required to be submitted to the CoC
- On or before **Wednesday, September 13, 2017** (15 days prior to submission deadline): The CoC is required to notify all project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC.
- On or before **Tuesday, September 26, 2017** (2 days prior to submission deadline): CoCs must post on their website (or a partner's website) all parts of the CoC Consolidated Application, including the CoC Application attachments and the completed Priority Listing (but not project applications), and notify community members and key stakeholders that the Consolidated Application is available.
- **Submission Deadline: Thursday, September 28, 2017 at 8:00 PM EDT/6:00 PM CDT/5:00 PM PDT**
- HUD may issue up to two conditional funding announcements.
- **September 30, 2019**: All conditional funds awarded in this competition must be obligated.
- **September 30, 2024**: Obligated funds must be expended.

AVAILABLE FUNDING FOR OUR COC

HUD determines the maximum award for which each CoC is eligible, determined by a combination of factors. On July 20, 2017 HUD released a revised CoC Estimated Annual Renewal Demand Report. Please note that as a result of the revised report, Santa Maria/Santa Barbara CoC's estimates for funding have changed. This year, in our CoC, our eligible application amounts are now as follows:

- Estimated CoC's Estimated Annual Renewal Demand (ARD): **$1,614,978**
    - Estimated Tier 1 (94% of ARD): **$1,518,079**
    - Estimated Tier 2 (remainder of annual renewal demand plus Bonus amount): **$193,798**
- Estimated Permanent Housing Bonus Amount (6% of FPRN): **$96,899**
- Estimated CoC Planning Amount: **$48,449** (Planning grants are not ranked again in 2017.)

2017 HUD COC POLICY PRIORITIES

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

1. **Ending homelessness for all persons**.
    a. CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
    b. CoCs should measure their performance based on local data taking into account challenges faced by subpopulations.
    c. CoCs should have a comprehensive outreach strategy to identify and continuously engage all unsheltered individuals and families.
    d. CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.

e. CoCs should use the reallocation process to create new projects that improve their overall performance and better respond to their needs.

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

3. **Strategically allocating and using resources.**
   a. Using cost, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness.
   b. CoCs should review project quality, performance, and cost effectiveness.
   c. HUD also encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness.
   d. CoCs should review all projects eligible for renewal in FY 2017 to determine their effectiveness in serving people experiencing homelessness as well as their cost effectiveness.

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

APPLICATION STRUCTURE

The CoC Consolidated Application is made up of three parts:

- **CoC Application**: Describes the CoC's plan for ending homelessness, its system-level performance, and addresses the NOFA's selection criteria. This part of the application is scored and will determine the order in which CoCs are funded.
- **Project Applications**
- **CoC Priority Listing**: Ranks all project applications in order of priority

REVIEW AND RANK CHANGES AND REMINDERS

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

TIER 1

- In 2017, Tier 1 is equal to the greater of the combined amount of Annual Renewal Amount for all permanent housing and HMIS projects eligible for renewal up to $1,000,000 or 94 percent of the CoC's FY 2017 Annual Renewal Demand.
- Tier 1 projects will be conditionally selected from the highest scoring CoC to the lowest scoring CoC, provided the project applications pass both eligibility and threshold review. In the event insufficient funding is available under this NOFA to award all Tier 1 projects, Tier 1 will be reduced proportionately, which could result in some Tier 1 projects falling into Tier 2. Therefore, CoCs should carefully determine the priority and ranking for all project applications in Tier 1 as well as Tier 2.

