TX-503 Austin/Travis County Continuum of Care Program

FY 2023 NOFO Bidders’ Conference (RENEWALS)

WEDNESDAY, AUGUST 2, 2023
9:00 AM – 10:30 AM
Today’s Agenda

- Estimated ARD & Bonus Amounts
- NOFO Timeline & Ranking Process
- Changes from FY2022
- Eligible Projects and Components
- YHDP Renewals
- Expansion, Transition, and Replacement Applications
- Appeals Policy and Processes
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
FY 2023 CoC NOFO
TX-503 Austin/Travis County

Estimated Annual Renewal Demand (ARD): $10,712,247
Planning Grant $535,612
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
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.
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...”
  
  **NOTE: CoCs will need to update the relevant written standards and policies as needed to reflect this new statutory criteria, prior to implementing this new definition.**

- **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
## CoC Projects Eligible for Renewal

<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Project Name</th>
<th>Project Component</th>
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<tbody>
<tr>
<td>Caritas of Austin</td>
<td>My Home</td>
<td>PH</td>
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<tr>
<td>Ending Community Homelessness Coalition, Inc.</td>
<td>HMIS Project 1 Renewal FY2022</td>
<td>HMIS</td>
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<tr>
<td>Housing Authority of the City of Austin</td>
<td>Onward FY2022</td>
<td>PH</td>
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<tr>
<td>The Housing Authority of Travis County</td>
<td>Upward</td>
<td>PH</td>
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<tr>
<td>The SAFE Alliance</td>
<td>SAFE Supportive Housing Program</td>
<td>TH</td>
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<tr>
<td>Front Steps, Inc.</td>
<td>PSH Renewal FY2024 TX0255L6J032111</td>
<td>PH</td>
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<tr>
<td>Austin-Travis County Mental Health and Mental Retardation Center dba Integral Care</td>
<td>Fresh Start FY2022</td>
<td>PH</td>
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<tr>
<td>The Salvation Army, A Georgia Corporation</td>
<td>Passages II Rapid Rehousing</td>
<td>PH</td>
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<tr>
<td>Youth and Family Alliance dba LifeWorks</td>
<td>Housing Options for Youth - renewal yr. 7</td>
<td>PH</td>
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<tr>
<td>The SAFE Alliance</td>
<td>DV Rapid Rehousing Project-Combined</td>
<td>PH</td>
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<tr>
<td>Youth and Family Alliance dba LifeWorks</td>
<td>Permanency through Outreach and Rapid Transitions (PORT) - replacement yr. 2</td>
<td>Joint TH &amp; PH-RRH</td>
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<tr>
<td>Youth and Family Alliance dba LifeWorks</td>
<td>YHDP Diversion - replacement yr. 2</td>
<td>SSO</td>
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<tr>
<td>Youth and Family Alliance dba LifeWorks</td>
<td>Youth Rapid Re-housing Collaborative - replacement yr. 2</td>
<td>PH</td>
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Eligible Components For Renewal Projects

Annual Renewal Demand (ARD)

- Renewal Projects Based on ARD (**minus 2% HMIS reallocation, except for HMIS & VSP renewal projects, per FY23 Reallocation & Deobligation Policy):
  - (a) Permanent housing-permanent supportive housing (PH-PSH) projects
  - (b) Permanent housing-rapid rehousing (PH-RRH) projects
  - (c) Transitional Housing (TH) projects
  - (d) Joint TH/PH-RRH component projects
  - (e) Dedicated HMIS project for the costs of 24 CFR 578.37(a)(4) by the HMIS Lead
  - (f) TH or Crisis Residential Transitional Housing projects**
  - (g) Supportive services only (SSO) projects**
  - (h) Supportive services only – coordinated entry (SSO-CE) projects**
  - (i) SSO – Host Home and Kinship Care projects**
  - (j) HMIS projects**

**Only applicable to YHDP replacement projects
Renewal Project Participant Eligibility

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

(b) PH-RRH, Joint TH/PH-RRH component, TH, and SSO projects may serve persons who qualify as homeless under paragraphs (1) or (4) of 24 CFR 578.3.

(c) YHDP renewal projects must serve youth aged 24 or younger, including unaccompanied and pregnant youth or parenting youth who:
   (i) qualify as homeless under paragraphs (1), (2), or (4) of the homeless definition in 24 CFR 578.3;
   (ii) have an unsafe primary nighttime residence and no safe alternative to that residence
YHDP Replacement Project Participant Eligibility

YHDP Replacement projects [section III.B.4.b.(5)] must serve youth aged 24 or younger, including unaccompanied and pregnant or parenting youth who:

(1) qualify as homeless under paragraphs (1), (2), or (4) of the homeless definition in 24 CFR 578.3;
(2) have an unsafe primary nighttime residence and no safe alternative to that residence.
Consolidation Project

Project applicants can consolidate two but not more than ten eligible renewal projects, including renewing YHDP projects, via the renewal project application and must ensure:

- The projects being combined during a grant consolidation will continue uninterrupted.
- The projects must have the same recipient (as evidenced by recipient’s Unique Entity Identifier) and be for the same component;
- and will only be funded in this Competition with FY 2023 funds (meaning no funds recaptured from prior years will be awarded to the project). See section III.B.4.b.(8) of this NOFO for additional information.
Expansion Project

The process by which a Renewal Project** applicant submits a New Project application to expand its current operations (e.g., increase the number of units, persons served, or services provided to existing program participants)

- Requires the submission of two applications in esnaps: 1 Renewal Application and 1 New Application
- Can only apply for 1-year grant term
- Excludes funding for capital costs (e.g., new construction, rehabilitation, or acquisition)
- Expansion Application is ranked as a New Project separately from the Renewal Project application

**NOTE: YHDP Renewals cannot submit for Expansion**
Expansion Requirements

You **cannot** use the expansion process to provide existing program participants with the **same** housing and services funded through the CoC Program; therefore, an expansion project must:

a) Serve new program participants;
b) Provide existing program participants with an expanded level of services;
c) Provide existing program participants with facilities that meet health and safety standards;
d) 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 persons experiencing homelessness; for more information refer to 24 CFR 578.87(a);
e) Provide expanded coordinated entry services to new and existing program participants, only eligible for SSO-CE; or
f) Provide expanded HMIS activities, only eligible for HMIS Leads.
Transition Project

A 1-year grant to fund a New Project to transition an eligible renewal project** that has been eliminated through reallocation from one program component to another eligible new component.

- Must be submitted in partnership with the CoC following the full reallocation of a renewal project
- The new project application must meet project eligibility and project quality thresholds established by HUD in Sections III.C.5.b. and c. of this NOFO.
- The Transition Grant will have the same operating year as the expiring Renewal Project grant
- Can only apply for 1-year grant term
- Transition Application is ranked as a New Project
- Transition Grants are eligible for renewal in subsequent fiscal years for eligible activities of the new component

**NOTE: YHDP Renewals cannot submit for Transition**
Replacement Project

A YHDP Renewal Project that seeks to replace component types to create a New Project.

- Only available to YHDP Renewal Projects that cannot utilize the Transition Project application process
- Replacement Applications must be submitted by the same recipient of the YHDP Renewal grant(s) being replaced
- Activities being requested, including Special YHDP Activities, are eligible and do not exceed the ARA of the renewal project being replaced.
- Capital costs *cannot* be requested.
- Can only apply for 1-year grant term
- Operating start date will be the day after the end of the previous grant term for the project being replaced.
- Replacement Application is ranked as a Renewal Project
- Replacement Grants are eligible for renewal in subsequent fiscal years for eligible activities of the new component
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)

HUD Exchange Resources

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