
QUESTIONS AND ANSWERS

**A Supplement to the
2008 Continuum of Care
Homeless Assistance
NOFA and Application**

**Office of Community Planning and Development
U.S. Department of Housing and Urban Development**

**Part II
August 26, 2008**

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Questions and Answers
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Additional information and training modules on the *e-snaps* system will be available at <http://esnaps.hudhre.info/training/>. CoCs may also contact the *e-snaps* Help Desk at esnaps@hud.hre.info or by calling 1-877-esnaps (1-877-637-6277).

A. Application

- 1. Screen 1D. Continuum of Care (CoC) Member Organizations does not include some services that are provided by organizations in our CoC. Additionally, the list only has “rental assistance” but does not include Emergency Housing, Transitional Housing, or Permanent Supportive Housing. Where would information about these providers go?**

Screen 1D. Continuum of Care (CoC) Member Organizations combines the information that was collected previously on the paper application on Charts D and H. The available items for all fields are identical to the selections that were previously available. Organizations that are providing services not included on this list should pick a service that is closely related. Information on CoCs’ existing housing is collected on the electronic Housing Inventory Chart.

- 2. If a CoC has one universal discharge planning protocol that covers multiple systems of care, should it be attached for each one?**

Yes. If CoCs have one universal discharge planning policy or protocol that has been finalized or implemented that applies to all four systems of care (Foster Care, Mental Health, Health Care, and Corrections) they must attach the document for each of the four systems on the Discharge Planning Attachment screen in *e-snaps*.

- 3. Can you please provide clarification - Is Housing Emphasis points scored based on new and renewal budgets or only renewal budgets?**

Housing Emphasis scoring will be based on the calculation of both new and renewal budgets. As indicated in the Housing Emphasis definition, HUD will award 18 points based on the relationship between funds requested for housing activities (i.e., transitional and permanent) and funds requested for supportive service activities. Housing Emphasis will be calculated on eligible new and renewal projects within FPRN, eligible Samaritan Housing Initiative projects, eligible Rapid Re-Housing projects, and eligible S+C new and renewal projects. HUD will count as housing activity all approvable requests for funds for rental assistance and approvable requests for acquisition, rehabilitation, construction, leasing and operations when used in connection with housing. HMIS costs and administrative costs will be excluded from this calculation. CoCs are not required to have 100 percent housing activities to receive the full 18 points for this scoring criterion. On August 13, 2008, HUD

published in the Federal Register a Notice that details the technical correction for the conflicting texts in the 2008 Continuum of Care (CoC) Notice of Funding Availability (NOFA).

B. Special Initiatives

1. Can a CoC that is in PPRN status combine Samaritan Initiative funds with available pro rata need funds?

No. CoCs that are in PPRN status cannot add available funds to Samaritan Housing projects. However, eligible CoCs may create additional new permanent housing projects using available PPRN which can later be consolidated with the designated bonus project. This will only be allowable if the applicant states that the non-Samaritan Housing project will serve 100% chronically homeless. Additionally, before the grant can be executed and consolidated, the grantee must agree to the terms of the Samaritan Housing program, even though the project was not funded with bonus funds.

2. The NOFA states that eligible families for the Rapid Re-Housing program must have been either living in an emergency shelter or on the streets for seven consecutive days. Can families that are not in shelter due to lack of shelter capacity and are therefore living with family/friends qualify to participate in the program?

The Rapid Re-Housing demonstration program is designed for households with dependent children residing on the streets or in emergency shelters as directed by Congress in the Consolidated Appropriations Act for 2008 (H.R. 2764).

Persons that are doubled up are not considered homeless in any of HUD's homeless assistance programs.

3. Would a 211 call center qualify as a Centralized Intake Facility?

The NOFA defines central intake as an assessment hotline, a single point of entry, a central intake facility or a centralized group of people that is standardized across the CoC and has the responsibility of assessing homeless persons as a method for screening homeless families into appropriate housing placements and service needs.

