

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR-5935-N-01]

Notice of Fiscal Year (FY) 2017 Opportunity to Register and Other Important Information for Electronic Application Submission for the Continuum of Care (CoC) Program Competition

AGENCY: Office of Community Planning and Development (CPD), HUD.

ACTION: Notice.

SUMMARY: For Fiscal Year (FY) 2017, HUD requires each Continuum of Care (CoC) Collaborative Applicant (also known as the CoC applicant) to register in advance of applying for funding available under the FY 2017 CoC Program Competition. Collaborative Applicants must complete the registration using *e-snaps*, a web-based portal accessible at www.hud.gov/esnaps.

This Notice provides Collaborative Applicants with the information necessary to register CoCs in preparation for the FY 2017 CoC Program Competition. HUD strongly recommends referring to the CoC Program interim rule (24 CFR part 578) in conjunction with this Notice. The registration process described in this Notice applies only to Collaborative Applicants who will register to submit the CoC Consolidated Application for FY 2017 CoC Program Competition funds, which includes the CoC Application and the CoC Priority Listing, and the project applications that have been either accepted and ranked or rejected. This registration process does not apply to project applicants or private individuals because HUD does not provide funding to private individuals and all project applications must be submitted by the Collaborative Applicant to HUD. Private individuals should not attempt to complete the registration process, or apply for funding under the FY 2017 CoC Program Competition.

DATES: The registration deadline is **8:00 p.m. Eastern Time** on the date that will be posted to the FY 2017 CoC Program Competition Funding Availability page on the HUD Exchange (<https://www.hudexchange.info/programs/e-snaps/fy-2017-coc-program-nofa-coc-program-competition/>) and announced via the HUD listserv once *e-snaps* is available. Registration submission must be received in *e-snaps* on or before the registration deadline. Collaborative Applicants that receive HUD approval of their registration submission must acknowledge that approval in *e-snaps*. Collaborative Applicants that do not receive HUD approval of their registration submission will be notified via *e-snaps* and will not be permitted to access or submit the FY 2017 CoC Consolidated Application in the FY 2017 CoC Program Competition. HUD will notify and remind Collaborative Applicants of the registration deadline through its websites located at www.hud.gov and www.hudexchange.info and via the CoC Program email-based listserv. Visit the following website to join the listserv at www.hudexchange.info/maillinglist/.

FOR FURTHER INFORMATION CONTACT: HUD staff will be available to provide general clarification on the content of this Notice and the CoC Program requirements.

- A. Local HUD CPD Field Office.** For further guidance on the registration submission requirements, including the FY 2017 Grant Inventory Worksheet(s) (GIWs), and the requirements imposed under the McKinney-Vento Homeless Assistance Act (the Act) and 24 CFR part 578, Collaborative Applicants may contact the HUD CPD field office serving their area listed at www.hudexchange.info/manage-a-program/cpd-field-office-directory/.
- B. Training and Resources.** Collaborative Applicants that need assistance completing the registration process in *e-snaps* or understanding the program requirements under the CoC Program may access the CoC Program interim rule, training materials, and program resources at www.hudexchange.info/homelessness-assistance.
- C. The HUD Exchange Ask A Question (AAQ).** Collaborative Applicants that require information and technical support concerning this Notice and the registration process in *e-snaps* may submit an electronic inquiry via the HUD Exchange *e-snaps* Ask A Question Help Desk at www.hudexchange.info/get-assistance, which is accessible 24 hours daily.

It is important to note that starting 2 days prior to the registration submission deadline, the AAQ Help Desk will only respond to emergency technical support questions up to the deadline date at 8:00 p.m. Eastern Time. Collaborative Applicants experiencing technical difficulty during this 2-day period should contact the AAQ immediately for assistance and document their attempts to obtain assistance.

Collaborative Applicants and project applicants that have questions about the McKinney-Vento Homeless Assistance Act or 24 CFR part 578 should submit these questions to the CoC Program AAQ Help Desk.

- D. HUD Homeless Assistance Listserv.** HUD will notify Collaborative Applicants of registration availability and deadlines, including the availability of the FY 2017 CoC Program Competition NOFA through its websites located at www.hud.gov, <https://www.hudexchange.info/programs/e-snaps/fy-2017-coc-program-nofa-coc-program-competition/>, and via the CoC Program email-based listserv. Visit the following website to join the listserv: www.hudexchange.info/maillinglist.

FULL TEXT OF ANNOUNCEMENT

This Notice is divided into five sections. Section I provides background information on the CoC Program and an overview of the CoC planning process. Section II contains key terms used throughout this Notice and the registration process. Section III provides detailed information on completing the CoC Program Registration process in *e-snaps*. Section IV provides information for the FY 2017 CoC Program Competition and certain requirements that all applicants should consider. Section V provides registration resources to help Collaborative Applicants to successfully complete the registration process and to prepare for submission. This Notice includes citations from 24 CFR part 578, which HUD expects applicants and stakeholders to read to increase their knowledge and understanding of the CoC Program requirements.

I. OVERVIEW INFORMATION

A. Background

24 CFR part 578 contains the requirements for the CoC Program (authorized by Subtitle C of Title IV of the Act). It is important that Collaborative Applicants and project applicants read 24 CFR part 578 to completely understand the requirements of this program before applying for FY 2017 CoC Program Competition funding, particularly regarding tenant-based rental assistance and the definition of chronically homeless at 24 CFR 578.51 and 578.3, respectively, which were both amended in 2016. These regulations govern the FY 2017 CoC Program Competition with the exception of environmental review provisions at 24 CFR 578.31 and 24 CFR 578.99(a). While the regulations in this section require environmental review by HUD under 24 CFR part 50, Section 100261(3) of MAP-21 (Pub. L. 112-141, 126 Stat. 405) has superseded this requirement and has made activities funded under the CoC Program subject to environmental review by a responsible entity under HUD regulations at 24 CFR part 58 instead.

While the Act and 24 CFR part 578 authorize increases in project administrative costs, leasing, rental assistance, and operating funds for renewal projects, HUD reserves the right to not fund all of these increases at the maximum authorized levels. Collaborative Applicants can request funds for CoC planning. Collaborative Applicants can also request funds for Unified Funding Agency (UFA) Costs, if HUD designates them as UFAs during this registration process. The FY 2017 CoC Program Competition NOFA will provide more information on the amount available and how to apply for CoC planning and UFA Costs project funds.

CoCs may use the reallocation process as stated in Section II.A.2.j of this Notice to create the following types of new projects or to expand existing projects of the following types:

1. permanent supportive housing projects that will primarily serve chronically homeless individuals and families, including unaccompanied youth;
2. rapid rehousing projects for homeless individuals and families, including unaccompanied youth;
3. Joint Transitional Housing (TH) and Permanent Housing-Rapid Rehousing (PH-RRH) component projects, that will combine TH and PH-RRH into a single project to serve individuals and families experiencing homelessness;
4. Dedicated Homeless Management Information System (HMIS) projects; or
5. Supportive Services Only (SSO) projects for centralized or coordinated assessment systems.

For FY 2017 CoC Program funding HUD will prioritize those CoCs that demonstrate a capacity to reallocate funding in the FY 2017 CoC Program Competition or have reallocated a total of at least 20 percent of the CoC's total ARD between FY 2013 and FY 2017 from lower performing projects to higher performing projects as demonstrated through the CoC's local selection process. See Section IV.B.4 of this Notice for additional information.

B. Summary of Registration

Each Collaborative Applicant must complete and submit a registration on behalf of the CoC in *e-snaps*, which allows:

1. Collaborative Applicants to confirm or update the CoC geographic area and merger or split status;
2. HUD to apportion “Preliminary Pro Rata Need” (PPRN) dollars associated with the CoC’s geographic area;
3. Collaborative Applicants to apply for Unified Funding Agency (UFA) designation;
4. HUD to inform each Collaborative Applicant that applies if UFA designation has been granted;
5. Collaborative Applicants to request High Performing Community (HPC) designation;
6. HUD to inform each Collaborative Applicant that applies if HPC designation has been granted; and
7. Collaborative Applicants to confirm their intent to submit a CoC Consolidated Application in the FY 2017 CoC Program Competition on behalf of the CoC.

HUD advises Collaborative Applicants to immediately register in *e-snaps* after carefully reading this Notice in conjunction with the General Section to HUD’s FY 2017 Notice(s) for Discretionary Programs (General Section), posted to www.grants.gov on September 30, 2016, and [24 CFR part 578](#), which is posted on the HUD Exchange. The General Section is also available on the [FY 2017 Continuum of Care \(CoC\) Program Competition: Funding Availability](#) page on the HUD Exchange.

All Collaborative Applicants and project applicants must register with Dun and Bradstreet (DUNS) if they have not already, and to complete or renew their registration in the System for Award Management (SAM) registration. For more information on DUNS numbers and SAM registration go to: <http://portal.hud.gov/portal/page/portal/HUD/topics/grants>.