TIER 2

- Projects in Tier 2 are less likely to be funded, but HUD's scoring process to determine which projects in Tier 2 are funded has changed in 2017 and does not include any priority for permanent housing projects, HMIS or Coordinated Entry projects. Every Tier 2 project will be scored using a 100-point scale based on three factors:
    - *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(s). To more evenly distribute funding across CoCs and take into account the CoCs ranking of projects, point values will be assigned directly related to the CoCs ranking of projects. (Additional details are available in the NOFA.)
    - *Commitment to Housing First.* Up to 10 of 100 points for:
        - How a permanent housing project commits to applying the Housing First model or
        - How a transitional housing project, Joint TH and PH-RRH component project, safe haven project, or SSO project that is not for centralized or coordinated assessment demonstrates that it is low-barrier, prioritizes rapid placement and stabilization in permanent housing, and does not have service participation requirements or preconditions to entry (such as sobriety or a minimum income threshold).
        - A HMIS project or SSO project for a centralized or coordinated assessment system will automatically receive 10 points.

IMPORTANT COC STRATEGY REMINDERS

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

NEW REVIEW AND RANK HUD POLICIES IN 2017

- CoCs may only reallocate eligible renewal projects that have previously been renewed under the CoC Program or projects funded under the Supportive Housing Program (SHP) or Shelter Plus Care (S+C) Program that are eligible for first-time renewal in the FY 2017 CoC Program Competition. **This indicates that CoC projects renewing for the first time cannot be reallocated. More information may be released by HUD.**
- **NEW THIS YEAR**, HUD will allow project applicants to apply for a new expansion project under the reallocation process or permanent housing bonus in order to **expand existing eligible renewal projects** that will increase the number of units in the project, or allow the recipient to serve additional persons. Project applicants that intend to submit a new reallocation or permanent housing bonus project for the purposes of expanding an eligible renewal project must:
    - provide the eligible renewal grant number that the project applicant requests to expand on the new project application;
    - indicate how the new project application will expand units, beds, services, persons served, or in the case of HMIS projects, how the current HMIS grant activities will be expanded for the CoC's geographic area; and
    - ensure the funding request for the new expansion project is within the funding parameters allowed under the reallocation process or permanent housing bonus (i.e. not a request for transitional housing).

  If both the new expansion project and the renewal it expands are conditionally selected for funding, **one grant agreement incorporating both project applications will be executed**. If the renewal project application is not conditionally selected for funding, the expansion project application will not be selected.
- The CoC is required to notify, in writing and outside of e-snaps, **all** project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) **will be accepted and ranked on the CoC Priority Listing, rejected, or reduced** by the CoC. Where a project application is being rejected or reduced, the CoC must indicate the reason(s) for the rejection or reduction.

NEW ELIGIBLE PROJECT TYPES

HUD has created two new eligible project types this year:

- ***DedicatedPLUS project*** is 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:
    - experiencing chronic homelessness as defined in 24 CFR 578.3;
    - 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;
    - 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;
    - 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;

- 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
- 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.

- ***Joint TH and PH-RRH component*** projects may be created to better serve homeless individuals and families. The Joint TH and PH-RRH component project includes two existing program components–transitional housing and permanent housing-rapid rehousing–in a single project to serve individuals and families experiencing homelessness.
  - If funded, HUD will limit eligible costs as follows, in addition to other limitations found in the Interim Rule to:
    - 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 rehousing portion of the project;
    - supportive services;
    - HMIS; and
    - project administrative costs.
  - 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.

ELIGIBLE NEW PROJECTS

PERMANENT HOUSING BONUS

The Permanent Housing Bonus, equal to 6% of Final Pro Rata Need (the higher of Annual Renewal Demand or Preliminary Pro Rata need), is available to all CoCs to apply for funding to create one or more new:

1. DedicatedPLUS projects (**NEW THIS YEAR**)
2. Permanent supportive housing projects where 100 percent of the beds are dedicated to chronically homeless individuals and families
3. Rapid rehousing projects that will serve homeless individuals and families, including unaccompanied youth, who are: **(D, E, and F are NEW THIS YEAR**)
   (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; or

(f) receiving services through a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

4. Joint TH and PH-RRH component projects, which will include transitional housing and permanent housing-rapid rehousing in a single project to serve individuals and families experiencing homelessness, including victims of domestic violence **(NEW THIS YEAR).**

ELIGIBLE REALLOCATION PROJECTS

The following types of **new projects** may be created using funds that the CoC has made available through reallocation:

1. Any of those eligible for the Permanent Housing Bonus
2. Dedicated Homeless Management Information System (HMIS) project (can only be carried out by the HMIS Lead)
3. Supportive services only project to develop or operate a new centralized or coordinated assessment system.

