

**FY 2024 Continuum of Care (CoC) Program Project Application
Frequently Asked Questions (FAQs) (08/01/2024)**

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FY 2024 Continuum of Care (CoC) Program Project Application Frequently Asked Questions (FAQs) (08/01/2024)

This document provides answers to Frequently Asked Questions (FAQs) about Project Applications within the context of the FY 2024 Notice of Funding Opportunity (NOFO) for the Continuum of Care (CoC) Program Competition.

How to Use This Document

To locate answers to your specific questions:

- Navigate the Table of Contents: Find the topic related to your question.
- Review the FAQs: Once you find the relevant topic, explore the detailed FAQs listed under that section to find the answer you need.

Contacting Help Desks

If your question is not addressed in this document, please contact the appropriate help desk for assistance:

- General Inquiries and Application Questions: Email CoCNOFO@hud.gov for matters concerning the FY 2024 NOFO, the CoC competition, and related applications.
- Technical Support: For issues with *e-snaps*, such as user profile creation, lockouts, password resets, and other navigation or access problems, email e-snaps@hud.gov. Please note that the ***e-snaps* Ask-A-Question (AAQ) desk on HUD Exchange is no longer operational.**
- Non-Competition CoC Program Topics: Visit the CoC program AAQ help desk on the HUD Exchange at <https://www.hudexchange.info/program-support/my-question/> for assistance with CoC program issues not related to the competition. If you do not have a Username and password for the HUD Exchange, you'll need register for the site at the same link.

Guidelines for Seeking Assistance

- Single Topic Per Submission: Limit each email to one topic to ensure prompt and precise responses.
- Number Sub-Questions: If your inquiry involves multiple sub-questions, number them for clarity and efficient response handling.
- Include Supporting Documents: Attach screenshots or relevant documents that may help clarify your questions.

Restrictions on Queries

HUD cannot respond to questions that might provide a competitive advantage. These include inquiries about project design, best practices, or specific types of projects to apply for, such as a Joint-TH/RRH or RRH project for a DV Bonus application. For these types of questions, consulting with your CoC Collaborative Applicant and other CoC members is recommended.

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Other Resources related to the CoC Program not Associated with the CoC Competition

- General CoC Program Questions: Visit the CoC Program FAQs on HUD.gov and HUD Exchange.
- Further Assistance Needed: If these resources do not answer your questions, please contact your local CPD field office.
- Please note that compliance with the NOFO and the Rule includes compliance with all Federal statutes relating to nondiscrimination (also included on your SF-424B/F-424D assurances). Please see 24 CFR 578.93 for more details of Fair Housing and Equal Opportunity requirements for the CoC program.

Reporting Inaccuracies

If you find any information in this document to be inaccurate or misleading, please email CoCNOFO@hud.gov with details of the issue for necessary updates or clarifications.

Important Updates to the FY2024 CoC Program NOFO	
<p>What is new in FY 2024 CoC Competition Project application(s)?</p>	<p>The FY2024 CoC Program NOFO is a 2-Year NOFO. The application and selection process for the FY 2024 CoC Program and YHDP Funding Opportunity will proceed much like it has in prior year competitions. However, CoCs are only required to submit one CoC application that will be applicable to the FY 2024 and FY 2025 funding opportunities. Projects that are awarded with a 12-month grant term during the FY 2024 application process will be eligible for an award in FY 2025 using their FY 2024 application submission and are not required to apply for renewal during the FY 2025 Funding Opportunity. Your application should reflect 1 year of funding. Though the FY2024 CoC Competition NOFO covers two years (FY2024 and FY2025), the funding will be disbursed as two one-year budget periods. Your application in <i>e-snaps</i> must reflect only one year of funding. See Section I.A.3.b. of the NOFO for more information.</p> <p>New restrictions regarding the reallocation of funding originally awarded to serve specific populations. If a new project is being created with reallocated funds that were originally awarded to a YHDP or DV Bonus project, the new project must continue to serve the same population as the project being reallocated. YHDP, DV Bonus and DV Reallocation funds may not be combined with any other funding in a new project application. (See Section</p>

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I.A.3 .c. of the NOFO for more information.) Applicants should also be aware of the following specific restrictions on using funding reallocated from DV Renewal projects (projects originally awarded with, or subsequently expanded with, DV Bonus funding):

- DV Renewal projects that have an SSO-CE component cannot be reallocated.
- Reallocated DV Renewal funding cannot be used to expand a CoC Renewal grant.
- DV Renewal projects cannot consolidate with CoC Renewal projects.

The Consolidated Appropriations Act, 2024 authorizes HUD to make reasonable cost of living adjustments to renewal amounts to help afford increasing cost of operations due to inflation. HUD will adjust amounts for the supportive services and HMIS Costs budget lines for renewing projects based on the most recent three-year average of changes in State Quarterly Census of Employment and Wages (QCEW) for the category Social Assistance (NAICS 624). Please note that HUD is only authorized to make these adjustments for Renewal projects. Supportive Services and HMIS budgets for all New projects, including Planning, UFA, YHDP Replacement, and YHDP Reallocation, will not be adjusted.

The FY 2024 CoC Program Competition process continues to allow requests for consolidations and expansions. However, an applicant may not combine a consolidation and an expansion into a single set of projects.

Additionally, if you want your renewal project applications considered for consolidation as outlined in Section I.B.2.b.(6) of the NOFO, you will only submit the individual renewal project applications. The additional submission of a fully consolidated project application is no longer required.

To expand an existing renewal project application as outlined in Section I.B.2.b.(10) and Section III.B.4.(7) of the NOFO, you only need to submit the individual renewal project application and create (and submit) a separate new project application. The additional submission of a combined renewal project application is no longer required.

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	<p>Lastly, YHDP projects can now apply for expansion under the CoC competition. YHDP expansion projects can only expand YHDP Renewal projects. The YHDP expansion projects may only be funded through YHDP Reallocation.</p>
<p>What is a 2-Year NOFO?</p>	<p>The application and selection process for the FY 2024 CoC Program and YHDP Funding Opportunity will proceed much like it has in prior year competitions. However, CoCs are only required to submit one CoC application that will be applicable to the FY 2024 and FY 2025 funding opportunities. Projects that are awarded with a 12-month grant term during the FY 2024 application process will be eligible for an award in FY 2025 using their FY 2024 application submission and are not required to apply for renewal during the FY 2025 Funding Opportunity. See Section I.A.3.b. of the NOFO for more information.</p> <p>NOTE: Your application should reflect 1 year of funding. Though the FY2024 CoC Competition NOFO covers two years (FY2024 and FY2025), the funding will be disbursed as two one-year budget periods. Your application in <i>e-snaps</i> must reflect only one year of funding.</p> <p>Additionally, CoC and YHDP Renewal grants that do not meet the renewal eligibility requirements for the FY 2024 Funding but are eligible for renewal when FY 2025 Congressional Appropriations are made, must submit applications for FY 2025 funding by the applications submission deadline of 8:00 PM EDT on August 29, 2025. Applicants that wish to reallocate eligible renewal projects and create new projects through reallocation in the FY 2025 funding process must also submit those applications by the applications submission deadline of 8:00 PM EDT on August 29, 2025. Applicants with YHDP Projects that expire in CY 2025 may non-competitively renew, replace, or reallocate those projects and must submit an application by 8:00 PM EDT on August 29, 2025.</p>
<p>Access/Submit the Project Application</p>	
<p>Is it a requirement to apply for Federal Assistance through the Grants.gov Notice of Funding Opportunity for the Fiscal Year 2024 and 2025 Continuum of Care</p>	<p>No, even though Grants.gov is the website serving as the Federal government’s central portal for searching and applying for Federal financial assistance throughout the Federal government and the CoC Program NOFO is officially posted on Grants.gov, this program</p>

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<p>Program Competition for the Renewal or Replacement of Youth Homeless Demonstration Program Grants?</p>	<p>only accepts applications submitted in <i>e-snaps</i>, an electronic application system. Registration on Grants.gov is not required for submission of applications for this NOFO.</p> <ol style="list-style-type: none"> 1. Log in to <i>e-snaps</i> to register an account or log in with existing credentials to gain access to the system. 2. Complete application forms within <i>e-snaps</i>. 3. Fill in the required information accurately and completely to avoid delays. 4. Upload required attachments as outlined in the NOFO. 5. Review application before submission. 6. Submit application to your CoC’s collaborative applicant. 7. Monitor application by checking <i>e-snaps</i>, to determine if additional information is requested. 8. Follow-up as needed.
<p>When attempting to access Project Applications the following error appears: “The application is connected to an incomplete applicant profile. Complete and submit the applicant profile to correct this error and submit the application.” What steps should applicants take?</p>	<p>Follow these steps:</p> <ul style="list-style-type: none"> • Log into <i>e-snaps</i>. • Click on "Applicants" from the left menu. • Select the orange folder next to the name of the applicant. • Click on "Submission Summary." • Click on the "Edit" button. • Select the “Profile Type” screen. Switch the “Project Applicant” to “Collaborative Applicant.” Save the change. Switch back to “Project Applicant.” Save the change. • Select “Submission Summary.” • Select "Complete." • Log out of <i>e-snaps</i>. • Log back into <i>e-snaps</i>. • Go to “Submissions” on the left menu bar and access your application. <p>The message should no longer be displayed when trying to access the Project Application.</p>

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<p>What is the “PIN” number for a grant in the renewal project application?</p>	<p>The Project Identification Number (PIN) is the first 6 digits of a project’s existing grant number. The first two letters represent the state abbreviation, and the following four digits are a number unique to that project within the State. For example, KY0097 is project number 97 from Kentucky. While the full grant number will change with each renewal, the PIN (first 6 digits) remains the same from the first award to each subsequent renewal.</p> <p>For renewal applications in a second or later year of renewal, the PIN is populated if you followed the instructions to import your previous year’s renewal project application. Confirm the PIN is correct on Screen 1A, question 5b. of the project application.</p> <p>For a first-time renewal application, use your current grant agreement, or grant agreement as amended, to ensure you enter the correct PIN in <i>e-snaps</i> on Screen 1A, question 5b. of the project application. Project Applicants for the FY 2024 CoC Program Competition must either enter or confirm the correct PIN on Screen 1A of the project application.</p>
<p>Will the PIN number automatically update from the previous grant year for renewal project applications?</p>	<p>Yes, the PIN will automatically update if you imported the previous year’s renewal project application when creating the project in <i>e-snaps</i>.</p> <p>If this is a first-time renewal project application, you will need to enter the PIN on Screen 1A, question 5b. of the renewal project application. Use your current grant agreement, or LOCCS data to ensure you enter the correct PIN. The PIN is the first six digits of the grant number. For example, the PIN for grant number CA0512L9T182300 = CA0512.</p> <p>HUD will update the grant number if the renewal project is selected for conditional award. For example, if this project is selected for award in FY 2024, the grant number will update to CA0512L9T182401.</p>
<p>Project Applicant Profile (Access/Complete/Edit)</p>	

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<p>What is the difference between a Project Applicant Profile and a Collaborative Applicant Profile in <i>e-snaps</i>.</p>	<p>A Project Applicant Profile is required in <i>e-snaps</i> for each organization applying for funding as a Project Applicant within the CoC Competition. Each applicant organization is required to complete only one Applicant Profile.</p> <p>A Collaborative Applicant Profile is for the organization submitting the CoC Program Registration and CoC's Consolidated Application on behalf of the CoC. These tasks are carried out under the Collaborative Applicant Profile in <i>e-snaps</i>.</p>
<p>How do I create a Project Applicant Profile in <i>e-snaps</i>?</p>	<p>This information can be found in the “Request Access to Your Organization’s <i>e-snaps</i> Account” document on HUD Exchange. https://files.hudexchange.info/resources/documents/Request-Access-to-Your-Organizations-e-snaps-Account.pdf</p> <p>The letter should explain the need for access and indicate the letter serves as a formal written request. It should also provide the organization's Applicant Name and Applicant Number. For an organization with a grant agreement, the Applicant Number is usually the DUNS Number or Tax ID Number. For a Collaborative Applicant organization, provide the CoC Name and CoC Number (e.g., AA-500).</p> <p>NOTE: If the Primary Contact or organization for the Collaborative Applicant is changing, additional actions may be required. Review the Update the Collaborative Applicant Organization and/or Primary Contact resource. Identify the person who needs access and provide the person's <i>e-snaps</i> username, e-mail address, and phone number. Then, obtain the signature of an authorized member of the organization (e.g., department head, executive director).</p>
<p>How do I update the Project Applicant Profile in <i>e-snaps</i>?</p>	<p>To update a Project Applicant Profile <i>e-snaps</i>, carry out the following steps:</p> <ol style="list-style-type: none"> 1. Log into <i>e-snaps</i> at https://esnaps.hud.gov/grantium/frontOffice.jsf and select "Applicants" in the left menu of the main screen. Important: if working on the project application select “Save” and then select “Back to Submissions List” to exit the project application and go back to the main menu. Select "Applicants" from the

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	<p>left menu to access the Project Applicant Profile using the following steps. Note: The “View Applicant Profile” link in the left menu leads to a read-only version of the profile and does not allow editing.</p> <ol style="list-style-type: none"> 2. After selecting "Applicants", select the folder under “Open.” The list of project applicant profile screens will appear in the left menu. 3. Begin by opening the profile for editing by selecting “6. Submission Summary” from the left menu and then select the "Edit" button at the bottom of the screen. Once in edit mode, the entire profile can be updated. 4. After completing the updates and saving the screens, return to “6. Submission Summary” and select the "Complete" button at the bottom of the screen. 5. Finally, select "Back to Applicants List" in the left menu, then select “Submissions” in the left menu of the <i>e-snaps</i> main screen to open a project application. The updated profile information should now appear on all Part 1 screens. If information is not showing as updated, most likely one of the steps above was not completed correctly. <p>For more information, please see the link below with instructions on how to update the Applicant Profile: https://files.hudexchange.info/resources/documents/Project-Applicant-Profile-Navigational-Guide.pdf</p>
<p>How do I provide staff access to my organization’s <i>e-snaps</i> account?</p>	<p>HUD will only provide information about a specific CoC project to the primary and alternate contact identified in the applicant profile.</p> <p>If your organization is a CoC Project Applicant (i.e., is applying for funds and will enter directly into a grant agreement with HUD), please consult the following resource: Request Access to Your Organization’s <i>e-snaps</i> Account: https://files.hudexchange.info/resources/documents/Request-Access-to-Your-Organizations-e-snaps-Account.pdf</p> <p>To provide staff access to your organization’s <i>e-snaps</i> Account, consult the following guidance: https://files.hudexchange.info/resources/documents/Give-Staff-Access-to-Your-Organizations-e-snaps-Account.pdf</p>

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	<p>If no one else in your organization has access to <i>e-snaps</i>, you must submit a letter to us at e-snaps@hud.gov mailbox that officially requests your access and identifies you as the Authorized Representative for your organization. The exact steps for this official request depend on their organization's role in the CoC.</p> <p>If your organization is the Collaborative Applicant for the CoC, please see this resource developed by a HUD Technical Assistance provider on the HUD Exchange: https://files.hudexchange.info/resources/documents/Updating-the-Collaborative-Applicant-Organization-and-Primary-Contact.pdf</p>
<p>I am unable to find the renewal application under “Projects” in <i>e-snaps</i>. However, see it listed under funding opportunities; but that only allows me to register, not actually edit the application. How should I proceed?</p>	<p>First, ensure that you first register in <i>e-snaps</i> for the FY2024 Funding Opportunity. Then, you will select the FY2024 Funding Opportunity when creating the new project from the dropdown.</p> <ol style="list-style-type: none"> 1. Select "Funding Opportunity Registrations" on the left menu bar. 2. The "Funding Opportunity Registrations" screen will appear. 3. Select the "Register" icon next to the correct item. Example: "Renewal Project Application FY 2024." The "Funding Opportunity Details" screen will appear. 4. When the question appears asking if you want to register the applicant for the funding opportunity, select "Yes" to confirm that you want to ‘register’ your organization. 5. The screen will then indicate that the Project Applicant has been registered. 6. Select the "Back" button to return to the "Funding Opportunity Registrations" screen. Select "Projects" on the left menu bar. 7. The "Projects" screen will appear. 8. Select the applicable funding opportunity from the "Funding Opportunity Name" dropdown. Example: "Renewal Project Application FY 2024" 9. The screen refreshes and an "Add" icon appears on the left side of the screen above the column headings. 10. Select the "Add" icon. 11. The "Create a Project" screen will appear. On the "Create a Project" screen, the Project Applicant Name will be pre-populated. 12. In the "Applicant Project Name" field, enter the name of the project that is being created or renewed, as it will appear in the grant and award letter.

