MISSISSIPPI
BALANCE OF STATE
CONTINUUM OF CARE

FY 2024
NOFO

Frequently
Asked
Questions

CoC Basics

＊ What is the purpose of the Continuum of Care (CoC) funding?

  ＊ The purpose of the CoC Program is to:
    ○ Promote community-wide commitment to the goal of ending homelessness;
    ○ Provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
    ○ Promote access to and effective utilization of mainstream programs by homeless individuals and families; and
    ○ Optimize self-sufficiency among individuals and families experiencing homelessness.

＊ What is the history of the CoC funding?

  ＊ The CoC process was developed by HUD in 1994 to coordinate the distribution of several competitive homeless assistance programs. Prior to the CoC process, organizations applied individually for funding from several homeless assistance programs. As a result, there was little coordination between these programs or between different organizations receiving funding in the same community. The CoC process was established to promote coordination within communities and between programs. It was also designed to bring together a broader collection of stakeholders such as public agencies, the faith and business communities, and mainstream service providers. Guidelines for the CoC planning process were included in annual Notices of Funding Availability (NOFAs). HUD regularly modified the process. On May 20, 2009, President Barack Obama signed the HEARTH Act (Public Law 111-22), providing Congressional authorization of the CoC process. Regulations governing the CoC program were published in the summer of 2012. The HEARTH Act placed more of the responsibility for measuring outcomes and overseeing performance on the leaders of local CoCs. The HEARTH Act also authorized funding for these entities. (Courtesy of the National Alliance to End Homelessness through the National Low Income Housing Coalition)

✳ What is a Collaborative Applicant?

    ✳ The Collaborative Applicant is the eligible applicant designated by the Continuum of Care (CoC) to collect and submit the CoC Registration, CoC Consolidated Application (which includes the CoC Application and CoC Priority Listing), and apply for CoC planning funds on behalf of the CoC during the CoC Program Competition. The CoC may assign additional responsibilities to the Collaborative Applicant so long as these responsibilities are documented in the CoC's governance charter.

✳ What is a CoC Board?

    ✳ The CoC board is the collective of individuals designated to provide oversight and governance on behalf of the CoC. The CoC Board's responsibilities are defined by the CoC and must be described in the CoC's governance charter. The CoC Board must be representative of the relevant organizations and of projects serving homeless populations and subpopulations within the CoC's geographic area. The CoC Board must also include at least one homeless or formerly homeless individual.

✳ What is the Code of Conduct and how do I submit it?

    ✳ All Federal award recipients, except states, and all subrecipients under Federal awards must have a code of conduct (or written standards of conduct) for procurements that meets all requirements in 2 CFR 200.318(c). Before entering into an agreement with HUD, each applicant selected for an award (other than a state) must ensure an up-to-date copy of the organization's code of conduct, dated and signed by the Executive Director, Chair, or equivalent official, of the governing body of the organization, is available in the Code of Conduct e-library.

https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants

Applicants can check the Code of Conduct List to confirm HUD has received their Code of Conduct.

CoC Eligibility

* ∗ What organizations are eligible to apply for CoC program funding?

  * ✳ Eligible applicants include nonprofit organizations, states, local governments, instrumentalities of state and local governments, Indian Tribes, and Tribally Designated Housing Entities (TDHEs), as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103) (TDHEs). Public housing agencies, as defined in 24 CFR 5.100, are eligible without limitation or exclusion. For-profit entities are ineligible to apply for grants or to be subrecipients of grant funds.

* ∗ Are Indian tribes and Tribally Designated Housing Entities (TDHEs) eligible to apply for a project grant in the FY 2024 CoC NOFO?

  * ✳ Yes. Eligible applicants include Indian tribes and Tribally Designated Housing Entities (TDHEs), as defined in section 4 of the Native American Housing Assistance and SelfDetermination Act of 1996 (25 U.S.C. 4103). Such tribal agencies should contact their local CoC and can apply for projects in the same way as any other applicant in their CoC. Please note that tribes and TDHEs are eligible to apply for projects within the CoC's registered geography regardless of whether the tribal entity participated in the CoC's registration process.

* ∗ Are there any special or different procedures for Indian tribes or TDHEs applying for a project grant in the FY 2024 CoC competition?

  * ✳ No, all eligible project applicants, including tribes and TDHEs, use the same application process. Please refer to the Project Application Detailed Instructions for more information. The project application in e-snaps includes a few items (such as a drop-down menu) where the applicant will need to indicate that it is a tribal agency. For more details on how to apply for a project, consult the FY 2024 CoC New Project Application Detailed Instructions.

* ∗ What are the **program components** within the CoC funding?

  * ✳ **Permanent Housing (PH)** - 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 (RRH). 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 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 (TH)** - 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. Currently only offered as a Joint TH-RRH Program.

✳ **Supportive Services Only** - Supportive services for homeless individuals and families in projects where the recipient or subrecipient is not providing housing or housing assistance. Starting in the 2015 CoC Program NOFA, HUD added Coordinated Entry as an eligible SSO project if funded through project reallocation.

✳ **Homeless Management Information System** - Funding for the CoC-designated HMIS Lead Entity for costs associated with establishing and operating the CoC's designated HMIS. See the At a Glance guide to HMIS eligible costs for more information on the difference between the HMIS program component versus recipient/ subrecipient HMIS costs allowable under other program components.

✳ **Homeless Prevention (HP)** - *Homeless Prevention is not prioritized within our CoC funding.*

✳ What are the **Eligible Costs** in the CoC Program?

✳ **Acquisition** - May be used to pay up to 100 percent of the acquisition cost of real property for the purpose of providing housing (PSH or TH) or supportive services to homeless persons.

✳ **Rehabilitation** - May be used to pay up to 100 percent of the cost to rehabilitate an existing structure that is owned (not leased) by the recipient

or subrecipient, and that is used to provide housing (PSH or TH) or supportive services to homeless persons. These costs may include installing cost-effective energy measures or bringing an existing structure to State and local government health and safety standards.

✳ **New Construction -** May be used to pay up to 100 percent of the cost of new construction, which can include:
- Building a new structure
- Building an addition to an existing structure that increases the floor area by more than 100 percent
- Acquiring land associated with the construction

✳ **Leasing Costs -** Leasing costs are eligible under the Permanent Supportive Housing (PSH), Transitional Housing (TH), and Supportive Services Only (SSO) components. Recipients and subrecipients may choose to use CoC Program funds to lease a structure or a portion of a structure that will be used for PSH, TH, or SSO projects. Leasing funds may also be used to lease individual housing units for TH or PSH. Leasing funds can pay for the following activities:
- Rent for the unit or structure
- Security deposits for up to 2 months
- First and last month's rent (up to one month each, allowed as an advanced payment)
- Staff or related costs to carry out leasing activities including conducting Housing Quality Standards (HQS), paying landlords, etc.
- Payments on unoccupied units while identifying a new program participant

✳ **Rental Assistance Costs -** CoC rental assistance funds can be used in Permanent Supportive Housing (PSH), Rapid Re-housing (RRH), or Transitional Housing (TH) to pay a portion of the rent. The length of time rental assistance can be provided varies depending on program component:
- Short-term (up to 3 mos.) or medium-term (4-24 mos.) – RRH, TH
- Long-term (more than 24 mos.) – PSH

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Rental Assistance also comes in three different forms:
- TBRA - Tenant-Based Rental Assistance - Where the program participants locate housing in the private rental market and enter into a lease with the property owner.
- SBRA - Sponsor-Based Rental Assistance - Where sponsor agencies rent units in the private market and then sublet the units to program participants. Sponsors may be private nonprofit organizations or

community mental health agencies established as nonprofit organizations. If the participant moves, the sponsor may sublease to a different participant or use the SBRA in a different unit with the current participant. SBRA stays with the sponsor.