IMPORTANT POINTS FOR RENEWAL PROJECTS

- Renewal project applicants (for grants that have renewed at least once) may submit their renewal project applications with no changes on select screens. More information is forthcoming. This change should speed application processes for applicants and review by HUD staff.
- A renewal project that is permanent supportive housing 100% dedicated to chronically homeless people may **either become a DedicatedPLUS project or may continue to dedicate 100 percent** of its beds to chronically homeless individuals and families. If a renewal project that has 100 percent of its beds dedicated to chronically homeless individuals and families elects to become a DedicatedPLUS project, the project will be required to adhere to all fair housing requirements at 24 CFR 578.93.
- A renewal project that is rapid rehousing is not required to continue to serve only those participants who were in a rapid rehousing category when the project was initially funded. Therefore, if a renewing rapid rehousing project was originally funded to serve only families with children, that project, through the FY 2017 project application, may indicate it will also serve individuals if it so chooses.

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.
- **No leverage:** No leverage again this year!
- **Easier Form Completion:** Most of the mandatory attachments in the Applicant Profile (e.g. HUD-2880, SF-LLL, HUD-50070) have been moved to *e-snaps* as fillable forms that only require a checkbox certification with the project applicant's authorized representative information. More information will be forthcoming.
- **New Lobbying Form:** Federal agencies require the submission of a signed Certification Regarding Lobbying to ensure applicants acknowledge the requirements in Section 319 of Public Law 101-121, 31 U.S.C. 1352, (the Byrd Amendment) and 24 CFR part 87 before receiving a

federal award. These statutes and regulation prohibit the use of federal award funds for lobbying the executive or legislative branches of the Federal government in connection with a specific award. This requirement is different and separate from the requirement for applicants to report lobbying activities using the SF-LLL form. The SF-LLL form must still be submitted by applicants that lobby or intend to lobby using non-federal funds. The only applicants excepted from submitting the Certification Regarding Lobbying form are federally-recognized Indian tribes because of each tribe's sovereign power. This form has also been hard-coded in e-snaps for project applicants and will need to be completed and certified in e-snaps before you have access to the actual project application.

- **Codes of Conduct**: All applicants must have a current HUD-approved Code of Conduct. Most organizations' Codes of Conduct were removed from HUD's website in early 2017, as they did not meet the requirements of 2 CFR part 200, and the organizations were notified by another HUD office that a new Code of Conduct must be submitted. Be sure to review the Code of Conduct for HUD Grant Programs page on HUD's website to ensure your organization is listed which means you have submitted an approved Code of Conduct. If you do not see your organization on the list, be sure to attach a current and complete Code of Conduct to your Project Applicant Profile in *e-snaps*. More information will be provided about requirements of Code of Conduct during the Review and Rank process.
- **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.
- **Program Regulation Apply When Amended:** 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.
- **2017 FMRs Will Apply:** Because the CoC Consolidated Application is due prior to the publication of the final FY 2018 FMRs, the FY 2017 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 2017 CoC Program funds will be required to *operate* as a Housing First project.
- **Environmental Requirements***:* Two important changes for projects categorized or Categorically Excluded from review under the National Environmental Policy Act and not subject to 24 CFR 58.5 (CENST):
  - All scattered-site projects where program participants choose their own unit and are not restricted to units within a pre-determined specific project site or sites are categorized in 24 CFR 58.35(b)(1) as CENST. This now includes both tenant-based rental assistance and tenant-based leasing projects where program participants choose their own unit. Previous guidance included only Tenant Based Rental Assistance as eligible CENST projects.
  - The Exempt/CENST form is only required for each project, not every unit. Previous guidance instructed recipients to complete an Exempt/CENST form for each unit.