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	<p>13. Renewals Only: In the "Import Data From:" field, select the project that is being renewed. Importing will ensure that your project information from the previous year's Project Application is imported and will decrease the amount of information that must be entered in the current Project Application. This field will only appear for "Renewal Project" types and will not appear for "New" projects.</p> <p>14. Select "Save & Back" to return to the "Projects" screen.</p> <p>15. The project name is listed in the menu.</p>
<p>SAM Unique Entity Identifier (UEI)</p>	
<p>Do I need a current System for Award Management (SAM) registration to apply for a new or renewal project?</p>	<p>Your organization must have an active System for Award Management (SAM) registration by the time of the CoC Program application submission deadline. Your organization must renew its SAM registration annually as you receive CoC Program funds. Each organization must also annually confirm the accuracy of its Employer/Tax Identification Number (TIN) and Unique Entity Identifier (UEI) numbers in both SAM.gov and the Project Applicant Profile. HUD verifies that your organization has an active SAM registration prior to the release of awarded funds if conditionally selected for the award and will withhold processing funds if your organization's SAM registration has expired.</p>
<p>Do subrecipients need a SAM Unique Entity Identifier (UEI)?</p>	<p>No, only applicants (recipients) are required to have a Unique Entity Identifier (UEI). Subrecipients are not required to have a UEI for the FY2024 CoC Program competition.</p>
<p>Renewal Project Eligibility and Grant Inventory Worksheets (GIWs)</p>	
<p>Which projects are eligible for renewal in the FY 2024 CoC Program competition?</p>	<p>Projects eligible for renewal include CoC Program projects and YHDP projects awarded previously with expiration dates between January 1, 2025, and December 31, 2025. Eligibility for renewal grants is determined early in the CoC Program competition cycle based in part on the Grant Inventory Worksheet (GIW). Copies of GIWs and are available on HUD.gov at: https://www.hud.gov/program_offices/comm_planning/coc/competition/giws</p>

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	<p>Note: if you believe you have a project eligible for renewal project that needs be included in this year’s CoC Program competition, contact your CoC and HUD field office immediately to determine project eligibility and learn the process to apply for a renewal project.</p>
<p>What organizations are eligible to apply for CoC program funding?</p>	<p>Eligible applicants include nonprofit organizations, states, local governments, instrumentalities of state and local governments, Indian Tribes, and Tribally Designated Housing Entities (TDHEs), as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103) (TDHEs). Public housing agencies, as defined in 24 CFR 5.100, are eligible without limitation or exclusion.</p> <p>For-profit entities are ineligible to apply for grants or to be subrecipients of grant funds.</p> <p>Eligible applicants interested in applying for CoC Program funding should contact their local CoC for more information.</p>
<p>Grant Inventory Worksheets (GIWs). For renewal projects, which organization should be the applicant for the FY 2024 project application and what should I do if the current recipient is different than the one listed on the FY 2024 GIW?</p>	<p>For renewal projects, only the current “grant recipient of record” can submit the application. The “grant recipient of record” is the recipient recognized on the grant agreement at the time of submission of the renewal application.</p> <p>Applicants who need to confirm the name of the project recipient on the grant agreement or believe that the FY 2024 Grant Inventory Worksheet (GIW) listed the incorrect project recipient must contact the Collaborative Applicant and the local HUD CPD Field Office immediately.</p>
<p>Will the VAWA and Rural BLI be included on the FY 2024 GIW?</p>	<p>Yes, in the FY 2024 GIW, columns for the VAWA and Rural BLI will be included. If your project applied for and was awarded funds for either BLI, you should see those populated in the FY 2024 GIW.</p>
<p>Project Application Forms and Certifications</p>	

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<p>What is the Code of Conduct and how do I submit it?</p>	<p>All Federal award recipients, except states, and all subrecipients under Federal awards must have a code of conduct (or written standards of conduct) for procurements that meets all requirements in 2 CFR 200.318(c). Before entering into an agreement with HUD, each applicant selected for an award (other than a state) must ensure an up-to-date copy of the organization’s code of conduct, dated and signed by the Executive Director, Chair, or equivalent official, of the governing body of the organization, is available in the Code of Conduct e-library.</p> <p>https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants</p> <p>Applicants can check the Code of Conduct List to confirm HUD has received their Code of Conduct.</p>
<p>Required Project Application Forms What are the required forms and certifications for CoC Program project applications, and do I need to attach these forms or certifications in <i>e-snaps</i>?</p>	<p>HUD has built the following required forms and certifications directly into the <i>e-snaps</i> project application process. No physical attachment of these forms is required to be added in <i>e-snaps</i> for:</p> <ol style="list-style-type: none"> (1) SF-424 Application for Federal Assistance, (2) Form HUD-2880, Applicant/Recipient Update/Disclosure (see in your Project Applicant Profile), (3) SF LLL, Disclosure of Lobbying Activities (if applicable), (4) Form HUD-50070, Certification for Drug-Free Workplace, (5) Disclosure of Lobbying Activities, (6) SF-424A: Budget Information for Non-Construction Programs, (7) SF-424B: Assurances for Non-Construction Programs, (8) SF-424D: Assurances for Construction Programs, and Applicant Certifications. <p>For the HUD-2880 form to accommodate applicants with more than one project application, HUD has built this form into your <i>e-snaps</i> Project Applicant Profile so a single form covers all your CoC Program project applications that will be submitted in each annual CoC Program competition. This process results in a ‘copy’ of this form to be included into Part 1 of each of your project application(s).</p> <p>https://files.hudexchange.info/resources/documents/How-to-Complete-the-HUD-Form-2880-in-e-snaps.pdf</p>

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<p>HUD-2880. Is a HUD-2880 form required for each project application? Can I combine multiple project amounts on a single form?</p>	<p>The Form HUD-2880 “Application for Federal Assistance” uses federal terminology that does not clearly match terminology used for the CoC Program and project applications. For CoC Program purposes, HUD is clarifying the meaning of “specific project or activity” and “this application” in Part 1 of the HUD-2880, questions 1 and 2.</p> <p>The legal requirements of the HUD-2880 as related to the CoC Program mean: any single organization/applicant equals one application for all accumulated project applications regardless of how many individual project applications are submitted in the CoC Program Competition. Therefore, information in an <i>e-snaps</i> HUD-2880 includes the total amount of all the project applications applying for funds in the CoC Program Competition. For example, if organization XYZ is submitting three separate project applications at \$100,000 each for a total amount of \$300,000; then an answer of “Yes” is required for Part 1, question 2 of the HUD-2880—as organization XYZ expects to receive assistance in excess of \$200,000. Since the total amount of funds requested by your organization exceeds \$200,000 for all project applications submitted, you must complete Parts II and III of the HUD-2880.</p>
<p>HUD-2880. How do I update the HUD-2880 form in <i>e-snaps</i> to include awards that are expected to and to update matching sources in Part II of the form?</p>	<p>Please refer to the full project application detailed instructions regarding HUD-2880 “Application for Federal Assistance”. In addition, you can find <i>e-snaps</i> instructions for entering HUD-2880 data into your Project Applicant Profile at: https://files.hudexchange.info/resources/documents/How-to-Complete-the-HUD-Form-2880-in-e-snaps.pdf</p> <p>In relation to what needs to be entered or updated in Part II, if Part I is “Yes”, you expect to receive assistance in excess of \$200,000, then Part II of the HUD-2880 collects information about other governmental and non-governmental funding for any organization with one or more CoC project applications. Project applicants and recipients must report any other government and non-governmental assistance involved in the project (grant) both from HUD and any other source—that have been or are to be, made available for the project (grant). Non-government sources of funds typically include (but are not limited to) foundations and private contributors.</p>
<p>HUD-2991. Where can I find the HUD-2991?</p>	<p>A HUD-2991 form “Certification of Consistency with the Consolidated Plan” is a required form. It must be submitted by your Collaborative Applicant as part of a CoC’s Consolidated</p>

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	<p>Application. A copy of HUD-2991 is posted on HUD's website at: https://www.hud.gov/sites/dfiles/CPD/documents/HUD-2991_Certification-of-Consistency-with-the-Consolidated-Plan_fillable.pdf</p> <p>The CoC Priority Listing in <i>e-snaps</i> must include HUD-2991 and must be completed and dated between May 1, 2024, and October 30, 2024.</p>
<p>HUD-2991. Does a project applicant need to submit a HUD-2991 form with a project application?</p>	<p>A HUD-2991 form “Certification of Consistency with the Consolidated Plan” is a required form but not as part of a project application. It must be submitted by the CoCs designated Collaborative Applicant. If the CoC has multiple projects, it may complete a single HUD-2991 for the jurisdiction provided the Collaborative Applicant includes a list of all projects (including Planning Cost projects). If there are multiple jurisdictions located within a CoC’s geographic area, it must obtain a signed HUD-2991 for each jurisdiction where projects are located.</p> <p>To be completed by the CoC’s Collaborative Applicant:</p> <ol style="list-style-type: none"> 1) Applicant Name. Enter the name of the project applicant’s organization. 2) Project Name. Enter the name of the project application that will be submitted to HUD in the Continuum of Care Program Competition. 3) Location of the Project. Enter the physical address of the project; however, if the project is designated as a domestic violence project, enter a P.O. Box or address of the main administrative office provided it is not the same address as the project. 4) Name of Certifying Jurisdiction. Enter the name of jurisdiction that will review the project information and certify consistency with the Consolidated Plan (e.g., City of..., County, State). <p>To be completed by the certifying jurisdiction:</p> <ol style="list-style-type: none"> 1) Certifying Official of the Jurisdiction. Enter the name of the official who will sign the form. 2) Title. Enter the official title of the certifying official (e.g., mayor, county judge, state official). 3) Signature. The certifying official is to sign the form. 4) Date. Enter the date the certifying official signs the form.

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<p>Do tribal applicants submit HUD-2991 Certification of Consistency with the Consolidated Plan?</p>	<p>Yes, applicants proposing to locate a project on tribal land or reservation must submit a tribal resolution authorizing the applicant to do so or a letter from an official or principal representing the Indian Tribe or TDHE. Tribes do not need to include a tribal resolution to site a project on their own reservation or trust land. Finally, it is the applicant’s responsibility to ensure the project is certified by the jurisdiction where the proposed project will be located, and projects are consistent with the jurisdiction’s HUD-approved consolidated plan. Certification must follow the provision of 24 CR part 91, subpart F.</p>
<p>On the SF-424 screen - what should I enter for my Proposed Project Dates?</p>	<p>For a renewal project application, the start date should be the end date of the most recently awarded grant that has an expiration date in calendar year 2025. If you need to verify your current grant’s end date, refer to the ‘POP End’ field in eLOCCS. If awarded, HUD will confirm actual start/end dates prior to grant agreement.</p> <p>New project application should enter the proposed project start and end dates. If awarded, HUD will confirm actual start/end dates prior to grant agreement</p>
<p>How do I complete the SF-424B?</p>	<p>SF-424B, Assurances for Non-Construction Programs must be completed when registering with SAM.gov. A curable deficiency notice will be issued if applicant fails to complete the SF 424B.</p>
<p>CoC Project Components</p>	
<p>Joint TH and PH-RRH. What type of applicants can apply for a new Joint TH and PH-RRH component project and can we use existing projects to ‘build’ a JOINT project?</p>	<p>Any eligible applicant can apply for a new Joint TH/RRH Projects. Current TH projects funded by the CoC program cannot ‘merge’ the existing TH project with an RRH project to create a Joint TH/RRH component project. An organization can name a project “Joint TH/RRH” and operate it as a Joint project, but this is not CoC “Joint TH/RRH component” project. TH providers that do not use State and Local funds for their TH units can use the existing units in their Joint TH or PH-RRH component application provided that those units are only used for new clients and not existing clients. Remember, a Joint TH/RRH Project MUST have both TH AND RRH components, not just one component.</p>

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

A Joint transitional housing (TH) and rapid re-housing (PH-RRH) component project includes two existing program components—TH and PH-RRH—into a single project to serve individuals and families experiencing homelessness. If funded, HUD will limit eligible costs to:

1. 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 in the rapid re-housing portion of the project.
3. Supportive services.
4. HMIS.
5. Project administrative costs.

If awarded, recipients or subrecipients must be able to provide both the TH and PH-RRH components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all program participants up to 24 months as needed by the program participants. For example, a program participant may only need a temporary stay in the transitional housing unit, but the recipient or subrecipient must be able to make available the financial assistance and supportive services that traditionally comes with rapid re-housing assistance to that program participant. However, this does not mean that the applicant must request funding from the CoC Program for both portions of the project (e.g., the project applicant may leverage other resources to pay for the transitional housing portion of the project).

All Joint TH and PH-RRH projects are required to be Housing First. It is not allowable to require that participants complete a stay in the TH portion of the program prior to being offered RRH.

Applications for Joint TH and PH-RRH component projects must demonstrate that the project will have the capacity to provide both transitional housing assistance and rapid re-housing assistance, as needed, to each program participant. Review the FY 2024 CoC Program Competition NOFO for a complete list of requirements, including the requirements to distinguish the two forms of housing. All Joint TH and PH-RRH projects must input data on Screen 4B, Housing Type and Location, which presents a summary chart of the units and beds included in the project according to the following categories:

- Total Units. Includes all units in the project, regardless of size.