- PBRA - Project Based Rental Assistance - the recipient or subrecipient contracts for a particular unit or property and the participant then enters a lease with the landlord. If the participant moves, the PBRA stays with the unit for the next eligible participant.

✳ **Supportive Services Costs** - Activities to help program participants obtain and maintain housing. Services not specified in the CoC Interim Rule are not eligible.

✳ **Operating Costs** - In general, the following costs are considered eligible:
  - The costs of maintenance and repair of housing **not included in the lease**
  - Property taxes and insurance
  - Scheduled payments to a reserve fund for the future replacement of **major buildings systems**. Major building systems include structural support, roofing, cladding, weatherproofing, plumbing, electrical, heating, ventilation, and air conditioning
  - Security for a housing program if more than 50 percent of the units or building area are CoC-funded
  - Utilities including electricity, gas, heating oil or other heating/cooling costs, water, sewer, and trash removal
  - Furniture (office/apartment) that remains with the project. **Mattresses are also eligible costs, even if they remain with the program participant**
  - Equipment, including office equipment, appliances such as microwaves, refrigerators, stoves, washers and dryers, etc. **that remain with the project**
  - Staff time spent carrying out the above eligible operating activities that are part of the approved grant.

✳ **HMIS Costs** - Recipients and subrecipients may use CoC Program funds to pay for staff and overhead costs directly related to contributing and maintaining data in HMIS or a comparable database. These costs are eligible under all CoC program components, including PSH, RRH, TH, SSO, and HMIS. Eligible HMIS costs for the PSH, RRH, TH, and SSO program components include:
  - Purchasing or leasing computer hardware, software, licenses, or equipment
  - Obtaining technical support

- Leasing office space in which HMIS activities are conducted
- Paying utilities necessary to operate or contribute data
- Paying salaries for operating HMIS
- Paying for travel to, and attending, approved trainings
- Paying staff travel costs to conduct intake
- Paying HMIS participation fees charged by the HMIS Lead

✳ **Project Administration** - Under the Project Administration program component, CoC recipients and subrecipients may use these funds to support:
- General management, oversight, and coordination
- Training on CoC requirements and attending HUD-sponsored CoC trainings
  Note: Recipients no longer need permission from HUD to spend CoC Program funds on conference attendance if the conferences includes a HUD or TA speaker assigned by HUD.
- Carrying out environmental reviews
  Note: An environmental review must be conducted for all projects prior to CoC program funds being committed.

✳ **CoC Planning Costs** - Planning funds are available to assist the Continuum of Care. Only the CoC's Collaborative Applicant or Unified Funding Agency (UFA) is eligible to apply for a planning grant.

✳ Which projects are eligible for renewal in the FY 2024 CoC Program competition?

  ✳ Projects eligible for renewal include CoC Program projects and YHDP projects awarded previously with expiration dates between January 1, 2025, and December 31, 2025. Eligibility for renewal grants is determined early in the CoC Program competition cycle based in part on the Grant Inventory Worksheet (GIW).

✳ Are translation and interpretation services eligible costs under the CoC program?

  ✳ Even though translation and interpretation services are not identified in the CoC program rule, the cost of these services would be eligible under any CoC program component, as long as translation and interpretation services are part of providing services under the component and the recipient determines that these services are reasonable and necessary to carry out the specified activity(ies) under the component. For example:

- If the recipient or subrecipient is using translation or interpretation services to conduct the annual assessment of service needs, the cost would be an eligible supportive services cost.
- If the recipient or subrecipient is using translation services to translate the HQS form, the cost would be eligible for either rental assistance or leasing.

If the recipient or subrecipient is using interpretation services to communicate with a program participant in the housing search process, the cost would be an eligible supportive service cost or a rental assistance or leasing cost, depending on whether the grant funds supportive services for housing search and counseling services or rental assistance or leasing activities which would include helping participants access housing search and placement services.

It is the responsibility of the recipient to ensure that costs billed to HUD are accurate, allowable, and documented. The agency should have clear policies and procedures on the method and frequency of documenting costs, who reviews and approves expenditures, and how costs are billed to the grant. The agency also should make sure these costs are included in the HUD approved budget. Administration of rental assistance and leasing does not have any record keeping requirements other than those of regular CoC program costs. If you are using the translator for multiple purposes and activities, you must prorate the costs so that only eligible costs are allocated to the CoC program grant and ineligible costs are paid for using other funds.

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* Is "case management" that is commonly conducted to help households find and maintain stable housing under the Continuum of Care (CoC) program, considered "housing counseling" for purposes of this rule?

  * Holistic case management for persons experiencing homelessness is not housing counseling as defined in the **Final Rule**. Therefore, if an activity provided under the CoC program is part of holistic case management for persons experiencing homelessness, it is not housing counseling and certification is not required. However, there may be instances where housing counseling, as defined in the Final Rule, is being provided under the CoC program. For example, if a program participant is receiving housing counseling, as defined in the Final Rule, as a separate specialized service,

then the housing counseling has to be provided by a HUD certified housing counselor working for an agency approved to participate in HUD's Housing Counseling Program.

＊ My CoC needs to prioritize households to meet the requirements of HUD's Notice CPD-17-01, but we are concerned that we might inadvertently violate federal civil rights laws and requirements, including the Fair Housing Act. How do we prioritize related to vulnerability/need in a non-discriminatory way?

✳ The assessment and prioritization process must be based on an individual's vulnerability or need level according to a Continuum of Care's (CoC) standardized prioritization criteria. In the prioritization stage, the Coordinated Entry (CE) staff person uses assessment data to compare the participant's level of need with the needs of others on the priority list and prioritizes the person for housing and supportive services based on the CoC's prioritization standards. Prioritization must be based on a specific and definable set of criteria that are made publicly available through written prioritization standards, conducted according to the CoC's written prioritization policies and procedures, and applied consistently throughout the CoC to all households being prioritized. CoCs are prohibited from using the prioritization process to discriminate based on protected classes as defined by Federal Civil Rights laws and requirements. These protected classes include race, color, religion, national origin, sex, age, familial status, or disability.

Additionally, the CoC's policies must be consistent with HUD's Equal Access requirements, including that (1) housing and shelters funded under CoC, Emergency Solutions Grants (ESG), Housing Opportunities for Persons With AIDS (HOPWA), and other HUD housing programs must be made available to otherwise eligible individuals without regard to sexual orientation, gender identity, or marital status; and (2) equal access to CPD programs, shelters, other buildings and facilities, benefits, services, and accommodations must be provided in accordance with an individual's gender identity. For example, a CoC's CE prioritization determination may not be based on whether an individual has a disability, or a specific type of disability or diagnosis, or another protected characteristic. It must be based on an individual's vulnerability or need level according to the specific and definable set of prioritization criteria.

✳ With regard to the final rule on the definition of chronically homeless, what constitutes an occasion of homelessness and how does HUD define a break?

  ✳ The amended definition as found in the **Final Rule on Defining "Chronically Homeless"** does not establish a minimum number of days that each occasion must total and instead defines the end of an occasion as a break of *at least seven nights* where the individual or head of household is not residing in an emergency shelter, safe haven, or is residing in a place meant for human habitation (e.g., with friends or family) or a period of 90 days or longer in an institution.

    While third-party documentation may be available to document a break in an individual or head of household's time residing in a place not meant for human habitation, in an emergency shelter, or in a safe haven, it is not required. All breaks can be documented through a written certification of the individual or head of household seeking assistance. However, please note that when there is evidence of a break (such as in an HMIS record) it must be counted.

