
FY21 CoC Program NOFO Summary

Prepared by Technical Assistance Collaborative, Inc. ([TAC](#))

On August 18, 2021, HUD published its [Fiscal Year \(FY\) 2021 Continuum of Care \(CoC\) Program Notice of Funding Opportunity \(NOFO\)](#). Additional notices and sections of the NOFO (e.g., [CoC Registration](#)) have been released previously and are available online.

This summary highlights some of this year's new areas; however CoCs and project applicants are strongly encouraged to review not only the NOFO and related e-snaps application components such as the detailed instructions, but also the [CoC Program interim rule](#) and other competition materials (FAQs and NOFO related broadcasts) that will be made available on the [HUD Exchange website](#) and [HUD.gov](#).

KEY DATES

TASK	DATE
✓ Project Applications submitted to CoC	See local competition documents for CoC-Specific Deadlines <i>HUD Requirement: No later than October 17, 2021 (Sunday) (30 days before the application deadline)</i>
✓ Project Applicants notified by CoC of acceptance, rejection or reduction of project application	See local competition documents for CoC-Specific Deadlines <i>HUD Requirement: No later than November 1, 2021 (Monday) (15 days before the application deadline)</i>
✓ Post CoC Consolidated Application to website and Notify stakeholders: CoC Application and Priority Listing	No later than November 14, 2021 (Sunday, two days) before CoC submission to HUD
✓ Submit to HUD Deadline	No later than November 16, 2021, 8:00 p.m. EST

CO C CONSOLIDATED APPLICATION

The application components are available through [e-snaps](#) and the instructional guides are available on the [HUD Exchange](#). All CoC Consolidated applications must be submitted from a Collaborative Applicant on behalf of the CoC online through [e-snaps](#) by the HUD established deadline.

The process for submitting the CoC Consolidated Application includes three-parts:

1. *FY21 CoC Application* (formerly known as Exhibit 1)
2. *FY21 Project Application(s)* (formerly known as Exhibit 2 and includes new and renewal applications)
3. *FY21 CoC Priority Listing*

CoC Application Scoring Criteria

The NOFO includes very comprehensive information about scoring and point allocation for the application. CoCs and project applicants are strongly encouraged to review the NOFO carefully.

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The CoC application assessment is on a 163-point scale this year with 25 bonus points available.

	Topic	Points
1.	CoC Coordination and Engagement*	96 points <i>(increased by 40)</i>
2.	Project Capacity, Review and Ranking	30 points <i>(increased by 1)</i>
3.	HMIS	11 points <i>(increased by 2)</i>
4.	Point-in-Time Count	3 points <i>(decreased by 3)</i>
5.	System Performance a. Reducing number of people homeless went from 10 to 1 b. Reduction of LOT homeless went from 14 to 6 point c. PH placement or retention went from 11 to 5 points d. Returns to homeless went from 8 to 4 points e. Increasing employment question went from 5 to 4 points f. Other non-employment question eliminated g. HMIS PMs eliminated from this section	23 points <i>(decreased by 37)</i>
	BONUS POINTS	
6.	Coordination with Housing and Healthcare BONUS points	10 points (NEW)
7.	CoC Merger BONUS points	15 points <i>(decreased by 10)</i>

**Some performance and strategic planning questions moved to this section*

CoC Application Attachments in e-snaps ([page 46 CoC Application Detailed Instructions for Collaborative Applicants](#))

- 1C-7.PHA Administration Plan Homeless Preference
- 1C-7.PHA Administration Plan–Moving On Preference
- 1C-14. Centralized or Coordinated Assessment System
- 1E-1. Announcement of 30-Day Local Competition Deadline–Advance Public Notice of How Your CoC Would Review, Rank, and Select Projects
- 1E-2 Project Review and Ranking Process Your CoC Used in Its Local Competition
- 1E-5. Public Posting – 15 Day Notification Outside of e-snaps – Projects Rejected or Reduced
- 1E-5a. Public Posting – 15 Day Notification Outside of e-snaps – Projects Accepted
- 1E-6. Public Posting CoC-Approved Consolidated Application (includes CoC Application, Priority Listing, all projects accepted, ranked where required, or rejected)
- **3A-1a. New PSH/RRH Project Leveraging Housing Commitment (NEW)**
- **3A-1a. Formal Written Agreements – Value of Commitment for New PSH/RRH Project Leveraging Healthcare Commitment(s) (NEW)**
- 3C-2. Project List–Persons Defined as Homeless under Other Federal Statutes (if applicable)