Collaborative Applicants must fully complete and update all parts of the CoC Applicant Profile in *e-snaps* during the CoC Program Registration process. Although the CoC Program Registration process does not apply to project applicants, HUD encourages project applicants to immediately begin the process of verifying and updating information contained in the *e-snaps* Project Applicant Profile in order to be ready to apply for funding when the FY 2017 Continuum of Care Program Competition Notice of Funding Availability (NOFA) is published and the project applications become available in *e-snaps*. The CoC and Project Applicant Profiles are available for Collaborative Applicants and project applicants in *e-snaps* both during and outside of the annual CoC Program Competition period and should be updated when key contacts are changed (e.g., Executive Director, HMIS Lead) and when information about key contacts changes (e.g., email addresses, phone numbers, titles). In addition, HUD encourages project applicants to create a permanent email that does not change with staff turnover, e.g., ExecutiveDirector@abcnonprofit.org. This will ensure that important information reaches employees that need it, in a timely manner. The CoC Program Competition period begins when

HUD publishes the CoC Program Competition NOFA and ends when HUD announces the conditionally awarded funds.

As an alternative to the electronic registration in *e-snaps*, Section III.E. of this Notice provides specific instructions for Collaborative Applicants:

1. located in one or more areas declared to be major disaster areas by the President under Title IV of the Robert T. Stafford Act; and
2. that intend to complete the FY 2017 CoC Program application process but do not have the ability to complete and submit the registration in *e-snaps* by the deadline established in this Notice.

C. CoC Program

Detailed requirements for the CoC Program, including standards for application review, standards used in award selection, requirements for grant execution, eligible uses of CoC Program funds and matching funds, recipient reporting requirements, and standards for compliance monitoring are included in 24 CFR part 578 and govern the FY 2017 CoC Program Competition and the administration of all grants funded in the FY 2017 CoC Program Competition.

The Collaborative Applicant approved by HUD during the FY 2017 registration process must be the same entity that submits the CoC Consolidated Application—which includes the CoC Application, CoC Priority Listing, and the project applications that have been either accepted and ranked or rejected—during the FY 2017 CoC Program Competition. CoCs should not change Collaborative Applicants during the FY 2017 CoC Program Competition period (unless HUD replaces the CoC’s designated Collaborative Applicant under the authority of Section 402(c) of the Act as described in Section III.C.6. of this Notice) without HUD’s prior approval. HUD will approve Collaborative Applicant changes after the registration process under certain circumstances that include:

1. an error made by the Collaborative Applicant when entering the Collaborative Applicant’s name in the CoC Applicant Profile;
2. the Collaborative Applicant chosen by the CoC is no longer in business;
3. the Collaborative Applicant withdrew;
4. the CoC selected a new Collaborative Applicant; or
5. a new Collaborative Applicant was selected by HUD through remedial action.

In cases where the CoC needs to change the Collaborative Applicant approved during registration, the CoC must notify the local HUD CPD Field Office in writing stating the reason for the Collaborative Applicant change. The notice to the local HUD CPD Field Office must include documentation of the CoC’s approval of the change (e.g., a copy of the meeting minutes, to include the date and attendees).

In the FY 2017 CoC Program Competition, CoC Program funds may be used for at least eight types of projects:

1. Permanent housing – permanent supportive housing;
2. Permanent housing – rapid re-housing;
3. Transitional housing;
4. Supportive services only;
5. Homeless Management Information System (HMIS);
6. Joint TH and PH-RRH Component Project;
7. Safe havens, which is only an allowable component for CoCs that are renewing a safe haven that was originally awarded under the Supportive Housing Program that meets the criteria of 24 CFR 578.33(d); and
8. homelessness prevention, which is only an allowable component in CoCs designated as a High Performing Community (HPC), because only designated HPCs may carry out homelessness prevention activities through the CoC Program. If your CoC intends to be considered for HPC designation during the FY 2017 CoC Program Competition, it must apply during the FY 2017 CoC Program Registration process (see Section III.C.4. of this Notice for more information).

D. For the FY 2017 CoC Program Competition, project applicants may request project administrative costs up to 10 percent of the total project budget.

First-Time CoC Program Renewals. Projects requesting renewal under the CoC Program for the first time may request project administrative funds from HUD in an amount up to 7 percent of the total project budget without being required to move funds from another Budget Line Item (BLI). HUD will fund this increase in the amount previously authorized under the Supportive Housing (SHP) and Shelter Plus Care (S+C) Programs. Projects may request up to 10 percent of the total project costs for project administrative costs, however, any amount above 7 percent must be moved from other BLIs.

CoC Program Renewal Projects. Projects originally funded under the CoC Program that intend to increase their project administrative requests to greater than the amount approved in their most recent grant agreement (up to the 10 percent maximum allowed in 24 CFR 578.59) may move an amount from another BLI to add to the project administrative costs BLI, provided that the total annual renewal amount for the project application does not increase. Applicants of renewing projects with rental assistance may move funds out of the rental assistance BLI to increase the project administrative costs BLI up to 10 percent; however, applicants are prohibited from reducing the number of units assisted that are contained in the grant being renewed. Applicants should note that the movement of funds from another BLI might adversely impact the ability to carry out the activities related to that budget line item.

New Projects. HUD will provide information regarding project administrative cost requests for new projects in the FY 2017 CoC Program Competition NOFA.

Project administrative costs may only be used for the administration of the awarded grant as outlined in 24 CFR 578.59.

To apply for funding under the FY 2017 CoC Program Competition, the Collaborative Applicant for each CoC must review the GIW populated by HUD that will be posted to the HUD Exchange. Any changes needed to the GIW must be completed on the GIW Change Form and submitted to the local HUD CPD Field Office for review. HUD will post the final GIW on the HUD Exchange with the CoC's final Annual Renewal Demand (ARD). The GIW will include all eligible renewal projects known to HUD and reflect the budget amounts as conditionally awarded in the FY 2016 CoC Program Competition, or if the GIW contains first-time renewals, the budget amounts as reflected under the current grant agreement or grant agreement as amended. For the FY 2017 CoC Program Registration process, the GIW is not a required attachment in *e-snaps* because HUD will not post the final GIW to the HUD Exchange until after the FY 2017 CoC Program Registration process is closed. See Section III.D.1. of this Notice for additional information.

II. KEY TERMS USED AS PART OF THE REGISTRATION PROCESS

A. Definitions. The key terms contained in this Notice are important for Collaborative Applicants to understand and complete the FY 2017 registration in *e-snaps* on behalf of the CoC. A more extensive list of definitions can be found at 24 CFR 578.3.

1. The following terms are defined in 24 CFR 578.3, which must be carefully reviewed by all applicants for the definitions contained in this section:

- a. *Annual Renewal Amount (ARA)*
- b. *Applicant*
- c. *Centralized or Coordinated Assessment System*
- d. *Collaborative Applicant*
- e. *Continuum of Care (CoC)*
- f. *Final Pro Rata Need (FPRN)*
- g. *High Performing Community (HPC)*
- h. *Permanent Housing (PH)*
- i. *Permanent Supportive Housing (PSH)*
- j. *Project*
- k. *Recipient*
- l. *Subrecipient*
- m. *Transitional Housing (TH)*
- n. *Unified Funding Agency (UFA)*

2. **CoC Program Registration Notice Definitions and Concepts.** The following terms are not found in 24 CFR 578.3 but are used in this FY 2017 CoC Program Registration

Notice to define concepts that pertain specifically to the CoC Program Registration process:

- a. *Annual Renewal Demand (ARD).*** The ARD is the total renewable funding amount of all the CoC's projects that will be eligible for renewal in the FY 2017 CoC Program Competition, before any required adjustments to funding for leasing, rental assistance, and operating BLIs based on Fair Market Rent (FMR) changes. ARD incorporates funding only for eligible activities—operating, supportive services, leasing, rental assistance, Homeless Management Information Systems (HMIS), and project administrative costs—that were funded in the original grant, or the original grant as amended, less the non-renewable activities—new construction, acquisition, rehabilitation, and any project administrative costs related to these activities.

Any funding for new construction, acquisition, or rehabilitation, and any project administrative costs related to those activities, is not renewable and therefore, will not be calculated in the project's ARA. If the eligible renewal grant includes these non-renewable activities, applicants must recalculate to reduce project administrative costs for such related activities. Project administrative costs cannot exceed 10 percent of the grant awarded, the maximum allowed in 24 CFR 578.59. See Section I.D. of this Notice for further information on project administrative costs. Because grants for CoC Planning or UFA costs are not eligible for renewal, they cannot be included in the final GIW.

- b. *Continuum of Care Merger Process.*** The Continuum of Care Merger is a process to merge two or more CoCs that registered separately in the FY 2016 CoC Program Competition. If the CoCs merging through this process have one CoC with an FPRN based on the ARD amount that exceeds the PPRN and at least one other CoC has a FPRN based on PPRN, then HUD will calculate the newly merged CoC's FPRN based on the higher FPRN for each CoC that participates in the merger process. HUD encourages smaller CoCs that struggle with funding to merge with a neighboring CoC, merge with a regional CoC, or merge with a Balance of State CoC.

CoCs that intend to voluntarily change their geographic area are asked to notify HUD by sending an email to the CoCMerger@hud.gov mailbox to obtain a new CoC name that clearly identifies the geographic area of the newly formed CoC. HUD will accept requests submitted for the following actions during the CoC Program Registration process but not later than 5 days before the end of the CoC Program Registration period:

- (1) The merger of two or more CoCs;
- (2) The separation of one or more geographic areas from one or more CoCs to other CoCs; or
- (3) The splitting of an existing CoC and the division of the geographic resources into two or more CoCs.

