

SUMMARY OF THE 2019 CONTINUUM OF CARE NOTICE OF FUNDING AVAILABILITY (COC NOFA)

BACKGROUND

Each year the U.S. Department of Housing and Urban Development (HUD) releases a Notice of Funding Availability (NOFA), signifying the beginning of a funding competition among approximately 450 Continuums of Care (CoC), the community stakeholder groups that guide local responses to homelessness. The 2019 CoC NOFA was released on July 3, 2019, opening the competition making available **APPROXIMATELY \$2.3 BILLION NATIONALLY** to serve people experiencing homelessness. The information in the NOFA sets forth the competition rules and processes for 2019.

The CoC Program (24 CFR Part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless; and to optimize self-sufficiency among those experiencing homelessness. Before the application is submitted to HUD, the CoC is required to hold a local competition to determine which projects will be included in the consolidated application, along with their relative priority. The results of the local competition dictate which projects the CoC will seek to fund.

This summary includes the highlights of the FY 2019 CoC NOFA. New or revised policies relating to the FY 2019 CoC Program Competition are indicated as ****NEW IN 2019**** and ****REVISED IN 2019****, respectively. Additional information about project application requirements and standards will be available locally. Details about anything in this summary can be found in the NOFA, available at: https://www.hud.gov/sites/dfiles/SPM/documents/6300_25_FY19_CoC.pdf.

AVAILABLE FUNDING FOR OUR COC

This year, in our CoC, the eligible application amounts are as follows:

- CoC's estimated Annual Renewal Demand: **\$1,393,131**
 - ****REVISED IN 2019**** Estimated Tier 1 (100% of combined Annual Renewal Amounts for all projects eligible for renewal for the first time plus 94% of the combined Annual Renewal Amounts for all other projects eligible for renewal): **\$1,316,823**
 - Estimated Tier 2 (remainder of Annual Renewal Demand + CoC Bonus amount): **\$145,965**
- ****REVISED IN 2019**** Estimated CoC Bonus amount (5% of Final Pro Rata Need, or 25% of Preliminary Pro Rata Need minus Annual Renewal Demand, whichever is greater): **\$69,657**
- Estimated DV Bonus amount (10% of Preliminary Pro Rata Need or a minimum of \$50,000, whichever is greater, or maximum of \$5 million, whichever is less): **\$122,958**
- Estimated CoC Planning amount (3% of Final Pro Rata Need or \$1,250,000, whichever is less): **\$41,794**

2019 HUD COC POLICY PRIORITIES

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

1. ENDING HOMELESSNESS FOR ALL PERSONS

- a. CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
- b. CoCs should measure their performance based on local data taking into account challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, and those experiencing chronic homelessness).
- c. CoCs should have a comprehensive outreach strategy to identify and continuously engage all unsheltered individuals and families.
- d. CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.
- e. CoCs should use the reallocation process to create new projects that improve their overall performance and better respond to their needs.

2. CREATING A SYSTEMIC RESPONSE TO HOMELESSNESS

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

3. STRATEGICALLY ALLOCATING AND USING RESOURCES

- a. Using cost, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness.
- b. CoCs should review project quality, performance, and cost effectiveness.
- c. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness.
- d. CoCs should work to develop partnerships to help CoC Program participants sustainably exit Permanent Supportive Housing, such as through partnerships with Public Housing Authorities (PHAs) and other government, faith-based, and nonprofit resources specializing in areas such as treating mental illness, substance abuse, job training, and life skills.
- e. CoCs should review all projects eligible for renewal in FY 2019 to determine their effectiveness in serving people experiencing homelessness, including cost effectiveness.

4. **REVISED IN 2019** USING AN EVIDENCE-BASED APPROACH

- a. CoCs should prioritize projects that employ strong use of data and evidence, including the cost-effectiveness and impact of homelessness programs on positive housing outcomes, recovery, self-sufficiency, and reducing homelessness.
- b. Examples of measures that CoCs may use to evaluate projects include, but are not limited to: rates of positive housing outcomes, such a reduced length of time homeless and reduced rates of return to homelessness; improvements in employment and income; and

improvements in overall well-being, such as improvements in mental health, physical health, connections to family, and safety.

5. ****NEW IN 2019** INCREASING EMPLOYMENT**

- a. CoCs and CoC-Program-funded projects should work with local employment agencies and employers to prioritize training and employment opportunities for people experiencing homelessness.
- b. CoCs should also promote partnerships with public and private organizations that promote employment.

6. ****NEW IN 2019** PROVIDING FLEXIBILITY FOR HOUSING FIRST WITH SERVICE PARTICIPATION REQUIREMENTS**

- a. CoC-Program-funded projects should work with individuals and families, with unconditional acceptance and without preconditions, to move quickly into permanent housing.
- b. This NOFA provides communities and programs with flexibility, without penalty, to use service participation requirements after people have been stabilized in housing.