A 211 call center could qualify as an assessment hotline and therefore may be considered a central intake resource provided that it can demonstrate that it is well advertised to the community, easily accessible by households with dependent children and conducts assessment.

4. What types of activities fall under “Housing Placement” in the Rapid Re-Housing programs?

Housing placement activities include those that can be directly linked to assisting a client find a place to live such as running a credit check, searching an apartment database, showing an apartment to a client, assisting with housing applications, etc.

5. With leasing providing “rental assistance only”, can this include first and last month’s rent for clients if required by the landlord?

In Rapid Re-Housing, as well as SHP in general, leasing funds may only be used to pay rent, grantees may use SHP leasing funds in an amount of up to or equal to one month’s rent to pay a security deposit to a landlord for unit’s expenses under the grant.

6. The NOFA states that families must have come from the streets or an emergency shelter. Also, how are Rapid Re-Housing projects different from other SHP transitional housing projects?

Rapid Re-Housing (RRH) projects are required to be administered in accordance with the requirements of the SHP/TH component, as well as those requirements listed in the NOFA that are specific to RRH projects. One of the requirements of RRH projects that are different than other TH projects is that the population to be served must be households with dependent children who have lived in emergency shelters or on the streets for at least seven consecutive days, must be able to independently sustain housing at the end of the short-term housing assistance, and must have at least one moderate barrier to housing. Households with dependent children that are being evicted from a private dwelling are not eligible to participate in Rapid Re-Housing projects.

7. The NOFA states that rental assistance for Rapid Re-Housing projects can be for 3-6 months or 12-15 months for each family served. However, the NOFA also states that rental assistance can be provided up to 18 months. Please clarify.

Project applicants are required to indicate in Exhibit 2 whether they will be providing short-term (3-6 month) or long-term (12-15 month) assistance to eligible families. The reason we are asking the applicant to specify is so that in the evaluation phase we will have two groups identified (short-term vs. long-term) and we can evaluate which worked better.

If a family cannot move on after the 3-6 or 12-15 month time frame, they can continue to get assistance, up to 18 months.

8. Can a Rapid Re-Housing project be an expansion of an existing project? If so, can funds from the expanded portion be shared with the existing project?

A project is considered an expansion if you are expanding an existing project (SHP or non-SHP funded) in order to increase the number of homeless persons served. Eligible applicants that are currently operating Rapid Re-Housing projects that are not funded by HUD, may apply for a new Rapid Re-Housing project as an expansion of the existing project. However, HUD SHP funds can only be used for new families and cannot be “shared” between projects. All requirements for Rapid Re-Housing in the NOFA apply to the expansion.

9. Can Rapid Re-Housing funds be used in conjunction with Shelter Plus Care TRA funds?

No, you cannot combine Rapid Re-Housing and S+C Tenant Based Rental Assistance (TRA). S+C TRA is a form of permanent supportive housing for disabled persons and their families that permit participants to choose the units in which they would like to reside. Because Rapid Re-Housing projects are transitional in nature and target those families that would be able to sustain housing on their own after a transitional period, Rapid Re-Housing projects should not be used in conjunction with permanent housing programs such as S+C TRA. If it is determined that a family has been accepted into RRH but they are deemed to need permanent supportive housing instead, they can be moved to the other program.

10. Is the Rapid Re-Housing limit (30% of the PPRN) an annual amount or (30% of our PPRN) spread (divided) over three years?

All Rapid Re-Housing (RRH) projects are required to have a three-year grant term. The amount identified in each CoC Registration represents 30% of a CoCs PPRN and is the maximum allowed for a three year grant term.

12. Will Rapid Re-Housing projects have to submit a technical submission? Will these projects be awarded separately, or as part of the CoC competition?

Projects that are awarded under the Rapid Re-Housing Demonstration Program will have the same technical submission requirements as other new projects. We expect these awards will be announced at the same time as the CoC announcement is made. The timeline for how soon these projects could get up and running will depend on the readiness of the project. Some projects may have issues that need to be resolved prior to grant agreement and execution and some may be ready to start immediately. Conditional grantees will have to work with their local HUD field office to meet all requirements in a timely manner so that grants can be executed quickly.