Project Listing Attachments

- HUD-2991, Certification of Consistency with Consolidated plan dated between August 17, 2021 and November 16, 2021. *(See page 20, item e. of NOFO for additional guidance)*

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NEW ITEM and KEY CHANGES TO FY21 NOFO

<p>Scoring and Funding</p>	<ul style="list-style-type: none"> • 163 points available (<i>FY19 was 200 points</i>) • Tier 1 calculation is equal to 100% of ARD (minus YHDP renewal and replacement projects) • YHDP renewal and replacement grants are non-competitive • CoC Coordination and Engagement and Strategic Planning combined • System Performance total decreased by 37 points to be 23 • New Projects <ul style="list-style-type: none"> ○ CoC Bonus Project funding available ○ Domestic Violence (DV) Bonus Project funding available ○ Incentives for new projects utilizing housing subsidies or subsidized housing units not funded through the CoC or ESG programs ○ Incentives for new projects that have formal agreements with healthcare organizations to utilize healthcare resources to serve participants
<p>Eligible Entities</p>	<ul style="list-style-type: none"> • Added Indian Tribes and Tribally Designated Housing Entities (TDHE) as eligible Collaborative Applicants, recipients or subrecipients • Indian Housing Block Grant program formula areas are now eligible to be added to the CoC's geographic area • Partial implementation of the above modifications with final changes and published PPRNs expected for FY2022 CoC Program Registration
<p>Policy Priorities</p>	<ul style="list-style-type: none"> • CoC Coordination with Public Housing Authorities (PHA) • Coordination with other systems in projects and to respond to pandemic • Reinstated Housing First requirements • Increased focus on promoting Racial Equity and Assessing Racial Disparities • Added the following policy priorities (see pages 9-10 of NOFO) <ul style="list-style-type: none"> ○ Reducing unsheltered homelessness ○ Partnering with Housing, Health and Service Agencies ○ Increase inclusion of persons with lived experience
<p>Youth Eligibility</p>	<ul style="list-style-type: none"> • 2021 Consolidated Appropriations Act provided that youth aged 24 and under must not be required to provide 3rd party documentation of homelessness as a condition for receiving services funded in FY21 NOFO. • Youth-serving providers (see page 16 of NOFO) may serve unaccompanied youth aged 24 and under or families headed by youth 24 or under who have an unsafe primary nighttime residence and no safe alternative to that residence

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Housing First	<ul style="list-style-type: none"> • Housing First requirement included in the NOFO
CoC Application Content Changes	<ul style="list-style-type: none"> • Emphasis on invitation and inclusion of organizations serving culturally specific communities experiencing homelessness to address equity • Emphasis on addressing the needs of LGBT individuals • Emphasis on Housing First and how CoCs are evaluating implementation of approach at project level (NEW) • Emphasis across many questions regarding how adjustments to current systems were made during COVID-19 response (NEW) <ul style="list-style-type: none"> ○ Domestic Violence response system and resources ○ Public Housing Authority partnerships ○ Mainstream Benefits ○ Coordinated Entry • Narrative related to COVID-19 response implementation of safety protocols, improved readiness for future public health emergencies, coordination with ESG-CV, mainstream health providers, homeless service providers and identifying vaccine eligible households experiencing homelessness (NEW) • Emphasis on promoting racial equity through assess racial disparities and taking necessary steps to address disparities • Narrative related to people with lived experience being actively included throughout the CoC structure and process development (NEW) • To be awarded points for inclusion, in the CoC process, of people who have lived experience they must have experienced homelessness within the last 7 years or currently be a program participant. (NEW) • Project review process <ul style="list-style-type: none"> ○ Project review use of objective criteria and use of system performance measures scoring changes ○ Addition of a domestic violence provider capacity question related to using comparable database and having objective criteria about safety (NEW) ○ Emphasis on rapid return to permanent housing in project review process ○ Addition of narrative on promoting racial equity when reviewing applications • Emphasis on having process ensure compliant comparable database for DV providers is in place