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	<ul style="list-style-type: none"> • Total Beds. Includes all beds in the project, regardless of unit configuration. Additionally, there are three columns: Total, TH, and PH-RRH. <p>The “Total” summary fields are compiled from all individual housing locations listed below the totals. These fields will populate and update automatically when new housing types and locations are added to the list. The TH and PH-RRH columns must be completed by the project applicant to differentiate the units and beds that will be used in each part of the project. The sum of the beds and units in the TH and PH-RRH columns must not be greater than the sum of the beds and units in the Total column.</p>
<p>Joint TH and PH-RRH. What is the required ratio of TH to RRH units in a Joint TH/PH-RRH project?</p>	<p>A “Joint” project must contain both a TH component and a PH-RRH component. Applicants must plan for 2 RRH units/beds for every 1 TH unit/bed. For example, an application proposing 4 TH units and 8 TH beds must include at least 8 RRH units and 16 RRH beds. This requirement is intended to ensure your project has sufficient units and beds for both housing types to allow program participants the choice of housing they prefer since a recipient cannot direct a program participant to one type of housing over the other.</p> <p>The total numbers reported must reflect the total units and total beds at full capacity on a single night for both the TH and PH-RRH portions of the project. This includes units supported only by CoC Program supportive services funds without CoC Program leasing, operating, or rental assistance funds.</p>
<p>Joint TH and PH-RRH. Can a Joint project plan to have all participants first be served with TH, then move to RRH when they complete the TH program?</p>	<p>No. Both housing types must be made available as choices to all participants, and projects may not require participation in transitional housing before accessing rapid rehousing. In addition, all Joint TH/PH-RRH projects must operate with Housing First approach and may not require additional steps or services before accessing housing (e.g., a required stay in transitional housing or a certain number of days of sobriety).</p>
<p>Joint TH and PH-RRH. If an applicant already runs a separate RRH project, may they apply only for TH units with a Joint application?</p>	<p>No. All Joint projects must include both TH and RRH housing within the project (though it is allowable to use non-CoC funding sources within the project).</p>

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<p>What is a Coordinated Entry / SSO-CE project and what does it mean beyond the definition offered in the NOFO.</p>	<p>SSO-CE projects are intended to develop or operate a Coordinated Entry system. For more detail, it may be helpful to review the New Project Detailed Instructions for “SSO-CE Part 6: Budgets”. The instructions for different BLIs may give you a better sense of what activities may be included in this grant type.</p>
<p>Can a CoC amend or reallocate funds from a CoC Planning grant awarded in a previous year to a different type of CoC grant.</p>	<p>No. CoC Planning Cost project component grants are new grants each year. Therefore, funds cannot be included in the reallocation process since these funds are not renewable.</p> <p>Reallocation of grant funds is only permitted with eligible renewal projects (i.e., renewal grants that are expiring in Calendar Year 2025). One flexibility that Planning cost projects have that other project components do not, is that Planning grants are not limited to operating dates that “run back-to-back” as is the case for all CoC renewal projects. Operating dates for one or more Planning grants can ‘overlap’ to assist in funding CoC Planning activities. In addition, there is also some additional flexibility for amending extensions for Planning projects.</p>
<p>What is the maximum amount for a CoC Planning project for my CoC.</p>	<p>For CoC Planning cost grants in the FY 2024 CoC competition, a Collaborative Applicant may apply for up to 5 percent of the CoC’s FY 2024 Final Pro Rata Need (FPRN) or \$1,500,000, notwithstanding the 3 percent cap in sec 423(a)(10) of the Act or \$50,000, whichever is greater. More information is provided in section III.B.4.d.(4)(h)(i) of the FY 2024 NOFO.</p> <p>CoCs can only submit one CoC planning cost application, which must be submitted by the CoC’s Collaborative Applicant. The maximum amount a Collaborative Applicant may request for a CoC planning grant can fluctuate from year to year depending on the CoC's FPRN, which may vary in subsequent CoC program competitions.</p>
<p>Do CoC Planning projects need to be ranked in the CoC’s Priority Listing as projects in Tier 1 or Tier 2?</p>	<p>No. CoC Planning and UFA Costs project applications are not ranked and will be selected, provided they pass project eligibility and project quality threshold review. HUD will not include a CoC Planning project application in Tier 1 or Tier 2 calculations. Therefore, Collaborative Applicants must not rank Planning project applications. Planning projects do not affect a CoC’s available amount for new and renewal project applications because the</p>

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	<p>CoC Planning project is not included in the CoC’s Annual Renewal Demand (ARD) calculation.</p> <p>The CoCs Collaborative Applicant may only submit one project application for CoC Planning costs and, if applicable, one project application for UFA Costs. The Collaborative Applicant listed on the CoC Applicant Profile in <i>e-snaps</i> is the only eligible applicant that may apply for CoC Planning and UFA Costs projects. CoC Planning funds and UFA costs may be used according to 24 CFR 578.39, and 578.41.</p>
<p>How do I calculate the number of beds, units, households, and persons being served by my project?</p>	<p>When determining the correct input for Units, Beds, Households, and Persons, please note that these reflect the full capacity of the program on a single night (not the total throughout the course of the project period). This should include capacity directly supported by CoC Program funds or eligible match funds in any way, including units supported only by CoC Program supportive services funds without CoC Program leasing, operating, or rental assistance funds. The reported number of units and beds on Screen 4B should not be higher than the number of households (units), and persons (beds) as listed on Screens 5A and 5B.</p>
<p>What definition should we use for “Survivors” on the population focus and subpopulations charts?</p>	<p>Survivors: Persons who have experienced trauma or a lack of safety due to domestic violence, dating violence, sexual assault, stalking, human trafficking or other dangerous, traumatic, or life-threatening conditions.</p> <p>Note: while this field includes all people in households eligible to be served with DV Bonus funds it may also include survivors who do not meet the narrower definition of DV Bonus eligibility. For more information on population eligible to be served in DV Bonus projects, please see Section I.B.2.b.6 of the NOFO for more information.</p>
<p align="center">Domestic Violence, Dating Violence, Sexual Assault, and Stalking Bonus (DV Bonus) Project Applications</p>	
<p>How are DV Bonus projects different than other projects in the CoC competition?</p>	<p>DV Bonus projects are funded from an additional special appropriation from Congress (Consolidated Appropriations Act, 2023), which requires that the funds be dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking. DV Bonus projects are awarded competitively based on scoring from the CoC application, including the applicant-specific DV Bonus section.</p>

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	<p>A new project that is dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking who qualify under the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act. While survivors of human trafficking may qualify as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act because they are often also victims of domestic violence, dating violence, sexual assault, or stalking, however, a DV Bonus project may not exclusively serve people fleeing or attempting to flee human trafficking.</p> <p>DV Bonus projects apply for the following project types: PH-RRH, Joint TH-RHH, or SSO-CE. (PH-PSH and HMIS projects are not eligible for DV Bonus funding.) All DV Bonus projects must be Housing First.</p>
<p>Is there a special process or a separate competition for DV Bonus projects compared to other CoC projects?</p>	<p>All projects that are eligible to apply for DV bonus funding are also eligible for CoC funding and must be submitted through the CoC’s local competition to be assessed, ranked, and prioritized along with other CoC projects. If the project is awarded DV Bonus funds, it will be skipped in the priority listing when determining the distribution of reallocation and CoC bonus funds.</p> <p>Applicants for DV Bonus projects must also provide additional information about the applicant organization and planned project within the CoC application submitted by the Collaborative Applicant to HUD. Please see the CoC Application Detailed Instructions and reach out to your Collaborative Applicant for more information.</p>
<p>Can a new DV Bonus project apply as an expansion of a renewal project?</p>	<p>Yes. A CoC may apply to expand an existing renewal project in accordance with Section I.B.2.b.(9) of the FY 2024 CoC Program Competition NOFO, including one that was previously funded with DV Bonus funding. DV Bonus funds can only be used to expand an existing renewal project if the new expansion project is dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking. Due to these funding restrictions in appropriations, DV Bonus projects must exclusively serve the households of survivors of domestic violence, dating violence, sexual assault, or stalking. Projects that focus on other</p>

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	<p>populations, including survivors of human trafficking, are not eligible for this restricted funding unless the project will be limited specifically to survivors of domestic violence, dating violence, sexual assault, and/or stalking. For projects that are expanding their current CoC Program-funded project, project applicants will be required to submit both the renewal project application to be expanded and a new project application with just the expansion information.</p>
<p>Are there special instructions for DV Bonus project applications in <i>e-snaps</i>?</p>	<p>To apply for DV Bonus in <i>e-snaps</i>, you must take the following steps:</p> <ol style="list-style-type: none"> (1) On screen “3B. Project Description,” question #3, check the “Survivor box. (2) On screen “3B. Project Description,” include how these funds will be dedicated to survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking who qualify under paragraph 4 at 24 CFR 578 (3) On screen “4A. Supportive Services for Participants”, describes how participants will be assisted to obtain and remain in permanent housing. New projects applying for DV Bonus funds must tailor the description to include how survivors of domestic violence, dating violence, sexual assault, or stalking who qualify under the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act will be assisted to obtain and remain in permanent housing that addresses their needs and includes trauma-informed, victim-centered approaches. (4) On screen “6A. Funding Request,” question #2, select “DV Bonus” from the drop-down menu.
<p>Can DV Bonus projects be dedicated to serving survivors of human trafficking (or another group that qualifies as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3)?</p>	<p>Due to funding restrictions in appropriations, DV Bonus projects must exclusively serve the households of survivors of domestic violence, dating violence, sexual assault, or stalking. Projects that focus on other populations, including survivors of human trafficking, are not eligible for this restricted funding unless the project will be limited specifically to survivors of domestic violence, dating violence, sexual assault, and/or stalking. Please see Section I.B.2.b.6 of the NOFO for more information. DV Reallocation projects (new projects created with funding reallocated from projects originally awarded as DV Bonus projects) must also exclusively serve the DV Bonus eligible population.</p>

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<p>What is a DV Reallocation and how is it different from the DV Bonus?</p>	<p>The DV Reallocation is a funding mechanism in the CoC program that allows project applicants to reallocate DV Bonus projects that have renewed at least one time, into a new DV project. As a reminder, a DV Reallocation can only be funded by reallocating DV Bonus projects. There is no difference in how the DV Bonus and DV Reallocation operate in the CoC program. Both funding types must exclusively serve the households of survivors of domestic violence, dating violence, sexual assault, or stalking.</p>
<p>Can I reallocate my Domestic Violence, Dating Violence, Sexual Assault, and Stalking Bonus (DV Bonus) grant to a new project that doesn't serve the same population?</p>	<p>No. If a new project is being created with reallocated funds that were originally awarded to DV Bonus project, the new project must continue to serve exclusively survivors of domestic violence, dating violence, sexual assault, or stalking. See Section I.A.3.c. of the NOFO for more information.</p> <p>Note: DV Bonus funds may not be combined with any other funding in a new project application.</p>
<p>Does an applicant have to be a Victim Service Provider (VSP) in order to apply for DV Bonus grants?</p>	<p>No, all eligible applicants for CoC funding may apply for DV Bonus funds for projects exclusively serving the households of survivors of domestic violence, dating violence, sexual assault, or stalking.</p> <p>Applicants for DV Bonus projects must also provide additional information about the applicant organization and planned project within the CoC application submitted by the Collaborative Applicant to HUD, including information about their experience and capacity to provide trauma-informed services. Please see the CoC Application Detailed Instructions and reach out to your Collaborative Applicant for more information.</p>
<p>Amendments</p>	
<p>Change of Recipient "Organization A" is in the process of transferring its grant to "Organization B." Since the transfer hasn't been finalized and the competition is open, who should apply?</p>	<p>First, discuss possible timing of a project transfer amendment with your local HUD field office. Any grant agreement amendment (including amending budgets or changing the recipient of a grant) involves many steps and can take time to complete.</p>

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	<p>Until the grant transfer amendment is fully accomplished, only the current recipient will have access to apply for renewal of the project. When in doubt, the current recipient should apply for the renewal project application in <i>e-snaps</i> and then after conditional award all parties can pursue the transfer in CoC post-award processes. This approach will ensure that the competition window for this renewal is not missed.</p>
<p>Budgets</p>	
<p>Should my budget reflect 2 years of funding since this is a 2-Year NOFO?</p>	<p>Your application should reflect 1 year of funding. Though the FY2024 CoC Competition NOFO covers two years (FY2024 and FY2025), the funding will be disbursed as two one-year budget periods. Your application in e-snaps must reflect only one year of funding.</p>
<p>Budget Changes. If we make errors in budget changes on our renewal application, is there any way for us to correct that after the application deadline?</p>	<p>No. If you mistakenly apply for more than your annual renewal amount (ARA), you will not be awarded more than your ARA. However, you cannot be awarded more than you apply for, so if you mistakenly apply for less than your ARA, your award cannot be restored to the full ARA amount. Please double check your budget change amounts before submitting your application.</p>
<p>VAWA Budget Line Item What are the eligible costs under the CoC VAWA Budget Line Item (BLI)?</p>	<p>Section 605(a)(2) of VAWA 2022 amends section 423(a) of the McKinney-Vento Homeless Assistance Act to add the following eligible activity to the CoC program: “Facilitating and coordinating activities to ensure compliance with [the emergency transfer plan requirement in 34 U.S.C. 12491(e)] and monitoring compliance with the confidentiality protections in 34 U.S.C. 12491(c)(4).”</p> <p>Funding can be requested for this activity in new project applications. Funds may also be added to this BLI in eligible renewal projects through expansion or by shifting up to 10 percent of funds from other eligible BLIs to the VAWA BLI.</p> <p>(a) Examples of eligible costs for emergency transfer facilitation include the costs of assessing, coordinating, approving, denying, and implementing a survivor’s emergency transfer which includes:</p>

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- (i) Assistance with moving costs. Reasonable moving costs to move survivors for an emergency transfer. (Note that the general requirement that moving costs be one-time does not apply for emergency transfer moves under this BLI.)
 - (ii) Assistance with travel costs. Reasonable travel costs for survivors and their families to travel for an emergency transfer.
 - (iii) Security Deposits. Grant funds can be used to pay for security deposits of the safe units the survivor is transferring to via an emergency transfer.
 - (iv) Utilities. Grant funds can be used to pay for costs of establishing utility assistance in the safe unit the survivor is transferring to.
 - (v) Housing Fees. Fees associated with getting survivor into a safe unit via emergency transfer, includes but not limited to application fees, broker fees, holding fees, trash fees, pet fees where the person believes they need their pet to be safe, etc.
 - (vi) Case management. Grant funds can be used to pay staff time necessary to assess, coordinate and implement emergency transfers.
 - (vii) Housing navigation. Grant funds can be used to pay staff time necessary to identify safe units and facilitate moves into housing for survivors through emergency transfers.
 - (viii) Technology to make an available unit safe. Grant funds can be used to pay for technology that the individual believes is needed to make the unit safe, including but not limited to doorbell cameras, security systems, phone, and internet service when necessary to support security systems for the unit, etc.
- (b) Examples of eligible costs for monitoring compliance with the VAWA confidentiality requirements include the costs of ensuring compliance with the VAWA confidentiality requirements which includes:
- (i) Monitoring and evaluating compliance with VAWA confidentiality requirements.
 - (ii) Developing and implementing strategies for corrective actions and remedies.
 - (iii) Program evaluation of confidentiality policies, practices and procedures.
 - (iv) Training about compliance with VAWA confidentiality requirements.
 - (v) Reporting to Collaborative Applicant, HUD, and other interested parties on compliance with VAWA confidentiality requirements
 - (vi) Costs for establishing methodology to protect survivor information.
 - (vii) Staff time associated with maintaining adherence to confidentiality requirements.

