

LOCAL COMPETITION, SCORE, AND RANKING PROCEDURES FOR THE COC PROGRAM SUPPLEMENTAL FUNDING OPPORTUNITY TO ADDRESS UNSHELTERED HOMELESSNESS

NORTHERN NEVADA CONTINUUM OF CARE (NV 501)

AUGUST 2022

INTRODUCTION AND BACKGROUND

The U.S. Department of Housing and Urban Development (HUD) released a [Supplemental Notice of Funding Opportunity \(NOFO\)](#) for the Continuum of Care Program (CoC) to address unsheltered and rural homelessness on June 22, 2022. The purpose of this Special NOFO is to target efforts to reduce unsheltered homelessness, particularly in communities with very high levels of unsheltered homelessness and homelessness in rural areas. Through the Special NOFO, HUD will award funding to communities to implement coordinated approaches grounded in Housing First and public health principles to reduce the prevalence of unsheltered homelessness, and improve services engagement, health outcomes, and housing stability among highly vulnerable unsheltered individuals and families. HUD expects communities to partner with health and housing agencies to leverage mainstream housing and healthcare resources.

As stated in Section I.D of the Special NOFO, approximately \$322 million is available in the Special NOFO. Of this amount \$54,500,000 is available only for projects that serve rural areas as defined in section III.C.2.K and \$267,500,000 is available for projects as part of the Unsheltered Homelessness Set Aside. All requirements for the application process, including requirements for the entire CoC Consolidated Application and the total amount of funds available, are included in the Special NOFO. HUD will require the Continuum of Care to rank all projects, including CoC planning and UFA Costs in order of priority.

AVAILABLE FUNDING, ELIGIBLE PROJECTS, AND BONUS PROJECTS

AVAILABLE FUNDING

The following table provides the maximum award amount for the Unsheltered Homelessness Set Aside and the Rural Set Aside. **See Section III.J. a & b of the Special NOFO for the methodology HUD used to determine the Unsheltered Homelessness Set Aside and Rural Set Aside award amounts for each CoC.**

CoC Number and Name	Maximum Unsheltered Homelessness Set Aside Amount	Maximum Rural Set Aside Amount	CoC Planning
NV-501 - Reno/Sparks/Washoe County CoC	\$2,410,608	\$0.00	Up to 3% of awarded amount for Unsheltered Homelessness Set Aside

ELIGIBLE PROJECTS & PARTICIPANTS THROUGH THE UNSHELTEREDHOMELESSNESS SET ASIDE

The initial grant term for all projects awarded by HUD through the Special NOFO will be for 3 years, including CoC Planning and UFA costs. Grant terms may be extended, consistent with 2 CFR 200.308 and 2 CFR 200.309.

The following types of project applications will be eligible for submission in the Special NOFO Competition:

- A. Permanent Supportive Housing (PH-PSH) projects;
- B. Rapid Rehousing (PH-RRH) projects;
- C. Joint TH and PH-RRH projects;
- D. Supportive Services Only;
- E. HMIS

Projects funded through the Unsheltered Homelessness Set Aside must have the following eligibility criteria for program participants:

1. Meet the criteria of paragraph (1) of the definition of homeless at 24 CFR 578.3, except that persons coming from transitional housing must have originally come from places not meant for human habitation, emergency shelters, safe havens, or institutions where they resided for 90 days or less and originally came from places not meant for human habitation, safe havens, or emergency shelters; or
2. Meet the criteria of paragraph (4) of the definition of homeless at 24 CFR 578.3.

All projects must participate in Coordinated Entry. Additionally, all projects must operate consistently with the CoC Plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs described in Section VII.B.4 of the Special NOFO.

LOCAL COMPETITION DEADLINES

The CoC is requesting new project applications that meet the criteria for the Unsheltered Homelessness set aside. The following timeline will be implemented for the CoC's Local Competition:

1. **Unsheltered NOFO Mandatory Applicant Meeting.** All applicants interested in applying for funds through the local competition are required to have a staff member attend the mandatory meeting on **August 11, 2022 at 10:00am**. The meeting will consist of a brief overview of the Special NOFO, the local competition timeline and process, and a question-and-answer period. Please email Catrina Peters at CPeters@washoecounty.gov for the meeting link.
2. **Project Applications Due for Rating and Ranking.** All e-snaps project applications and Supplemental Application & Assurances (outside of e-snaps) are required to be submitted to the CoC on or before **September 6, 2022**. Email a copy of the project application exported from e-snaps and the Supplemental Application & Assurances to CPeters@washoecounty.gov.
3. **Rating and Ranking.** Raters will review applications individually between **September 07, 2022 – September 14, 2022**. Rating and Ranking will take place on **September 15, 2022**.

