TX-503 Austin/Travis County Continuum of Care Program

FY 2023 NOFO Bidders’ Conference (NEW PROJECTS)

THURSDAY, AUGUST 3, 2023
9:00 AM – 10:30 AM
Today’s Agenda

• Intro to the NOFO
• Funding and Policy Priorities
• Estimated Renewal & Bonus Amounts
• Changes from FY2022
• Eligible Applicants & Application Requirements
• Appeals Policy and Processes
What is the CoC Program NOFO?

- The Continuum of Care (CoC) Program Notice of Funding Opportunities (NOFO) is the application process through which HUD awards funding to the Continuum of Care.

- The Collaborative Applicant (ECHO) submits one Consolidated Application to HUD on behalf of the Austin/Travis County CoC.

- The entire Consolidated Application is scored and specific projects are funded in the order that they are prioritized (ranked) by the CoC Board in the Consolidated Application ECHO submits to HUD.

- HUD contracts with and funds each agency through the NOFO directly.
HUD’s Homeless Policy Priorities and Program Highlights

1. Ending homelessness for all persons
2. Use a Housing First approach
3. Reducing Unsheltered Homelessness
4. Improving System Performance
5. Partnering with Housing, Health, and Service Agencies
6. Racial Equity
7. Improving Assistance to LGBTQ+ Individuals
8. Persons with Lived Experience
9. Increasing Affordable Housing Supply
Housing First
• Housing First is a homeless services approach that prioritizes providing permanent housing to people experiencing homelessness without precondition.

Trauma Informed Care
• A trauma informed approach seeks to resist re-traumatization of clients as well as staff.

Harm Reduction
• Harm Reduction is an approach aimed at reducing the risks and harmful effects associated with substance use and/or other behaviors that may result in negative consequences.
TX – 503 Austin/Travis County CoC Local Competition Timeline

- **Release of Local Competition**
  - July 28, 2023

- **Bidders’ Conferences**
  - August 2, 2023
  - August 3, 2023

- **NOFO Office Hours**
  - August 11, 2023
  - August 18, 2023
  - August 25, 2023
  - 9:00 – 10:00 AM

- **Applications Due**
  - August 29, 2023
  - By 6:00 PM

- **Deficient Applications Returned for Corrections**
  - August 30, 2023

- **Corrections Due**
  - September 6, 2023
  - By 6:00 PM
TX – 503 Austin / Travis County CoC Local Competition Timeline

IRT Completes Project Application Scoring
Sept. 15, 2023

Leadership Council Approves Priority Listing
Sept. 18, 2023

Draft Priority Listing Released
Sept. 18, 2023

Applicant Appeals Due
Sept. 21, 2023
By 6:00 PM

Leadership Council Rules on Any Appeals
Sept. 22, 2023

Collaborative Application Due to HUD
Sept. 28, 2023
By 7:00 PM
Local Competition Ranking Process

1. All project applications submitted through e-snaps and CoC Local Competition webpage reviewed by an Independent Review Team (IRT).

2. IRT reviews all project application submissions and scores projects based on Scoring Criteria.

3. ECHO provides project priority ranking (Tier 1 and Tier 2) according to NOFO policies, including the Review, Ranking, and Scoring Policy and Procedures and FY23 NOFO requirements.

4. ECHO presents ranking recommendations to Leadership Council.

5. Leadership Council approves final ranking decision.

6. CoC Collaborative Applicant (ECHO) submits final Consolidated Application and Priority Listing to HUD.
Community Ranking Policy

The Austin/Travis County CoC will rank all projects which have passed threshold and project quality review and scoring by the IRT on the Priority Listing in the following manner:

1) Non-competitively Ranked Projects
   a) Projects eligible for renewal for the first time as part of the CoC Program NOFO will be non-competitively ranked above competitively ranked projects.

   b) The Continuum of Care Board has deemed HMIS as critical to the infrastructure of the CoC and thus HMIS Renewal and Expansion Project applications will be noncompetitively ranked above all ranked projects.

2) Renewal Projects
   a) Renewal Projects with a FY21 Q2 – FY 22 Q1 Quarterly Performance Scorecard score averaging 65% or above will be ranked above any New Projects.