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<p>What is the difference between case management costs under a “VAWA BLI” request on the VAWA budget screen in <i>e-snaps</i> and case management costs in the Supportive Services budget screen?</p>	<p>Case Management costs under the VAWA budget are used to pay for staff time specifically necessary to assess, coordinate, and implement VAWA emergency transfers. Case Management under the Supportive Services budget is to pay for the staff time needed for assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s).</p>
<p>How do I know if my project qualifies for VAWA costs? Can a project request the VAWA BLI even if the applicant is not a VSP, or the project is not a DV bonus project?</p>	<p>The VAWA BLI is available in all project types, except for planning and UFA costs, regardless of grantee type or sub-population focus. The VAWA BLI is NOT exclusive to victim service providers (VSPs) or DV Bonus projects. All eligible projects will technically include a VAWA BLI (even if the project chooses to keep that BLI at \$0), to help expedite minor budget changes later in the grant should a situation arise where a project needs to quickly move funds to the VAWA BLI, e.g., for an unexpected emergency transfer.</p>
<p>How can my SSO-CE project use the VAWA BLI?</p>	<p>SSO-CE projects may use this BLI to budget for activities to facilitate emergency transfers in accordance with the CoC’s emergency transfer plan, or for activities to ensure compliance with VAWA confidentiality requirements. Emergency transfers should be conducted in accordance with the CoC’s emergency transfer plan, which must meet the requirements laid out in 24 CFR 578.99(j)(8) and 24 CFR 5.2005(e). To extent that the CoC’s plan uses a coordinated approach to assessing and facilitating emergency transfer requests (including having a local victim service provider assess and facilitate all emergency transfer requests centrally), it is allowable to use the VAWA BLI within an SSO-CE project to do so.</p>
<p>How do I complete the new VAWA budget screens in <i>e-snaps</i>?</p>	<p>Project Applications for New, and all YHDP projects, you can simply enter the amount of funding requested on the VAWA BLI screen in the categories listed. All New and YHDP projects are given a VAWA BLI, with the VAWA funding checkbox selected for them, and this box cannot be unchecked. Applicants will enter funding amounts on the VAWA BLI screen, like how funding is entered on other BLI screens (SS, Operating, HMIS). A description of funds is not required since that is already given on the BLI screen. Funding amounts on the VAWA screen are automatically pulled forward onto the summary budget screen.</p>

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	<p>For Renewal project applications, if you plan on adding funds to the VAWA BLI you can do so by shifting funds from another BLI or you can apply for an Expansion project (not applicable to YHDP Renewal). Applicants are required to answer Questions 1 & 2 on screen 6A. All renewal projects do have the VAWA funding checkbox selected for them, and this box cannot be unchecked. This allows for funds to be moved into the new VAWA BLI upon request to your field office.</p>
<p>Are match requirements for a VAWA budget the same as other CoC BLIs?</p>	<p>Yes. A VAWA BLI follows the same 25 percent match requirements as other BLIs in the CoC Program, except for the Leasing BLI, which has no match requirement.</p>
<p>Why does my project have a VAWA BLI added automatically to its summary budget, and why can I not remove it?</p>	<p>As stated in HUD’s final rule implementing VAWA 2013, “The requirements set forth in 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), implementing the requirements of VAWA apply to all permanent housing and transitional housing for which CoC program funds are used for acquisition, rehabilitation, new construction, leasing, rental assistance, or operating costs.” While projects can choose to use other funds to meet these requirements, we recognize that the costs associated with emergency transfers cannot be fully predicted and planned in advance.</p> <p>To allow for the flexibility to meet VAWA emergency transfer requirements and provide effectively for the safety of project participants experiencing domestic violence, dating violence, sexual assault, and/or stalking, all projects are required to have a VAWA BLI (even a \$0 BLI) in case of the need for an emergency transfer request or other unexpected need.</p>
<p>How is the CoC VAWA budget funded, for new project applications, specifically in Renewal projects that have set budgets already?</p>	<p>For New project applications you can add funding requests for a new CoC VAWA Budget Line Item (BLI) the same as any other BLI request in <i>e-snaps</i>.</p> <p>For Renewal projects, including all YHDP projects, HUD will not be adding new money to projects to fund the CoC VAWA BLI; however, CoC funding for the VAWA BLI in renewal projects must come from shifting funds from existing BLIs <u>or</u> by applying for an expansion project with your VAWA BLI request.</p>

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<p>Rural Budget Line item How is the CoC Rural budget line item funded for new project applications, specifically in Renewal projects that have set budgets already?</p>	<p>CoC Renewal projects are eligible this year to add the Rural BLI to their project application to be used in eligible rural or tribal geocodes. There are three scenarios where this can occur:</p> <ol style="list-style-type: none"> 1. The Renewal project was previously awarded a Rural BLI through a New Expansion in the FY23 competition, and can now renew their project this year with the Rural BLI included in their project application 2. The project applicant applies in this competition for a New Expansion of their Renewal grant, and within that New Expansion, they request a Rural BLI. 3. The Renewal project can select the Rural BLI on screen 6A in the renewal application, answer a question related to the Rural BLI on the same screen, and select an eligible Rural geocode on screen 3A. <p>HUD SNAPS will determine if the project can be awarded a Rural BLI during project review.</p> <p>For New and all YHDP project applications, including expansion project applications as noted above, you can add funding requests for a new CoC Rural Budget Line Item (BLI) the same as any other new project BLI request in <i>e-snaps</i>.</p> <p>For reference, see Section 5707 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (PL 117-263, December 23, 2022, 136 Stat 2395) amends section 423(a) of the McKinney-Vento Homeless Assistance Act to allow projects in rural areas [as defined in section I.B.2.b.(26) of this NOFO] to use program funds to pay for the following eligible CoC Program activities to include adding a Rural BLI to eligible renewal projects through expansion.</p>
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<p>What are the eligible costs under the Rural Budget Line Item (BLI)?</p>	<p>The Rural BLI must be used only for eligible activities in eligible rural or tribal geocodes. Under Section III.B.4.b.(3) of the NOFO, those eligible costs are:</p> <ol style="list-style-type: none"> 1. Payment of short-term emergency lodging, including in motels or shelters, directly or through vouchers. 2. Repairs to units; <ol style="list-style-type: none"> a. (i) in which homeless individuals and families will be housed; or b. (ii) which are currently not fit for human habitation. 3. Staff training, professional development, skill development, and staff retention activities
<p>How do I know if I'm in a CoC Program Approved Rural Area?</p>	<p>Within the New, Renewal and all YHDP applications, on Screen 3A, there are three tables that allow the applicant to determine whether their project qualifies as a rural area. These three tables are:</p> <ol style="list-style-type: none"> 1. The state your project is based in. 2. The rural geocodes that would fall under your projects work area. 3. Any tribal rural areas <p>HUD will be the final arbiter if your project qualifies for the CoC Rural costs.</p>
<p>How do I complete the new rural screens/questions (3A, 6A and Rural) in <i>e-snaps</i>?</p>	<p>In the New and YHDP CoC applications, the Rural Costs budget has two parts:</p> <ol style="list-style-type: none"> 1. On screen 3A, you will select if you are requesting “rural costs” within this project application. If you select “Yes”, the Rural costs budget will be activated in the application along with 3 tables related to rural geocodes to help HUD SNAPS determine rural eligibility. <p>If the rural costs budget is activated, you will then be asked to fill out that budget. The process of filling out the budget is similar to how other BLI screens are filled out (supportive services, HMIS, Operating and VAWA).</p> <p>For Renewal, you will select your geocode areas on Screen 3A and then answer a Rural BLI related question on screen 6A. There is no Rural Budget Detail screen for Renewals. The field only exists in the summary budget.</p>

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<p>Do the same match requirements for “Rural Costs” in <i>e-snaps</i> the same as for the match requirements for other approved budget line items (except leasing)?</p>	<p>Yes. Rural costs follow the same match rules as other BLIs in the CoC Competition (except for the Leasing BLI, which has no match requirement.)</p>
<p>FMR Years. Why are we being asked to apply with FY23 FMRs?</p>	<p>All projects that are eligible to apply for the FY2024 CoC Competition must use FY2023 FMRs in their project applications. The FMR amounts shown in the <i>e-snaps</i> application tables are accurate FY2023 FMRs for the FMR areas you select. If your project application is selected for conditional award, HUD will apply updates based on the FMRs in effect as of the application submission deadline. The updates will be based on your eligible BLI total. The adjusted amount will be shown in your new award total with exact amounts seen in the <i>e-snaps</i> table at post award.</p>
<p>FMRs and Actual Amounts less than FMRs. Can we change back to full FMR calculations rather than our Actual funding designation. Can this be done as part of a renewal project application.</p>	<p>No. The NOFO does not address changing project funding back to FMR once a project decides to move to actual rent, as HUD addresses this issue on a case-by-case basis by amendment is rarely approved. There are factors to consider when determining if this is allowable; including where the excess funds were moved to and documentation reflecting the reason actual rent is no longer viable and validates the request to return to FMR. Please connect with your local HUD Field Office Representative about amending the grant to change from actual rent to full FMR. Keep in mind however, that existing funds within the grant would need to be shifted from another budget line item to rental assistance to increase up to the full FMR. If that is not feasible the number of units would need to decrease to fit within the full FMR. The overall funding amount for the grant, the annual renewal amount (ARA) cannot be increased.</p>
<p>Cost of Living Adjustments (Supportive Services and HMIS Costs)</p>	<p>The Consolidated Appropriations Act, 2024 authorizes HUD to make reasonable cost of living adjustments to renewal amounts to help afford increasing cost of operations due to inflation. Your application should reflect BLIs based on previously awarded amounts. HUD will apply this adjustment to the Supportive Services and HMIS Costs BLIs for renewal projects that are conditionally awarded.</p>

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<p>Can Rental Assistance funds be used to pay for security deposits? If so, how would I request rental assistance dollars specifically for security deposits or other approved costs?</p>	<p>Yes, security deposits are an eligible cost item within the rental assistance Budget Line Item (Section 578.51(a)(2)). Under rental assistance, a project recipient may use grant funds for security deposits in an amount not to exceed 2 months of rent so long as it is provided before the CoC Program participant exits from the program. Although the costs for the security deposits come from the rental assistance budget in the <i>e-snaps</i> project application, there is not a way to enter a separate cost for security deposits since they are considered part of the rent. A good practice would be to mention security deposits in the project description. Many applicants use the 30% rent income from participants to serve additional participants or cover security deposits.</p>
<p>Details of Costs and Renewal Budgets. Are renewal project applicants required to provide details beyond total cost requests for leased structures, supportive services, operating, or HMIS Budget Line Items (BLIs)?</p>	<p>No. HUD no longer requires applicants to list budget detail information in <i>e-snaps</i> beyond the total costs requested for leased structures, supportive services, operating, or HMIS budget line items in renewal project applications. HUD expects the details of past approved budgets to be the baseline for renewal grant expenses (in line with 24 CFR part 578). Though HUD is not collecting detailed budget information as part of the application, HUD still expects that all costs expended will meet the requirements of the CoC Program interim rule and 2 CFR Part 200. HUD will continue to verify budget information during HUD compliance monitoring.</p>
<p>What are replacement reserves and how do I request funds for operating and replacement reserve costs?</p>	<p>Replacement reserves are scheduled payments to a reserve fund for the repair of major building systems and are an eligible cost for recipients of transitional or permanent supportive housing projects where the recipient or subrecipient owns or operates the building(s). The replacement reserve question is only applicable to projects with an "Operating" budget line item (BLI) and have identified you are choosing to use your operating BLI following standard housing development practices of budgeting replacement reserves. This question is not available for projects that do not have an "Operating" BLI.</p> <p>First-Time Renewals: If you are renewing a project for the first time in <i>e-snaps</i>, you must enter all data in the renewal project application as you cannot bring forward data from the new project application submitted initially and awarded. If the renewal project has an "Operating" BLI, you will check the box for "Operating" on-screen 6A Funding Request in <i>e-snaps</i>, enter the amount for "Operating" on the Summary Budget screen and click save. Once this is completed, the new "Replacement Reserve" question will appear on screen 3A,</p>

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	<p>and you must navigate to this screen to complete the additional question(s) before you can submit the renewal project application.</p> <p>Regular Renewals – Renewal projects that are not first-time renewals but have an “Operating” BLI will see the "Replacement Reserve" question on 3A as the “Operating” BLI has already been recorded in the application since it was brought forward from last year's application.</p> <p>New project. To request CoC Program funds for “Replacement Reserve” costs, for a new application, go to Screen “6G Operating Budget,” and answer the questions on Screen 3A Project Detail. Additionally, if the project will use CoC Program Operating funds for replacement reserve, the applicant must attach documentation on Screen “7A Attachments”. For further details, refer to instructions for Screen 3A (#8) in the <i>FY 2024 CoC New Project Application Detailed Instructions</i>.</p>
<p>Indirect Costs For the administration budget in a project application, can the Indirect Cost Rate PLUS the total of the other project administration budget line items exceed 10% of total direct cost expense?</p>	<p>No. CoC Program eligible administration costs cannot exceed 10 percent of the subtotal of other BLIs. CoC project “admin” costs and indirect costs are not synonymous in the CoC program. Currently, eligible indirect costs cannot be identified as a line item in the project application’s budget or within eLOCCS when recipients draw down funds. The CoC Program interim rule allows for indirect costs to be added to the existing Budget Line Item (BLI) within the eligible cost categories in the grant agreement’s scope of work. This allows recipients to be able to draw down funds from eLOCCS that include direct costs as well as eligible costs associated with the indirect costs within each existing BLI.</p> <p>Per the CoC Program interim rule, the CoC Administration BLI is capped at 10 percent of other BLI subtotals, up to the amount in your project application. Recipients seeking reimbursement for administrative costs should review the CoC Program interim rule Section 578.59 which details the project’s administrative eligible costs. The recipient or subrecipient may use up to 10 percent of the total of non-CoC admin BLIs of any grant awarded under this part.</p>
<p>What is the difference between project administration and indirect costs?</p>	<p>Please note that CoC project administration costs and indirect costs are not the same. Recipients seeking reimbursement for administrative costs should review the CoC Program</p>