    Stays of less than seven nights in one of these places is not considered a break and instead counted toward the total time residing in a place not meant for human habitation, an emergency shelter, or a safe haven. Additionally, stays in institutions of fewer than 90 days are not considered a break and instead the time spent in the institution is counted towards the total time residing in a place not meant for human habitation, an emergency shelter, or safe haven.

✳ How does HUD define victim service provider?

  ✳ HUD defines a victim service provider to mean a private nonprofit organization whose primary mission is to provide direct services to victims of domestic violence. This term includes permanent housing providers—including rapid re-housing, domestic violence programs (shelters and non-residential), domestic violence transitional housing programs, dual domestic violence and sexual assault programs, and related advocacy and supportive services programs.

* For CoC Program projects that are awarded funding for new construction, rehabilitation, or acquisition, how long must the recipient/subrecipient use the structure and/or property constructed, rehabilitated, or acquired to serve homeless individuals and families?

* In general, all recipients/subrecipients receiving CoC Program grant funds for acquisition, rehabilitation, or new construction must operate the housing or provide supportive services, in compliance with the **McKinney-Vento Act** and the **CoC Program regulation**, for at least 15 years from the date of initial occupancy by a program participant or the date of initial service provision by the recipient/subrecipient.

* May a recipient/subrecipient charge program participants program fees?

* No. Section 578.87(d) of the **CoC Program Interim Rule** prohibits recipients/subrecipients from charging program participants any charges other than occupancy charges or rent. Section 578.77 further explains how to calculate rent and occupancy charges; the amount that a program participant must pay varies depending on the type of assistance provided by the recipient/subrecipient.

* How do I know how much I can charge participants for rent?

* The amount of rent or occupancy charges owed by the program participant is calculated using the family's annual income less allowable deductions. Generally, it is based on six factors:

    ○ Number of people in household
    ○ Age of people in the household
    ○ Anticipated income
    ○ Anticipated expenses
    ○ Anticipated allowances
    ○ Anticipated household-paid utilities

    The maximum amount that can be charged is based on the occupants' monthly adjusted income, monthly gross income, and any welfare assistance received. These calculations and additional information can be found on the **HUD Exchange.**

2-Year NOFO

* What is a 2-year NOFO?
    * The application and selection process for the FY 2024 CoC Program and YHDP Funding Opportunity will proceed much like it has in prior year competitions. However, CoCs are only required to submit one CoC application that will be applicable to the FY 2024 and FY 2025 funding opportunities. Projects that are awarded with a 12-month grant term during the FY 2024 application process will be eligible for an award in FY 2025 using their FY 2024 application submission and are not required to apply for renewal during the FY 2025 Funding Opportunity. See Section I.A.3.b. of the NOFO for more information.

        Additionally, CoC and YHDP Renewal grants that do not meet the renewal eligibility requirements for the FY 2024 Funding but are eligible for renewal when FY 2025 Congressional Appropriations are made, must submit applications for FY 2025 funding by the applications submission deadline of 8:00 PM EDT on August 29, 2025. Applicants that wish to reallocate eligible renewal projects and create new projects through reallocation in the FY 2025 funding process must also submit those applications by the applications submission deadline of 8:00 PM EDT on August 29, 2025. Applicants with YHDP Projects that expire in CY 2025 may non-competitively renew, replace, or reallocate those projects and must submit an application by 8:00 PM EDT on August 29, 2025.

* Should my budget reflect 2 years of funding since this is a 2-Year NOFO?
    * Your application should reflect 1 year of funding. Though the FY2024 CoC Competition NOFO covers two years (FY2024 and FY2025), the funding will be disbursed as two one-year budget periods. Your application in e-snaps must reflect only one year of funding.

Joint TH and PH-RRH Component

∗ What is the "Joint TH and PH-RRH" component type and are there special requirements that interested project applicants need to be aware of?

✴ A Joint transitional housing (TH) and rapid re-housing (PH-RRH) component project includes two existing program components– TH and PH-RRH– into a single project to serve individuals and families experiencing homelessness.

✴ If funded, HUD will limit eligible costs to:
  ○ 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 in the rapid re-housing portion of the project.
  ○ Supportive services.
  ○ HMIS.
  ○ Project administrative costs.

If awarded, recipients or subrecipients must be able to provide both the TH and PH-RRH 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 program participants up to 24 months as needed by the program participants. For example, a program participant may only need a temporary stay in the transitional housing unit, but the recipient or subrecipient must be able to make available the financial assistance and supportive services that traditionally comes with rapid re-housing assistance to that program participant.

However, this does not mean that the applicant must request funding from the CoC Program for both portions of the project (e.g., the project applicant may leverage other resources to pay for the transitional housing portion of the project). All Joint TH and PH-RRH projects are required to be Housing First. It is not allowable to require that participants complete a stay in the TH portion of the program prior to being offered RRH. Applications for Joint TH and PH-RRH component projects must demonstrate that the project will have the capacity to provide both transitional housing assistance and rapid rehousing assistance, as needed, to each program participant. Review the FY

2024 CoC Program Competition NOFO for a complete list of requirements, including the requirements to distinguish the two forms of housing.

✳ What type of applicants can apply for a new Joint TH and PH-RRH component project and can we use existing projects to 'build' a JOINT project?

　　✴ Any eligible applicant can apply for a new Joint TH/RRH Projects. Current TH projects funded by the CoC program cannot 'merge' the existing TH project with an RRH project to create a Joint TH/RRH component project. An organization can name a project "Joint TH/RRH" and operate it as a Joint project, but this is not CoC "Joint TH/RRH component" project. TH providers that do not use State and Local funds for their TH units can use the existing units in their Joint TH or PH-RRH component application provided that those units are only used for new clients and not existing clients. Remember, a Joint TH/RRH Project MUST have both TH AND RRH components, not just one component.

✳ What is the required ratio of TH to RRH units in a Joint TH/PH-RRH project?

　　✴ A "Joint" project must contain both a TH component and a PH-RRH component. Applicants must plan for 2 RRH units/beds for every 1 TH unit/bed. For example, an application proposing 4 TH units and 8 TH beds must include at least 8 RRH units and 16 RRH beds. This requirement is intended to ensure your project has sufficient units and beds for both housing types to allow program participants the choice of housing they prefer since a recipient cannot direct a program participant to one type of housing over the other. The total numbers reported must reflect the total units and total beds at full capacity on a single night for both the TH and PH-RRH portions of the project. This includes units supported only by CoC Program supportive services funds without CoC Program leasing, operating, or rental assistance funds.

✳ Can a Joint project plan to have all participants first be served with TH, then move to RRH when they complete the TH program?

　　✴ No. Both housing types must be made available as choices to all participants, and projects may not require participation in transitional housing before accessing rapid rehousing. In addition, all Joint TH/PH-RRH projects must

operate with Housing First approach and may not require additional steps or services before accessing housing (e.g., a required stay in transitional housing or a certain number of days of sobriety).

✳ If an applicant already runs a separate RRH project, may they apply only for TH units with a Joint application?

   ✳ No. All Joint projects must include both TH and RRH housing within the project (though it is allowable to use non-CoC funding sources within the project).

DV Projects

✳ What definition should we use for "Survivors" on the population focus and subpopulations charts?

   ✳ Survivors: Persons who have experienced trauma or a lack of safety due to domestic violence, dating violence, sexual assault, stalking, human trafficking or other dangerous, traumatic, or life-threatening conditions. Note: while this field includes all people in households eligible to be served with DV Bonus funds it may also include survivors who do not meet the narrower definition of DV Bonus eligibility. For more information on population eligible to be served in DV Bonus projects, please see Section I.B.2.b.6 of the NOFO for more information.