IMPORTANT COC STRATEGY REMINDERS AND UPDATES

- CoCs cannot receive grants for new projects, other than through reallocation, unless the CoC competitively ranks projects based on how they improve system performance.
- ****REVISED IN 2019**** HUD is increasing the share of the CoC score that is based on performance criteria. Additionally, HUD has added scoring for increased collaborations with community partners for services to increase employment and all forms of income (employment income and non-employment income).
- HUD will continue to prioritize funding for CoCs that have demonstrated the ability to reallocate resources to higher performing projects.
- ****NEW IN 2019** YOUTH.** Any youth-serving provider funded under this NOFA may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence.
 - **Youth Documentation.** As provided by the Consolidated Appropriations Act, 2019, youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under this NOFA.
 - **Definitions.** HUD interprets “youth-serving provider” as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence.
 - These youth-related requirements supersede any conflicting requirements under this NOFA or the CoC Program rule.
- **HUMAN TRAFFICKING.** Again HUD clarifies that persons who are fleeing or attempting to flee human trafficking may qualify as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3; and, therefore, the individuals may be eligible for certain forms of homeless assistance under the CoC Program, subject to other restrictions that may apply.
 - ****NEW in 2019**** HUD removed additional language used in the 2018 NOFA that could limit the above to certain circumstances.
- **RACIAL DISPARITIES.** Research has found racial disparities in rates of homelessness. Specifically, people who are black or Native American experience homelessness at

disproportionately higher rates. Efforts to prevent and end homelessness should consider and address racial inequities to achieve positive outcomes for all persons experiencing homelessness

ELIGIBLE NEW PROJECTS

Again in 2019, CoCs may submit new projects created through: reallocation, CoC Bonus, or a combination of reallocation and CoC Bonus, or DV Bonus..

ELIGIBLE TYPES OF NEW PROJECTS CREATED THROUGH BONUS, REALLOCATED, OR COMBINATION FUNDING

- ****NEW IN 2019** Fewer Population Eligibility Specifications.** Note that eligible new housing projects available through the 2019 NOFA contain fewer population limitations than the previous year.
- A CoC may apply the following types of new projects:
 - **PERMANENT HOUSING-PERMANENT SUPPORTIVE HOUSING PROJECTS** for chronically homeless at program entry or who meet the definition of DedicatedPLUS
 - **PERMANENT HOUSING-RAPID REHOUSING PROJECTS** for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 (and paragraph (3) if the CoC is approved to serve this population)
 - **JOINT TRANSITIONAL HOUSING AND RAPID REHOUSING COMPONENT PROJECTS** for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 (and paragraph (3) if the CoC is approved to serve this population)
 - **DEDICATED HMIS PROJECT** for the costs at 24 CFR 578.37(a)(2) that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant, and that is listed on the HMIS Lead form in the CoC Applicant Profile in *e-snaps* (and HMIS Lead can also apply for funding for comparable database for victim service providers).
 - **SUPPORTIVE SERVICES ONLY PROJECTS FOR COORDINATED ENTRY PROJECT** to develop or operate a centralized or coordinated assessment system.

ELIGIBLE TYPES OF NEW PROJECTS CREATED THROUGH DOMESTIC VIOLENCE (DV) BONUS

- Through this NOFA, up to \$50 million is available nationally for DV Bonus projects, which are dedicated to survivors of domestic violence, dating violence, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3.
- A CoC may apply the following types of projects:
 - **RAPID REHOUSING PROJECT** that demonstrates trauma-informed, victim-centered approaches and is dedicated to serving survivors of domestic violence, dating violence, or stalking;
 - **JOINT TRANSITIONAL HOUSING AND RAPID REHOUSING COMPONENT PROJECT** that demonstrates trauma-informed, victim-centered approaches and is dedicated to serving survivors of domestic violence, dating violence, or stalking; and
 - **SUPPORTIVE SERVICES ONLY PROJECTS FOR COORDINATED ENTRY** to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of survivors of domestic violence, dating violence, or stalking (e.g., to implement policies and procedures that are trauma-informed, client- centered or to

better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different)

OTHER NEW PROJECT INFORMATION

- ****NEW IN 2019** New Project Grant Terms.** HUD will allow new projects to request 1 year of funding with a longer initial grant term not to exceed 18 months. HUD has determined that most new projects requesting 1 year of funding normally take approximately 3 to 6 months to begin fully operating the new project (e.g., hiring staff, developing partnerships with landowners if leasing or renting). Therefore, a new project requesting 1 year of funding may request a grant term of 12 months to 18 months that will allow for the additional start-up process.
- **EXPANSION PROJECTS** HUD will allow project applicants to apply for a new expansion project under the DV Bonus, reallocation, and CoC bonus processes to expand existing projects by adding units, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-Coordinated Entry projects within the CoC geographic area.

RESOURCES:

For questions about the local competition, please contact Bridget Kurtt DeJong from HomeBase at 415.788.7961 x.324 or bridget@homebaseccc.org

- 2019 CoC NOFA Competition Page: <https://www.hudexchange.info/programs/e-snaps/fy-2019-coc-program-nofa-coc-program-competition/#nofa-and-notices>
- 2019 CoC NOFA: <https://www.hudexchange.info/resource/5842/fy-2019-coc-program-nofa/>
- HUD Announcement of 2019 NOFA Release: <https://www.hudexchange.info/news/the-fy-2019-coc-program-competition-opening-and-updates/>
- CoC Program Interim Rule (24 CFR part 578): <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>
- Training and Resources: www.hudexchange.info/homelessness-assistance/
 - Code of Conduct for HUD Grant Programs: www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conduct
- Subscribe to HUD Listserv: www.hudexchange.info/maillinglist
- HUD Exchange, Ask A Question (AAQ): <https://www.hudexchange.info/program-support/my-question/>
- HUD Websites:
 - www.hud.gov
 - www.hudexchange.info
- Application Pages
 - Access E-snaps Application System: <https://esnaps.hud.gov>
 - E-snaps Information: <https://www.hudexchange.info/programs/e-snaps/>