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<p style="text-align: center;">CoC Application Point Adjustments and Removed Questions</p>	<ul style="list-style-type: none"> • Increased points for ensuring families are not separated • Increased points for written agreements for educational services for children 0-5 • Increased points for addressing the needs of victims of domestic violence, dating violence, sexual assault and stalking and added question about how increase in DV calls was addressed during COVID-19 • Increased points for working with Public Housing Authorities (PHA) • Increased points for efforts to stop criminalization of homelessness • Increase points for system to connect to mainstream benefits • Removed <ul style="list-style-type: none"> ○ Unsheltered count from reducing number of homeless individuals and families for this year and decreased point value ○ HMIS performance measures ○ Promoting and increasing employment new questions from FY19
<p style="text-align: center;">CoC Application Key New/Revised Questions</p>	<ul style="list-style-type: none"> • FY19 CoC Performance and Strategic Planning question integrated into CoC Coordination and Engagement and other sections • Open Invitation for New Members (1B-2) – revised • Collaboration related to Children and Youth (1C-4) - revised • Addressing needs of DV – Safety, Planning and Confidentiality (1C-5b) • LGBT Anti-Discrimination Policy and Training (1C-6) • PHA-funded Units in Coordinated Entry (1C-7c and 7c.1) • Submitting CoC and PHA joint applications (1C-7d and 7d.1) • Coordinated with PHA(s) to apply or implement HCV dedicated vouchers (1C-7e and 7e.1) • Housing First – Lowering Barriers to Entry (1C-9) • Housing First – Project Evaluation (1C-9a) • Promoting Racial Equity (1C-15 and sub questions) • Persons with Lived Experience – Active CoC Participation (1C-16) • Addressing COVID-19 – 1D-1 through 1D-8) • Local CoC Competition – (1E) – streamlined, clarified attachments and altered points structure around objective criteria and use of system performance measures in project review • HMIS DV Comparable Database (2A-4, 2A-5b and 5b.1) • CoC PIT - (2B) – focus on 2022 • CoC System Performance Measures (point values decreased for FY21) • Coordination with Housing and Healthcare (3A) – new bonus points for written project level partnership • Domestic Violence Bonus Projects (4A) – revision to 4A-2a, 4A-4b, and 4A-4e

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<p>Project Application New Items and Changes</p>	<ul style="list-style-type: none"> • <u>CoC Bonus Projects</u> – 5% of FPRN • <u>DV Bonus Projects</u> – 15% of PPRN. Allowed to apply for multiple RRH and Joint TH-RRH DV Bonus projects. One new DV CES application per CoC. <i>(see DV Bonus below for more details)</i> • <u>New Projects</u> <ul style="list-style-type: none"> ○ New projects may continue to request a grant term of 12-18 months to allow for typical start-up process to establish project • <u>Expansion Projects</u> – Application submission process has changed. Projects that are expanding their current CoC Program-funded project, project applicants will be required to submit: <ul style="list-style-type: none"> (1) the renewal project application that will be expanded; and (2) a new project application with the expansion information. <p style="text-align: center;"><i>The FY19 requirement of the additional submission of a combined renewal project application was eliminated.</i></p> • <u>YHDP Renewal Project</u> - are allowed to apply and are non-competitive with separate instruction documents • Continued requirement that youth aged 24 and under must not be required to provide third-party documentations homeless status as a condition for receiving services • Defined a youth serving provider and their ability to serve youth who have an unsafe primary nighttime residence and no safe alternatives
<p>DV Bonus</p>	<ul style="list-style-type: none"> • May apply for any number of RRH or Joint TH-RRH projects with minimum application being \$50,000 • Only one new Coordinated Entry application • May use DV Bonus to expand an existing renewal project not originally awarded with DV funds, if expansion would be to service survivors of DV in the project
<p>YHDP</p>	<ul style="list-style-type: none"> • Renewals and replacement projects will be non-competitively renewed • YHDP projects are eligible for renewal provided they meet the requirements of the CoC Program and if operating end date is between 1/1/2022 and 12/31/2022 <ul style="list-style-type: none"> ○ Not eligible for reallocation process ○ No consolidations with non-YHDP project • No use of expansion process • YHDP renewal or replacement projects will not be required to meet the 25 percent match requirement if the applicant is able to demonstrate it has taken reasonable steps to maximize resources available for youth experiencing homelessness (NEW) • A List of CoC Program ineligible activities that can be funded under YHDP renewal and replacement grants is listed in NOFO

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PROJECT APPLICATIONS

Allowable project applications types for the FY21 NOFO are as follows:

- Renewal projects including ability to consolidate renewal projects
- Youth Homelessness Demonstration Project (YHDP) renewal and **replacement** projects
- New Projects – standalone, transition or expansion of current renewal
 - Bonus funding only
 - Reallocation funding only (including transition grants *(see page 25 of NOFO and page 2 of New Project Detailed Instructions)*)
 - Reallocation and Bonus funding combined projects
 - Domestic Violence (DV) Bonus projects
- CoC Planning projects *(Collaborative Applicant only)*
- UFA projects *(Collaborative Applicant only)*.