3) New Projects
   b) New Projects will be competitively ranked against Renewal Projects with a FY21 Q2 – FY 22 Q1 Quarterly Performance Scorecard score averaging 64.9% or below.
Community Funding Priorities

- Site-based Permanent Supportive Housing (PSH) will be prioritized

Additional Priorities:

1. Furthering Racial Equity
2. Authentic Engagement of People with Lived Expertise
3. Using Emerging Data to Inform Program Design and Growth
4. Investing in a Competitive Workforce
5. Demonstrating Fiscal Responsibility and Grant Management
FY 2023 CoC NOFO
TX-503 Austin/Travis County

- Estimated Annual Renewal Demand (ARD): $10,712,247
  Anticipated reallocation amount: $651,783.68

- CoC Bonus Amount: $749,857
- DV Bonus Amount: $810,778
- Tier 1: $9,962,390
- Tier 2: $4,197,252

CoC may submit applications up to the total allocated amounts funded
Tier 1 and Tier 2

- Tier 1 is equal to 93% of the Annual Renewal Amount (not including CoC and DV Bonus amounts or Planning Grant)
  - According to the Austin/Travis County Review, Soring and Ranking Policy, Renewals are typically ranked above New Projects* which results in Tier 1 only including Renewal Applications
  - This means New Projects typically rank in Tier 2
  - HUD awards projects in Tier 1 in order from the highest scoring CoC application to the lowest scoring application

- Tier 2 is equal the remainder of our award (the difference between Tier 1 and the maximum amount the CoC can apply for)
  - HUD awards projects in Tier 2 using a 100-point scale that competes each project application nationally
  - This makes Tier 2 funding much more competitive than Tier 1 funding
Changes from FY2022 - NOFO

• Round 1 YHDP (Youth Homelessness Demonstration Project) Grants:
  - Will be *competitively* renewed or replaced and are subject to the Tier 1 and Tier 2 funding selection process.
  - Can be reallocated to create new CoC grants (that are not required to be youth-specific).

• New eligible VAWA Costs Budget Line Item (BLI) for “facilitating and coordinating activities to ensure compliance with the [emergency transfer plan requirement...] and monitoring compliance with the confidentiality protections of [the confidentiality requirement...]” to implement VAWA 2022.

• Amendment to criteria for qualifying as “homeless” (per VAWA 2022) for HUD Category 4 Fleeing DV Homeless Definition to add “is experiencing trauma or a lack of safety related to, or fleeing...”

• Tier 1 amount reduced to 93 percent (from 95 percent).
Changes from FY2022 – Local Policies

**Review, Scoring, and Ranking Policy**

- HMIS (Renewal & Expansion) will be non-competitively ranked above all ranked projects.
- YHDP project applications for Diversion & Joint TH-RRH will be scored based on the Project Supplemental Questions (65% of total score in place of Quarterly Performance Scorecard).
- 7 bonus points awarded to Renewal Projects which voluntarily reallocate between 5 – 9% of their ARA.
- 10 bonus points awarded to New Projects that do not have subpopulation targeting in their program eligibility criteria.
- Members of CoC Lead Agency are non-conflicted from serving on IRT so long as the CoC Lead Agency does not submit any competitive applications & members of the CoC Lead Agency do not make up more than ¼ of the total IRT membership.
Changes from FY2022 – Local Policies

Reallocation and Deobligation Policy

- Involuntary reallocation of 2% from each Renewal Project application (except HMIS and VSP projects) will be reallocated towards HMIS Expansion

- Involuntary reallocation must be decided by a 2/3 majority vote conducted amongst a quorum of non-conflicted Leadership Council members or designated representatives

- Projects may be subjected to involuntary reallocation in the following instances:
  1. Projects which do not demonstrate adequate management of the program, including but not limited to: inadequate demonstration of fiscal responsibility (including timely use of funds and timely spending drawdowns), organizational capacity (including appropriate staffing structures to support project), satisfying all statutory and regulatory requirements.
  2. Projects undergoing HUD monitoring which have one or more open finding related to financial management, or who will be required to submit repayment following a HUD monitoring.
  3. Projects which have demonstrated activities, behaviors, or determinations that could be perceived as grossly negligent or egregious, and/or could cause risk to the reputation or performance of the rest of the CoC.
Changes from FY2022 – Local Policies

Community Funding Priorities
- Site-based Permanent Supportive Housing (PSH) will be prioritized

1. Furthering Racial Equity
2. Authentic Engagement of People with Lived Expertise
3. Using Emerging Data to Inform Program Design and Growth
4. Investing in a Competitive Workforce
5. Demonstrating Fiscal Responsibility and Grant Management
Options: Creating NEW projects w/ eligible components

- CoC/DV Bonus
- Reallocation
- Expansion
- Transition

NEW PROJECT
New Project Eligibility: CoC Bonus/Reallocation

Following project components are eligible in the CoC for CoC Bonus or Reallocation funding:

1) **Permanent Housing – Permanent Supportive Housing** (PH-PSH)
2) **Permanent Housing – Rapid Re-Housing** (PH-RRH)
3) **Joint Transitional Housing and Rapid Rehousing** (Joint TH and PH-RRH)
4) **Dedicated HMIS project** – *for HMIS Lead only*
5) **Supportive Services Only – Coordinated Entry** (SSO-CE) to develop or operate a centralized or coordinated assessment system

*NOTE: besides SSO-CE, no other SSO project types are eligible for New Project funding*

Applicant must be in good standing with HUD
- No open HUD findings
- No history of slow expenditures
- Limited unexpended funds
New Project Eligibility: DV Bonus

Following projects types are eligible in the CoC for DV Bonus funding:

1) **Permanent Housing – Rapid Re-Housing (RRH)**
2) **Joint Transitional Housing and Rapid Rehousing (Joint TH and PH-RRH)**
3) **Supportive Services Only – Coordinated Entry (SSO-CE)**

- CoCs can only submit (1) new DV Bonus project for SSO-CE
- Can apply for as many project types through RRH and Joint TH and PH-RRH
- Each project must be at least for $50,000
- DV Bonus projects are NOT allowed to be combined with Reallocated or CoC Bonus funds

**Special emphasis in application:**
- Approaches: victim-centered practices (e.g., Housing First, Trauma-Informed Care, Confidentiality)
- Housing & Safety Outcomes

NOTE: DV Bonus projects not selected by HUD for DV Bonus funding will be considered for CoC Bonus funding.

Resource: [Applying for DV Bonus Projects](#)
Permanent Supportive Housing (PSH)

- Must select either 100% Chronic Homeless or DedicatedPLUS
- The Head of Household must have a qualifying disability and meet the criteria required as defined in 24 CFR 578.3
- Supportive Services must be offered to all program participants and must be included in project budget.
- Rental Assistance must be offered to all program participants but does not have to be included in project budget.
- Must receive referrals through Coordinated Entry
- Must operate with Housing First
Rapid Rehousing (RRH)

- Provides rental assistance, housing location, case management, and supportive services for up to 24 months.
- Rental Assistance offered for 3-24 months; supportive services must be offered for up to 6 months after rental assistance stops
- Must receive referrals through Coordinated Entry
- Must operate with Housing First
New Project Grant Terms

New Projects may apply for an initial grant term of 1-year, 2-years, 3-years, 4-years, 5-years, or 15-years. Exceptions to this rule:

1. New projects can request 1 year of funding with a grant term between 12 months up to 18 months (for start up costs). New Projects that request capital costs (i.e., new construction, acquisition, or rehab) must apply for a minimum grant term of 3-years and up to 5-years.

2. New Expansion Projects may only apply for a 1-year grant term, regardless of project type.

3. New Projects that request tenant-based rental assistance, operating costs, SSO, HMIS, and administrative costs may apply for a grant term of 1-year, 2-years, 3-years, 4-years, or 5-years.

4. New projects that request leasing costs—either leasing costs only or leasing costs plus other costs (e.g., SSO, HMIS) may request a grant term of up to 3-years.

5. New PH Projects that request project-based rental assistance, sponsor-based rental assistance, or operating costs may request up to 15-year grant term; however, project applicants may only request up to 5 years of funding.

6. New projects applying for DV Bonus funds may only request 1 year of funding but may request up to 18-month grant term.

7. New YHDP replacement projects may only request 1 year of funding, and up to a 1-year grant term.
New Project Participant Eligibility

(1) New PH-PSH projects must serve one of the following:
   ◦ (a) persons eligible to be served by DedicatedPLUS projects as described in Section I.B.2.b.(7) of this NOFO in which case all units funded by the project must be used to serve program participants who meet the qualifications for DedicatedPLUS; or
   ◦ (b) persons experiencing chronic homelessness at the time they initially enroll in the project.

(2) New PH-RRH, Joint TH and PH-RRH, and SSO-CE projects must serve persons who qualify as homeless under paragraphs (1) or (4) of 24 CFR 578.3.