✳ Does an applicant have to be a Victim Service Provider (VSP) in order to apply for DV Bonus grants?

   ✳ No, all eligible applicants for CoC funding may apply for DV Bonus funds for projects exclusively serving the households of survivors of domestic violence, dating violence, sexual assault, or stalking. Applicants for DV Bonus projects must also provide additional information about the applicant organization and planned project within the CoC application submitted by the Collaborative Applicant to HUD, including information about their experience and capacity to provide trauma-informed services. Please see the CoC Application Detailed Instructions and reach out to your Collaborative Applicant for more information.

∗ How are DV Bonus projects different than other projects in the CoC competition?

    ✴ DV Bonus projects are funded from an additional special appropriation from Congress (Consolidated Appropriations Act, 2023), which requires that the funds be dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking. DV Bonus projects are awarded competitively based on scoring from the CoC application, including the applicant-specific DV Bonus section. A new project that is dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking who qualify under the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act. DV Bonus projects apply for the following project types: PH-RRH, Joint TH-RHH, or SSOCE. (PH-PSH and HMIS projects are not eligible for DV Bonus funding.) All DV Bonus projects must be Housing First.

∗ Is there a special process or a separate competition for DV Bonus projects compared to other CoC projects?

    ✴ All projects that are eligible to apply for DV bonus funding are also eligible for CoC funding and must be submitted through the CoC's local competition to be assessed, ranked, and prioritized along with other CoC projects. If the project is awarded DV Bonus funds, it will be skipped in the priority listing when determining the distribution of reallocation and CoC bonus funds. Applicants for DV Bonus projects must also provide additional information about the applicant organization and planned project within the CoC application submitted by the Collaborative Applicant to HUD. Please see the CoC Application Detailed Instructions and reach out to your Collaborative Applicant for more information.

∗ Can a new DV Bonus project apply as an expansion of a renewal project?

    ✴ Yes. A CoC may apply to expand an existing renewal project in accordance with Section I.B.2.b.(9) of the FY 2024 CoC Program Competition NOFO, including one that was previously funded with DV Bonus funding. DV Bonus funds can only be used to expand an existing renewal project if the new expansion project is dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking. Due to these funding restrictions in appropriations, DV Bonus projects must exclusively serve the households of

survivors of domestic violence, dating violence, sexual assault, or stalking. For projects that are expanding their current CoC Program-funded project, project applicants will be required to submit both the renewal project application to be expanded and a new project application with just the expansion information.

❋ Can DV Bonus projects be dedicated to serving survivors of human trafficking (or another group that qualifies as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3)?

❋ Due to funding restrictions in appropriations, DV Bonus projects must exclusively serve the households of survivors of domestic violence, dating violence, sexual assault, or stalking. Projects that focus on other populations, including survivors of human trafficking, are not eligible for this restricted funding unless the project will be limited specifically to survivors of domestic violence, dating violence, sexual assault, and/or stalking. Please see I.B.2.b.6 of the NOFO for more information. DV Reallocation projects (new projects creating with funding reallocated from projects originally awarded as DV Bonus projects) must also exclusively serve the DV Bonus eligible population.

Reallocations

❋ What is a DV Reallocation and how is it different from the DV Bonus?

❋ The DV Reallocation is a funding mechanism in the CoC program that allows project applicants to reallocate DV Bonus projects that have renewed at least one time, into a new DV project. As a reminder, a DV Reallocation can only be funded by reallocating DV Bonus projects. There is no difference in how the DV Bonus and DV Reallocation operate in the CoC program. Both funding types must exclusively serve the households of survivors of domestic violence, dating violence, sexual assault, or stalking.

✳ Can I reallocate my Domestic Violence, Dating Violence, Sexual Assault, and Stalking Bonus (DV Bonus) grant to a new project that doesn't serve the same population?

　✴ No. If a new project is being created with reallocated funds that were originally awarded to DV Bonus project, the new project must continue to serve exclusively survivors of domestic violence, dating violence, sexual assault, or stalking. See Section I.A.3.c. of the NOFO for more information. Note: DV Bonus funds may not be combined with any other funding in a new project application.

Budgeting

✳ How do I calculate the number of beds, units, households, and persons being served by my project?

　✴ When determining the correct input for Units, Beds, Households, and Persons, please note that these reflect the full capacity of the program on a single night (not the total throughout the course of the project period). This should include capacity directly supported by CoC Program funds or eligible match funds in any way, including units supported only by CoC Program supportive services funds without CoC Program leasing, operating, or rental assistance funds. The reported number of units and beds on Screen 4B should not be higher than the number of households (units), and persons (beds) as listed on Screens 5A and 5B.

✳ If we make errors in budget changes on our renewal application, is there any way for us to correct that after the application deadline?

　✴ No. If you mistakenly apply for more than your annual renewal amount (ARA), you will not be awarded more than your ARA. However, you cannot be awarded more than you apply for, so if you mistakenly apply for less than your ARA, your award cannot be restored to the full ARA amount. Please double check your budget change amounts before submitting your application.

✳ What is the difference between HMIS as a program component and HMIS as an eligible cost?

　✳ Under the CoC Program, HMIS can be funded as a program component and an eligible cost. Program components establish the overall purpose and nature of the project that is being funded, whereas eligible costs specify what may be funded by the grant. Each program component is associated with eligible costs. There are five CoC Program components. All CoC projects must fit into one of these components. A project cannot include multiple components. When preparing a grant application, an applicant must first choose the program component that they want to apply under, and then it must specify the eligible costs it is seeking to be funded by the grant. Allowable CoC Program Components include:

　　○ Permanent housing (which includes permanent supportive housing for people with disabilities and rapid re-housing)
　　○ Transitional housing
　　○ Supportive services only
　　○ HMIS
　　○ Homelessness prevention

Only an HMIS lead may apply for an HMIS dedicated project (i.e., HMIS component), whereas any project applicant may include HMIS eligible costs in their grant applications under the other program components. Eligible costs under the HMIS component are broader than those allowed under other program components.

For example, the Homeless Coalition, the HMIS lead for the CoC, receives a CoC Program grant under the HMIS program component to fund its CoC-wide HMIS system, including leasing its offices, staffing the CoC-wide system, and other costs associated with operating the HMIS. A different agency within the CoC receives a CoC Program grant under the permanent housing program component, which includes HMIS eligible costs to fund HMIS licenses and other costs associated with contributing data to the HMIS.

✳ What are the eligible costs under the CoC VAWA Budget Line Item (BLI)?

　✳ Section 605(a)(2) of VAWA 2022 amends section 423(a) of the McKinney-Vento Homeless Assistance Act to add the following eligible activity to the CoC program: "Facilitating and coordinating activities to ensure compliance

with [the emergency transfer plan requirement in 34 U.S.C. 12491(e)] and monitoring compliance with the confidentiality protections in 34 U.S.C. 12491(c)(4)."

Funding can be requested for this activity in new project applications. Funds may also be added to this BLI in eligible renewal projects through expansion or by shifting up to 10 percent of funds from other eligible BLIs to the VAWA BLI.