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	<p>interim rule Section 578.59 which details the project administrative eligible costs: The recipient or subrecipient may use up to 10 percent of any grant awarded under this part, excluding the amount for Continuum of Care Planning Activities and UFA costs, for the payment of project administrative costs related to the planning and execution of Continuum of Care activities. Note that Project Administrative costs do not include staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57 because those costs are eligible as part of those activities.</p> <p>Recipients seeking reimbursement for indirect costs should review 578.63 of the CoC Program interim rule and OMB Circular Part 200, which allows for indirect costs to be added to direct costs within the eligible cost categories in the grant agreement’s scope of work. If incorporated, recipients would be able to draw down funds from eLOCCS that include direct costs as well as eligible costs associated with the 10 percent de minimus indirect cost rate, as modified for the CoC Program, within each existing budget line item. Currently, eligible indirect costs cannot be identified as a line item in the project application’s budget or within eLOCCS when recipients draw down funds.</p> <p>Please see the following notices and resources for more information about Indirect Costs:</p> <ul style="list-style-type: none"> • Indirect Cost Toolkit for CoC and ESG Programs at https://files.hudexchange.info/resources/documents/Indirect-Cost-Toolkit-for-CoC-and-ESG-Programs.pdf
<p>Does HUD need to approve an indirect cost rate for that rate to be used in the project application?</p>	<p>No. An indirect rate must be submitted to and approved by your cognizant agency, which is the Federal agency that you receive the highest amount of Federal funding. This may be HUD or another agency. If your organization has a Federally approved indirect cost rate agreement, it can be entered on the “6A Funding Request” screen. Be sure to attach the approved indirect cost agreement to the project application.</p>

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<p>Can I enter multiple indirect cost rates in a project application if we have multiple subrecipients?</p>	<p>No. Indirect cost rates from subrecipients cannot be used for CoC funds. A project applicant can only have one indirect cost rate, which must be the approved rate from the recipient organization. There is no requirement to enter the indirect cost rates of subrecipients; such rates are <u>not</u> to be used with a CoC grant. All subrecipient organizations expending CoC funds must use the recipient organization’s indirect cost rate, or de minimis 10 percent rate, even if the subrecipient organization has a different rate. If subrecipients want to use their individual rate, they must become a direct CoC grant recipient.</p>
<p>My organization has an expired indirect rate. We applied for a new one and it is currently under review. Can we use our expired indirect rate until the new one is approved?</p>	<p>In this case, attach the letter in <i>e-snaps</i> that indicates that you requested an indirect cost rate approval (along with the expired documentation). Complete all the required fields in <i>e-snaps</i> about indirect costs with the new information, as possible. A caution message may appear. Hit “Save,” and the caution message will disappear. If HUD selects the project for a conditional award, your HUD field office will ask for the attachment with the approved indirect cost rate. If you are using the de minimis 10 percent, an attachment is not needed.</p>
<p>When can leasing funds be used?</p>	<p>Leasing costs are eligible under the Permanent Supportive Housing (PSH), JOINT (TH portion only), Transitional Housing (TH), and Supportive Services Only (SSO) components. Recipients and subrecipients may choose to use CoC Program funds to lease a structure or a portion of a structure that will be used for PSH, TH, or SSO projects.</p> <p>Leasing funds may also be used to lease individual housing units for TH or PSH.</p> <p>Leasing funds can pay for the following activities:</p> <ul style="list-style-type: none"> • Rent for the unit or structure (§ 578.49(b)(1)) • Security deposits for up to 2 months (§ 578.49(b)(4)) • First and last month’s rent (up to one month each, allowed as an advanced payment) (§ 578.49(b)(4)) • Staff or related costs to carry out leasing activities including conducting Housing Quality Standards (HQS), paying landlords, etc. • Payments on unoccupied units while identifying a new program participant. •
<p>Can I apply for a grant term for a new project of more than one year?</p>	<p>Yes, per Section III.B.4.d.(4) of the NOFO, the initial grant term for new project applications may be for 1 year, 2 years, 3 years, 4 years, 5 years, or 15 years. HUD may</p>

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	<p>extend the grant consistent with 2 CFR 200.308 and 2 CFR 200.309. HUD will allow new projects to request 1 year of funding with a longer initial grant term not to exceed 18 months. The reason for this longer grant term is that HUD has determined that most new projects requesting one year of funding often take approximately 3 to 6 months to begin fully operating the new project (e.g., hiring staff, developing partnerships with landowners if leasing or renting). Therefore, a new project requesting 1 year of funding may request a grant term of 12 months to 18 months that will allow for the additional start-up process. Any new projects requesting capital costs (i.e., new construction, acquisition, or rehabilitation) are not eligible for 1-year funding requests.</p>
<p>New projects can request up to 6-month extended Grant Term. How do I request 13 to 18 months of funding for a new project application with an initial term of one year?</p>	<p>To submit a request for a 13-month to 18-month initial grant term through the project application screen “6A Funding Request,” question 6 for the specific project type to which you are applying. First-time renewal eligibility will be dependent on the project’s operating end date.</p>
<p>Project Application Processes</p>	
<p>Reallocation Process. What is the policy on projects eligible for reallocation as part of the renewal application process?</p>	<p>CoCs and project applicants can reallocate any eligible CoC Program project that has previously been renewed under the CoC Program. CoCs cannot reallocate a project that is expiring for the first time. Section I.B.2.b(24) of the FY 2024 CoC Program NOFO provides additional information. To be eligible for reallocation, an expiring project must be an eligible renewal project in this year's competition.</p> <p>Note: The House and Senate Committees on Appropriations expressed that for projects awarded for specific subpopulations (e.g., youth experiencing homelessness or survivors of domestic violence, dating violence, sexual assault or stalking), before funding for such projects may be reallocated to other populations, HUD must consult with relevant stakeholders. For the FY 2024 Funding Opportunity, HUD requires funding reallocated from projects previously funded with YHDP or DV Bonus funding must be used for projects serving the same subpopulation. Therefore, prior to executing the</p>

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	<p>reallocation of any project, HUD strongly recommends reviewing the Grant Inventory Worksheets (GIWs) published on the CoC Program Competitions page on the HUD.gov website to determine the type of new projects that can be created with reallocated funding intended for the specific subpopulations.</p>
<p>Reallocation Process. What is reallocation, what can it fund and how does it work?</p>	<p>Section I.B.2.b(24) of the FY 2024 CoC Program Competition NOFO defines Reallocation as a process that CoCs use to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without affecting the CoC’s Annual Renewal Demand. CoCs may use relocation to create new:</p> <ul style="list-style-type: none"> • PH-PSH. • PH-RRH. • Joint TH/PH-RRH component. • Dedicated HMIS; or • SSO-CE for coordinated entry. <p>Reallocation funding is eligible to fund:</p> <ul style="list-style-type: none"> • New Expansion projects. • Transition Projects. • CoC Bonus projects. <p>Remember, relocated in full or in part, should be correctly identified on a CoC’s priority listing in <i>e-snaps</i>.</p>
<p>Reallocation Process. Do reallocations need to be included in the priority listing for a CoC?</p>	<p>Yes, please ensure all reallocations and new projects are listed on your priority listing.</p>
<p>Reallocation Process. What is a “New Project Created through Reallocation” and where can I find a definition?</p>	<p>Section I.B.2.b(24) of the NOFO defines a reallocation as “a process the CoCs use to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC’s ARD.” So, a “New Project Created through Reallocation” is a new project application requesting to use a CoC’s funds previously used for one or more other CoC-funded projects for new project within the same CoC. For example, the CoC may decide to reduce an existing project by \$10,000 from an eligible renewal and use the \$10,000 for a new project created through the reallocation process.</p>

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	<p>Before submitting a project application for the FY 2024 CoC Program competition, we recommend you contact your local CoC for more information. CoC contact information can be found at https://www.hudexchange.info/grantees/find-a-grantee/</p>
<p>Reallocation Process. What are “DV Reallocations” and what should a CoC be aware of when reallocating projects originally awarded with DV Bonus funding.</p>	<p>DV Reallocation Projects are projects created from the reallocation of eligible DV Renewal projects [see I.B.2.b.(7) of the NOFO]. CoCs may reallocate eligible DV Renewal projects to create new DV Reallocation projects, so long as 100 percent of the population served by the new DV Reallocation project are individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who qualify under the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act.</p> <p>When reallocating DV Renewal project(s), the new project(s), including new expansion projects, in their entirety must meet all the same requirements of a DV Bonus project, including the inclusion of trauma informed and survivor-centered services, including safety planning. and the sum of all DV Reallocation applications must be for the same amount DV Reallocation Projects are projects created from the reallocation of eligible DV Renewal projects [I.B.2.b.(7)].</p> <p>If a CoC reallocates funding from a DV Renewal grant and does not earmark those funds for new project(s) that are 100 percent dedicated to that subpopulation, HUD may condition the project applications to ensure the projects are serving the required subpopulation.</p> <p>The following restrictions also apply:</p> <ul style="list-style-type: none"> • DV Renewal projects that have an SSO-CE component cannot be reallocated. • Reallocated DV Renewal funding cannot be used to expand a CoC Renewal grant.
<p>Consolidation Process. What are the requirements and restrictions regarding consolidating project grants?</p>	<p>HUD did not make any changes to the Consolidation process in the FY 2024 CoC NOFO. For details of how to use the Consolidation process, please carefully review the section in the <i>Renewal Project Detailed Instructions</i> about consolidations. Here is a summary:</p> <p>To be eligible for consolidation, renewal projects must meet the following criteria:</p>

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	<ul style="list-style-type: none"> • The grant must be eligible for renewal and expire between December 31, 2024, and December 31, 2025. • The projects must have the same recipient as was previously awarded, or as amended. • The projects must have the same project component and project type (i.e., PH-PSH, PH-RRH, Joint TH/PH-RRH, TH, SSO, SSO-CE, or HMIS). <p>There are some restrictions for consolidations:</p> <ul style="list-style-type: none"> • Applicants are not allowed to use the consolidation process and expansion process within the same year. • A single renewal project may not be part of a consolidation and an expansion in the same application. If an applicant submits a renewal application that includes both consolidation and renewal, HUD will only accept the application as an expansion and reject the consolidation. • A project with an existing TH component project cannot consolidate or expand with a new or existing PH:RRH component project to create a Joint TH/PH:RRH component project. • YHDP Replacement projects cannot consolidate with another project type. • A Transition project cannot consolidate with another project until its next renewal application. <p>Although YHDP Renewal projects can consolidate with each other, a YHDP Renewal project cannot consolidate with a non-YHDP renewal. If your YHDP renewal projects can consolidate, all YHDP full grant number will have a “Y” as the 7th character.</p>
<p>Consolidation Process. Can a consolidated application be submitted under the “Submit Without Changes” Function (for a renewal application)?</p>	<p>Yes. The “Submit Without Changes” option is available for renewal applications associated with the consolidation. This option includes the surviving grant and the terminating grant(s).</p> <p>However, a renewal grant that contains a rental assistance line item that uses “actual” rents (instead of “fair market rents”) <u>cannot</u> use the “Submit Without Changes” option. In addition, any renewal projects that are permanent housing projects with leasing or operating line item(s) cannot "Submit Without Changes."</p>

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<p>Consolidation Process. What do the terms “surviving” and “terminating” mean in relation to the project applications? On the Renewal Grant Consolidation screen, question 2 asks for this information.</p>	<p>A “surviving” grant is the renewal grant with the earliest Period of Performance that is part of a request for renewal project consolidation. A “terminating grant” is the remaining grant(s) that will no longer exist if HUD approves the consolidation. Remember, project applicants must submit renewal applications for the individual projects to be included in the consolidation. Each project application must identify the grant number that will survive (which must be the grant number with the earliest start date in Calendar Year 2025).</p>
<p>Consolidation Process. If two or more renewal projects in a consolidation request have the same “earliest” start dates, which one should I use?</p>	<p>The renewal grant with the oldest and lowest Project Identification Number (PIN) should be identified as the surviving PIN to be entered into the <i>e-snaps</i> table.</p>
<p>Consolidation Process. How do applicants use the grant consolidation process to submit consolidated project applications?</p>	<p>To request the consolidation of eligible renewal projects, project applicants must submit renewal projects for each project to be included in the consolidation. Each project application must identify the grant number that will survive (which must be the grant number with the earliest start date in CY 2025).</p> <p>Project applications for the grants that are proposed to be part of the consolidation must be ranked with a unique rank number for each project. If all of those grants are selected for funding, HUD will conditionally award the single surviving grant based on its ranked position to include the amount of funding of all grants included in the consolidation. HUD will then remove all other project applications included in the surviving grant. As a result, the project applications that are below it will move up one ranked position.</p> <p>Project applicants must not submit a consolidated project application that contains two different components (e.g., permanent housing and Transitional Housing).</p> <p>To be eligible for renewal grant consolidation, each grant must be under the same applicant and be the same component. In addition, the grants must not have any serious operational issues as outlined in the FY 2024 CoC Program NOFO.</p>

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	<p>Be sure to complete the “Renewal Grant Consolidation” screen to request a consolidated renewal request. This screen is toward the beginning of the application screens and immediately follows the “Recipient Performance” screen. Question 1 will ask if the project application is requesting to be part of a renewal grant consolidation. If the applicant responds “Yes,” a series of questions regarding the consolidation will appear.</p>
<p>Consolidation Process. What screens do I need to complete for each renewal project to indicate it is part of a consolidation?</p>	<p>Begin by completing the “Renewal Grant Consolidation” screen. It follows the “Recipient Performance” screen. Question 1 asks if the project application is requesting to be part of a renewal grant consolidation. If the applicant responds “Yes,” a series of questions regarding the consolidation will appear.</p> <p>To identify the individual renewal grants to be included in a consolidation request, select the drop-down box that states “terminating.” Then, identify the grant that will be the consolidated grant as the “surviving” grant. When “surviving” is selected, the screen will ask for additional information for all the renewal grants that are being consolidated.</p> <p>The required information that must be completed for each screen includes the following:</p> <ol style="list-style-type: none"> 1. Project Identification Number (PIN). 2. Total Requested Amount. 3. Surviving PIN or Terminating PIN. 4. Operating Start Date. 5. Expiration Date.
<p>Consolidation Process. When will the start date of a consolidated project grant begin?</p>	<p>The start date for the consolidated grant, if conditionally awarded, will be the day after the expiration date of the eligible renewal project with the earliest expiration date. HUD will calculate the expiration date for the consolidated grant by averaging the expiration dates for all expiring grants included in the consolidated grant weighted by the size of each expiring grant. If that date falls on the first through the fifteenth of a month, then the expiration date will be the last day of the previous month. If the date falls on the sixteenth through the end of the month, then the expiration date will be the last day of the month. See the FY 2024 CoC NOFO for more details.</p>