- c. ***Continuum of Care Registration.*** The first step in the annual CoC Program Competition process, where the Collaborative Applicant confirms its intent to submit a CoC Consolidated Application in the FY 2017 CoC Program Competition on behalf of the CoC and requires each CoC to:
- (1) review its geographic area;
 - (2) designate a Collaborative Applicant that will be responsible for submitting the electronic registration and application in *e-snaps*;
 - (3) review and request necessary changes to the HUD-posted GIW; and
 - (4) obtain the ARD amount.
- d. ***Joint TH and PH-RRH Component Project.*** In the FY 2017 CoC Program Competition, CoCs will be able to create new joint TH and PH-RRH component projects to better serve individuals and families experiencing homelessness. These projects will provide low-barrier, temporary housing while individuals and families quickly move to permanent housing with a seamless program design. The joint TH and PH-RRH component combines 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 as follows:
- (1) capital costs (i.e., new construction, rehabilitation, or acquisition), leasing of a structure or units, and operating costs to provide transitional housing;
 - (2) short- or medium-term tenant-based rental assistance on behalf of program participants to pay for the rapid re-housing portion of the project;
 - (3) supportive services;
 - (4) HMIS; and
 - (5) project administrative costs.
- Joint TH and PH-RRH component projects that assist program participants must be able to provide both transitional housing assistance and rapid re-housing assistance to each program participant. HUD will require that applications for joint TH and PH-RRH component projects demonstrate that the project will have the capacity to provide both kinds of assistance as needed to each program participant. Additional information will be provided in the FY 2017 CoC Program Competition NOFA.
- e. ***Grant Inventory Worksheet (GIW).*** The GIW is an inventory of all projects within a CoC's geographic area that are eligible for renewal in a particular year. HUD uses the GIW to determine which projects are eligible to receive renewal funding and to ensure an accurate calculation of the CoC's ARD. HUD will no longer issue individual GIWs to Collaborative Applicants or require submission of the GIW with the CoC's Registration; instead, HUD will post all CoCs' GIWs, populated by HUD with all eligible renewal projects known to HUD, to the HUD

Exchange website for Collaborative Applicants, CoCs, and project recipients review. See Section III.D. of this Notice for more information about using the GIW and how to submit corrected information to HUD.

The final GIW will include the most update to date BLI information known to HUD for each project and the correct unit configuration for rental assistance projects in order to calculate the ARD for the CoC. HUD will post the final GIWs for all CoCs to the HUD Exchange website.

Project applicants and CoCs, through the designated Collaborative Applicants, must ensure that the renewal budget and total number of units for all renewal projects match the amounts and units approved by HUD on the final GIW. HUD will apply any FMR updates to the permanent housing operating, leasing, and rental assistance BLIs after the application deadline, but before HUD conditionally awards grants. As necessary, HUD will reduce the requested budgets and units to match the budgets and total number of units on the CoC's final GIW(s). As a reminder, a renewal project cannot exceed the total ARA.

- f. ***Homeless Management Information Systems (HMIS) (24 CFR 578.3 and 578.57).*** An HMIS is a computerized data collection application designed to capture client-level information over time on the characteristics of housing and service needs of men, women, and children experiencing homelessness, while also protecting client confidentiality. An HMIS aggregates client-level data to generate an unduplicated count of clients served within a community's system of homeless services, and can provide data on client characteristics and service utilization. The activities in 24 CFR 578.57(a)(2) must be carried out by the HMIS Lead, which must also be the recipient or subrecipient of an HMIS grant, and be the entity listed on the HMIS Lead form in the CoC Applicant Profile in *e-snaps*.
- g. ***Homeless Management Information Systems (HMIS) Lead (24 CFR 578.3).*** The HMIS Lead is designated by the CoC as the entity responsible for managing the CoC's HMIS. The HMIS Lead, which is the recipient or subrecipient of an HMIS grant, is the only entity eligible to carry out the activities of the dedicated HMIS funds including leasing a structure where the HMIS project is located, and for HMIS costs related to establishing, operating, and customizing a CoC's HMIS.
- h. ***Other Community-based Resources.*** Resources that are available within the CoC's geographic area that provide additional support, funding, and services to persons experiencing homelessness such as local food banks, support groups for substance abuse, or philanthropic organizations.
- i. ***Preliminary Pro Rata Need (PPRN).*** The amount of funds a CoC could receive based upon the geographic areas claimed by the CoC during the FY 2017 CoC Program Registration process. To determine the amount of funding available for each geographic area (i.e., metropolitan city, urban county, or other county), HUD will use the formula set forth in the CoC Program interim rule at 24 CFR 578.17(a). Each year, HUD publishes the PPRN for each jurisdiction on

the HUD Exchange website. A CoC's PPRN is determined by adding the published PPRN of each metropolitan city, urban county, or other county located within the HUD-approved CoC geographic area. For the FY 2017 CoC Program Competition process, the amounts associated with the geographic codes will be posted once FY 2017 funds have been appropriated.

- j. *Reallocation.*** When a CoC shifts funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD. All CoCs may use the reallocation process. In the FY 2017 CoC Program Competition, HUD anticipates allowing CoCs to use the reallocation process to create, at a minimum, the following new projects:
- (1) permanent supportive housing projects that will primarily serve chronically homeless individuals and families, including unaccompanied youth;
 - (2) rapid rehousing projects for homeless individuals and families, including unaccompanied youth, coming directly from the streets or emergency shelter, or persons fleeing domestic violence situations and other persons meeting the criteria of paragraph (4) of the definition of homelessness;
 - (3) joint component projects, which will combine TH and PH-RRH into a single project to serve individuals and families experiencing homelessness;
 - (4) dedicated HMIS projects; or
 - (5) Supportive Services Only (SSO) projects for centralized or coordinated assessment systems.

Additional types of projects may be considered if authorized by the FY 2017 appropriation.

CoCs may choose to eliminate or reduce one or more eligible renewal projects to create one or more reallocated projects. When a CoC chooses to reallocate projects, the Annual Renewal Demand for the CoC does not change.

- k. *Rental Assistance Worksheet.*** The rental assistance worksheet is a tab on the GIW that will accurately calculate a rental assistance project's ARA.

- (1) HUD will complete a rental assistance worksheet for known S+C project(s) that are eligible for renewal for the first time in the FY 2017 CoC Program Competition.
- (2) SHP projects that will renew for the first time that request a change from leasing to rental assistance in the FY 2017 CoC Program Competition must complete a rental assistance worksheet for review by the local HUD CPD Field Office.

It is important to select the correct FMR area to provide the FMR amounts in effect for the FY 2017 CoC Program Competition application process and after

adding the number of rental assistance units the worksheet automatically calculates the total ARA for the project that will be used to populate the rental assistance amount on the GIW.

III. COMPLETING THE REGISTRATION PROCESS

Accessing and completing the registration process in *e-snaps* will include the following steps, which are slightly different for the FY 2017 CoC Program Registration process because the GIW step is different and will occur later in the process.

A. Step One: Log in to *e-snaps* to Access the Registration Forms.

Any Collaborative Applicant primary contact person who has accessed the registration forms in *e-snaps* in previous Competitions is referred to by HUD as “returning *e-snaps* user.” These users will have access to the FY 2017 registration forms in *e-snaps*. For FY 2017, returning users may use the same username and password previously created. First-time users of *e-snaps* must create an *e-snaps* user account by completing the *e-snaps* user profile information. Each person who created a user account for the first time must be granted permission by the primary authorized *e-snaps* user of the Collaborative Applicant in order to access the FY 2017 registration forms.

Applicants should use the HUD Exchange AAQ if they require assistance with adding and deleting users in *e-snaps*. For instruction on contacting the AAQ, see Section C of the “FOR FURTHER INFORMATION CONTACT” section at the beginning of this Notice.

B. Step Two: Update and Complete Applicant Profile.

The Applicant Profiles allow CoCs and project applicants to update the contact information for the primary and alternate contacts to ensure that HUD has up-to-date information on file. It is imperative that both the CoC and Project Applicant Profiles have accurate and up-to-date primary and alternate contact information. The contact information is used by HUD to contact applicants for any curable deficiencies. The information in the Applicant Profiles can be updated throughout the year and HUD strongly encourages applicants to update the contact information when key contact changes occur (e.g., changes in Executive Director, CEO, HMIS Lead). HUD also encourages project applicants to create a permanent email that does not change with staff turnover—e.g., ExecutiveDirector@abcnonprofit.org—to ensure that important information reaches appropriate staff in a timely manner. Returning Collaborative Applicants must make any necessary updates to the CoC Applicant Profile in *e-snaps*. This includes any required changes to the Collaborative Applicant Primary and Alternate contacts, HMIS Lead information and Contact Person, and Homeless Resources Contact Person. Collaborative Applicants representing new CoCs must complete the Applicant Profile information in full. Information on completing and updating the [Applicant Profile](#) can be found on the HUD Exchange.

C. Step Three: Complete the Registration Forms.

All Collaborative Applicants registering for the first time or returning must input all information relevant to the FY 2017 CoC Program Registration forms. The CoC Program

Registration Instructional Guide provides instructions on completing this process. The remainder of this section highlights information that applicants must enter into *e-snaps* to complete and submit the registration.