(a) Examples of eligible costs for emergency transfer facilitation include the costs of assessing, coordinating, approving, denying, and implementing a survivor's emergency transfer which includes:
- Assistance with moving costs. Reasonable moving costs to move survivors for an emergency transfer. (Note that the general requirement that moving costs be one-time does not apply for emergency transfer moves under this BLI.)
- Assistance with travel costs. Reasonable travel costs for survivors and their families to travel for an emergency transfer.
- Security Deposits. Grant funds can be used to pay for security deposits of the safe units the survivor is transferring to via an emergency transfer.
- Utilities. Grant funds can be used to pay for costs of establishing utility assistance in the safe unit the survivor is transferring to.
- Housing Fees. Fees associated with getting survivor into a safe unit via emergency transfer, includes but not limited to application fees, broker fees, holding fees, trash fees, pet fees where the person believes they need their pet to be safe, etc.
- Case management. Grant funds can be used to pay staff time necessary to assess, coordinate and implement emergency transfers.
- Housing navigation. Grant funds can be used to pay staff time necessary to identify safe units and facilitate moves into housing for survivors through emergency transfers. Technology to make an available unit safe. Grant funds can be used to pay for technology that the individual believes is needed to make the unit safe, including but not limited to doorbell cameras, security systems, phone, and internet service when necessary to support security systems for the unit, etc

(b) Examples of eligible costs for monitoring compliance with the VAWA confidentiality requirements include the costs of ensuring compliance with the VAWA confidentiality requirements which includes:

- Monitoring and evaluating compliance with VAWA confidentiality requirements.
- Developing and implementing strategies for corrective actions and remedies.
- Program evaluation of confidentiality policies, practices and procedures.
- Training about compliance with VAWA confidentiality requirements.
- Reporting to Collaborative Applicant, HUD, and other interested parties on compliance with VAWA confidentiality requirements
- Costs for establishing methodology to protect survivor information.
- Staff time associated with maintaining adherence to confidentiality requirements.

✳ What is the difference between case management costs under a "VAWA BLI" request on the VAWA budget screen in esnaps and case management costs in the Supportive Services budget screen?

  ✳ Case Management costs under the VAWA budget are used to pay for staff time specifically necessary to assess, coordinate, and implement VAWA emergency transfers. Case Management under the Supportive Services budget is to pay for the staff time needed for assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s).

✳ How do I know if my project qualifies for VAWA costs? Can a project request the VAWA BLI even if the applicant is not a VSP, or the project is not a DV bonus project?

  ✳ The VAWA BLI is available in all project types, except for planning and UFA costs, regardless of grantee type or sub-population focus. The VAWA BLI is NOT exclusive to victim service providers (VSPs) or DV Bonus projects. All eligible projects will technically include a VAWA BLI (even if the project chooses to keep that BLI at $0), to help expedite minor budget changes later in the grant should a situation arise where a project needs to quickly move funds to the VAWA BLI, e.g., for an unexpected emergency transfer.

✳ How do I complete the new VAWA budget screens in e-snaps?

  ✳ Project Applications for New, and all YHDP projects, you can simply enter the amount of funding requested on the VAWA BLI screen in the categories

listed. All New and YHDP projects are given a VAWA BLI, with the VAWA funding checkbox selected for them, and this box cannot be unchecked. Applicants will enter funding amounts on the VAWA BLI screen, like how funding is entered on other BLI screens (SS, Operating, HMIS). A description of funds is not required since that is already given on the BLI screen. Funding amounts on the VAWA screen are automatically pulled forward onto the summary budget screen. For Renewal project applications, if you plan on adding funds to the VAWA BLI you can do so by shifting funds from another BLI or you can apply for an Expansion project (not applicable to YHDP Renewal). Applicants are required to answer Questions 1 & 2 on screen 6A. All renewal projects do have the VAWA funding checkbox selected for them, and this box cannot be unchecked. This allows for funds to be moved into the new VAWA BLI upon request to your field office.

✳ Why does my project have a VAWA BLI added automatically to its summary budget, and why can I not remove it?

   ✳ As stated in HUD's final rule implementing VAWA 2013, "The requirements set forth in 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), implementing the requirements of VAWA apply to all permanent housing and transitional housing for which CoC program funds are used for acquisition, rehabilitation, new construction, leasing, rental assistance, or operating costs." While projects can choose to use other funds to meet these requirements, we recognize that the costs associated with emergency transfers cannot be fully predicted and planned in advance. To allow for the flexibility to meet VAWA emergency transfer requirements and provide effectively for the safety of project participants experiencing domestic violence, dating violence, sexual assault, and/or stalking, all projects are required to have a VAWA BLI (even a $0 BLI) in case of the need for an emergency transfer request or other unexpected need.

✳ How is the CoC VAWA budget funded, for new project applications, specifically in Renewal projects that have set budgets already?

   ✳ For New project applications you can add funding requests for a new CoC VAWA Budget Line Item (BLI) the same as any other BLI request in e-snaps. For Renewal projects, including all YHDP projects, HUD will not be adding new money to projects to fund the CoC VAWA BLI; however, CoC

funding for the VAWA BLI in renewal projects must come from shifting funds from existing BLIs or by applying for an expansion project with your VAWA BLI request.

✳ How is the CoC Rural budget line item funded for new project applications, specifically in Renewal projects that have set budgets already?

✺ CoC Renewal projects are eligible this year to add the Rural BLI to their project application to be used in eligible rural or tribal geocodes. There are three scenarios where this can occur:

- ○ The Renewal project was previously awarded a Rural BLI through a New Expansion in the FY23 competition, and can now renew their project this year with the Rural BLI included in their project application.
- ○ The project applicant applies in this competition for a New Expansion of their Renewal grant, and within that New Expansion, they request a Rural BLI.
- ○ The Renewal project can select the Rural BLI on screen 6A in the renewal application, answer a question related to the Rural BLI on the same screen, and select an eligible Rural geocode on screen 3A.

HUD SNAPS will determine if the project can be awarded a Rural BLI during project review.

For New and all YHDP project applications, including expansion project applications as noted above, you can add funding requests for a new CoC Rural Budget Line Item (BLI) the same as any other new project BLI request in e-snaps.

For reference, see Section 5707 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (PL 117-263, December 23, 2022, 136 Stat 2395) amends section 423(a) of the McKinney-Vento Homeless Assistance Act to allow projects in rural areas [as defined in section I.B.2.b. (26) of this NOFO] to use program funds to pay for the following eligible CoC Program activities to include adding a Rural BLI to eligible renewal projects through expansion.

* What are the eligible costs under the Rural Budget Line Item (BLI)?
    * The Rural BLI must be used only for eligible activities in eligible rural or tribal geocodes. Under Section III.B.4.b.(3) of the NOFO, those eligible costs are:
        ○ Payment of short-term emergency lodging, including in motels or shelters, directly or through vouchers.
        ○ Repairs to units;
            ◆ (i) in which homeless individuals and families will be housed; or
            ◆ (ii) which are currently not fit for human habitation.
        ○ Staff training, professional development, skill development, and staff retention activities.

* How do I know if I'm in a CoC Approved Rural Area?
    * Program Within the New, Renewal and all YHDP applications, on Screen 3A, there are three tables that allow the applicant to determine whether their project qualifies as a rural area. These three tables are:
        ○ The state your project is based in.
        ○ The rural geocodes that would fall under your projects work area.
        ○ Any tribal rural areas HUD will be the final arbiter if your project qualifies for the CoC Rural costs

* What is Fair Market Rent (FMR), and how do I find it?
    * An amount published annually by HUD to establish estimates of gross rent, taking into account both rent and the cost of necessary utilities (e.g., water and power), excluding option utilities (e.g., cable, internet). FMRs vary depending upon the geographic area in which the housing unit is located. This report may be found at www.huduser.gov/portal/datasets/fmr.html

* Why are we being asked to apply with FY23 FMRs?
    * All projects that are eligible to apply for the FY2024 CoC Competition must use FY2023 FMRs in their project applications. The FMR amounts shown in the e-snaps application tables are accurate FY2023 FMRs for the FMR areas you select. If your project application is selected for conditional award, HUD will apply updates based on the FMRs in effect as of the application submission deadline. The updates will be based on your eligible BLI total.