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<p>Consolidation Process. Is a consolidated grant from last year considered a new or renewal grant for this year's competition?</p>	<p>A consolidated project grant from a prior year is a renewal project and not considered a new project. A consolidated project is the same as any renewal project in the current year's project application processes.</p>
<p>Consolidation Process. Can we include a renewal grant that we expanded last year into a consolidation for this year's competition?</p>	<p>Yes. Any renewal grant (including one that was expanded last year) that meets the criteria outlined in the FY2024 NOFO may be included in a project consolidation request.</p>
<p>How many projects can I consolidate?</p>	<p>Project applicants can consolidate two but no more than ten eligible renewal projects during the application process</p>
<p>Can two or more RRH projects be consolidated? What if one is a DV Bonus Project?</p>	<p>Yes, two RRH grants may be consolidated for the FY 2024 CoC competition. However, the beds and units that are part of the project funded by the DV Bonus must remain dedicated to the same subpopulation as in the original DV Bonus grant.</p> <p>The best way to keep track of these numbers is in the Project Description of the surviving grant, which is the grant with the earliest start date.</p>
<p>Can PSH projects with two types of rent be consolidated?</p>	<p>Yes, you can consolidate PSH projects with two different types of rental assistance. (both FMR and Actual rent) provided all Budget Line Items stay consistent with the GIW and you continue to serve the same amount of people as your previous application.</p> <p>When submitting the Project Application, you must complete two separate rental assistance line items on the renewal form Rental Assistance Budget Screen. If you want to have it as one, it will need to be all as Actual Rent, not FMR.</p>
<p>What if I want to include two or more projects in a consolidation application with the same operating start dates?</p>	<p>If the individual projects that are part of the consolidation have the same operating start dates, enter the oldest PIN as the terminating grant. For example, if AK0001 and AK0005 are both PH-PSH projects that are requesting consolidation approval and both projects have</p>

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	<p>the same operating start date of April 1, then AK0001 will be identified as the surviving PIN (lowest# and oldest PIN), and AK0005 will be identified as the terminating PIN (highest and newer PIN).</p>
<p>Is my renewal project eligible for consolidation?</p>	<p>To be eligible for consolidation, renewal projects must meet all four of the conditions below:</p> <ul style="list-style-type: none"> • The grant period must expire between December 31, 2024, and December 31, 2025. • The projects must have the same recipient. • The projects must have the same component and project type (i.e., PH-PSH, PH-RRH, Joint TH/PH-RRH, TH, SSO, SSO-CE, or HMIS). • The projects must not have any serious operational issues, as outlined in the FY2024 and FY 2025 Continuum of Care NOFO. <p>There are some restrictions.</p> <ul style="list-style-type: none"> • A TH project cannot consolidate with a PH:RRH project to create a Joint TH and PH:RRH project. • YHDP Replacement projects cannot consolidate with another project. • Transition projects cannot consolidate with another project. <p>While YHDP Renewal projects can consolidate with each other, a YHDP Renewal project cannot consolidate with a non-YHDP renewal</p>
<p>May I consolidate one or more projects that are transitioning?</p>	<p>No. If you are using the transition grant process you cannot consolidate (or expand) a project that is transitioning.</p>
<p>How many project applications do I need to submit for a consolidation?</p>	<p>A project applicant must submit one project application for each individual project to be consolidated. The project applicant will NOT submit a separate renewal project application that combines the project and budget information for all consolidating projects. If HUD approves the consolidation, HUD will conditionally award one grant that combines the budgets and project information for each project.</p>

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<p>How can I determine if a project has the same project and component type?</p>	<p>To consolidate two or more projects, the projects must have the same applicant and be of the same component and type. Using a Permanent Housing (PH) Project as example:</p> <ul style="list-style-type: none"> • The component is the first letters (PH), then the project type is after the dash (PSH). • A PH-PSH can only consolidate with another PH-PSH (not with a PH-RRH.) • It does NOT matter if one PH-PSH gets rent from the CoC program and the other PH-PSH gets leasing.
<p>How do I complete the consolidated project budget?</p>	<p>When consolidating two projects, each budget line item must match the sum of each of the projects specific budget line items. For example, the consolidated leasing budget line item should equal the sum of the leasing budget line items of Project 1 and Project 2.</p> <p>Applicants cannot shift funds in the project application from one BLI to another, unless that shift is less than 10 percent, this includes the consolidation application. Shifts in funds from one BLI to another that is 10 percent or more must be requested and approved through your local HUD CPD field office via a grant agreement amendment.</p> <p>In the project applications, we ask that you do not combine the budgets. We request that all budgets remain unchanged when you submit. If the consolidation is approved, HUD will combine the budgets under the “Surviving” grant.</p>
<p>Consolidation Process & UFAs. Do Unified Funding Agencies (UFAs) have any special requirements for project consolidations?</p>	<p>Collaborative Applicants designated by HUD as a Unified Funding Agency (UFA) have more flexibility in how they manage their CoC funded projects, making the consolidation of project applications unnecessary.</p> <p>A Collaborative Applicant with UFA designation may consolidate projects during the grant term, so long as the consolidations are not combining different component types and the projects are funded under the same grant (e.g., projects are currently funded under the same renewal grant). If a UFA-designated Collaborative Applicant consolidates projects during the grant term, it can apply to renew them during the FY 2024 CoC Program Competition as consolidated projects.</p>

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<p>Expansion Process. What has changed in the FY 2024 Expansion Process since the FY 2023 CoC competition?</p>	<p>As in previous years the CoC Program Competition will continue to allow applicants to request Expansion projects through the application process to expand an existing renewal project application as outlined in Section I.B.2.b.(9) of the NOFO by submitting a new project application, you will only submit the individual renewal project application and create and submit a separate new project application. The additional submission of a combined renewal project application is eliminated. The two projects must have the same component (e.g., both the new and renewal project applications are PH-PSH). NOTE: For the first time, YHDP renewals may now use the expansion process. For YHDP projects, the YHDP Renewal will apply as the “Stand-Alone Renewal” and the YHDP Reallocation will apply as the “Stand-Alone New” in the expansion process.</p> <p>Note: the same CoC Renewal or YHDP project may NOT be part of both a consolidation and an expansion in the same application. If a renewal is submitted for both consolidation and renewal, HUD will treat the application only as an expansion and reject the consolidation.</p>
<p>Expansion Process. Can I “expand” my CoC Renewal or YHDP Renewal project with a ‘New’ Expansion project and how is this accomplished in <i>e-snaps</i>?</p>	<p>For a regular CoC renewal and YHDP project, yes, as in previous years for CoC Renewals, applicants can apply for a new project that will expand an existing eligible CoC Program renewal project (Section I.B.2.b.(9) of the NOFO). The two projects must have the same component (e.g., both the new and renewal project applications are PH-PSH). YHDP Renewals follow the same process and rules, the only difference is the YHDP Reallocation is where the new expansion request is based for the YHDP expansion process.</p> <p>For the details of how to utilize the Expansion process, please review the expansion directions in the ‘Renewal Project Detailed Instructions’, the ‘New Project Detailed Instructions’, The YHDP Renewal and YHDP Replacement/Reallocation Detailed Instructions. The most critical instruction to understand is your renewal project application (CoC or YHDP) is submitted individually and then a new project application(s) is submitted separately. AND each of those separate applications MUST correctly identify each other in <i>e-snaps</i> questions as being part of your expansion request for the other application. If awarded, HUD will combine these two applications into one project in the post-award process. Please ensure that budgets and proposed numbers of units, people to be served, etc. are not duplicated between the Stand-alone New and Stand-alone Renewal applications, in</p>

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	<p>order to ensure the accuracy of the final project.</p> <p>For basic <i>e-snaps</i> guidance see “Renewal Expansion Screen” to enter a Stand-Alone Renewal Application. Applicants must complete the questions as requested in e-snaps including correctly identifying this project’s name and PIN number of this renewal application. The PIN number should match the current renewal project you are entering.</p> <p>For entering a Stand-Alone New Application(s), in either the CoC New Application or YHDP Reallocation Application, you must complete the questions on <i>e-snaps</i> “Screen 3C Project Expansion Information.” Enter the project name (preferably, the same or close to the name of the renewal project with “Expansion” added at the end. Enter the renewal project name and PIN of the renewal application (see above) that will be expanded through this new project application(s). Answer the remaining questions on Screen 3C.</p> <p>As a reminder, expansion projects are only eligible when associated with an existing CoC-funded renewal project. Projects that do not receive CoC program funds that wish to expand will need to apply as a separate new project.</p> <p>NOTE: For YHDP projects, YHDP expansion projects are only eligible when associated with an existing YHDP Renewal project. A YHDP Reallocation cannot be used to expand upon an existing CoC Renewal project or a YHDP Replacement project.</p>
<p>Expansion Process. What projects are eligible for the expansion process?</p>	<p>In the FY 2024 CoC Program Competition, the expansion process applies to a current CoC-funded renewal project that is one of the following project types: PH-PSH, PH-RRH, JOINT TH & PH-RRH, SSO-CE, and HMIS. For YHDP projects, the eligible project types are: PH-PSH, PH-RRH, TH, JOINT TH & PH-RRH, SSO Non-CE, and HMIS.</p> <p>An example of an eligible expansion project is a new CoC or YHDP-funded PH-PSH project that proposes to expand the number of units and beds to serve more people in an existing CoC or YHDP-funded project.</p>

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	<p>The expansion process cannot propose providing existing program participants with the same level of housing and services funded through the CoC Program. Therefore, an expansion project must meet at least one of the following criteria:</p> <ol style="list-style-type: none"> a. serve new program participants that meet the HUD definition of homelessness. For YHDP, the project must continue to serve 100% youth participants. b. provide existing program participants with an expanded level of CoC-eligible services. c. provide existing program participants with facilities that meet health and safety standards. d. provide the same activities that are CoC Program-eligible but were previously paid for by a different eligible non-renewable source. Applicants are prohibited from using CoC Program funds to replace state or local funds previously used, or designated for use, to assist homeless persons; for more information refer to 24 CFR 578.87(a). e. provide expanded coordinated entry services to new and existing program participants, only eligible for SSO-CE. f. provide expanded HMIS activities within the CoC's geographic area (HMIS grants only).
<p>Expansion Process. Are other projects not funded by the CoC Program eligible for expansion?</p>	<p>No. Projects that do not receive CoC Program funds that wish to expand will need to apply as a separate new project. An existing non-CoC-funded PH-PSH project is not eligible for an expansion project. The applicant would need to submit a separate new project, not an expansion project.</p>
<p>Transition Process. What is a transition project and how do I apply for a transition project?</p>	<p>A transition project is a request to transition eligible renewal project(s) from their original component(s) to another eligible component. Eligible components for new projects in the transition process are PH-PSH, PH-RRH, Joint TH and PH-RRH, SSO-CE, and HMIS. See Section I.B.2.b(24) (reallocation) and Section 1.B.2.b(30) (transition grant) of the NOFO for additional information and requirements, including notification to the CoC of your organization's intent to use the transition grant process.</p> <p>For a new project to be considered a transition grant, the new project applicant must be the recipient listed on the current grant agreement for the eligible renewal grant(s) being</p>

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	<p>eliminated and must include the grant number(s) of the project(s) being eliminated to create the new project and attach a copy of the most recently awarded project application (most projects will attach a copy of the FY 2023 CoC Program Competition project application).</p> <p>To apply for a transition project, an applicant and CoC must choose to fully reallocate the renewal project(s) funds that will transition to the new component. Then, the applicant must submit it as a new project application in following the New Project Detailed Instructions for new project application data entry into <i>e-snaps</i>.</p>
<p>Transition Process. How do renewal project applicants designate a project application as a transition grant in <i>e-snaps</i>?</p>	<p>To designate a project application as a transition grant in <i>e-snaps</i>, go to the new project application, then go to Screen 3A Project Detail. Question 7 asks if the project is applying as a transition project. A “Yes” response will open additional questions specific to a transition project. Transition projects must list the expiring grant number(s) involved in the transition and must attach a copy of the most recently approved project application(s) on Screen 7A. (e.g., if the expiring project was last funded in the FY 2023 CoC Program Competition, attach a copy of the FY 2023 CoC Program Competition project application).</p> <p>In question 7b of screen 3A, the project applicant must provide a description that addresses the scope of the proposed transition from the expiring component to the new component during the first year of operation. Provide a detailed description of how the project will be transitioned from the renewal project to the new project. The description must include:</p> <ol style="list-style-type: none"> 1. How the project will strategically wind down the eliminated project. 2. How the project will ensure existing program participants in the eliminated project do not become homeless and will be assisted in obtaining permanent housing, while the project increases activities in the new component; and 3. The estimated timeline, within the 1-year grant period, that the project will be fully operating as the newly awarded component. <p>Note: If you are requesting to use the transition grant process you cannot simultaneously Consolidate and/or Expand a renewal project that is transitioning.</p>
<p>Transition Process. When is the operating start date for a transition project?</p>	<p>The operating start date of a transition project conditionally awarded in the FY 2024 CoC Program Competition will be the day after the end of the previous grant term for the</p>

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	<p>expiring component, i.e., the transition project will have the same operating year as the expiring component project.</p> <p>For transition projects reallocated from more than one project, the operating start date will be the day after the end of the earliest expiring grant term. The grant term may be extended consistent with 2 CFR 200.308 and 2 CFR 200.309. By the end of the operating year for which FY 2024 funds were awarded, the transition grant must be fully operating under the new component and will be eligible to apply for renewal in the next CoC Program Competition under the component to which it transitioned.</p>
<p>Transition Process. How long does a transition grant have to fully transition to the new eligible activities?</p>	<p>Transition grants conditionally awarded in the FY 2024 CoC Program Competition will have one year to fully transition from the original component to the new component during the normal operating year (e.g., April 1, 2025, through March 31, 2026) once the grant agreement is executed.</p>
<p>Transition Process. Does a recipient need to obtain approval from a CoC to apply for a transition grant?</p>	<p>Yes, due to the need the renewal portion of a transitioning project to be fully reallocated to be eligible to receive a transition grant, the recipient must have the approval of its CoC as they will need to rank the new transition project on the New Project Listing in the FY 2024 CoC Priority Listing.</p>
<p>Transition Process. Can a recipient ‘transition’ renewal projects to create a new project that replaces two existing renewals of different components into a third component? In other words, if a recipient has one TH grant and one RRH grant, can a CoC fully reallocate both grants to create a new Joint TH/RRH project?</p>	<p>Yes, a recipient may transition up to two projects with differing components into one project for a transition grant. Please be aware of the Transition grant processes for ‘transitioning’ more than one grant, specifically the operating start date is critical. To meet the requirements HUD will consider the following as CoC consent for the transition grant:</p> <ol style="list-style-type: none"> 1. The project application identifies the project as a transition project. 2. The CoC ranks the new transition grant project on the New Project Listing in the FY 2024 CoC Priority Listing. <p>If HUD determines a new project submitted as a transition grant does not qualify but meets all other new project requirements, HUD may award the project as a new non-transition grant project. If this occurs, the recipient will not be permitted to expend any FY 2024 funds until the new project grant agreement is executed by the local HUD field office.</p>