1. ***CoC Type.*** CoC Applicants will have the option to register as a Collaborative Applicant or a Collaborative Applicant applying for Unified Funding Agency (UFA) designation. HUD will notify Collaborative Applicants of the final HUD-approved designation as Collaborative Applicant or UFA during the CoC Program Registration process. Collaborative Applicants requesting UFA designation must meet the selection criteria as outlined in 24 CFR 578.11 and have financial systems that meet the standards set forth in 2 CFR 200.302. Collaborative Applicants requesting UFA designation must fully answer all questions in the FY 2017 CoC Program Registration forms and attach all required documents in order to submit the registration in *e-snaps*. If the Collaborative Applicant is unable to answer all questions or attach the required documentation, it will be required to change the designation request from UFA to Collaborative Applicant before the registration forms can be submitted.
2. ***Identify CoC Mergers.*** For CoCs that merge before the end of the registration process, the FY 2017 CoC Program Registration must capture the total PPRN of the merged CoCs. To determine these totals, HUD will provide guidance on eligibility and procedures via the *CoC Merger Worksheet and Guidance on CoC Merger*.

The Worksheet will indicate whether a CoC could benefit from merging under the CoC Merger option in FY 2017 and will be available in *e-snaps* and at <https://www.hudexchange.info/programs/e-snaps/fy-2017-coc-program-nofa-coc-program-competition/>.

3. ***Review the CoC's Geographic Area.*** All Collaborative Applicants must notify HUD of the geographic area(s) covered by the CoC in *e-snaps* during CoC Program Registration process. HUD has posted a list of each geographic area at: <https://www.hudexchange.info/programs/e-snaps/fy-2017-coc-program-nofa-coc-program-competition/>. Once the FY 2017 funds have been appropriated, HUD will update the geographic area list to include the PPRN amount associated with each geographic area.

Due to changes in the allocation of funds for metropolitan cities, urban counties, and other counties under the Community Development Block Grant (CDBG) formula, HUD has made changes to the metropolitan cities, urban counties, and all other counties eligible to receive a PPRN amount in the FY 2017 CoC Program Competition. Information regarding the PPRN formula and the role of CDBG in determining the formula and geographic areas can be found at 24 CFR 578.17(a). It is important that Collaborative Applicants identify all areas within the CoC's geographic area during the registration process in *e-snaps* as additional metropolitan cities, urban counties, and all other counties might exist within the CoC's geographic area. The following geographic areas have been added to the PPRN calculation in the FY 2017 CoC Program Competition: Lompoc, CA (062064); West Sacramento, CA (064050); Commerce City, CO (080300); Caldwell City, ID (160138); Lenexa, KS (201944); Grand Island, NE (311254); Berwick Borough, PA (420474); and Bloomsburg, PA (420588).

The following metropolitan cities, urban counties, or other counties were removed from the PPRN calculation in the FY 2017 CoC Program Competition: Hoover, AL (011206); Bentonville, AR (050228); Richmond, CA (063000); Bibb County, GA (139021); and Bedford City, VA (519515).

Per 24 CFR 578.35(d), if more than one CoC claims the same geographic area, HUD will award funds to the Collaborative Applicant(s) whose application(s) have the highest total score. No projects will be funded from the lower scoring CoC. No project applications that are submitted in two or more competing CoC Consolidated Applications will be funded. HUD will not correct errors made by Collaborative Applicants, including errors where a Collaborative Applicant failed to claim a geographic area claimed in the past.

4. High Performing Community (HPC) Designation. Collaborative Applicants requesting HPC designation for the CoC must complete the HPC forms in *e-snaps* and attach the required information outlined below. HUD will assess all submitted responses, required documents, and information submitted in the Homelessness Data Exchange (HDX) to determine if the CoC is eligible for HPC designation. CoCs that meet all requirements based on a pass or fail standard will receive HPC designation for grants awarded in the FY 2017 CoC Program Competition that will allow the CoC, through the Collaborative Applicant, to submit project applications for homelessness prevention.

a. HPC Requirements. Collaborative Applicants requesting HPC designation on behalf of the CoC will be required to provide the following information that will be reviewed by HUD on a pass/fail standard:

(1) CoC Program Expenditures/Allocation Process. CoCs requesting HPC designation must generate a report that demonstrates how CoC Program funds received in the preceding year were expended. This report must be based on the FY 2015 awarded CoC Program funds that appeared on the FY 2016 GIW. Collaborative Applicants will also be required to provide a narrative describing the priorities established for the FY 2015 CoC Program funding process and attach the FY 2016 final HUD-approved GIW (which lists the FY 2015 projects that were awarded funds). To pass this requirement, Collaborative Applicants must:

(a) attach the final HUD-approved FY 2016 GIW that lists all projects awarded funds in the FY 2015 CoC Program Competition and add a column that includes the amount of funds expended by each project during the FY 2015 grant term; and

(b) clearly describe the priorities established, communicated, and used by the CoC to determine which types of projects were submitted to HUD in the FY 2015 CoC Program Competition.

(2) Plan for FY 2017 CoC Program Funds. Collaborative Applicants must describe how the CoC intends to use the HPC designation, if approved by HUD, during the FY 2017 CoC Program Competition. To pass this requirement, the narrative must clearly describe the following:

- (a) if the CoC intends to use any of the FY 2017 available funding, through renewal or new projects, to carry out activities related to housing relocation and stabilization services as well as short-term or medium-term rental assistance to individuals and families at risk of homelessness;
 - (b) how the CoC will determine the need for housing relocation and stabilization services in addition to short-term and/or medium-term rental assistance for those at risk of homelessness;
 - (c) how the CoC will ensure individuals and families served by these types of projects will be prevented from falling into homeless situations; and
 - (d) the types of projects (e.g., Transitional Housing or Supportive Services Only) that the CoC intends to reduce or eliminate in order to create one or more new projects under the HPC designation, because reallocation is the only process that CoCs will be able to use to submit a project application for HPC designated activities.
- (3) *Mean Length of Homelessness.* Collaborative Applicants must demonstrate at least one of the following:
- (a) The mean length of episodes of homelessness for individuals and families within the CoC's geographic area for the reporting period is fewer than 20 days; or
 - (b) The mean length of episodes of homelessness for individuals and families in the CoC's geographic area is at least 10 percent lower in the most recent reporting period than in the previous reporting period.
 - i. CoCs must use HMIS data to calculate the combined number of days every homeless individual and person in a family is sleeping in a place not meant for human habitation, emergency shelter, safe haven, and transitional housing during the reporting period.
 - ii. The reporting period is October 1, 2015 to September 30, 2016, and CoCs must include in the calculation any individual or person in a family who was recorded in HMIS in an emergency shelter bed, transitional housing bed, or safe haven bed.
 - iii. The number of days recorded for any individual or person in a family must include all of the days for a period ending on their last day in one of those program types during the reporting year and beginning 365 days before then, and, for any person who was homeless at the beginning of that

365-day period, it must include all of the consecutive days homeless prior to the first day of that 365-day period.

- iv. The number of days must also include days that a person was unsheltered as reported in HMIS data elements 3.917A and 3.917B as described in *HMIS Data Standards: HMIS Data Dictionary*.
- v. The combined number of days calculated as such must then be divided by the unduplicated persons reported in HMIS for the reporting period.

Information about using HMIS to calculate information for this measure can be found in the [System Performance Measures Programming Specifications](#) posted on the HUD Exchange.

- (4) *Reduced Returns to Homelessness.* A Collaborative Applicant must use HMIS data to calculate the percentage of individuals and families who exited emergency shelter, safe havens, or transitional housing for a permanent housing destination, which includes destinations recorded in fields 10, 11, and 19-23 of Universal Data Element 3.12 *Destination* as described in *HMIS Data Standards: HMIS Data Dictionary* and then experienced a subsequent episode of homelessness in the following 24 months. To pass this requirement, the Collaborative Applicant must meet one of the following standards:
 - (a) Of homeless individuals and families who exited homelessness programs for a permanent destination in the year ending September 30, 2014, fewer than 5 percent had a subsequent experience of homelessness (return to homelessness) in the 24 months following their exit; or
 - (b) There was a 20 percent reduction in returns to homelessness for homeless individuals and families who exited emergency shelter, safe havens, or transitional housing for a permanent housing destination in the year ending September 30, 2014, compared to individuals and families who exited emergency destination in the year ending September 30, 2013.
- (5) *HMIS Coverage.* Collaborative Applicants must be able to demonstrate that the CoC's bed coverage rate and service volume coverage is at least 80 percent for emergency shelters, transitional housing, and permanent supportive housing for Fiscal Years 2013, 2014, 2015, and 2016 to the extent that these types of projects exist within the CoC's geographic area.
 - (a) For purposes of a CoC's bed coverage rate, this is calculated by dividing the total number of year-round beds reporting into HMIS by the total number of beds for each type of project located in the

CoC's geographic area, after excluding beds in domestic violence programs.