The adjusted amount will be shown in your new award total with exact amounts seen in the e-snaps table at post award.

✳ Can we change back to full FMR calculations rather than our Actual funding designation? Can this be done as part of a renewal project application?

　✳ No. The NOFO does not address changing project funding back to FMR once a project decides to move to actual rent, as HUD addresses this issue on a case-by-case basis by amendment is rarely approved. There are factors to consider when determining if this is allowable; including where the excess funds were moved to and documentation reflecting the reason actual rent is no longer viable and validates the request to return to FMR. Please connect with your local HUD Field Office Representative about amending the grant to change from actual rent to full FMR. Keep in mind however, that existing funds within the grant would need to be shifted from another budget line item to rental assistance to increase up to the full FMR. If that is not feasible the number of units would need to decrease to fit within the full FMR. The overall funding amount for the grant, the annual renewal amount (ARA) cannot be increased.

✳ Can Rental Assistance funds be used to pay for security deposits? If so, how would I request rental assistance dollars specifically for security deposits or other approved costs?

　✳ Yes, security deposits are an eligible cost item within the rental assistance Budget Line Item (Section 578.51(a)(2)). Under rental assistance, a project recipient may use grant funds for security deposits in an amount not to exceed 2 months of rent so long as it is provided before the CoC Program participant exits from the program. Although the costs for the security deposits come from the rental assistance budget in the e-snaps project application, there is not a way to enter a separate cost for security deposits since they are considered part of the rent. A good practice would be to mention security deposits in the project description. Many applicants use the 30% rent income from participants to serve additional participants or cover security deposits.

✳ Are renewal project applicants required to provide details beyond total cost requests for leased structures, supportive services, operating, or HMIS Budget Line Items (BLIs)?

✳ No. HUD no longer requires applicants to list budget detail information in e-snaps beyond the total costs requested for leased structures, supportive services, operating, or HMIS budgets to be the baseline for renewal grant expenses (in line with 24 CFR part 578). budget line items in renewal project applications. HUD expects the details of past approved budgets to be the baseline for renewal grant expenses (in line with 24 CFR part 578). Though HUD is not collecting detailed budget information as part of the application, HUD still expects that all costs expended will meet the requirements of the CoC Program interim rule and 2 CFR Part 200. HUD will continue to verify budget information during HUD compliance monitoring.

✳ What are replacement reserves and how do I request funds for operating and replacement reserve costs?

✳ Replacement reserves are scheduled payments to a reserve fund for the repair of major building systems and are an eligible cost for recipients of transitional or permanent supportive housing projects where the recipient or subrecipient owns or operates the building(s). The replacement reserve question is only applicable to projects with an "Operating" budget line item (BLI) and have identified you are choosing to use your operating BLI following standard housing development practices of budgeting replacement reserves. This question is not available for projects that do not have an "Operating" BLI.

✳ When can leasing funds be used?

✳ Leasing costs are eligible under the Permanent Supportive Housing (PSH), JOINT (TH portion only), Transitional Housing (TH), and Supportive Services Only (SSO) components. Recipients and subrecipients may choose to use CoC Program funds to lease a structure or a portion of a structure that will be used for PSH, TH, or SSO projects. Leasing funds may also be used to lease individual housing units for TH or PSH. Leasing funds can pay for the following activities:
  ○ Rent for the unit or structure (§ 578.49(b)(1))
  ○ Security deposits for up to 2 months (§ 578.49(b)(4))

- First and last month's rent (up to one month each, allowed as an advanced payment) (§ 578.49(b)(4))
- Staff or related costs to carry out leasing activities including conducting Housing Quality Standards (HQS), paying landlords, etc.
- Payments on unoccupied units while identifying a new program participant.

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* Can I apply for a grant term for a new project of more than one year?
  * Yes, per Section III.B.4.d.(4) of the NOFO, the initial grant term for new project applications may be for 1 year, 2 years, 3 years, 4 years, 5 years, or 15 years. HUD may extend the grant consistent with 2 CFR 200.308 and 2 CFR 200.309. HUD will allow new projects to request 1 year of funding with a longer initial grant term not to exceed 18 months. The reason for this longer grant term is that HUD has determined that most new projects requesting one year of funding often take approximately 3 to 6 months to begin fully operating the new project (e.g., hiring staff, developing partnerships with landowners if leasing or renting). Therefore, a new project requesting 1 year of funding may request a grant term of 12 months to 18 months that will allow for the additional start-up process. Any new projects requesting capital costs (i.e., new construction, acquisition, or rehabilitation) are not eligible for 1-year funding requests.

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* Since this grant works on a reimbursement basis, how does an agency come up with the initial funding?
  * The reimbursement process for CoC funding is actually pretty quickly, so you can print the checks on the previous month to request the funding. This will allow it to be available in time for the checks to be mailed. Also, if your match funding is a cash match, then that can be used as startup funds also.

Reallocations

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* What is reallocation, what can it fund and how does it work?
  * Section I.B.2.b(24) of the FY 2024 CoC Program Competition NOFO defines Reallocation as a process that CoCs use to shift funds in whole or part from existing eligible renewal projects to create one or more new

projects without affecting the CoC's Annual Renewal Demand. CoCs may use relocation to create new:

- ○ PH-PSH.
- ○ PH-RRH.
- ○ Joint TH/PH-RRH component.
- ○ Dedicated HMIS; or
- ○ SSO-CE for coordinated entry.

Reallocation funding is eligible to fund:

- ○ New Expansion projects.
- ○ Transition Projects.
- ○ CoC Bonus projects.

Remember, relocated in full or in part, should be correctly identified on a CoC's priority listing in e-snaps.

✳ **What is the policy on projects eligible for reallocation as part of the renewal application process?**

✴ CoCs and project applicants can reallocate any eligible CoC Program project that has previously been renewed under the CoC Program. CoCs cannot reallocate a project that is expiring for the first time. Section I.B.2.b(24) of the FY 2024 CoC Program NOFO provides additional information. To be eligible for reallocation, an expiring project must be an eligible renewal project in this year's competition. Note: The House and Senate Committees on Appropriations expressed that for projects awarded for specific subpopulations (e.g., youth experiencing homelessness or survivors of domestic violence, dating violence, sexual assault or stalking), before funding for such projects may be reallocated to other populations, HUD must consult with relevant stakeholders.

For the FY 2024 Funding Opportunity, HUD requires funding reallocated from projects previously funded with YHDP or DV Bonus funding must be used for projects serving the same subpopulation. Therefore, prior to executing the reallocation of any project, HUD strongly recommends reviewing the Grant Inventory Worksheets (GIWs) published on the CoC Program Competitions page on the HUD.gov website to determine the type of new projects that can be created with reallocated funding intended for the specific subpopulations.

＊ What is a "New Project Created through Reallocation" and where can I find a definition?

    ✳ Section I.B.2.b(24) of the NOFO defines a reallocation as "a process the CoCs use to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD." So, a "New Project Created through Reallocation" is a new project application requesting to use a CoC's funds previously used for one or more other CoC-funded projects for new project within the same CoC. For example, the CoC may decide to reduce an existing project by $10,000 from an eligible renewal and use the $10,000 for a new project created through the reallocation process. Before submitting a project application for the FY 2024 CoC Program competition, we recommend you contact your local CoC for more information.

Expansions

＊ What projects are eligible for the expansion process?