(3) New DV Bonus projects (RRH, Joint TH/PH-RRH, and SSO-CE) must serve survivors of domestic violence, dating violence, sexual assault, or stalking who qualify as homeless under paragraph (1) or (4) of 24 CFR 578.3.
Applicant Eligibility

Eligible Organizations:

- Nonprofit organizations
- State and Local governments
- Public housing agencies
- For profit organizations are NOT eligible to apply for grants or to be sub-recipients of grants

- Additionally, all project applicants must ensure their organization has a Code of Conduct that complies with the requirements of 2 CFR part 200 and is included on HUD’s website. If the organization's Code of Conduct does not appear on HUD's website, the project applicant must attach its Code of Conduct that includes all required information to its Project Applicant Profile in e-snaps. c. FY 2023 CoC Priority Listing.
Project Budgets

- All Budget Line Items (BLI) must be:
  - Clearly written in e-snaps (see CoC New Project Application Detailed Instructions)
  - In compliance with eligible expenses for project type (see CoC Program Interim Rule)

- When requesting Rental Assistance e-snaps will automatically calculate Fair Market Rental (FMR) amount per unit
  - If selecting SRO – please review guidance in NOFA

- Maximum 10% in administrative costs
**Budget: Supportive Service BLI**

The itemized budget screen includes 17 eligible costs (24 CFR 578.53(e))

<table>
<thead>
<tr>
<th>1. Assessment of Service Needs</th>
<th>10. Life Skills</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Assistance with Moving Costs</td>
<td>11. Mental Health Services</td>
</tr>
<tr>
<td>3. Case Management</td>
<td>12. Outpatient Health Services</td>
</tr>
<tr>
<td>4. Child Care</td>
<td>13. Outreach Services</td>
</tr>
<tr>
<td>5. Education Services</td>
<td>14. Substance Abuse Treatment Services</td>
</tr>
<tr>
<td>6. Employment Assistance</td>
<td>15. Transportation</td>
</tr>
<tr>
<td>7. Food</td>
<td>16. Utility Deposits</td>
</tr>
<tr>
<td>8. Housing/Counseling Services</td>
<td>17. Operating Cost*</td>
</tr>
<tr>
<td>9. Legal Services</td>
<td></td>
</tr>
</tbody>
</table>

Not on this screen is “Direct provision of services.”

- If the service is being directly delivered, eligible costs under the specific supportive service includes:
  - The cost of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services; and the salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.
  - Staff overhead costs directly related to carrying out operating activities are eligible as part of those activities listed on the supportive services budget.

May only include “17. Operating Costs” (maintenance, repair, building security, furniture, utilities, and equipment) in the Supportive Services budget, if the costs are for a facility that is used to provide supportive services for program participants.
Budget: Match

- Match must be equal to or greater than 25% of the total grant request (including Administrative costs but excluding Leasing costs)
- Current commitments at the time of project application, covering the requested grant operating period (i.e., grant term), and NOT based on projections.
- HUD expects the amount(s) listed on this screen to be accurate, with a commitment letter(s) in place that includes at least the same amount(s) as those listed in this screen.
- Match contributions can be:
  1. Cash,
  2. In-kind, or
  3. A combination of both.

NOTE: Project applicants that include program income as match must provide an estimate of how much program income will be used for match.
HUD Threshold: Pass/Fail Standards

- Must meet eligibility program requirements described in CoC Program Interim Rule 24 CFR part 578 and provide evidence of eligibility
- Demonstrate financial and management capacity and experience to carry out the project as detailed in the application and the capacity to administer federal funds
- Submit the required certifications specified in FY23 NOFO
- Populations proposed must align with the CoC program Interim Rule and Fair Housing
- Demonstrate cost effectiveness
- Must agree to participate in local Homelessness Management Information System (HMIS) except for agencies required by the Violence Against Women Act to use a comparable system and share all required de-identified data to the HMIS system
How to apply: E-SNAPS

- All interested applicants to complete project application in HUD’s online ESNAPS system
- Read and follow Esnaps and Detailed Instruction Guides
  - Applicant Profile
  - New OR Renewal Project Application
- Complete Project Application and submit by local deadlines
Required Applicant Certifications

- **HUD Approved Code of Conduct**
- SF-424 Application for Federal Assistance;
- SF-424 Supplement, Survey on Ensuring Equal Opportunities for Application required for nonprofit applicants only where completion and submission of this survey is voluntary;
- Form HUD-2880, Applicant/Recipient Update/Disclosure;
- Form HUD-424-B, HUD Applicant and Recipient Assurances and Certifications;
- SF LLL, Disclosure of Lobbying Activities (if applicable);
- Form HUD-50070, Certification for Drug-Free Workplace;
- Disclosure of Lobbying Activities;
- Applicant Certifications
Eligible Local Appeals

Appeals can be requested by any agency which has a project submitted for participation in the FY23 CoC Program NOFO in the Austin/Travis County CoC geographic area.