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Match	
<p>What is “Match” for a CoC project application and how should it be included in an application?</p>	<p>Statutory provisions of the McKinney-Vento Homeless Assistance Act require recipients of CoC Program funds to “match” a portion of the CoC funds they receive for all budget categories except the leasing budget category. Simply put, “match” is the non-federal share of costs that the recipient is required to contribute to accomplish the purposes of the grant.</p> <p>Match in the CoC Program can be actual cash or in-kind resources contributed to the grant. All costs paid for with matching funds must be for activities that are eligible under the CoC Program, even if the recipient is not receiving CoC Program grant funds for that activity.</p> <p>The CoC Program requires a 25 percent match of the awarded grant amount minus funds for leasing. Another way to state this is that the leasing budget line item in <i>e-snaps</i> is not included in the grant’s match calculation. Cash or in-kind resources will satisfy the match requirement.</p>
<p>Is the CoC program match requirement specific to each project application?</p>	<p>Yes, for CoCs that have more than one recipient, each grant recipient must provide match on a grant-by-grant basis. However, when a CoC has been designated with Unified Funding Agency (UFA) status or is identified as sole grant recipient, in those instances, matching funds may be provided by the recipient/UFA on a CoC-wide basis. For reference, refer to the CoC Interim Rule at 24 CFR 578.73.</p>
<p>Can program income be used as cash match for a project application?</p>	<p>Yes. Although the CoC Program Interim Rule does not directly state whether program income is an eligible source of match, it has been determined to be eligible to be used as match until a permanent decision regarding this provision is made. Until that time, CoC Program grant recipients will be permitted to count program income as match as determined by the corresponding congressional appropriation, which includes funding under the FY 2024 CoC NOFO.</p>

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<p>Match. What are HUD’s requirements for documentation of third-party in-kind match contributions in the project application?</p>	<p>The CoC Interim Rule at 24 CFR 578.73(c)(3) requires that in-kind services, to be provided by a third party, be documented by a memorandum of understanding (MOU), or equivalent document, between the recipient (or subrecipient) and the third party. This MOU must be provided before grant execution.</p> <p>In the Sources of Match Detail Screen in <i>e-snaps</i>, if the applicant has selected “Yes” in response to question 1 on Screen 6I (New Projects) or 6D (Renewal), a Screen 7A will appear to attach the MOU. Note: screen 7A only appears if the applicant has selected “Yes” in response to question 1 on Screen 6I (New Projects) or 6D (Renewal).</p> <p>HUD strongly recommends that project applicants attach the MOU to the application in <i>e-snaps</i> if available at the time of application. If project applicants do not attach an MOU that documents in-kind match HUD will place a condition on the project. If selected for a conditional award, the project applicant must provide the MOU to their HUD field office representative before the grant agreement execution. This issue may cause a delay in grant agreement processing.</p>
<p>Match from Program Income. Can program income be as match, and are project applicants required to provide any information as part of their project application?</p>	<p>Yes. Although the CoC Program Interim Rule does not directly state whether program income is an eligible source of match, it has been determined to be eligible to be used as match until a permanent decision regarding this provision is made. Until that time, CoC Program grant recipients will be permitted to count program income as match, If your project expects to use program income as match, complete questions 1, 1a. and 1b on the Match screen in <i>e-snaps</i>.</p>
<p>Match. Can ESG be used as match for a CoC project?</p>	<p>Yes, Emergency Solutions Grant (ESG) and ESG-CV funds may be used as a match for the CoC Program if the matching funds are contributed to the CoC Program and expended for the recipient's or subrecipient’s allowable CoC Program costs, and all other CoC Program requirements are met. For example, as indicated in the CoC Program interim rule at 578.75(b), housing leased with CoC Program funds, or for which rental assistance payments are made with CoC Program funds must meet the applicable housing quality standards (HQS) under 24 CFR 982.401.</p>

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	<p>Match is actual cash or in-kind resources contributed and expended on eligible CoC Program costs. According to 578.73 of the CoC Program interim rule, CoC Program recipients or subrecipients must match all grant funds (except for leasing funds) with No less than 25 percent of funds or in-kind contributions from other sources. Match resources may be from public (not statutorily prohibited from the funding agency) or private resources. Recipients are responsible for determining if non-program sources are eligible to be used as a match for the CoC Program.</p> <p>Keep in mind that ESG funds must be used for allowable ESG Program costs and must meet all other ESG Program requirements. For allowable ESG/ESG-CV HMIS program costs, be sure to review section 576.107 of the ESG Program Interim Rule and any alternative requirements established by Notice CPD-21-08, Section III.E.4.</p>
<p>Match. Under which circumstances can Medicaid be used as match in CoC Program-funded projects?</p>	<p>A Project Applicant can use the value of services reimbursed through Medicaid as the match in your renewal project if the Medicaid services are contributed to the project directly (e.g., if the project has one or more staff persons who provide services to program participants and those services are funded through Medicaid). Count the value of the match; the applicant must demonstrate that the services are being contributed directly to the project. The match can be done through a Memorandum of Understanding (MOU) or contract with a partner organization that provides services reimbursed through Medicaid to program participants. The Project Applicant should attach the MOU or commitment letter to the application on Screen 7A in <i>e-snaps</i> “In-Kind MOU Attachment,” if available at the time of project application.</p> <p>If the Medicaid services are not being contributed to the project, meaning they are being provided directly to program participants regardless of their participation in the CoC Program project, or there is No MOU or contract in place, then these Medicaid services cannot be considered a match for the project.</p> <p>Several resources provide general information on the match requirements and how in-kind services should be handled. Please refer to the following:</p> <ul style="list-style-type: none"> • Section 578.73(c)(1) of the CoC Program interim rule – “The recipient or subrecipient may use the value of any real property, equipment, goods, or services

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	<p>contributed to the project as match, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible under Subpart D, or, in the case of HPCs, eligible under 578.71.”</p> <ul style="list-style-type: none"> • The Importance of Documenting Match Under the CoC Program Podcast. The podcast is available on HUD Exchange and includes both audio and a transcript at: https://soundcloud.com/hudexchange/importance-of-documenting-match-under-the-coc-program https://files.hudexchange.info/resources/documents/CoC-Importance-of-Documenting-Match-Transcript.pdf
DedicatedPlus	
<p>If a renewal project is already 100% dedicated to serving chronically homeless persons, can we change the project to DedicatedPLUS in a renewal application?</p>	<p>Yes, Project applicants may change any eligible renewal project that is currently 100% dedicated to DedicatedPLUS in the CoC Program renewal application in <i>e-snaps</i> without an amendment by using the single drop-down on Screen 3C and selecting “DedicatedPlus.” However, these projects cannot begin serving program participants under the DedicatedPLUS definition until the FY 2024 grant begins.</p>
<p>What is a DedicatedPlus project?</p>	<p>A DedicatedPLUS project is a permanent supportive housing (PH-PSH) project where the entire project will serve individuals and families that meet one of the following criteria at project entry (See also Section I.B.2.b(5)) of the FY 2024 CoC Program Competition NOFO):</p> <ol style="list-style-type: none"> 1. Experiencing chronic homelessness as defined in 24 CFR 578.3. 2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project. 3. Residing in a place not meant for human habitation, emergency shelter, or Safe Haven and had been admitted and enrolled in a permanent housing project within the last year but were unable to maintain a housing placement and met the definition of chronic homeless as defined in 24 CFR 578.3 prior to entering the project. 4. Residing in transitional housing funded by a Joint Transitional Housing (TH) and Permanent Housing-rapid rehousing (PH-RRH) (Joint TH and PH-RRH) component

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	<p>project and who were experiencing chronic homelessness as defined in 24 CFR 578.3.</p> <ol style="list-style-type: none"> 5. Residing and has resided in a place not meant for human habitation, Safe Haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions and the individual or head of household meet the definition of “homeless individual with a disability”: or 6. Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system. <p>A renewal project where 100 percent of the beds were dedicated to chronically homeless individuals and families, as described in Section I.B.2.b(5) of the FY 2024 CoC Program Competition NOFO may either become a DedicatedPLUS project or may continue to dedicate 100 percent of its beds to chronically homeless individuals and families. If a renewal project that has 100 percent of its beds dedicated to chronically homeless individuals and families elects to become a DedicatedPLUS project, the project will be required to adhere to all fair housing requirements in 24 CFR 578.93.</p> <p>Also noted in Section I.B.2.b(5) of the FY 2024 NOFO, projects that were awarded DedicatedPLUS in a previous CoC Program Competition are required to include households with children to qualify as a DedicatedPLUS project.</p>
<p>For DedicatedPLUS projects, are there any requirements for how recipients must prioritize households for assistance, including if there are No households meeting the eligibility requirements outlined in the NOFO?</p>	<p>Yes, some requirements exist for prioritizing households in DedicatedPLUS projects. This response explains how to prioritize eligible households in DedicatedPlus Projects and then explains prioritizing in DedicatedPLUS projects when there are not any eligible households.</p> <p>Prioritizing Eligible Households in DedicatedPlus Projects: HUD's option of DedicatedPLUS provides CoCs with more flexibility to serve vulnerable populations and to more effectively and more immediately address the needs of persons experiencing chronic homelessness, at risk of experiencing chronic homelessness, or who were chronically homeless prior to being housed and who have recently become homeless again. In general, households that meet any of the criteria in Section I.B.2.b(5) of the FY 2024 CoC Program NOFO may be served in any order established by the CoC, though the CoC must</p>

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incorporate any orders of priority into their written standards for prioritizing assistance in PSH. When making changes to their written standards, HUD encourages CoCs to continue adopting prioritization standards based on the length of time a potential program participant resided on the streets, in an emergency shelter, or in a safe haven along with the severity of their service needs.

For dedicated PSH beds—as defined in Section I.B.2.b(5) of the FY 2024 CoC Program NOFO—CoCs must follow existing CoC written standards for prioritizing assistance for persons experiencing chronic homelessness in those beds (i.e., if the CoC has adopted the orders of priority in Notice CPD-16-11, the recipient will be required to fill these dedicated beds consistent with section III.A of that Notice).

Prioritizing in DedicatedPLUS Projects When There Are No Eligible Households:
Consistent with HUD's expectations for recipients of dedicated permanent supportive housing (PSH) projects, recipients of DedicatedPLUS projects will be expected to exercise due diligence when conducting outreach and assessment to locate and engage eligible households as outlined in Section I.B.2.b(5) of the FY 2024 CoC Program NOFO. HUD recognizes that some persons might require significant engagement and contacts prior to their entering or re-entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH. However, please note that street outreach providers are expected to continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and recipients of DedicatedPLUS projects should be following a Housing First approach to the maximum extent practicable.

At the point in which a vacancy occurs, if there are No eligible households identified who are ready to accept assistance, recipients should consider the following:

- Where there are No chronically homeless persons identified, Dedicated PSH beds included in DedicatedPLUS projects may fill the vacancy either in accordance with section III.B.1.(b)-(d) of Notice CPD-16-11 or households eligible for DedicatedPLUS as outlined in Section III.A.3.d of the NOFA. The CoC must document how these beds will be prioritized in the event of such a vacancy in the CoC's written standards.

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	<ul style="list-style-type: none"> • Where there are No persons meeting the eligibility criteria for DedicatedPLUS as outlined in Section I.B.2.b(5) of the FY 2024 CoC Program Competition NOFO, recipients are encouraged to follow the order of priority outlined in section III.B.1.(b)-(d) of Notice CPD-16-11 to fill any vacancies. https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/ • At a minimum, the CoC should consider the total length of time the potential program participant has been residing in a place not meant for human habitation, emergency shelter, or safe haven and the severity of service needs. The CoC must document how these beds will be prioritized in the event of such a vacancy in the CoC's written standards. • The recipient must always continue to prioritize households that are eligible for DedicatedPLUS (and dedicated PSH, if applicable). This means that anytime there is a new vacancy, the recipient must always first seek to fill it with an eligible household even if it was most recently used to serve a household that would not otherwise be eligible due to the circumstances outlined above. <p>The recipient of DedicatedPLUS PSH projects must maintain records to document efforts to locate persons meeting the eligibility criteria in Section I.B.2.b(5) of the FY 2024 CoC Program NOFO. Ideally, the CoC should have comprehensive and high-quality data on all households that are currently presenting for assistance within the CoC that is informed by a comprehensive outreach strategy. To justify serving a non-eligible household, a recipient of DedicatedPLUS projects must have documentation from the CoC that demonstrates that outreach is occurring regularly and that the CoC is making reasonable efforts to locate and identify all persons experiencing homelessness within the community.</p>
Solo Projects (including solo project appeals)	
<p>What is a Solo Applicant?</p>	<p>A Solo Applicant is a project applicant that: (1) has a project application that was rejected during the local CoC competition prior to the close of the annual CoC Program Competition, (2) believes that it was denied the right to participate in the CoC's planning process and (3) wants to submit the application to HUD anyway.</p>

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<p>How can a Solo Applicant apply for funding?</p>	<p>A project applicant may submit a Solo Application during the CoC Program Competition when the applicant attempts to participate in the CoC’s planning process and believes it was denied the right to participate in a reasonable manner. In such a case, the Solo Applicant may apply for a project grant to HUD but only if HUD determines that the Solo Applicant was not reasonably permitted to participate in your CoC’s planning process.</p> <p>To apply as a solo applicant, the project applicant must submit a Solo Applicant Project Application in <i>e-snaps</i> by the application submission deadline. Additionally, the solo applicant, Collaborative Applicant, and HUD must take the following steps (See 24 CFR 578.35 for more information):</p> <ol style="list-style-type: none"> 1. Written Notice of Intent to Appeal. The solo applicant must submit a written notice of intent to appeal, with a copy to the CoC, with their funding application. 2. No later than 30 days after the date that HUD announces the awards, the solo applicant shall submit in writing, with a copy to the Collaborative Applicant, all relevant evidence supporting its claim. The submission shall be emailed to snapsappeals@hud.gov. 3. The CoC shall have 30 days from the date of its receipt of the solo applicant’s evidence to respond to HUD in writing, with a copy to the solo applicant. The submission shall be emailed to snapsappeals@hud.gov. 4. HUD will notify the solo applicant and the CoC of its decision within 60 days of receipt of the CoC’s response. 5. If HUD finds that the solo applicant was not permitted to participate in the CoC planning process in a reasonable manner, then HUD may award a grant to the solo applicant when funds next become available and may direct the CoC to take remedial steps to ensure reasonable participation. <p>Note: This process is not for project applicants and CoC Collaborative Applicants who are appealing an award decision by HUD after applications have been submitted. Entities seeking an award decision appeal must follow the instructions in the NOFO for the applicable CoC Program Competition.</p>
<p>Submit Without Changes in <i>e-snaps</i></p>	

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

A CoC project's FY 2024 renewal project information must match the FY 2023 renewal project application unless HUD required changes to the grant before grant agreement execution, or if the recipient requested and received a grant agreement amendment.