13. What are the match requirements for Rapid Re-Housing projects?

The Rapid Re-Housing Demonstration Program is required to follow the same match requirements as other SHP projects. As the only allowable activities for these projects are leasing, supportive services, and administrative costs, the only match requirement will be for supportive services. Project applicants requesting supportive services funds are required to match 20% of the total supportive service budget and SHP funds will pay 80%. You can find match requirements in the regulations at 24 CFR 583.145 and in the statute at Section 11383.

14. Are Balance of State, Statewide, or regional CoCs able to have a central intake that is located in multiple areas?

HUD understands that some Balance of State and large, regional CoCs may only be able to submit applications that include limited central intake coverage. The NOFA states that HUD will award up to 20 points based on an applicant's ability to demonstrate that centralized intake exists for households with dependent children within the CoC that is well advertised to the community and easily accessible by these households. So we encourage CoCs to use their resources as efficiently as possible to maximize their coverage and to submit a response that fully describes their plan. CoCs should be reminded that the final awards will be made to those applications that are competitive across a majority of the rating factors.

15. What are the eligible terms for a new Samaritan project?

New SHP Samaritan Housing projects must be for either 2 years or 3 years. New S+C Samaritan Housing projects may be for 5 or 10 years, depending on the component type. New SRO Samaritan Housing projects must be for 10 years.

C. Projects

1. Do the goals identified in the e-Logic Model have to match the goals identified in the project's APR?

No. The priorities in the e-Logic Model allow a project to identify specific goals and activities. The goals in the APR and the e-Logic Model are not exactly the same, although both target the same larger goal of ending chronic homelessness and moving homeless families and individuals to permanent housing. In completing the e-Logic Model, you must select and focus on the goals and priorities available from the drop-down menu that most closely relate to the goals and activities of your project. They do not need to match the goals from the APR exactly. Finally, your e-Logic Model goals should be consistent with the goals described in your HUD project narrative.

2. What types of housing structures can be used for permanent supportive housing? When can leasing funds be used?

Most types of housing structures can be used for permanent supportive housing. Apartments, single-family houses, duplexes, group homes, or single-room occupancy units all qualify. In addition, permanent housing means that there is no limitation on the length of stay.

Under the SHP program, grantees may use leasing funds only when there are actual leasing costs. That is, funds designated for leasing may only be used for the actual costs of leasing a structure/unit. SHP leasing funds may not be used to pay a project sponsor's monthly mortgage obligation or other costs of building operations. Also, leasing funds cannot be used for buildings that are owned, or leased by the applicant, sponsor or parent companies.

3. My organization provides housing in self-contained units located within a building or complex that houses only persons with special needs. This is not included as a housing type option in Exhibit 2. What should we do?

The housing types identified in *e-snaps* are those most commonly used to house homeless households. Apartments, single family homes/townhouses/duplexes, and shared housing can all qualify as self-contained and can be used to house persons with special needs.

4. Are dedicated HMIS new and renewal projects required to complete the e-Logic Model?

Yes. All projects are required to complete and attach the e-Logic Model.

5. How should non-profit applicants respond to the Discharge Planning Policy screen in Exhibit 2?

On the Discharge Planning Policy screen in Exhibit 2, applicants that are not state or local government entities should select "Not Applicable."

D. Renewal Funding

1. Which FMR's do S+C renewals use when applying for renewal funds?

For Shelter Plus Care (S+C) grants that are being renewed for the first time, CoCs may request up to the amount determined by multiplying the number of units under lease at the time of your application for renewal funding by the applicable current Fair Market Rent(s) by 12 months.

For S+C grants that are being renewed for the second or subsequent renewal, the number of units requested for renewal in 2008 may not exceed the number of units funded in 2007.