Example of eligible appeals include:

1. Projects that are not funded or receive less funding than the amount in the application.
2. Renewal projects that are ranked in Tier 2 of the CoC application (in which the applicant’s funding may be at risk).
3. Projects that fall into the bottom portion of Tier 1 that equals the Tier 2 amount.
4. Projects that are deemed to have submitted an incurable deficiency.
Local Appeal Process

- Draft Ranking is Posted: September 18, 2023
- Applicants Notified & Appeals Opened: September 18, 2023
- Appeals Due: September 21, 2023 by 6:00pm
- LC Rules on Appeals: September 22, 2023
Local Appeal Process

• An appeal must be in the form of a letter on the applicant agency’s letterhead and must clearly state the reasons for the appeal and specify all issues being contested.

• The appealing agency must specify facts and evidence sufficient for Leadership Council to determine the validity of the appeal.

• Agencies will receive, in writing, the appeal decision before the CoC Collaborative Application submission deadline. ECHO will be responsible for ensuring that projects have received proper notice of all final funding decisions.

• Applicants may ask ECHO for summary scoring information prior to the submission of the appeal letter. Individual IRT member scores will not be released to applicants.

As prescribed by HUD in the CoC NOFO, applicants may appeal the local CoC competition decision to HUD if the project applicant would like to further appeal the CoC Board’s decision.
HUD Appeal Process

• Applicants may appeal directly to HUD following two different processes:

• Solo Applicants: a process for eligible applicants that attempted to participate in the Local Competition and believe they were unreasonably denied participation
  • To apply as a Solo Applicant, the project applicant must submit: a Solo Applicant Project Application in esnaps by the NOFO Application deadline, a Written Notice of Intent to Appeal, all relevant evidence supporting its claim (by no later than 30 days after the date that HUD announces awards)

• Denied or Decreased Funding: a process for eligible applicants that are denied funds by HUD or that requested more funds than HUD awarded
  • May appeal HUD’s award within 45 days after HUD’s final funding announcement
  • Eligible Appeals must have been ranked by the CoC within the CoC’s maximum amount available

Applicant Appeals may delay signing grant agreements for the awarded project(s) listed in the CoC’s Priority Listing as submitted to HUD

More information in Section VII. of the NOFO (pg. 117 – 120)
HUD Appeal Process

Applicants also have appeal processes available through HUD, as outlined in 24 CFR 578.35

Solo Project Application Resources for the CoC Program

Date Published: August 2021

Description
This resource is for project applicants whose project application is rejected during the local CoC competition prior to the close of the annual CoC Program Competition. A project applicant may submit a Solo Application during the CoC Program Competition when the applicant attempts to participate in the CoC’s planning process and believes it was denied the right to participate in a reasonable manner.

Note: This resource is not for project applicants and CoC Collaborative Applicants who are appealing an award decision by HUD after applications have been submitted. Entities seeking an award decision appeal must follow the instructions in the NOFA for the applicable CoC Program Competition.

View all resources related to e-snaps and the annual CoC Program Competition.

Resource Links
- Project Application Appeal Process Navigational Guide for Solo Projects (PDF)

FY23 CoC Program Competition NOFO Notices:
https://www.hud.gov/program_offices/comm_planning/coc/competition

e-snaps Application Instructions:
https://www.hudexchange.info/programs/e-snaps/

CoC Program Laws, Regulations and Notices:

CoC Program Virtual Binders
https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/

All In: Federal Strategic Plan to Prevent and End Homelessness:
https://www.usich.gov/All_In_The_Federal_Strategic_Plan_to_Prevent_and_End_Homelessness.pdf

Rapid Rehousing Information:
https://endhomelessness.org/rapid-re-housing-works
TX-503 Resources

Austin/Travis County CoC’s NOFO Competition Information:
https://www.austinecho.org/leading-system-change/continuum-of-care/

TX-503 Estimated Annual Renewal Demand Amount Report:

Austin / Travis County Homelessness Response System Dashboard:
https://www.austinecho.org/dashboard/

Affirmatively Furthering Fair Housing Act:
https://www.huduser.gov/portal/affht_pt.html
Questions?

Office Hours:
- August 11, 2023 / 9:00 – 10:00 AM
- August 18, 2023 / 9:00 – 10:00 AM
- August 25, 2023 / 9:00 – 10:00 AM

Email the ECHO NOFO team:
Email: nofo@austinecho.org