4. **Project Applicant Notification.** Applicants will be notified through written notification outside of e-snaps by **September 19, 2022**. The notification will indicate if your project(s) will be included in the CoC Application to HUD, the ranked position of your project(s), and the funding amount the project is being submitted for.
5. **Rating and Ranking Debrief.** Applicants that receive notification that their application is being included in the CoC Application to HUD will receive a written rating and ranking debrief by **October 5, 2022**. The debrief will contain any revisions to the application the committee deemed necessary and any suggestions to strengthen the application. Thereafter, applicants will have the opportunity to revise and strengthen applications based on the debrief.
6. **Revised Project Applications Due.** Revised project applications submitted in e-snaps are due to the CoC on or before **October 14, 2022**.
7. **Posting of Full Application.** The CoC will post the full application, including the Collaborative Application, project applications, priority listing and all attachments to the Washoe County website found here: <https://www.washoecounty.gov/homeless/CoC/index.php> on October 17, 2022.

REVIEW AND OVERSIGHT

HUD expects each CoC to implement a thorough review and oversight process at the local level for new project applications submitted to HUD in this Special CoC Program Competition. To meet this expectation, the CoC closely reviews information provided in each project application in order to ensure that:

1. All proposed program participants will be eligible for the program component type selected;
2. The proposed activities are eligible under the 24 CFR part 578 and the Special NOFO;
3. Each project narrative is fully responsive to the question being asked and that it meets all of the criteria for that question as required by the Special NOFO and included in the detailed instructions provided in e-snaps;
4. The data provided in various parts of the project application are consistent; and
5. All required attachments correspond to the attachments list in e-snaps and the attachments contain accurate and complete information, and are dated between June 22, 2022 and October 20, 2022.

On October 2, 2022 Continuum of Care Leadership Council approved the Rating and Ranking process and procedures. The Review, Score, and Ranking Procedures are posted to the website and are available to potential applicants.

SUPPLEMENTAL APPLICATION

All projects are required to submit a supplemental application along with their project application in e-snaps. The CoC supplemental application components and narratives serve to: (1) confirm the capacity of agencies to provide CoC funded programs; (2) provide information on program delivery in order to evaluate performance and meeting HUD criteria for scoring and ranking of projects by the Rating and Ranking Committee (RRC); and (3) provide project level narrative to be utilized in the Collaborative Application. **The supplemental Application Questions & Assurances for New Projects are provided in Appendix A.**

RATING CRITERIA

Each of the questions included in the Supplemental Project Applications correspond to criteria articulated in the Department of Housing and Urban Development's Rating and Ranking Tool and Special NOFO. An overview of the rating criteria that will be considered during the rating and ranking process is provided below. **Additionally, tables mapping the questions from the New Project Supplemental Application to these criteria will be published at a later date.** According to guidance from HUD, CoCs should use objective, performance-based scoring criteria and selection priorities that are approved by the CoC to determine the extent to which each project addresses HUD's policy priorities.

COC THRESHOLD CRITERIA

The CoC has established five threshold criteria. If an applicant does not meet these threshold requirements, their application will not be rated and submitted for consideration.

These threshold criteria are:

- ✓ Coordinated Entry Participation
- ✓ Housing First and/or Low Barrier Implementation
- ✓ Documented, secured minimum match
- ✓ Acceptable organizational audit/financial review
- ✓ Active participation in CoC
- ✓ The project is consistent with the plan described by the CoC in response to Section VII.B.4 of the NOFO

HUD THRESHOLD CRITERIA

The CoC requires project applicants to submit an attachment entitled “Assurances” that will ask applicants to attest to their compliance with HUD Threshold criteria. These Assurances address issues such as compliance with federal law and standard accounting practices.

COC LOCAL CRITERIA

The CoC local criteria ensure that applicants are responsive to local needs and requirements, while also meeting the standards laid out in the Special NOFO. This is a high-level overview of the local criteria. The detailed Rating and Ranking tool will be made available to all project applicants and posted on the CoC’s website at a later date.