In both scenarios, CoCs should use the FMRs that were published in the Federal Register in October 2007. Please be advised that the actual FMRs used in calculating your grant will be those in effect at the time the grants are selected which may be higher or lower than those found in the October 1, 2007 FR Notice. S+C applicants that want to apply for 100% of the FMR can select the FMR area for which they are applying and *e-snaps* will automatically calculate the appropriate amount.

2. Can a CoC that is in preliminary pro rata need (PPRN) status decide to reduce or not request renewal funds for existing projects?

Yes. The need for the continuation of previously funded projects should be considered in the local needs analysis process and a decision should be made locally on the priority to assign to the continuation of a project. HUD does not require that existing projects be renewed or be given a higher priority than other projects. HUD is very concerned that the ongoing housing and service needs of persons currently being served by existing projects also be taken into account as part of the decision-making process. The CoC should review each project at the time it seeks renewal to determine if the project is performing satisfactorily and is meeting the needs of persons it serves.

3. Can renewal project applicants shift less than 10 percent of funds between line items in a renewal project? What about more than 10 percent?

HUD will allow budget changes of 10% or less at the time of application as we have in previous years, as long as the total grant amount matches the SHP Grant Inventory. No budgetary changes of more than 10% will be allowed either at the time of application or through a grant amendment. Applicants that submit budgets in *e-snaps* with differences in line items of more than 10% from the final grant inventory that was submitted to HUD will be reversed back to what is on the grant inventory. Grant amendments to change line items more than 10% will be allowed after the application due date following review and approval by the field office.

4. Do projects that were funded as bonus projects before the Samaritan Housing Initiative have the same requirements to serve Chronically Homeless persons?

No. SHP and S+C Permanent Housing Bonus projects funded prior to 2005 were not limited to the chronically homeless, whereas projects funded with Samaritan Housing Bonus funds, beginning in 2005, must exclusively serve chronically homeless individuals.

5. The NOFA indicated that HUD may provide SHP renewal projects with up to a 4% increase in the leasing line item. Should project applicants include the 4% increase in their Exhibit 2 application?

No. SHP project applicants should not submit a leasing budget with a 4% increase. HUD may, **after** selection and depending on availability of funds, provide SHP renewal projects with up to a 4% increase in the leasing budget line item, not to exceed the local FMR amounts.

6. My project budget has an HMIS line item but is not a dedicated HMIS project. What component should I select?

An applicant should select the HMIS component type only if they are applying for a dedicated HMIS project and they will only see the HMIS budget. If the project has HMIS and supportive service activities, then it should be classified as an SSO project so that both budgets can appear and be filled out.

7. Can projects have more than one project sponsor?

Each project must identify one project applicant and one project sponsor. Although some projects may have multiple sub-recipients of grant funds, there must be one lead sponsor identified in *e-snaps*.

E. Housing Inventory Chart

1. If a facility is marked as under development, but will have 100% HMIS participation when finished, should it be included in the housing inventory under HMIS participation?

As in the past, do not include inventory under development in the HMIS participation.

2. The excel Housing Inventory Chart does not allow deleting a row and/or moving rows around (to cut and past within the document). Am I doing something wrong or was the excel file created this way for a particular reason?

The Housing Inventory Chart (HIC) does not have the flexibility that some of the other spreadsheets for the 2008 competition have because the calculations that are being performed are much more complex. Due to the complexity of the document, the option to insert and delete rows has been removed.

3. It was our understanding that we could not count any of our "formerly homeless" that were residing in our Permanent Supportive Housing programs. Why does this year's HIC ask for PIT Counts for our Permanent Supportive Housing programs?

HUD's Point-in-Time count in the sheltered portion of the Populations and Subpopulations chart is limited to Emergency Shelter and Transitional Housing. However, HUD encourages CoCs to perform a Point-in-Time count in Permanent Supportive Housing programs as well in order to provide another source of data quality verification. Thus, the 2008 Housing Inventory Chart includes space for

communities to enter Point-in-Time data for Permanent Supportive Housing programs as a data quality aid for those programs that conducted a Point-in-Time count.