    ✳ In the FY 2024 CoC Program Competition, the expansion process applies to a current CoC-funded renewal project that is one of the following project types: PH-PSH, PH-RRH, JOINT TH & PH-RRH, SSO-CE, and HMIS. An example of an eligible expansion project is a new CoC-funded PH-PSH project that proposes to expand the number of units and beds to serve more people in an existing CoC-funded project. The expansion process cannot propose providing existing program participants with the same level of housing and services funded through the CoC Program. Therefore, an expansion project must meet at least one of the following criteria:

        ○ serve new program participants that meet the HUD definition of homelessness. For YHDP, the project must continue to serve 100% youth participants.

        ○ provide existing program participants with an expanded level of CoC-eligible services.

        ○ provide existing program participants with facilities that meet health and safety standards.

        ○ provide the same activities that are CoC Program-eligible but were previously paid for by a different eligible non-renewable source. Applicants are prohibited from using CoC Program funds to replace state or local funds previously used, or designated for use, to assist homeless persons; for more information refer to 24 CFR 578.87(a).

- provide expanded coordinated entry services to new and existing program participants, only eligible for SSO-CE.
- provide expanded HMIS activities within the CoC's geographic area (HMIS grants only).

✳ Can I "expand" my CoC Renewal or YHDP Renewal project with a 'New' Expansion project and how is this accomplished in e-snaps?

✳ For a regular CoC renewal and YHDP project, yes, as in previous years for CoC Renewals, applicants can apply for a new project that will expand an existing eligible CoC Program renewal project (Section I.B.2.b.(9) of the NOFO). The two projects must have the same component (e.g., both the new and renewal project applications are PH-PSH).

For the details of how to utilize the Expansion process, please review the expansion directions in the 'Renewal Project Detailed Instructions', the 'New Project Detailed Instructions', The YHDP Renewal and YHDP Replacement/Reallocation Detailed Instructions.

The most critical instruction to understand is your renewal project application (CoC or YHDP) is submitted individually and then a new project application(s) is submitted separately. AND each of those separate applications MUST correctly identify each other in e-snaps questions as being part of your expansion request for the other application. If awarded, HUD will combine these two applications into one project in the post-award process. Please ensure that budgets and proposed numbers of units, people to be served, etc. are not duplicated between the Stand-alone New and Stand-alone Renewal applications, in order to ensure the accuracy of the final project.

✳ Are other projects not funded by the CoC Program eligible for expansion?

✳ No. Projects that do not receive CoC Program funds that wish to expand will need to apply as a separate new project. An existing non-CoC-funded PH-PSH project is not eligible for an expansion project. The applicant would need to submit a separate new project, not an expansion project.

Transition Grants

* What is a transition project and how do I apply for a transition project?

   * A transition project is a request to transition eligible renewal project(s) from their original component(s) to another eligible component. Eligible components for new projects in the transition process are PH-PSH, PH-RRH, Joint TH and PH-RRH, SSO-CE, and HMIS. See Section I.B.2.b(24) (reallocation) and Section 1.B.2.b(30) (transition grant) of the NOFO for additional information and requirements, including notification to the CoC of your organization's intent to use the transition grant process.

      For a new project to be considered a transition grant, the new project applicant must be the recipient listed on the current grant agreement for the eligible renewal grant(s) being eliminated and must include the grant number(s) of the project(s) being eliminated to create the new project and attach a copy of the most recently awarded project application (most projects will attach a copy of the FY 2023 CoC Program Competition project application).

      To apply for a transition project, an applicant and CoC must choose to fully reallocate the renewal project(s) funds that will transition to the new component. Then, the applicant must submit it as a new project application in following the New Project Detailed Instructions for new project application data entry into e-snaps.

* How do renewal project applicants designate a project application as a transition grant in e-snaps?

   * To designate a project application as a transition grant in e-snaps, go to the new project application, then go to Screen 3A Project Detail. Question 7 asks if the project is applying as a transition project. A "Yes" response will open additional questions specific to a transition project. Transition projects must list the expiring grant number(s) involved in the transition and must attach a copy of the most recently approved project application(s) on Screen 7A. (e.g., if the expiring project was last funded in the FY 2023 CoC Program Competition, attach a copy of the FY 2023 CoC Program Competition project application). In question 7b of screen 3A, the project applicant must

provide a description that addresses the scope of the proposed transition from the expiring component to the new component during the first year of operation. Provide a detailed description of how the project will be transitioned from the renewal project to the new project. The description must include:

- How the project will strategically wind down the eliminated project.
- How the project will ensure existing program participants in the eliminated project do not become homeless and will be assisted in obtaining permanent housing, while the project increases activities in the new component; and
- The estimated timeline, within the 1-year grant period, that the project will be fully operating as the newly awarded component.

Note: If you are requesting to use the transition grant process you cannot simultaneously Consolidate and/or Expand a renewal project that is transitioning.

✳ When is the operating start date for a transition project?

✳ The operating start date of a transition project conditionally awarded in the FY 2024 CoC Program Competition will be the day after the end of the previous grant term for the expiring component, i.e., the transition project will have the same operating year as the expiring component project. For transition projects reallocated from more than one project, the operating start date will be the day after the end of the earliest expiring grant term. The grant term may be extended consistent with 2 CFR 200.308 and 2 CFR 200.309. By the end of the operating year for which FY 2024 funds were awarded, the transition grant must be fully operating under the new component and will be eligible to apply for renewal in the next CoC Program Competition under the component to which it transitioned.

✳ How long does a transition grant have to fully transition to the new eligible activities?

✳ Transition grants conditionally awarded in the FY 2024 CoC Program Competition will have one year to fully transition from the original component to the new component during the normal operating year (e.g., April 1, 2025, through March 31, 2026) once the grant agreement is executed.

* Does a recipient need to obtain approval from a CoC to apply for a transition grant?
    * Yes, due to the need the renewal portion of a transitioning project to be fully reallocated to be eligible to receive a transition grant, the recipient must have the approval of its CoC as they will need to rank the new transition project on the New Project Listing in the FY 2024 CoC Priority Listing.

* Can a recipient 'transition' renewal projects to create a new project that replaces two existing renewals of different components into a third component? In other words, if a recipient has one TH grant and one RRH grant, can a CoC fully reallocate both grants to create a new Joint TH/RRH project?
    * Yes, a recipient may transition up to two projects with differing components into one project for a transition grant. Please be aware of the Transition grant processes for 'transitioning' more than one grant, specifically the operating start date is critical. To meet the requirements HUD will consider the following as CoC consent for the transition grant:
        o The project application identifies the project as a transition project.
        o The CoC ranks the new transition grant project on the New Project Listing in the FY 2024 CoC Priority Listing.

    If HUD determines a new project submitted as a transition grant does not qualify but meets all other new project requirements, HUD may award the project as a new non-transition grant project. If this occurs, the recipient will not be permitted to expend any FY 2024 funds until the new project grant agreement is executed by the local HUD field office.

Match Requirements

* What is "Match" for a CoC project application and how should it be included in an application?
    * Statutory provisions of the McKinney-Vento Homeless Assistance Act require recipients of CoC Program funds to "match" a portion of the CoC funds they receive for all budget categories except the leasing budget category. Simply put, "match" is the non-federal share of costs that the recipient is required to contribute to accomplish the purposes of the grant. Match in the CoC Program can be 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. The CoC Program requires a 25 percent match of the awarded grant amount minus funds for leasing. Another way to state this is that the leasing budget line item in e-snaps is not included in the grant's match calculation. Cash or in-kind resources will satisfy the match requirement.

✳ Is the CoC program match requirement specific to each project application?