New Projects

For new projects these criteria address:

- ✓ Experience
- ✓ Design of housing and supportive services
- ✓ Timeliness
- ✓ Documented organizational financial stability
- ✓ Project effectiveness
- ✓ Financial feasibility of project
- ✓ Cost per exit to permanent housing
- ✓ Application is complete and data are consistent
- ✓ Service to a high needs population
- ✓ Strategy to address those at risk of becoming homeless
- ✓ Strategy to reduce rate of returns to homelessness
- ✓ Identification of common factors of individuals that return to homelessness
- ✓ Street outreach
- ✓ Strategy to support underserved populations
- ✓ Strategy to further fair housing and market housing and supportive services
- ✓ Assistance to clients to increase access to employment and non-employment cash resources
- ✓ Leveraging Healthcare Resources

Additionally, rating criteria for specific new project types are included to ensure that HUD’s minimum requirements for new projects are met.

The Rating and Ranking Committee may also review information in the Line of Credit Control System (LOCCS); Annual Performance Reports (APRs); and information derived from monitoring, including monitoring reports and A-133 audit reports as applicable, as well as performance standards on prior grants.

RATING AND RANKING PROCESS

All new applications will be reviewed by an unbiased review panel composed of representatives from neutral (non-applicant) organizations, referred to as the Rating and Ranking Committee (RRC). The RRC will drive the rating and ranking process and will adopt a rating and ranking tool that meets all HUD and CoC requirements.

RATING AND RANKING COMMITTEE MEMBERS

The Rating and Ranking Committee (RRC) is comprised of local representatives and consultants who are knowledgeable about homelessness and housing in our CoC and the best practices nationally and who are broadly representative of the relevant sectors, subpopulations, and geographic areas. These representatives will be comprised of a consulting firm that specializes in the CoC program and a cross-section of groups participating in the CoC, including faith-based providers, private sector, non-profit providers of homeless services and housing and jurisdiction staff. RRC members have no financial stake or interest in a CoC funded program.

The Rating and Ranking process will take place between September 07, 2022 and September 14, 2022. RRC members will be oriented to the NOFO, the CoC competition, the Rating and Ranking tool, and the CoC's priorities. They will receive each application electronically and review each application independently. Projects will first be rated based on minimum threshold requirements, then ratings will be assigned based on customized rating criteria established by the CoC. Five raters will independently rate each application.

On September 15, 2022, raters will convene to review rating scores and rank applications. Thereafter, the RRC will discuss and adjust the ranking for each project based on its established criteria and the CoC's priorities. The RRC will finalize the Ranking to best meet the priorities of the CoC.

The final ranking will include a motion, a second and a majority of the RRC voting in favor of the final ranking for it to pass as a recommendation to the Steering Committee.

RATING

Each project application will be reviewed and scored by five independent reviewers from the RRC during the date of the Rating and Ranking committee meeting.

- The reviewers will first read through each application for completeness, then check to see if each application meets the Threshold Requirements.
- After each independent reviewer has checked to see if the application meets the Threshold Requirements, they will score the application based on the criteria outlined in the previous section entitled "Rating Criteria".
- After each reviewer scores the application using the published Rating and Ranking Tool, the committee will calculate the average of the scores, and enter the calculated scores in the final scoring matrix. This calculation will give the Rating and Ranking committee the preliminary project ratings.

RANKING

The scores from each Rating and Ranking Committee member will be computed and averaged for each project and entered into the CoC's Rating and Ranking tool, which generates the preliminary project ranking list from highest to lowest average score. The CoC ranking committee will then discuss all projects and move up in ranking those project applications that the CoC determines are high priority, high performing, and meet the needs and gaps as identified in the CoC. The CoC considers the policy priorities established in the Special NOFO in conjunction with local priorities to determine the ranking of new and renewal project application requests.