- (b) The information provided by the Collaborative Applicant must match the data provided on the Housing Inventory Count (HIC) in 2013, 2014, 2015, and 2016 as submitted to the HUD Homelessness Data Exchange (HDX).
 - (c) For purposes of the service volume coverage, divide the total number of persons served in CoC and ESG Program funded projects who received at least one service by the total number of persons served in those projects.
- (6) *Serving Families and Youth.* No CoCs were approved to serve families with youth as defined by other federal statutes in the FY 2016 CoC Program Competition; therefore, there is no means in which to evaluate this HPC requirement in FY 2017.
- (7) *Community Action.* Collaborative Applicants are required to demonstrate that all of the metropolitan cities and counties within the CoC's geographic area have a comprehensive outreach including specific steps for identifying homeless individuals and families and providing referrals to the appropriate housing and services. To pass this requirement, the Collaborative Applicant must:
- (a) Attach evidence of a clear process established by the CoC that comprehensively addresses the outreach, engagement, and assessment plan in place.
 - (b) Clearly demonstrate in the narrative statement that that the CoC's outreach efforts are identifying and meeting the needs of homeless individuals and families sleeping in places not meant for human habitation. To pass this requirement, the Collaborative Applicant must:
 - i. demonstrate that 100 percent of the CoC's claimed geographic area is covered by street outreach efforts that meet with homeless individuals and families where they are sleeping;
 - ii. clearly identify community partners that conduct street outreach and the areas they cover;
 - iii. clearly identify how and when training for outreach is conducted with a minimum of one training date within the past year identified;
 - iv. include the date of the last training; and

v. attach the CoC's street outreach plan that clearly outlines the policies and procedures described in the narrative.

(c) CoCs must provide evidence that their outreach, engagement, and assessment strategies are linking homeless individuals and families with needed housing resources by demonstrating that the number of individuals that enter emergency shelter, safe havens, transitional housing, and permanent housing projects—including permanent supportive housing, and rapid rehousing—from places not meant for human habitation is higher than the unduplicated number of unsheltered individuals and families identified in the Point-in-Time (PIT) count. CoCs should compare the number of unsheltered homeless persons counted during the 2016 PIT and data from the HMIS, specifically *Universal Data Element 3.9—Residence Prior to Program Entry*, for all clients who entered emergency shelter, safe havens, transitional housing, and permanent housing projects—including permanent supportive housing or rapid rehousing—in FY 2016. To pass this requirement, the number of participants who entered the homelessness programs listed above should be higher than the unduplicated number of unsheltered persons counted in the 2016 PIT. HUD will confirm the information provided in the CoC Program Registration form for HPC with the data submitted to HUD via the HDX and Annual Performance Reports (APRs).

(8) *Renewing HPC Status.* Because no CoCs applied for HPC designation in the FY 2016 CoC Program Competition, there is no basis for HUD to determine the effectiveness of CoC Program funds for this activity in the FY 2017 CoC Program Registration process.

b. Required Attachments.

(1) FY 2016 final HUD-approved GIW (see Section III.C.4.a.(1) of this Notice); and

(2) CoC's Street Outreach Plan (see Section III.C.4.a.(7) of this Notice).

c. HPC Comment Period. Following the CoC Program Registration *e-snaps* deadline HUD will publish the HPC information submitted by each CoC that is requesting HPC designation on the [FY 2017 CoC Program Competition](#) page located on the HUD Exchange for public comment as required by 24 CFR 578.67. HUD will issue a listserv to the national CoC, HMIS, and ESG contacts registered with the HUD Exchange to receive email messages alerting all stakeholders that the HPC information is available for review.

(1) Stakeholders in the affected CoC geographic area who believe the information submitted by the CoC is inaccurate or fraudulent should submit comments, along with evidence supporting the comment and clearly identify the CoC by number and name (e.g., AB-500), to HUD

within 7 calendar days of HUD's publication of the HPC information that will identify the CoC number and name along with a PDF copy of the CoC(s) completed HPC information.

- (2) Comments must be submitted to HPCComments@hud.gov no later than 11:59:59 p.m. Eastern Time on the date posted to the FY 2017 CoC Program Competition Funding Availability page on the HUD Exchange and announced via the HUD listserv. HUD will not consider any email comments received after the 11:59:59 p.m. Eastern Time on the date posted by HUD during review of a CoC's HPC designation request. At the conclusion of the comment period, HUD will compile all of the timely comments received and email the comments to the Primary and Secondary Contacts designated for the Collaborative Applicant in the CoC Applicant Profile in *e-snaps*. Therefore, it is important that Collaborative Applicants, and the CoC, ensure this contact information is accurate.
- (3) The Collaborative Applicant will have 5 calendar days to provide any information to HUD in response to the comments. All CoC-level responses must be submitted to HPCComments@hud.gov no later than 11:59:59 p.m. Eastern Time on the date that will be posted to the FY 2017 CoC Program Competition Funding Availability page on the HUD Exchange and announced via the HUD listserv. HUD may consider information from the Collaborative Applicant after the designated due date for the following extenuating circumstance: the primary and secondary contact person for the Collaborative Applicant can provide evidence that they did not receive a copy of the public comments from HUD.

HUD will consider comments submitted by stakeholders when determining whether the CoC met the criteria for HPC. HUD reserves the right to fail a CoC on any of the application criteria described in this section of the Notice if evidence submitted by public comments or in HUD records does not match the information submitted by the CoC in the application to be designated an HPC. Additionally, HUD will consider the information submitted by the Collaborative Applicant on the HPC form in *e-snaps*, including the required attachments, in conjunction with the CoC's Point-in-Time (PIT) Count, submission for the Annual Homeless Assessment Report (AHAR), Housing Inventory Count (HIC), and projects' Annual Performance Reports (APRs) to determine if any information conflicts with the HPC application. If there is a conflict, HUD will use its discretion to determine whether to designate the CoC as an HPC.

5. ***UFA Designation.*** Collaborative Applicants requesting UFA designation must complete all of the UFA forms in *e-snaps* and attach the CoC's written policies, procedures, and plans that document responses provided in registration. HUD will assess all submitted responses and required documents to determine if the Collaborative Applicant is currently performing the required duties of a UFA or has the capacity to perform all of the required functions of a UFA. Collaborative Applicants that meet all requirements will be designated as a UFA and will be allowed by HUD to apply as such during the FY 2017 CoC Program Competition.

UFA designation is only effective for 1 year and UFA costs are non-renewable. Therefore, if HUD designated a Collaborative Applicant as a UFA in the FY 2016 CoC Program Registration process and that Collaborative Applicant intends to continue as a UFA, it must apply for designation in the FY 2017 CoC Program Registration process.

- a. Criteria.** HUD will assess applications for new UFA designates using a 70-point scale as outlined in the criteria in Section III.C.5.b and c of this Notice. To receive UFA designation, a Collaborative Applicant must receive a minimum of 25 out of 30 points in the UFA Capacity–CoC Responsibilities section (Section III.C.5.b of this Notice), and 40 out of 40 points in the UFA Financial Management and Subrecipient Responsibilities section (Section III.C.5.c of this Notice). HUD has added regulatory citations from the CoC Program interim rule to help provide easy reference for Collaborative Applicants to obtain additional information.
- b. UFA Capacity.** HUD will review and score CoC Responsibilities on the following criteria with a total of 30 points available. To be designated as a UFA, the Collaborative Applicant must clearly demonstrate that the CoC is in compliance with the requirements of 24 CFR 578.7.
 - (1) CoC Structure (5 points).** HUD will award up to a total of 5 points to Collaborative Applicants that:
 - (a)** demonstrate the CoC holds meetings of the full membership, including published agendas, at least semi-annually (24 CFR 578.7(a)(1));
 - (b)** demonstrate the CoC has an open invitation process for new members to join at least annually (24 CFR 578.7(a)(2));
 - (c)** the CoC has adopted and is following a written process to select the Board of Directors to act on behalf of the CoC (24 CFR 578.7(a)(3)); and
 - (d)** submit documentation that lists all committees, subcommittees, and workgroups that are active in the CoC (24 CFR 578.7(a)(4)). – Documentation may be the CoC governance charter, if the governance charter includes this information.

HUD will not award maximum points to Collaborative Applicants for these criteria unless they clearly demonstrate meetings are held at least semiannually by attaching meeting agendas between January 1, 2016 and February 1, 2017.

- (2) Governance Charter (24 CFR 578.7(a)(5)) (1 point).** HUD will award up to 1 point to Collaborative Applicants that attach a governance charter that was developed in consultation with the Collaborative Applicant and HMIS Lead, clearly demonstrating that the parties involved follow the governance charter and that this document is updated at least annually. In

order to receive the full points, the governance charter must be attached to the CoC Program Registration in *e-snaps* and include the following:

- (a) date of the last update to the governance charter;
- (b) the policies and procedures for compliance with subpart B of 24 CFR part 578 and with 2014 HMIS Data Standards ([2014 HMIS Data Standards Manual](#)); and
- (c) a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board.

HUD will review the CoC governance charter to determine if it incorporates all elements required in (24 CFR 578.7 (a)(5)). Governance charters that do not meet the criteria established in the CoC Program interim rule will receive no points.

(3) Project Performance (11 points). HUD will award up to 9 of the 11 points to Collaborative Applicants that have established performance targets for CoC-funded projects, and that:

- (a) demonstrate how the CoC uses performance and outcome data to determine how resources under its purview are allocated and inform how other resources in the community are utilized to end homelessness for all populations;
- (b) demonstrate that the CoC uses a Housing First approach to remove barriers to housing, remove service participation requirements or preconditions to program participation, and prioritize rapid placement and stabilization in permanent housing;
- (c) demonstrate that the CoC has established, in consultation with recipients and subrecipients, performance targets appropriate for the population and program types;
- (d) describe how the CoC monitors performance, evaluates outcomes, and takes actions towards poor performing projects (24 CFR 578.7(a)(6)); and
- (e) describe how the CoC evaluates the outcomes for projects funded under the Emergency Solutions Grants (ESG) and CoC programs (24 CFR 578.7(a)(7)).