If a project does not have changes from the FY 2023 submission, it can be submitted as a FY 2024 renewal project application with No changes (other than those required annually). If a project is a first-time renewal, the applicant must complete the entire renewal project application.

An applicant cannot use the “submit without changes” process if:

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

Ensure that the FY 2024 renewal project application mirrors the final HUD-approved information in either the grant agreement or grant agreement amendment.

Data can be imported (brought forward) into a FY 2024 renewal project application from a FY 2023 new or renewal project application. However, it is important to understand that the imported data will be exactly as it was submitted in the FY 2023 project application and will not show any updates to a project application that occurred in FY 2023 *e-snaps* Post Award (C1.9a) or any *e-snaps* amendment data from (C1.9b). For a project application that did not import last year's FY 2023 information, *e-snaps* will automatically be set to “Make Changes” and all questions on each screen must be updated.

Then, navigate to the Submit Without Changes Screen in *e-snaps*.

1. Are the requested renewal funds reduced from the previous award due to reallocation?
 - Select: Yes, if this renewal project will be submitted with a reduced budget from the previous award due to a partial reallocation. No, if the budget information is the same as the previous Competition year.
2. Do you wish to submit this application without making changes? Required.

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- Select “Submit without Changes” if no changes are needed from the previous year’s application submission reviewed and approved by HUD. This will leave Parts 2 through 6 of the application in read-only mode and indicates to HUD that you have not made changes and are requesting to renew your project application per the project details as imported from your prior year’s new or renewal project application into the FY 2024 project application.
 - Select “Make Changes” if you did not import last year’s application data; this question will automatically be set and cannot be edited. If you need to make changes due to a condition(s) placed on last year’s application that impacts the renewal information (e.g., BLIs, 100 percent dedicated beds, population); or executed grant agreement amendment affecting the renewal project information.
3. Specify which screens require changes by clicking the checkbox next to the name and then click the “Save” button: This screen has a list that includes all the screens available to your project in Parts 2 through 6. Select the checkboxes for each screen where you will make changes. Once “Save” is selected, the check-marked screen(s) will be available for edit. As needed, the following description of changes is required. If you checked a box in error, and did not actually make any changes, explain this in the text box.

You have selected “Make Changes” to Question 2 above. Provide a brief description of the changes that will be made to the project information screens (bullets are appropriate). Enter a description of the changes being made to this renewal application and include the reason (e.g., result of a condition placed by HUD on last year’s project, due to an executed grant agreement amendment).

The following *e-snaps* screens can be edited for required annual updates and do not affect your ability to “Submit without Changes:”

- Submission Without Changes Screen
 - Questions 1 and 2
- Recipient Performance Screen
 - Review and update all questions.
- Renewal Grant Consolidation or Renewal Grant Expansion Screen
 - Question 1

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	<ul style="list-style-type: none"> • 3A. Project Detail Screen <ul style="list-style-type: none"> ○ Question 2b • 6A. Funding Request Screen <ul style="list-style-type: none"> ○ Questions 1, 2, and 6 • 6D. Sources of Match Screen <ul style="list-style-type: none"> ○ Update match amount / match type if needed. • 6J. Summary Budget Screen • 7A. Attachments Screen <ul style="list-style-type: none"> ○ See checklist to determine if you need to include an attachment(s) • 7B. Certification Screen <ul style="list-style-type: none"> ○ Review all information on the screen and certify. <p>4. All other screens in Part 2 through Part 6 are “Read-Only” and should be reviewed for accuracy, including any updates that were made to the 2023 project during the CoC Post Award Issues and Conditions process or as amended. If all the imported data is accurate and No edits are needed to any screens other than the mandatory screens and questions noted above, you should select “Submit Without Changes” in Part 8. If you imported data and need to make updates to the information on one or more screens, navigate to Part 8: “Submission Without Changes” Screen, select “Make Changes,” and check the box next to the screen title(s) to unlock the screen(s) for editing. After you select the screen(s) you want to edit, click “Save” and the screen(s) will be available for editing. Once you check a box and click “Save,” you cannot uncheck the box.</p>
Subrecipients	
<p>Can a project subrecipient submit a Project Application in <i>e-snaps</i> on behalf of the Applicant?</p>	<p>No, a subrecipient cannot submit a project application. The direct recipient (applicant) organization and authorized representative are legally responsible for submitting a project application in <i>e-snaps</i>.</p> <p>However, the project subrecipient may assist in entering data into the project application in <i>e-snaps</i>. To assist in completing the project application, the applicant’s Authorized Representative must give the project subrecipient access to the project application (i.e.,</p>

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	<p>must add the person as a ‘registered user’ who is associated with the application). HUD will not award funding to projects if the project application refers to the subrecipient organization as the project applicant.</p> <p>Refer to the ‘Adding and Deleting Registrants’ resource for instructions – https://files.hudexchange.info/resources/documents/Give-Staff-Access-to-Your-Organizations-e-snaps-Account.pdf</p>
<p>Does an applicant need to list all the subrecipient information in <i>e-snaps</i> for its application?</p>	<p>If a project application includes one or more subrecipients that will perform some (or all) of the activities, the applicant must include the subrecipient(s) information on this screen and attach a copy of the subrecipient(s) nonprofit documentation on the Attachment. If a project will not include subrecipient(s), an applicant should not enter data on this screen.</p>
<p>What is the difference between a subrecipient and a contractor?</p>	<p>For more information on the use of subrecipients and the difference between a subrecipient and a contractor, review the definition in 24 CFR 578.3, recipient responsibilities in 24 CFR 578.23(c)(4), and the Characteristics Indicative of a Subrecipient in the July 24, 2015: Using Contractors in ESG and CoC Programs located on the HUD Exchange.</p>
<p>Can a project subrecipient be a “for-profit” entity?</p>	<p>No. For-profit entities are not eligible to be Project Applicants or subrecipients.</p>
Tribes & Tribally Designated Housing Agencies	
<p>Are Indian tribes and Tribally Designated Housing Entities (TDHEs) eligible to apply for a project grant in the FY 2024 CoC NOFO?</p>	<p>Yes. Eligible applicants include Indian tribes and Tribally Designated Housing Entities (TDHEs), as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103). Such tribal agencies should contact their local CoC and can apply for projects in the same way as any other applicant in their CoC. Please note that tribes and TDHEs are eligible to apply for projects within the CoC’s registered geography regardless of whether the tribal entity participated in the CoC’s registration process.</p>

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<p>Are there any special or different procedures for Indian tribes or TDHEs applying for a project grant in the FY 2024 CoC competition?</p>	<p>No, all eligible project applicants, including tribes and TDHEs, use the same application process. Please refer to the Project Application Detailed Instructions for more information. The project application in <i>e-snaps</i> includes a few items (such as a drop-down menu) where the applicant will need to indicate that it is a tribal agency. For more details on how to apply for a project, consult the FY 2024 CoC New Project Application Detailed Instructions.</p>
<p>What is a Tribally Designated Housing Entity (TDHE)?</p>	<p>A TDHE is defined in Section 4 of the Native American Housing and Self-Determination Act of 1996 (24 U.S.C 4103). The Consolidated Appropriations Act of 2021 included language allowing the participation of Indian Tribes and Tribally Designated Housing Entities (TDHEs) in the CoC Program, which is one of two primary federal funding programs to address homelessness.</p>
<p align="center">YHDP Renewal and YHDP Replacements Project Applications</p>	
<p>How should our Youth Homeless Demonstration Project (YHDP) recipients that are renewing in the CoC Competition apply?</p>	<p>Youth Homeless Demonstration Project (YHDP) recipients should contact their YHDP desk officer at HUD headquarters to determine if a project is eligible to be renewed in the current FY 2024 CoC Program Competition. For information on how to apply for the YHDP renewal, go to the HUD.gov FY 2024 CoC Competition website for the YHDP Detailed Instructions and <i>e-snaps</i> Renewal YHDP Navigational Guide.</p> <p>https://www.hud.gov/program_offices/comm_planning/coc/competition</p>
<p>If YHDP applicants apply for renewal funding under an incorrect funding opportunity in the FY 2024 CoC Program Competition, could this affect the CoC's overall funding?</p>	<p>Yes. Requesting renewal funding for a Youth Homeless Demonstration Project (YHDP) project incorrectly could have adverse consequences on the CoC's overall funding request.</p> <p>YHDP applicants must use <i>e-snaps</i> to create renewal project applications and must select YHDP Renewal Project Application from the Funding Opportunity screen options in <i>e-snaps</i>. See the How to Access the Project Application guide for more details. If recipients submit renewal projects under incorrect funding opportunities, the following steps must be taken to remedy the problem:</p> <ol style="list-style-type: none"> 1. The YHDP renewal project applicant must inform their CoC they submitted the renewal project under the incorrect funding opportunity.

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	<ol style="list-style-type: none"> 2. The YHDP renewal project applicant must submit a new renewal project application under the YHDP Renewal Project Application funding opportunity. 3. The CoC must reject/remove the original project applied for under the incorrect funding opportunity. 4. The CoC reviews the renewal project applied for under the correct funding opportunity, based on actions in step 2 of this list, which placed the renewal project on the YHDP Project Listing.
<p>Who can apply for the YHDP Replacement funding opportunity?</p>	<p>Only Youth Homeless Demonstration Project (YHDP) communities with a YHDP Renewal project that is eligible to be replaced can apply for the YHDP Replacement funding opportunity. The YHDP Replacement funding opportunity is a funding mechanism to allow YHDP communities to replace old YHDP projects with new YHDP projects. See Section I.A.3.d(2) of the FY 2024 CoC Program NOFO for more information.</p>
<p>What is the YHDP Replacement funding opportunity?</p>	<p>The Youth Homeless Demonstration Project (YHDP) Replacement funding opportunity is a funding mechanism to allow YHDP communities to replace old YHDP projects with new YHDP projects. See Section I.A.3.d(2) of the FY 2024 CoC Program NOFO for more information. In the past, YHDP communities have not been able to replace under-performing projects (i.e., projects that have not been able to meet system performance measures as set by the CoC and HUD). The YHDP Replacement funding opportunity allows YHDP communities to replace under-performing projects and apply for projects that have shown more success in their communities or innovative projects that have not been seen in the community before.</p>
<p>How does the YHDP Replacement funding opportunity work?</p>	<p>A Youth Homeless Demonstration Project (YHDP) Replacement project application must replace a YHDP Renewal project. An applicant cannot apply for a YHDP Replacement project and maintain all their YHDP Renewal projects. <u>At least one</u> YHDP Renewal must be replaced. Multiple YHDP Renewals can be replaced and combined under one YHDP Replacement. Additionally, one YHDP Renewal can be replaced and create multiple YHDP Replacement projects. <u>In all instances, the recipients must be the same and the total budgets must match.</u></p>

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	<p>YHDP Project applicants do not have to go through reallocation to apply for the YHDP Replacement project. Project applicants can apply under the YHDP Replacement funding opportunity, select “YHDP Replacement” on screen 3A, and ensure on screen 6A that “YHDP Replacement” has been selected as the funding type. Once this has been confirmed and all other project application questions have been answered, you may submit the project. If an application is submitted for both a YHDP Replacement and the YHDP Renewal being replaced, HUD HQ will determine which project will be awarded. Only one will be awarded, never both.</p> <p>A YHDP Replacement cannot request more funding than what the YHDP Renewal was awarded for in the most recent CoC competition. For example, if the YHDP PSH Renewal had a total budget of \$100,000 the YHDP Replacement can apply for up to \$100,000. The YHDP Replacement can apply for less than \$100,000, but it cannot apply for more.</p> <p>YHDP Replacement projects can apply for component types and conduct services that are currently allowed under the Youth Demo program. Please refer to Section I.A.3.d(2) of the FY 2024 CoC Program NOFO for more details. In addition, YHDP Replacement projects can only apply for 1-year grant terms.</p>
<p>I have a YHDP Renewal that I need to make changes to, will these changes require me to apply as a YHDP Replacement instead?</p>	<p>Not necessarily. Under the FY 2024 CoC Competition, minor changes to a Youth Homeless Demonstration Project (YHDP) Renewal project, such as small Budget Line Item (BLI) shifts, small unit configuration or small shifts to populations being served are allowed this year under the YHDP Renewal application. Additionally, YHDP Renewals may now add or remove Special YHDP Activities without the need for applying as a YHDP Replacement.</p> <p>However, if your project plans on making significant project changes such as a change in component or subtype, , major changes to the project description, large BLI shifts, etc.; then you will need to apply as a YHDP Replacement.</p>
<p>Can I reallocate my YHDP grant to a new project that doesn’t serve youth?</p>	<p>No. If a new project is being created with reallocated funds that were originally awarded to a YHDP project, the new project must continue to serve the same population as the project being reallocated. See Section I.A.3.c of the NOFO for more information.</p>

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<p>Can YHDP Renewal Projects Reallocate in the FY24 Competition?</p>	<p>Yes, a YHDP Renewal project can now reallocate in the FY 2024 CoC Competition. However, there are restrictions on what this project can be reallocated into. YHDP Renewals can only be reallocated into another YHDP project. This project will be known as a YHDP Reallocation. See Section I.A.3.c of the NOFO for more information.</p>
<p>What makes YHDP Reallocations different from YHDP Replacements?</p>	<p>This is a great question, and there are many similarities between YHDP Reallocation and YHDP Replacement projects. However, the two major differences are that YHDP Reallocations can change the applicant from the YHDP Renewal being reallocated, while YHDP Replacements cannot change the applicant from the YHDP Renewal being replaced. Additionally, YHDP Reallocations can apply to be a part of the Expansion process, but YHDP Replacements cannot.</p>
<p>Do I need to rank my YHDP projects this year?</p>	<p>No, you will not be required to rank your YHDP projects in the FY24 competition. All YHDP projects will be awarded noncompetitively. You will still need to list all YHDP projects on the Priority Listing.</p>
<p>Are YHDP projects eligible to use the expansion process?</p>	<p>Yes, under the FY24 competition, YHDP projects may now partake in the expansion process. However, only certain YHDP projects may apply for the expansion process:</p> <ol style="list-style-type: none"> 1. YHDP Renewals and YHDP Reallocations may take part in the expansion process 2. YHDP Replacements are NOT eligible for the expansion process
<p>How does the YHDP expansion process work?</p>	<p>The YHDP expansion process follows a similar pattern as the COC expansion process (please reference the expansion FAQs in this document), with some unique distinctions.</p> <ol style="list-style-type: none"> 1. The YHDP Renewal will apply as the “Stand-Alone Renewal” under the expansion process. The YHDP Reallocation will apply as the “Stand-Alone New”. Within the YHDP Renewal Application, the project applicant will need to list what projects are involved in the Expansion. Within the YDHP Reallocation application, the project will list the YHDP Renewal it is expanding upon, and what services will be expanded (units/beds, supportive services, HMIS, etc.)

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	<p>The YHDP Expansion process is allowed to expand upon ONLY YHDP funded projects. Component types that are eligible to be expanded are PH, TH, JOINT, SSO, SSO-CE, and HMIS.</p>
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