CoCs should use objective, performance-based scoring criteria and selection priorities that are approved by the CoC to determine the extent to which each project addresses HUD's policy priorities. See Section II of the Special NOFO for more information on HUD's homeless policy and program priorities. The following provides additional context regarding the selection criteria:

- **Unsheltered Homelessness.** Unsheltered homelessness is continuing to rise in many areas of the country and recent analysis of homelessness data shows that people experiencing unsheltered homelessness report significantly greater health challenges and experiences of trauma and violence than their sheltered peers. These challenges often begin before they lose their housing. This NOFO supports this highly vulnerable population by supporting CoCs in their efforts to identify people living in unsheltered situations, including encampments, and connects them with health and housing resources. It also supports CoCs in their efforts to enhance their Homeless Management Information System (HMIS) to collect more comprehensive data on people experiencing unsheltered homelessness in their geographic area.
- **Unsheltered Homelessness and Individuals and Families Experiencing Homelessness with Severe Service Needs in Rural Areas.** Rural areas often lack the resources and infrastructure for providing homeless services and permanent housing. Additionally, rural areas often require unique strategies to solve challenges specific to their geography. To support CoCs in their efforts to end unsheltered homelessness in their rural areas, this NOFO targets resources to rural areas and provides additional eligible activities to address some of the unique needs of rural areas.
- **Providing Assistance on Tribal Lands.** Indian Reservations and Trust Lands may be all or part of a CoCs' geographic areas, and Indian Tribes and Tribally Designated Housing Entities are eligible recipients of CoC Program funds. This NOFO provides additional incentives for creating projects that serve individuals and families in geographic areas that have high levels of homelessness, housing distress, or poverty, and are located where CoC services have until now been entirely unavailable, such as, for example, Trust Lands and Reservations.
- **Involving a Broad Array of Stakeholders in the CoC's Efforts to Reduce Homelessness.** Ending homelessness cannot be achieved by homeless service organizations alone. It requires coordination with a variety of other stakeholders, including affordable housing developers, mainstream service providers, the business community, victim service providers, political leaders, and healthcare providers. This NOFO supports and encourages CoCs to invite a variety of stakeholders to develop and implement a CoC Plan to Serve Individuals and Families Experiencing Homelessness with Severe Service Needs.
- **Advancing Equity.** In nearly every community, Black, Indigenous, and other people of color as well as individuals who identify as LGBTQ+ and individuals with disabilities are substantially overrepresented in the homeless population. HUD is emphasizing system and program changes to address equity within CoCs through identifying and addressing the needs of subpopulations who are disproportionately more likely to experience

homelessness, such as the populations identified above, and other populations who are disproportionately more likely to experience homelessness. CoCs should be reviewing their strategies to support and serve underserved communities in their geographic area, identify barriers that led to any disparities in communities being served, and take steps to eliminate these barriers. This includes, in conjunction with people experiencing homelessness, reviewing local policies, procedures, and processes to determine where and how to address disparities affecting underserved communities experiencing homelessness.

- **Use a Housing First approach.** Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. Projects funded under this NOFO should help individuals and families move quickly into permanent housing, and the CoC should measure and help projects reduce the length of time people experience homelessness as well as ensure projects are correctly implementing a Housing First approach. Additionally, CoCs should engage landlords and property owners to identify an inventory of housing available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt service delivery methods that respond to the preferences and needs of the individual or family presenting for assistance.

RANKING RESULTS

The Rating and Ranking Committee, which will meet on September 15, 2022, to establish and approve the rankings has the authority to approve the rating and ranking on behalf of the CoC. The results will be presented to the Continuum of Care General meeting on October 4th, 2022 for final approval.

APPEALS PROCESS

DENIED OR DECREASED FUNDING

If an applicant wishes to appeal rating and ranking outcomes that resulted in denied or decreased funding, they must submit a letter of appeal to the chair of the CoC. Applicants will have 14 days from the receipt of their written notice of confirmation that their application will or will not be included in the CoC Application. The governing body of the CoC will be convened on October 4th to review any such appeal submitted prior to October 4th, 2022 and will notify the appellant in writing of the results of the appeal.

REJECTED PROJECTS

Project applicants whose project was rejected may appeal the local CoC competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local CoC planning process in a reasonable manner by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline on October 20, 2022. The CoC's notification of rejection of the project in the local competition must be attached to the Solo Application. If the CoC fails to provide written notification outside of e-snaps, the Solo Applicant must attach evidence that it attempted to participate in the local CoC planning process and submitted a project application that met the local deadlines, along with a statement that the CoC did not provide the Solo Applicant written notification of the CoC rejecting the project in the local CoC competition. See Section X.C. in the Special NOFO for more information.