To receive the full points for this section, the descriptions must provide clear details on the successful method(s) the CoC uses to gather recipient and subrecipient information to determine appropriate performance targets for the population(s) served, how poor performing projects are mentored to improve performance, and the specific evaluation methods used to determine if the outcomes from ESG and CoC programs are sufficient to address the reduction of homelessness in the CoC's geographic area.

Finally, HUD will award 2 of the 11 points to Collaborative Applicants that attach the written standards created and followed by the CoC, in consultation with ESG recipients (Written Standards), that include at the minimum information found in 24 CFR 578.7 (a)(9)(i-vi).

- (4) Centralized or Coordinated Assessment System (24 CFR 578.7(a)(8))** (1 point). HUD will award 1 point to Collaborative Applicants whose CoC has established and operates a centralized or coordinated assessment system, in consultation with the ESG recipients, that covers the CoC's geographic area.
- (a)** The system must demonstrate how services and housing are matched to participants needs.
 - (b)** A copy of a description of the centralized or coordinated assessment system must be attached to the registration that clearly:
 - i.** demonstrates how the system used is successfully implemented;
 - ii.** describes the protocol used by the CoC within the geographic area to assist homeless individuals, families, unaccompanied youth, and persons fleeing domestic violence situations, and other persons meeting the criteria of paragraph (4) of the definition of homelessness in obtaining the necessary referrals for housing and services; and
 - iii.** states in the protocols the CoC's specific policy on how the system addresses the specific needs of those who are fleeing, or attempting to flee domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers.
- (5) HMIS Structure (4 points).** HUD will award up to 4 points to Collaborative Applicants that demonstrate:
- (a)** a single HMIS has been designated for the CoC (24 CFR 578.7(b)(1));
 - (b)** the process used to ensure consistent participation of recipients and subrecipients in the designated HMIS (24 CFR 578.7(b)(4)), and includes how aggregate data from domestic violence service providers is handled;
 - (c)** the CoC has designated the HMIS Lead (24 CFR 578.7(b)(2));
 - (d)** the HMIS Lead has the following CoC-approved plans in place: privacy plan, security plan, and data quality plan (24 CFR 578.7(b)(3)); and

- (e) the Collaborative Applicant ensures that the HMIS is administered in compliance with the 2014 HMIS Data Standards (24 CFR 578.7(b)(5)).
- (6) Coordination (6 points). HUD will award up to 6 points to Collaborative Applicants that:
- (a) demonstrate that a Point-in-Time (PIT) count is:
 - i. conducted for sheltered at least annually, and unsheltered at least biennially, homeless individuals and families by indicating the date of the most recent PIT count for both sheltered and unsheltered homeless individuals and families (24 CFR 578.7(c)(2)); and
 - ii. demonstrate that a gaps analysis of needs and services is conducted by the CoC at least annually (24 CFR 578.7(c)(3));
 - (b) describe coordination efforts to implement a housing and service system that meets the needs of homeless individuals, families, unaccompanied youth, and persons fleeing domestic violence situations, and other persons meeting the criteria of paragraph (4) of the definition of homelessness; and attach the plan to registration in *e-snaps* that clearly outlines the methods for outreach, engagement, and assessment as well as shelter, housing, supportive services, and prevention strategies (24 CFR 578.7(c)(1));
 - (c) describe how the CoC actively participates in the geographic area(s) Consolidated Plan which includes the specific activities that it performs during the development or update of the jurisdiction(s) Consolidated Plan (24 CFR 578.7(c)(4)); and
 - (d) describe how the CoC consults with ESG Program recipients to guide the allocation of ESG funds and document whether a plan has been developed for joint reporting guidelines for ESG recipients and subrecipients—if a plan has been developed, describe what is included in the plan that has been approved by both the CoC and ESG recipients (24 CFR 578.7(c)(5)).
- (7) Monitoring Subrecipients (24 CFR 578.11(b)(4)) (2 points). HUD will award up to 2 points to Collaborative Applicants that attach the CoC's comprehensive written policies and procedures for monitoring subrecipients (Monitoring Guide for Subrecipients) that include:
- (a) the frequency of monitoring;
 - (b) examples of forms used;

- (c) samples of letters used to notify the subrecipient of concerns and/or findings; guidance on resolving concerns/findings; and
- (d) action taken by the Collaborative Applicant if a subrecipient refuses to abide by correction actions issued to address deficiencies during monitoring, and any other CoC-approved requirements.

c. UFA Financial Management and Subrecipient Responsibilities. HUD will award up to 40 points using the criteria below. To receive the maximum 40 points for these two sections, Collaborative Applicants must clearly demonstrate through the written responses in *e-snaps* and required attachments adequate financial management practices.

(1) UFA Financial Management (24 CFR 578.11(b)(2)) (20 points). HUD will award up to 20 points to Collaborative Applicants that demonstrate financial management capacity by providing detailed information on its financial management system and its internal procedures and federally required audit as detailed below. HUD will evaluate the criteria in this section using a pass/fail standard. For each of the three criteria below, HUD will award maximum points to Collaborative Applicants whose response satisfy the criterion and zero points if the response does not satisfy the criterion:

- (a) Federally Required Audit (10 points).** The Collaborative Applicant must demonstrate that it has a financial management system that meets the standards set forth in 2 CFR 200.302. To receive maximum points for this section, the Collaborative Applicant must:
 - i.** provide a description that clearly details how the Collaborative Applicant is successful at meeting each of the requirements of 2 CFR 200.302;
 - ii.** provide the most recent audit conducted in accordance with 2 CFR part 200, subpart F which must indicate that the Collaborative Applicant has no material weaknesses, deficiencies, or concerns that HUD considers to be relevant to the financial management of the CoC Program; and
 - iii.** if the federally required audit(s) identified weaknesses or deficiencies, the Collaborative Applicant must provide documentation that addresses how those weaknesses have been removed or are being addressed—Collaborative Applicants must meet all the criteria to receive any points in this section.
- (b) The Collaborative Applicant must submit a copy of its written financial management policies and procedures, including an**

organizational chart that establishes lines of responsibility (5 points).

- (c) Collaborative Applicants must submit written policies and procedures that detail how CoC Program funds will be distributed to subrecipients within 45 days of the subrecipient providing source documentation of eligible costs and that a process is in place to ensure CoC Program funds are drawn from LOCCS at least once per quarter. The written policies and procedures must be attached to the registration (LOCCS/Drawdown Procedures) (24 CFR 578.85(c)) (5 points).

(2) Subrecipient Responsibilities (20 points). HUD will award up to 20 points to Collaborative Applicants that meet the criteria described below. HUD will evaluate the criteria in this section using a pass/fail standard. For each of the four criteria below, HUD will award Collaborative Applicants 5 points if the criterion is satisfied, or zero points if a criterion is not satisfied.

- (a) Collaborative Applicants must affirmatively indicate that they have obtained documentation evidencing approval (e.g., a letter from each potential subrecipient signed by the Authorized Official) from all potential subrecipients to which CoC program funds will be allocated, documenting that each organization will allow the UFA, if designated, to become the recipient for grant funds.
- (b) Collaborative Applicants must provide a copy of written policies and procedures currently in place to bring noncompliant subrecipients into compliance.
- (c) Collaborative Applicants must provide a copy of written policies and procedures to ensure “high risk” subrecipients receive appropriate oversight and monitoring.
- (d) Collaborative Applicants must provide a copy of written policies and procedures to review for evidence of conflict of interest, either between the UFA and subrecipient or between the subrecipient and its contractor(s).

d. Required Application Documents for Collaborative Applicants seeking Initial UFA Designation. The following is a list of attachments that corresponds to the UFA registration questions and must be submitted during the registration process by Collaborative Applicants not currently designated as UFAs and requesting UFA designation. These documents must be uploaded as an attachment in *e-snaps* prior to the Collaborative Applicant’s registration submission.

(1) Attachments to satisfy CoC Program interim rule requirements are only required of the Collaborative Applicant requesting UFA designation that are not currently designated as UFAs:

- (a) CoC Meeting Agendas/Minutes (from Section III.C.5.b.(1) of this Notice, as applicable);
- (b) CoC Governance Charter (from Section III.C.5.b.(2) of this Notice);
- (c) Written Standards for CoC projects (from Section III.C.5.b.(3) of this Notice);
- (d) Description of Centralized or Coordinated Assessment System (from Section III.C.5.b.(4) of this Notice);
- (e) CoC Housing and Services System/Coordination Plan (from Section III.C.5.b.(6) of this Notice); and
- (f) Monitoring Guide for Subrecipients (from Section III.C.5.b.(7) of this Notice).