Basic Requirements for Project Application Process

- CoCs must ensure a fair and inclusive process for soliciting projects. As part of the solicitation projects, CoCs must establish local deadlines and points are attached to compliance with these deadlines. *(See Key Dates chart on first page)*
- All accepted, accepted and reduced and rejected project applications must be notified in writing outside of the e-snaps system by the CoC. Accepted and reduced and rejected must indicate the reason(s) for the action.

Project Application Attachments – New and Renewal (page 54 of NOFO)

- Documentation of Applicant and Subrecipient Eligibility
- Applicant Code of Conduct – verify if listed on [HUD website](#), if not listed attach updated file that is in compliance with 2 CFR 200 requirements to project application
- The following are built into e-snaps and required for all project applications
 - SF-424 Application for Federal Assistance *(built into e-snaps)*
 - SF-424 Supplemental, Survey on Ensuring Equal Opportunities *(built into e-snaps)*
 - Form HUD-2880 Applicant/Recipient Disclosure *(built into e-snaps)*
 - SF-LLL, Disclosure of Lobbying Activities *(built into e-snaps)*
 - Form HUD-50070, Certification for Drug-Free Workplace *(built into e-snaps)*
 - Certification Regarding Lobbying
 - SF-LLL, Disclosure of Lobbying Activities *(built into e-snaps)*
 - SF-424B *(built into e-snaps)* **(NEW)**
 - SF-424D *(built into e-snaps)* **(NEW)**
- Transition Projects additional attachments
 - A copy of the most recently awarded project application from e-snaps

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Funding for New and Renewal Projects

- Projects will be funded in the following order until no more funds are available:
 - CoC Planning projects that pass eligibility and threshold review
 - UFA Cost projects that pass eligibility and threshold review
 - YHDP Renewal and YHDP Replacement projects **(NEW)**
 - DV Bonus projects that pass eligibility and threshold review
 - Projects fully in Tier 1 that pass eligibility and threshold review
 - Projects in Tier 2 in order of point value that pass eligibility and threshold review.
- Project applications that straddle Tier 1 and Tier 2 selected using the above criteria for Tier 1 and Tier 2. The portion of the project in each Tier will be evaluated separately and project feasibility of the Tier 1 portion will be reviewed if the Tier 2 project portion is not funded.
- CoCs that receive a higher score have a better chance of being awarded projects ranked in Tier 2.

	Amount	Selection Criteria
Tier 1	100% of combined ARD (NEW)	Projects in this tier will be conditionally selected based on CoC score ranked from highest to lowest.
Tier 2	Difference between Tier 1 and the maximum amount of CoC renewal, reallocation and CoC bonus funds. (Does not including YHDP renewals and replacements, CoC planning, UFA or projects selected with DV Bonus)	Projects in this tier will be conditionally selected by assigning a point value to each new and renewal project using a 100-point scale. <ul style="list-style-type: none"> • <i>CoC Score</i>: up to 50 points in direct proportion to the score receive on the CoC application • <i>CoC Project Ranking</i>: up to 40 points for the CoC’s ranking of the project application. The calculation of point values will be 50 times (NEW) the quantity (1-x) where x is the ration of the cumulative funding requests for all projects or portions of projects ranked higher by the CoC in Tier 2 plus one half of the funding of the project of interest to the total amount of funding available in Tier 2. • <i>Commitment to Housing First</i>: up to 10 points for how the project demonstrates it is low barrier and prioritized rapid placement and stabilization in permanent housing, does not have preconditions to entry. (NEW language)

Renewal Projects

- Renewal project applications can request only 1 year of funding.
- Eligible renewal projects requesting rental assistance are permitted to request a per-unit amount less than the FMR, based on actual rent costs per unit.
- Total request for each renewing project cannot exceed the ARA approved by HUD for that project
- CoCs can request renewal funding for:
 - CoC Program and S+C projects that have a signed grant agreement and will expire in calendar year 2022
- PSH renewals may choose to change a project to 100% DedicatedPLUS.

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Bonus Funding

- CoCs can request up to 5% of its Final Pro Rata Need (FPRN) provided it has demonstrated the ability to reallocate lower performing projects and demonstrated that all project applications are evaluated and ranked based on the degree to which they improve the CoC's system performance.
 - HUD issued a report containing the CoC's Preliminary Pro Rate Need (PPRN), Final Pro Rata Need (FPRN) and Annual Renewal Demand (ARD).
- CoCs can choose to submit one or more projects for the Bonus, but the total amount requested by all the Bonus projects cannot exceed 5% of the CoC's FPRN.

Reallocation Funding

- CoC may shift funds in whole or part from existing renewal projects to create one or more new projects.