COMMUNITY-LEVEL CHANGES AND REMINDERS

- **GIW Loses Relevance:** Annual Renewal Demand (ARD) is no longer calculated based on the final GIW for each CoC posted on the HUD Exchange. The NOFA defines ARD as, "The total amount of all the CoC's projects that will be eligible for renewal in the FY 2017 CoC Program Competition, before any required adjustments to funding for leasing, rental assistance, and operating budget line items based on FMR changes. The ARD will be calculated by combining the total amount of

funds requested by eligible renewal projects on the Renewal Project Listing combined and the eligible renewal project amount(s) that were reallocated."

- **Compliance with Violence Against Women Act (VAWA) Rule:** On November 16, 2016, HUD published its VAWA final rule (81 FR 80798), which provides various protections to victims of domestic violence, dating violence, sexual assault, and stalking under the CoC Program and other HUD programs. The grants to be awarded under this NOFA will be the first CoC Program grants that will be required to comply with the VAWA rule as provided in 24 CFR 578.99(j)(3). To enable full compliance with this rule, ***each CoC must establish an emergency transfer plan under 24 CFR 578.7(d) and make related updates to the written standards*** for administering CoC program assistance under 24 CFR 578.7(a)(9)(ii), (iii) and (v). These tasks must be completed by the time the local CPD Field Office issues the first FY 2017 grant agreement for a project in the CoC's geographic area.
- **Meaningful Participation**: HUD encourages all applicants to HUD's competitive programs to ensure, where applicable, public decision making and meaningful participation throughout the visioning, development, and implementation of funded projects, by residents of affected areas and especially communities traditionally marginalized from planning processes. In seeking public participation, applicants and grantees must ensure that all communications are provided in a manner that is effective for persons with hearing, visual, and other communications-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 and, as applicable, the Americans with Disabilities Act. In addition Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that grantees take responsible steps to ensure meaningful access to services, programs, and activities by persons with Limited English Proficiency.
- **CoC Mergers**: To encourage CoC mergers and mitigate the potential adverse scoring implications that may occur when a high performing CoC merges with one or more lower performing CoC(s), HUD is awarding up to 25 bonus points to CoCs that completed a merger in the period between the final funding announcement for FY 2016 and the FY 2017 CoC Program Registration deadline. CoCs may want to consider undertaking mergers next year prior to the Registration deadline.
- **Category 3:** As in past years, CoCs may request that up to 10 percent of funding for the fiscal year awarded under this NOFA be approved to serve homeless households with children and youth defined as homeless under other federal statutes who are unstably housed (paragraph 3 of the definition of homeless found at 24 CFR 578.3). Additional details are available in the NOFA.
- **Major Disasters:** If your CoC's geography has had a recent major disaster, review the NOFA for potential scoring leniencies.
- **All Relevant Subpopulations:** HUD is defining "all relevant subpopulations" to mean families, youth, veterans, persons fleeing domestic violence, persons who are unsheltered, and chronically homeless individuals and families.

RESOURCES:

- 2017 CoC NOFA: https://www.hudexchange.info/resource/5419/fy-2017-coc-program-nofa/
- General Section NOFA: https://portal.hud.gov/hudportal/documents/huddoc?id=2017nofa_gensec.pdf
- CoC Program Interim Rule (24 CFR part 578): https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version

- HUD Websites:
    - www.hud.gov
    - www.hudexchange.info
- Funding Application: www.hud.gov/esnaps
- Training and Resources: www.hudexchange.info/homelessness-assistance/
- HUD Exchange Ask A Question (AAQ): www.hudexchange.info/get-assistance
- Listserv: www.hudexchange.info/mailinglist