　✴ Yes, for CoCs that have more than one recipient, each grant recipient must provide match on a grant-by-grant basis. However, when a CoC has been designated with Unified Funding Agency (UFA) status or is identified as sole grant recipient, in those instances, matching funds may be provided by the recipient/UFA on a CoC-wide basis. For reference, refer to the CoC Interim Rule at 24 CFR 578.73.

✳ Can program income be used as cash match for a project application?

　✴ Yes. Although the CoC Program Interim Rule does not directly state whether program income is an eligible source of match, it has been determined to be eligible to be used as match until a permanent decision regarding this provision is made. Until that time, CoC Program grant recipients will be permitted to count program income as match as determined by the corresponding congressional appropriation, which includes funding under the FY 2024 CoC NOFO.

✳ Can program income be as match, and are project applicants required to provide any information as part of their project application?

　✴ Yes. Although the CoC Program Interim Rule does not directly state whether program income is an eligible source of match, it has been determined to be eligible to be used as match until a permanent decision regarding this provision is made. Until that time, CoC Program grant recipients will be permitted to count program income as match, If your project expects to use program income as match, complete questions 1, 1a. and 1b on the Match screen in e-snaps.

* What are HUD's requirements for documentation of third-party in-kind match contributions in the project application?
    * The CoC Interim Rule at 24 CFR 578.73(c)(3) requires that in-kind services, to be provided by a third party, be documented by a memorandum of understanding (MOU), or equivalent document, between the recipient (or subrecipient) and the third party. This MOU must be provided before grant execution. In the Sources of Match Detail Screen in e-snaps, if the applicant has selected "Yes" in response to question 1 on Screen 6I (New Projects) or 6D (Renewal), a Screen 7A will appear to attach the MOU. Note: screen 7A only appears if the applicant has selected "Yes" in response to question 1 on Screen 6I (New Projects) or 6D (Renewal). HUD strongly recommends that project applicants attach the MOU to the application in esnaps if available at the time of application. If project applicants do not attach an MOU that documents in-kind match HUD will place a condition on the project. If selected for a conditional award, the project applicant must provide the MOU to their HUD field office representative before the grant agreement execution. This issue may cause a delay in grant agreement processing.

* Can ESG be used as match for a CoC project?
    * Yes, Emergency Solutions Grant (ESG) and ESG-CV funds may be used as a match for the CoC Program if the matching funds are contributed to the CoC Program and expended for the recipient's or subrecipient's allowable CoC Program costs, and all other CoC Program requirements are met. For example, as indicated in the CoC Program interim rule at 578.75(b), housing leased with CoC Program funds, or for which rental assistance payments are made with CoC Program funds must meet the applicable housing quality standards (HQS) under 24 CFR 982.401. Match is actual cash or in-kind resources contributed and expended on eligible CoC Program costs. According to 578.73 of the CoC Program interim rule, CoC Program recipients or subrecipients must match all grant funds (except for leasing funds) with No less than 25 percent of funds or in-kind contributions from other sources. Match resources may be from public (not statutorily prohibited from the funding agency) or private resources. Recipients are responsible for determining if non-program sources are eligible to be used as a match for the CoC Program. Keep in mind that ESG funds must be used for allowable ESG Program costs and must meet all other ESG Program requirements. For allowable ESG/ESG-CV HMIS program costs, be sure to

review section 576.107 of the ESG Program Interim Rule and any alternative requirements established by Notice CPD-21-08, Section III.E.4.

✳ Under which circumstances can Medicaid be used as match in CoC Program-funded projects?

✳ A Project Applicant can use the value of services reimbursed through Medicaid as the match in your renewal project if the Medicaid services are contributed to the project directly (e.g., if the project has one or more staff persons who provide services to program participants and those services are funded through Medicaid). Count the value of the match; the applicant must demonstrate that the services are being contributed directly to the project. The match can be done through a Memorandum of Understanding (MOU) or contract with a partner organization that provides services reimbursed through Medicaid to program participants. The Project Applicant should attach the MOU or commitment letter to the application on Screen 7A in e-snaps "In-Kind MOU Attachment," if available at the time of project application.

If the Medicaid services are not being contributed to the project, meaning they are being provided directly to program participants regardless of their participation in the CoC Program project, or there is No MOU or contract in place, then these Medicaid services cannot be considered a match for the project.

Several resources provide general information on the match requirements and how in-kind services should be handled. Please refer to the following: Section 578.73(c)(1) of the CoC Program interim rule – "The recipient or subrecipient may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible under Subpart D, or, in the case of HPCs, eligible under 578.71."

✳ Are match requirements for a VAWA budget the same as other CoC BLIs?

✳ Yes. A VAWA BLI follows the same 25% match requirements as other BLIs in the CoC Program, except for the Leasing BLI, which has no match requirement.

＊ Do the same match requirements for "Rural Costs" in e-snaps the same as for the match requirements for other approved budget line items (except leasing)?

　＊ Yes. Rural costs follow the same match rules as other BLIs in the CoC Competition (except for the Leasing BLI, which has no match requirement.)

Submitting the Application

＊ What are the required forms and certifications for CoC Program project applications, and do I need to attach these forms or certifications in e-snaps?

　＊ HUD has built the following required forms and certifications directly into the e-snaps project application process. No physical attachment of these forms is required to be added in e-snaps for:
　　○ SF-424 Application for Federal Assistance
　　○ Form HUD-2880, Applicant/Recipient Update/Disclosure (see in your Project Applicant Profile)
　　○ SF LLL, Disclosure of Lobbying Activities (if applicable)
　　○ Form HUD-50070, Certification for Drug-Free Workplace
　　○ Disclosure of Lobbying Activities
　　○ SF-424A: Budget Information for Non-Construction Programs
　　○ SF-424B: Assurances for Non-Construction Programs
　　○ SF-424D: Assurances for Construction Programs, and Applicant Certifications.

＊ How do I submit a renewal grant that doesn't have any changes?

　＊ A CoC project's FY 2024 renewal project information must match the FY 2023 renewal project application unless HUD required changes to the grant before grant agreement execution, or if the recipient requested and received a grant agreement amendment. If a project does not have changes from the FY 2023 submission, it can be submitted as a FY 2024 renewal project application with No changes (other than those required annually).

　　If a project is a first-time renewal, the applicant must complete the entire renewal project application. An applicant cannot use the "submit without changes" process if:

- HUD placed a condition on your FY 2023 application requiring your organization to adjust information (e.g., units, unit configuration, BLIs, project description, etc.); or
- You executed a grant agreement amendment resulting in changes needed to the renewal project application (e.g., units, unit configuration, population served, BLIs).

Ensure that the FY 2024 renewal project application mirrors the final HUD-approved information in either the grant agreement or grant agreement amendment. Data can be imported (brought forward) into a FY 2024 renewal project application from a FY 2023 new or renewal project application. However, it is important to understand that the imported data will be exactly as it was submitted in the FY 2023 project application and will not show any updates to a project application that occurred in FY 2023 e-snaps Post Award (C1.9a) or any e-snaps amendment data from (C1.9b).

For a project application that did not import last year's FY 2023 information, e-snaps will automatically be set to "Make Changes" and all questions on each screen must be updated. Then, navigate to the Submit Without Changes Screen in e-snaps.

✳ Eligibility Requirements for Applicants state we must disclose that an applicant has committed a violation of Federal criminal law. What if we don't have anything to disclose because there aren't any violations?

   ✴ Applicants must disclose IF there are violations. If there aren't any violations, make sure you have a statement in your policy and procedures that discusses the mandatory disclosure requirement.

✳ What government-approved financial management systems are allowed?

   ✴ Any financial management system is okay as long as it meets the requirements in **2 CFR 200.302.** It is also important to have written processes in place that discuss your internal controls, procurement process, and how you handle fraud and waste.