Bonus and reallocation projects may be one of the following types:

- Permanent Supportive Housing (PSH) with 100% of beds designated to DedicatedPLUS (see definition in chart)
- Permanent Supportive Housing (PSH) with 100% of beds dedicated to people experiencing chronic homelessness
- Rapid Re-Housing (RRH) (see eligibility criteria below), or
- Joint Transitional Housing and Rapid Re-Housing (TH-RRH) project (see eligibility criteria below)
- Dedicated Homeless Management Information System (HMIS) project; or
- Supportive Services Only (SSO-CES) project specifically for a coordinated assessment system
- Bonus and reallocation projects may create new projects or expand renewal projects to add capacity to increase units and/or serve more people

CoC Planning

- Up to 3% of the FPRN or \$1,250,000, whichever is less, is available for CoC planning projects

UFA Costs

- Up to 3% of the FPRN or \$1,250,000, whichever is less, is available for UFA costs for approved CoCs

Domestic Violence (DV) Bonus Funding

- CoCs can request up to 15% of its Preliminary Pro Rata Need (PPRN) for new DV Bonus projects in the amount listed on the HUD issued [report](#)
- Each project must be at least \$50,000 (**NEW**) and must be less than \$5 million
- CoCs may apply for the following types of projects:
 - Rapid Re-Housing (RRH) (*see criteria below*),
 - Joint Transitional Housing and Rapid Re-Housing (TH-RRH) project, or
 - SSO for Coordinated Entry Systems (SSO-CE) (*one project application per CoC*)
- DV Bonus funds may apply to expand an existing renewal project that is not dedicated to DV to dedicated additional units, beds, persons served or services to this population
- DV Bonus projects must be ranked on the New Project Listing

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- Projects will be chosen based on CoC Application score and response to specific question in the application on a 100-point scale
 - RRH and Joint TH-RRH:
 - CoC Score – up to 50 points in direct proportion to the CoC Application score (Revised from FY2019)
 - Need for Project – up to 25 points based on the extent the CoC quantifies the need for the project in the portfolio, the extent of the need, and how the project will fill the gap (4A and sub questions)
 - Quality of the Project Applicant – up to 25 points based on previous performance of applicant in serving population AND their ability to house survivors and meet safety outcomes
 - SSO – Coordinated Entry:
 - CoC Score – up to 50 points in direct proportion to the CoC Application score
 - Need for the Project – up to 50 points based on the extent to which the CoC is able to demonstrate the need for a CES that better meets the needs of survivors of DV AND how the project will fill the need

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New Project Funding Opportunity	Eligible Project Types	Eligible Participant Populations
<p>Bonus Funding <i>(Available amount set by HUD and funding may be used by one or more projects)</i></p> <p>AND</p> <p>Reallocation Funding <i>(Available amount dependent on CoC reallocations and funding may be used by one or more projects)</i></p>	<p>PSH</p> <p>Rapid Re-Housing</p> <p>Joint TH and RRH</p> <p>Dedicated HMIS</p> <p>SSO for Coordinated Entry Systems</p>	<p>PSH</p> <ul style="list-style-type: none"> • 100% bed designated as DedicatedPLUS OR • People experiencing chronically homeless <p>DedicatedPLUS projects - 100% of beds are dedicated to serve individuals, families and unaccompanied youth that are:</p> <ul style="list-style-type: none"> • Experiencing chronic homelessness • Residing in TH that will be eliminated and were experiencing chronically homelessness at TH entry • In place not meant for human habitation, shelter or safe haven BUT were experiencing chronic homelessness AND had been in permanent housing (PH) project within last year and were unable to maintain housing placement • Residing in TH funded by Joint TH-RRH component project AND were experiencing chronically homelessness prior to entering the project • In place not meant for human habitation, shelter or safe haven for at least 12 months in the last 3 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 • In a Department of Veteran Affairs (VA)-funded homeless assistance program AND met one of the above at initial intake to the VA homeless assistance system <p>RRH and Joint TH-RRH</p> <ul style="list-style-type: none"> • Persons who qualify as homeless under paragraphs 1, 2, or 4 of 24 CFR 578.3
<p>Domestic Violence Bonus <i>Available amount set by HUD.</i></p> <p><i>Funding may be used by one CES project and other housing projects. There is no limit on RRH and Joint TH-RRH projects.</i></p>	<p>Rapid Re-Housing</p> <p>Joint TH and RRH</p> <p>SSO for Coordinated Entry Systems for People Experiencing DV</p>	<p>All projects types dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking as defined in paragraph (4) at 24 CFR 578.3</p>