(2) Other Required Attachments:

- (a) Federally Required Audit (from Section III.C.5.c.(1)(a) of this Notice);
- (b) Financial Policies and Procedures (from Section III.C.5.c.(1)(b) of this Notice);
- (c) LOCCS/Drawdown Procedures (from Section III.C.5.c.(1)(c) of this Notice);
- (d) Policies and Procedures for Managing Non-Compliant Subrecipients (from Section III.C.5.c.(2)(b) of this Notice);
- (e) Procedures for High-Risk Subrecipient Management (from Section III.C.5.c.(2)(c) of this Notice);
- (f) Policies and Procedures for Subrecipient Conflict of Interest (from Section III.C.5.c.ii.(2)(d) of this Notice); and
- (g) Other attachments submitted by the Collaborative Applicant (optional)

The CoC is responsible for creating all the documents listed above, except the federally required Audit which must be completed by an auditor, and include the last date the documents were reviewed and approved by the CoC membership.

- e. **UFA Grant Agreement.** HUD will require Collaborative Applicants that are approved and designated as UFAs for the first time in the FY 2017 CoC Program

Registration process to work with HUD to establish uniform expiration dates for all conditionally awarded renewal projects after the FY 2017 CoC Program Competition conditional awards are announced. During the grant agreement phase, the UFA will work with HUD Headquarters to establish the single renewal expiration date.

6. **Submit Registration to HUD.** All CoC applicants must submit their FY 2017 registration to HUD through *e-snaps* no later than **8:00 p.m. Eastern Time** on the date that will be posted to the FY 2017 CoC Program Competition Funding Availability page on the HUD Exchange and announced via the HUD listserv once *e-snaps* is available. It is imperative that **ALL** Collaborative Applicants that intend to submit applications in the FY 2017 CoC Program Competition meet this registration deadline. CoCs that fail to submit their registration will not have access to the FY 2017 CoC Consolidated Application (CoC Application, CoC Priority Listing, and the project applications that have been either accepted and ranked or rejected) in *e-snaps*. Failure to submit a registration in *e-snaps* by the deadline may also result in HUD contacting the CoC to determine if it did intend to submit the CoC Program Registration, and may also result in HUD finding that the CoC does not meet the requirements of section 402 of the Act and 24 CFR 578.13. If the Secretary makes that finding, under section 402(c) of the Act, HUD may take remedial action to ensure fair distribution of grant amounts to eligible entities within the CoC's geographic area, which includes the possibility that HUD will designate another eligible applicant to be the Collaborative Applicant for the CoC.

D. Step Four: Review the HUD-issued Grant Inventory Worksheet (GIW) and Submit Corrections to HUD.

HUD is changing the way it issues GIWs to streamline the process, reduce errors, and to make the process more transparent for CoCs and project applicants. Beginning with the FY 2017 CoC Program Competition, HUD will post the GIW populated with all eligible renewal projects known to HUD to the HUD Exchange website as “read-only” for Collaborative Applicant, CoC, and project applicant review—HUD will no longer email GIWs to CoCs. If the CoC or a project recipient determines there is an error in the information or an eligible renewal project is missing from the HUD-posted GIW, the CoC Collaborative Applicant must submit a HUD prescribed GIW Change Form to provide information and documentation regarding the error and the change that needs to be made by HUD. If after review HUD approves the change request, HUD will make the change to the GIW and post an updated GIW to the HUD Exchange website incorporating the change. All GIW Change Forms must be submitted by the CoC's Collaborative Applicant to the local HUD CPD Field Office for review and approval. HUD will not consider any change requests that it receives directly from project recipients.

1. **Identifying Projects to be Included on the GIW.** This is a two part process:
 - a. HUD will complete an inventory of all projects eligible for renewal funding in the FY 2017 CoC Program Competition, which are projects expiring during Calendar Year (CY) 2018 (the period between January 1, 2018 and December 31, 2018). In FY 2017, CoC designated Collaborative Applicants will review the populated inventory of eligible projects on the published GIWs and notify HUD via the

GIW Change Form if additional eligible renewal projects are missing or if there are any changes needed to the GIW (e.g., grant consolidations, budget changes that occur via grant agreement amendment). If there are any changes that impact the rental assistance BLI a Rental Assistance Worksheet must also be submitted.

- b.** The local HUD CPD Field Office will review any changes and if approved, notify HUD Headquarters and the CoC Collaborative Applicant of the approval. HUD Headquarters will use the information contained on the GIW Change Form to update the GIW, which it will post to the HUD Exchange with a revision date. Collaborative Applicants must use the final GIW on the HUD Exchange to determine the CoC's FY 2017 ARD. HUD will use the ARD amount to calculate the eligible amount of CoC Planning and if designated as UFA, UFA Costs funds for which the Collaborative Applicant can apply in the FY 2017 CoC Program Competition. Therefore, it is imperative that the CoC ensures all eligible renewal projects are included on the GIW.

Collaborative Applicants are responsible for ensuring that the GIWs accurately list all projects eligible for renewal funding in the FY 2017 CoC Program Competition and must notify HUD of any missing eligible renewal projects. HUD will populate the GIWs with the projects that were awarded 1 year of funding, renewal and new, in FY 2016 CoC Program Competition and grants that might not have been submitted for renewal funding yet from the FY 2011 CoC Homeless Assistance Grants Competition. CoC planning and UFA Costs projects awarded in the FY 2016 CoC Program Competition are not included on the pre-populated GIWs as these projects do not contribute to a CoC's ARD amount nor are these projects included in the national ARD amount. The FY 2017 CoC Program Competition NOFA will provide more information on how to apply for CoC planning and UFA Costs projects.

- 2.** HUD recognizes that the initial GIW posted on the website may be incomplete or inaccurate; therefore, the Collaborative Applicant, in consultation with the local HUD CPD Field Office, must ensure that the following eligible projects are included on the GIWs:
 - a.** Grants awarded prior to FY 2016 funding through the FY 2016 CoC Program Competition, i.e., CoC Program, SHP, or S+C grants, that expire in CY 2018 (January 1, 2018 through December 31, 2018).
 - b.** Any renewal grants that received 1-year of FY 2016 funding through the FY 2016 CoC Program Competition.
 - c.** Any new 1-year grants awarded under the FY 2016 funding through the FY 2016 CoC Program Competition that will expire in CY 2018, except those grants for CoC planning or UFA Costs.
 - d.** Any S+C grants awarded prior to FY 2002 for which funding is expected to run out in CY 2018, and which have never received renewal funding.
 - e.** Any grants originally awarded in the FY 2011 CoC Homeless Assistance Grants Competition, that have funds expiring in CY 2018 or later and have not been

renewed in a previous competition. Funds for these grants will expire and will no longer be available after September 30, 2018. Therefore, renewal funding is imperative for continued project operations. Funds from these expiring grants will be recaptured and returned to the U.S. Treasury and will no longer be available for expenditure, regardless of whether the end date established in the grant agreement is beyond September 30, 2018. Grants awarded in the FY 2011 CoC Homeless Assistance Grants Competition are not eligible for renewal with FY 2017 CoC Program funds if they expired in CY 2017 (January 1, 2017 through December 31, 2017), and were not renewed in a previous competition, or were not approved for extension into CY 2018 or later.

3. **First-Time TRA and SRA Renewals.** For applicants with projects previously funded under the S+C Program as Tenant Based Rental Assistance (TRA) and Sponsor Based (SRA) components that renew with FY 2017 funds for the first time and request more units than approved in the original application, the number of renewable units is determined by the number of units under lease during HUD's GIW review process. To support the addition of units beyond the initial award, the applicant must provide the local HUD CPD Field Office with copies of all executed leases once the GIWs are available for review on the HUD Exchange website. As these changes impact the rental assistance BLI, a Rental Assistance Worksheet must also be submitted. HUD will consider the additional units under lease at the time of the GIW review process to determine the maximum number of units that can be renewed in FY 2017. Renewal projects that increase the number of units are subject to the requirements for renewals as stated in 24 CFR 578.33(d). For more information about that provision, refer to HUD's December 18, 2012, webinar entitled *Homeless Programs: Transition Policies and Changes* at www.hudexchange.info/resource/2727/homeless-programs-transition-policies-and-changes-webinar/.
4. **Projects Listed on the GIW.** Including a project on the GIW does not guarantee that the project will receive funding in the FY 2017 CoC Program Competition because the project must meet the eligibility and threshold requirements and be prioritized through the ranking process as will be detailed in the FY 2017 CoC Program Competition NOFA. Applicants must submit a project application in *e-snaps* in the FY 2017 CoC Program Competition for renewal funding. **HUD will not fund projects that fail to submit a project application in *e-snaps* by the Competition deadline regardless of whether the project was included on the GIW.** HUD retains its discretion to withhold funding, in whole or part, for any project that has significant capacity issues related to performance, financial management, or other unresolved audit or monitoring findings. Collaborative Applicants must ensure that all projects are accurately reflected on the GIW to ensure that the CoC's planning efforts and application are comprehensive and for HUD's application review process.
5. **Special Instructions for CoCs without Expiring Renewal Grants.** CoCs that do not have any projects within their geographic area that are eligible for renewal funding in the FY 2017 CoC Program Competition and that **will not** request UFA or HPC designation or funding for new projects, including CoC planning or UFA costs in FY 2017 are not required to complete the registration. However, CoC Program Registration is strongly encouraged so that HUD is informed of the CoC's active status. The Collaborative

Applicant must review and reconcile any discrepancies with HUD, via the GIW Change Form, by the due date that will be posted to the FY 2017 CoC Program Competition Funding Availability page on the HUD Exchange and communicated via the HUD Listserv. HUD Headquarters will post the final GIW to the HUD Exchange.

