FY 2019 Continuum of Care Program Competition Notice of Funding Availability (NOFA) Highlights

The Fiscal Year (FY) 2019 Continuum of Care (CoC) Program Competition NOFA was released on July 3, 2019. The application is due by 7 PM (CST) on September 30, 2019. There is approximately $2.3 billion available in the FY 2019 CoC Program Competition NOFA, including up to $50 million available for Domestic Violence (DV) Bonus projects. Project Applications are due no later than 30 days prior to the NOFA deadline and the CoC must notify project applicants if their application will be included in the CoC Consolidated Application submission at least 15 days prior to the deadline.

HUD is continuing its two-tier funding process, similar to previous years. Like last year, Tier 1 will be 94% of the CoC’s Annual Renewal Demand (ARD) and Tier 2 will be 6%. Chicago’s estimated ARD is $70,798,663, which means Tier 1 will be approximately $66,991,521 and Tier 2 will be approximately $12,347,075.

The focus of HUD’s homeless policy and program priorities for this NOFA are:

1) Ending homelessness for all persons
2) Creating a systemic response to homelessness
3) Strategically allocating and using resources
4) Using an evidence-based approach
5) Increasing employment
6) Providing flexibility for Housing First with service participation requirements

CoC program implementation considerations highlighted in the NOFA include:

1) CoCs may submit requests for new projects through the process of reallocation, new bonus, and a Domestic Violence (DV) Bonus.
2) The FY 2019 Appropriations Act establishes certain requirements for the Competition and these will continue for the FY 2019 CoC Program Competition. These include the following:
   a) CoCs cannot receive grants for new projects, other than through reallocation, unless the CoC competitively ranks projects based on how they improve system performance;
   b) HUD must base an increasing share of the CoC score on performance criteria; and,
   c) HUD must prioritize funding for CoCs that have demonstrated the ability to reallocate resources to higher performing projects.
3) The FY 2019 Appropriations Act established the ability for renewal projects to transition from one CoC Program component to another during the CoC Program Competition.
4) The FY 2019 HUD Appropriations Act provides the opportunity for CoCs to apply for a Domestic Violence (DV) Bonus up from $50,000 to $5 million to create DV Bonus Projects. Eligible project types are Rapid Re-housing projects, Joint Transitional Housing, and Permanent Housing-Rapid Rehousing component projects. A CoC can only submit one project application for an SSO-coordinated entry project. Each application must be for at least $25,000. A project may also apply to expand an existing renewal under the models listed.
5) Eligible renewal project applicants are able to consolidate two or more eligible renewal projects (but no more
than four projects) into one project application. Projects must have the same recipient and have the same project component.

6) Youth-serving providers may serve unaccompanied youth ages 24 and under (or families headed by youth ages 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence.

7) New project applications may be created through the reallocation process or as bonus projects. CoCs may create new project through the bonus funding up to 5% of the CoC’s Final Pro-Rata Need (FPRN). The following types of projects may be created:
   a) Permanent Supportive Housing projects that meet DedicatedPLUS or all beds will be dedicated for use by chronically homeless individuals and families;
   b) Rapid Re-housing projects that will serve homeless individuals and families, including unaccompanied youth;
   c) Joint TH and PH-RRH projects serve persons who qualify as homeless under paragraphs 1, 2 or 4;
   d) Dedicated Homeless Management Information System (HMIS) project for the HMIS Lead; and,
   e) Supportive Services Only projects specifically for a centralized or coordinated assessment system.

8) HUD will allow project applicants to apply for a new expansion project under reallocation or a Permanent Housing bonus to expand existing eligible renewal projects that will increase the number of units in the project or all additional recipients to be served.

9) CoCs will be required to rank all projects (renewal and new projects) in e-snaps, except CoC planning and UFA Costs. HUD will not review any project that is rejected by the CoC. HUD will continue to use the Tier 1 and Tier 2 funding process:
   a) Tier 1 is equal to 94% of the CoC’s ARD amount. Projects in this tier are conditionally selected from the highest scoring CoC to the lowest scoring CoC, provided the project applications pass both eligibility and threshold review.
   b) Tier 2 is the difference between Tier 1 and the CoC’s ARD, plus any amount available for CoC Bonus projects (not including amounts available for DV Bonus projects).

The following are CoC program requirements:

1) All PSH projects in the Chicago CoC must be DedicatedPlus
2) Human Trafficking: HUD is clarifying that persons who are fleeing or attempting to flee human trafficking may qualify as homeless under paragraph 4 of the homeless definition.
3) Joint TH and PH-RRH is a program model type.
   a) Program participants may choose to receive only the TH unit or the PH-RRH component, but the recipient must make both types of assistance available.
4) Compliance with the Violence Against Women Act (VAWA): Grants awarded under this NOFA will be required to comply with the VAWA rule. To enable full compliance, each CoC must establish an emergency transfer plan and make related updates to the written standards for administering CoC program assistance.

Threshold requirements
HUD will review the project applications for threshold requirements on a pass/fail standard. Those thresholds include:
1) Ineligible Applicants
2) Project Eligibility Threshold
3) Project Quality Threshold
4) Project Renewal Threshold
5) Certification of Consistency with the Consolidated Plan
6) Environmental Requirements

For information on the breakdown of potential points for the various sections of the NOFA, please see the page numbers listed below:

2) Renewal and New Applications – a total of 100 points. Please refer to pages 10-11.
3) Domestic Violence Applications – a total of 100 points. Please refer to pages 11-12.