NEW PROJECT SUPPLEMENTAL APPLICATION

Project Name: _____

Agency Name: _____

Project Type: ☐ Permanent Housing ☐ Rapid ReHousing☐ Joint Transitional Housing & Rapid ReHousing ☐ HMIS ☐ SSO

Section I – Threshold Requirements

1. Do you currently participate in Coordinated Entry? ☐ Yes ☐ No
 - a. If so, please describe for which program or project.
 - b. If not, please describe your plan for quickly moving to full participation in Coordinated Entry.
2. Amount of Funding Requested: \$ _____
3. Amount of Match documented with letters attached to project application in e-snaps:
\$ _____
4. Have you provided a copy of your most recent audit and management letter?
Yes _____ No _____
5. Number of CoC Leadership, Subcommittee, Working Group or General Meetings attended August 2021-July 2022: _____

Meeting	Dates Attended
CoC Leadership Meetings (RAAH Leadership Council)	
Subcommittee Meetings	
Working Group Meetings	
General Meetings (RAAH General Meetings)	
Other: (please specify)	

Section II – Local Criteria

6. Please describe your agency's experience in working with the proposed population and in providing housing as proposed in the application.
7. Do you offer services using a Housing First approach?
☐ Yes ☐ No
8. If you answered yes to question 7, describe your agency's experience utilizing a Housing First approach. Include 1) eligibility criteria; 2) process for accepting new clients; 3) process and criteria for exiting clients.
 - a. Describe if the project has any preconditions to entry

- b. Describe the proposed process to address situations that may jeopardize housing or project assistance
9. Describe your agency's experience in effectively utilizing federal funds including HUD grants and other public funding, including satisfactory drawdowns and performance for existing grants as evidenced by timely reimbursement of subrecipients (if applicable), regular drawdowns, timely resolution of monitoring findings, and timely submission of required reporting on existing grants.
10. Please describe the following:
- a. Needs of clients to be served
 - b. Type, scale, and location of the housing
 - c. Type and scale of all supportive services, regardless of funding source
 - d. How clients will be assisted in obtaining and coordinating the provision of mainstream benefits
 - e. How performance measures for housing and income will be established that are objective, measurable, trackable, and meet or exceed any established HUD, HEARTH, or CoC benchmarks
11. Select all "Harder to Serve" homeless or at-risk of homeless populations served:
- ☐ Mental Illness
 - ☐ Alcohol Abuse
 - ☐ Drug Abuse
 - ☐ Chronic Health Conditions
 - ☐ HIV
 - ☐ Developmental Disabilities
 - ☐ Physical Disabilities
 - ☐ Domestic Violence
 - ☐ Unaccompanied Youth under age 18
 - ☐ Unaccompanied TAY age 18-24 years
12. Describe how you consider the severity of needs and vulnerabilities experienced by program participants which includes (check all populations your project serves):
- ☐ Low or no income
 - ☐ Current or past substance abuse
 - ☐ Criminal record—with the exception of restrictions imposed by federal, state, or local law or ordinance
 - ☐ Chronic homelessness
- a. How many individuals and/or family members will you serve, if funded?
- b. Please provide your projected cost per person: _____
- c. Of those, how many would be chronically homeless?
13. Describe the agency's strategy to address individuals and families at risk of becoming homeless.

14. Describe the agency's strategy to reduce the length-of-time individuals and families remain homeless.
15. Describe the agency's plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs.
- d. **For Permanent Housing Projects Only:** How will the agency increase the rate at which individuals and persons in families in permanent housing retain their permanent housing or exit to permanent housing destinations?
 - e. **For all projects:** Describe how the agency addresses both housing and service needs to ensure families successfully maintain their housing once assistance ends.
16. Describe how clients will be assisted to increase access to employment and non-employment cash sources.
- f. How does the agency work with mainstream employment organizations to help individuals and families increase their cash income?
 - g. How does the agency keep program staff up-to-date regarding mainstream resources available for persons experiencing homelessness (e.g., SNAP, SSI, TANF, substance abuse programs)?
17. Describe how the agency will identify common factors of individuals and persons in families who return to homelessness.
- h. What is the agency's strategy to reduce the rate of additional returns to homelessness?
18. Describe the agency's street outreach including how often is it conducted and describe how the agency tailored its street outreach to persons experiencing homelessness who are least likely to request assistance.
19. Does the agency have a specific strategy that furthers fair housing used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identity, sexual orientation, age, familial status, or disability?
- ☐ Yes ☐ No
- i. If yes, please describe how this strategy effectively communicates fair housing with persons with disabilities and limited English proficiency?
 - j. If no, please provide a calendar of when such a strategy will be implemented.