E. Special Registration Instructions for CoCs in Disaster Areas as Declared under Title IV of the Robert T. Stafford Act. CoCs located in areas declared to be major disaster areas by the President under Title IV of the Robert T. Stafford Act in the 12 months prior to the publication of this Notice may request that HUD submit their registration in *e-snaps* on their behalf, if the CoC's capacity to complete the registration process in *e-snaps* was degraded and/or destroyed, as a direct result of a major natural disaster. Collaborative Applicants should send written notification addressed to Norm Suchar, Director, Office of Special Needs Assistance Programs, at CoCDisaster@hud.gov. Collaborative Applicants must include the following information in the request:

1. **Geographic areas claimed by the CoC.** List the geographic areas that are eligible to be covered by the CoC.
2. **Contact information.** Provide current contact information for the Collaborative Applicant so that HUD may contact the CoC in regard to this request, as needed.
3. **Grant Inventory Worksheet.** As stated in Section III.D. of this Notice, HUD Headquarters will post GIWs to the HUD Exchange website for the purpose of review and notification to HUD of errors or projects missing that are eligible for renewal in the FY 2017 CoC Program Competition. HUD will populate the GIWs with the renewal grants that received 1 year of funding and 1-year new grants funded with FY 2016 CoC Program funds. The initial GIW posted by HUD might not include a complete listing. Along with the request, disaster-affected CoCs must confirm, to the best of their knowledge, that the information on the GIW is accurate. If the CoC is able to identify any additional renewal grants, it should provide the previous grant number of any such renewals so that HUD can add it to the list. HUD Headquarters will continue to work with the local HUD CPD Field Office to identify any additional grants not identified by the Collaborative Applicant.

IV. HUD'S HOMELESSNESS POLICY AND PROGRAM PRIORITIES

A. Policy Priorities. This year's CoC Program Competition will continue to focus on the goals of ending homelessness for all populations. This section explains HUD's Policy Priorities for the upcoming CoC Program Competition. These are not requirements, instead they explain HUD's priorities and provide context for to the requirements in the FY 2017 CoC Program Competition. The policy priorities in the FY 2017 CoC Program Competition will include:

1. **Create a systemic response to homelessness.** CoCs should use CoC Program performance measures such as the average length of homeless episodes, rates of return to homelessness, and other factors that determine the effectiveness of serving people experiencing homelessness. Additionally, CoCs should be doing everything they can to create and use an effective Coordinated Entry process, promote participant choice, coordinate homeless assistance and mainstream housing service providers to ensure people experiencing homelessness receive assistance quickly that

results in obtaining and maintaining housing, and make the delivery of homeless assistance open, inclusive, and transparent.

2. **Strategically allocate and use resources.** Using costs, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness. CoCs should have a process in place to comprehensively review project quality, performance and cost effective measures that determines the extent to which each CoC Program funded project addresses the requirements of the Act and 24 CFR part 578. HUD also encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness. Finally, CoCs should review transitional housing stock to determine its effectiveness in serving homeless people and its cost-effectiveness.
3. **Use a Housing First Approach.** Housing First is an approach to homelessness assistance that prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. Programs that use a Housing First approach should be moving individuals and families quickly into permanent housing and should be collecting data to measure the length of time it takes for projects to move households into permanent housing and help providers improve performance. Additionally, CoCs should be engaging landlords and property owners, removing barriers to entry, and adopting client-centered service methods.

HUD strongly encourages all stakeholders to read materials, especially CoC Program Competition messages, that are published on the HUD Exchange website.

B. CoC Program Implementation. The following list highlights important information that CoCs and applicants should consider to prepare for FY 2017 CoC Program Registration and the remainder of the FY 2017 CoC Program Competition. This is not an exhaustive list of considerations or requirements—all applicants and CoC stakeholders should carefully review the CoC Program interim rule.

1. Projects and activities that were eligible under SHP and S+C but are no longer eligible under the CoC Program (e.g., safe havens, projects limited to persons with specific disabilities or diagnoses), will continue to be eligible for renewal under the original grant terms so long as the recipient does not significantly change the project after submission of the FY 2017 project application.
2. The difference between costs used for leasing and those used for rental assistance are described at 24 CFR 578.49 and 578.51. Recipients with grants that include a leasing budget line item (BLI) should carefully review the nature of the project to determine if a change should be made from leasing to rental assistance for the project. Per 24 CFR 578.49(b)(8), leasing funds will be renewed as rental assistance if the funds are used to pay rent on units where the lease is between the program participant and the landowner or sublessor. Eligible first-time renewal grants formerly funded under the SHP program that include a leasing BLI will have the opportunity to change the budget funding type from leasing to rental assistance in FY 2017. Under this type of agreement, the project applicant may change the BLI information from leasing to rental assistance and use the area(s) FMR amount to determine the budget line item amount. Project applicants that are eligible to change the budget line item from

- leasing to rental assistance must provide copies of the lease to the local HUD CPD Field Office prior to the close of the FY 2017 CoC Program Registration process and the change from leasing to rental assistance should be reflected on the CoC's GIW, which must be submitted via the GIW Change Form to the local HUD CPD Field Office.
3. HUD will continue to limit renewal projects to 1 year of funding; however, any renewal permanent housing project that receives project-based rental assistance or operating costs may request a 15-year grant term for 1 year of funding only. Funding for the remainder of the 15-years grant term is subject to availability and applicants must apply for additional funds at such time and in such manner as HUD may require.
 4. HUD will continue the Reallocation process. CoCs may reduce or eliminate funds from eligible renewal projects, including first-time renewal projects formerly funded under the S+C program, to develop new projects. At a minimum, CoCs can use the reallocation process to create new:
 - a. permanent supportive housing projects that will primarily serve persons experiencing chronic homelessness, including unaccompanied homeless youth;
 - b. rapid rehousing projects that will serve homeless individuals and families, including unaccompanied youth, coming directly from the streets or emergency shelter, and include persons fleeing domestic violence situations, and other persons meeting the criteria of paragraph (4) of the definition of homelessness;
 - c. joint component projects, which will combine TH and PH-RRH into a single project to serve individuals and families experiencing homelessness;
 - d. dedicated HMIS projects; and
 - e. SSO projects for centralized or coordinated assessment systems.
 5. Depending on the amount of funding made available in the FY 2017 Appropriation, HUD may continue the Permanent Housing Bonus. CoCs may create new projects through the permanent housing bonus based on a percentage of the CoC's FPRN for the following types of new projects for those CoCs that meet the criteria in the FY 2017 CoC Program Competition NOFA:
 - a. new permanent supportive housing projects that will primarily serve chronically homeless individuals and families including youth experiencing chronic homelessness;
 - b. new rapid rehousing projects that will serve homeless individuals and families who enter directly from the streets or emergency shelters, including youth up to age 24, and includes persons fleeing domestic violence situations, and other persons meeting the criteria of paragraph (4) of the definition of homeless;
 - c. new joint component projects, which will combine TH and PH-RRH into a single project to serve individuals and families experiencing homelessness.

6. HUD will continue the Tier 1 and Tier 2 funding process in the FY 2017 CoC Program Competition to promote a more competitive process among CoCs.
7. CoCs must rank all projects submitted by project applicants in *e-snaps*—except project applications for CoC planning and UFA Costs—including:
 - a. renewal and new projects created through reallocation;
 - b. new bonus projects; and
 - c. new homelessness prevention projects created by designated HPC(s).

HUD will not review any project that a CoC rejects, with the exception of Solo Appeals, which must follow the appeals procedure that will be prescribed in the FY 2017 CoC Program Competition NOFA.

8. CoC Planning and UFA Costs Projects. Each CoC may only submit one CoC planning application and one UFA cost application (if UFA designation is approved), which may only be submitted by the Collaborative Applicant designated by the CoC. The FY 2017 CoC Program Competition NOFA will provide more information on how to apply for CoC planning and UFA Costs projects.
9. Because HUD does not have a full year appropriation at the time of publication of this Notice, HUD may include additional requirements in the FY 2017 CoC Program Competition NOFA.

V. GETTING INFORMATION AND ASSISTANCE

A. HUD Exchange Website. Prospective Collaborative Applicants are advised to review the numerous resources available online at www.hudexchange.info to help successfully complete the registration process, prepare for application submission, and understand CoC Program requirements. All *Federal Register* publications, user guides, and other resources related to the registration process, the FY 2017 CoC Program Competition, and the CoC Program can be obtained from the HUD Exchange website. HUD will also post on the website responses to frequently asked questions regarding the registration process. Collaborative Applicants are advised to reference this site and its resources to all persons that will be working on the registration process or completing the FY 2017 CoC Application and CoC Priority Listing.

B. Environmental Impact. Finding of No Significant Impact (FONSI) with respect to the environment has been made for this notice in accordance with HUD regulations at 24 CFR part 50, which implement Section 102(2)(C) of the National Environmental Policy Act of 1969 (42 U.S.C. 4332(2)(C)). The FONSI is available for inspection at HUD's Funds Available web page at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail.

Date: APR 7 2017



Clifford Taffet,
General Deputy Assistant Secretary
for Community and Planning Department