20. How many months of operating funds does your organization have in reserve in order to support this project?

21. Does the agency have under-represented individuals (BIPOC, LGBTQ+, etc.) in managerial and leadership positions? Yes _____ No _____

22. Does the agency Board of Directors include representation from more than one person with lived experience (previously or currently experienced homelessness)? Yes _____ No _____

23. Does your agency have a documented process for receiving and incorporating feedback from persons with lived experience during both the project planning and review process? Yes _____ No _____
(If Yes, please include a copy of this policies in the attachments)

24. Has your agency reviewed internal policies and procedures with an equity lens and created a plan for the development and implementation of more equitable policies and procedures that do not impose undue barriers? Yes _____ No _____

If Yes, please describe the plan.

25. Has your agency reviewed program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/ or age? Yes _____ No _____

If Yes, please describe your findings.

Application Attachments to Include:

- ☐ If your agency does not currently receive a HUD Continuum of Care grant, please provide a copy of your 501c3 determination letter
- ☐ Most recent audit and management letter
- ☐ Documented process for receiving and incorporating feedback from persons with lived experience
- ☐ New Project Assurances

Assurances- New Project Grant Applicants

Please review and certify that your organization meets the following criteria. **You must check either Yes or No for each question; do not leave any questions blank.**

☐ **Yes** ☐ **No** 1. Applicant has Active SAM registration with current information.

☐ **Yes** ☐ **No** 2. Applicant has Valid DUNS number in application.

☐ **Yes** ☐ **No** 3. Applicant has no Outstanding Delinquent Federal Debts- It is HUD policy, consistent with the purposes and intent of 31 U.S.C. 3720B and 28 U.S.C. 3201(e), that applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds, unless:

(a) A negotiated repayment schedule is established and the repayment schedule is not delinquent, or

(b) Other arrangements satisfactory to HUD are made before the award of funds by HUD.

☐ **Yes** ☐ **No** 4. Applicant has no Debarments and/or Suspensions - In accordance with 2 CFR 2424, no award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal Government.

☐ **Yes** ☐ **No** 5. Applicant has Accounting System - HUD will not award or disburse funds to applicants that do not have a financial management system that meets federal standards as described at 2 CFR 200.302. HUD may arrange for a survey of financial management systems for applicants selected for award who have not previously received federal financial assistance or where HUD Program officials have reason to question whether a financial management system meets federal standards, or for applicants considered high risk based on past performance or financial management findings.

☐ **Yes** ☐ **No** 6. Applicant has disclosed any violations of Federal criminal law - Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.

☐ **Yes** ☐ **No** 7. Applicant has demonstrated they are Eligible Project Applicants - Eligible project applicants for the CoC Program Competition are, under 24 CFR 578.15, nonprofit organizations, States, local governments, and instrumentalities of State and local governments. Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. Neither for-profit entities nor Indian tribes are eligible to apply for grants or to be subrecipients of grant funds.

☐ **Yes** ☐ **No** 8. Applicant has submitted the required certifications as specified in the Special NOFO.

☐ **Yes** ☐ **No** 9. Applicant has demonstrated the project is cost-effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.

☐ **Yes** ☐ **No** 10. Applicant has demonstrated they Participate in HMIS - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that complies with the federal HMIS data and technical standards. While not prohibited from using HMIS, legal services providers may use a comparable database that complies with federal HMIS data and technical standards, if deemed necessary to protect attorney client privilege.

☐ **Yes** ☐ **No** 11. Applicant has demonstrated Project Meets Minimum Project Standards - HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness, and performance standards. Please note that these are minimum threshold criteria. CoCs and project applicants should carefully review the Special NOFO to ensure they understand and have accounted for all applicable standards. To be considered as meeting project quality threshold, all new projects must meet all of the following criteria:

- (a) Project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded under the SHP, S+C, or CoC Program, as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings;
- (b) Project applicants must demonstrate they will be able to meet all timeliness standards per 24 CFR 578.85. Project applicants with existing projects must demonstrate that they have met all project renewal threshold requirements of this NOFA. HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit or monitoring finding related to one or more existing grants, or does not routinely draw down funds from eLOCCS at least once per quarter. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on the prior grant.