

HUD CONTINUUM OF CARE (CoC) 2014 RENEWAL APPLICATIONS

Guidance Document #1: General Timeline and Completing Your Project Application

September 22, 2014

This document provides updated information and tips on the Continuum of Care 2014 Renewal application process. We will continue to send out these updates as needed throughout the application process. Note that as in prior years, HUD has released comprehensive documentation of the step-by-step application process. Much of the information below is available through linked documents at HUD websites, most of which can be found through their [CoC Program Competition Resources](#) page. We strongly encourage you to review those documents.

Here's what's in this Guidance Document:

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Who do we contact with questions? For application questions, you can contact Ryan Deibert at 503-823-2368 or ryan.deibert@portlandoregon.gov. If you have specific questions about *e-snaps* you can find HUD guidance, training documents, search or browse FAQs or submit specific technical assistance requests or questions via the HUD Exchange website: <https://www.hudexchange.info/e-snaps/fy-2013-coc-program-nofa-coc-program-competition/>.

What does the overall process look like this year? The 2014 CoC application process is the third to be conducted since implementation of the HEARTH Act through CoC Interim Rule. The [CoC Interim Rule](#), [HUD's 2013-14 CoC Notice of Funds Available \(NOFA\)](#), and the separate [NOFA for the 2014 portion of funds in the 2013-14 competition](#) (just released on September 16, 2014) establish the regulations and application process at the national level. Generally, the process for renewal project applications in 2014 is fairly similar to prior years, though HUD has simplified the renewal application process in 2014 by allowing applicants to import their project applications from 2013 directly via e-snaps. This should reduce the amount of effort required to complete your renewal application this year.

As in prior years, HUD is again requiring each CoC to submit its renewal project applications in two "tiers." The tiers are monetary thresholds, with "Tier 1" equal to the full renewal value of all CoC projects, less 2% (i.e. Tier 1 equals 98% of the value of all renewal projects); "Tier 2" is equal to the remaining 2%, plus the amount of each CoC's eligible planning costs. In awarding 2014 project funding, HUD will first fund all projects in Tier 1, and then move on to fund projects in Tier 2, as funds are

available. Notably, though, HUD projects that there are sufficient funds nationally to award all renewal projects, regardless of their tier placement.

Additionally, HUD has set aside \$40 million nationally for new permanent housing bonus projects that provide permanent supportive housing to chronically homeless households. Under the conditions of the 2014 NOFA, our community will be able to submit one bonus project application for up to ~~\$848,520~~ **\$1,969,805**. The bonus project application is submitted outside of the funding tiers, so it will be separate from and in addition to the tiered amounts.

In addition to the tiered application process, HUD is again requiring all CoCs to rate and rank each project application within the CoC. We will distribute separate guidance very soon regarding this year’s rating and ranking process, our process for assigning project applications to Tier 1 and Tier 2, and the application and selection process for the permanent housing bonus project.

HUD will again conduct a basic threshold review of all renewal projects and will approve and award renewal projects relatively quickly following the full CoC application submission. HUD has previously expressed intent to announce renewal awards within the calendar year, but we expect that they may do so early in 2015.

What are our internal deadlines for Project Application submission this year? HUD’s timeline for the CoC competition is generally very challenging, and they have made it more so this year by shortening the full application process to 45-days (rather than 60 in prior years). HUD, has, however made detailed guidance available very early in the competition and is allowing projects to import their application data from 2013, which should help in meeting the shorter timeline. The general timeline is:

Application Step	Date (2014)
HUD releases 2014 CoC NOFA	Tuesday, September 16
PHB releases preliminary local guidance to renewing projects	Monday, September 22
PHB releases additional local guidance to renewing projects and schedules informal Q&A session for renewing projects	TBD, following completion of rating/ranking timeline
2014 CoC Taskforce presents project rating/ranking results and recommended Tier 1/Tier 2 placements to HFE Coordinating Board	Wednesday, October 8
All renewing Project Applications complete and submitted in e-snaps	5:00 PM, Friday, October 10
PHB reviews all renewing Project Applications – requested changes sent to new and renewing projects	October 13 - 17
Renewing projects incorporate all requested changes to their Project Applications into e-snaps	Wednesday, October 22
PHB reviews and gives final approval to all Project Applications	October 22 - 24
PHB consolidates and completes all required elements of the CoC’s 2014 application, makes available for review online	Approximately October 27
PHB submits full 2014 Application to HUD	No later than September 30

Accessing e-snaps and HUD's application instructions

Where do I access e-snaps, and what if I've forgotten my user name or password (or need a new user name and password for new staff)? You can access e-snaps at www.hud.gov/esnaps. Instructions for adding or deleting users to e-snaps are available at the [CoC Program Competition Resources](#) site. Instructions for creating a user profile or updating passwords are available on pages 5-8 of the [Project Applicant Profile Instructional Guide](#).

How do I access HUD's instructions for completing my 2014 Project Application (formerly known as Exhibit 2) in e-snaps? HUD has made available several detailed guidance documents to assist you in completing your renewal project application. You are strongly encouraged to review them:

- [Project Applicant Profile Instructional Guide](#): Written instructions for updating your Applicant Profile – the required first step before you will be able to access your Project Application.
- [Accessing the Project Application Resource](#): This document is fairly duplicative to our summary below, but it includes screen shots that may help you navigate e-snaps more effectively.
- [Renewal Project Application Instructional Guide and Renewal Project Detailed Instructions](#): These two documents are the primary written instructions that will help you navigate both Section 1 and Section 2 of your Project Application.
- [Budgets – Project Application Instructional Guide](#): Detailed instructions for completing the budget section of your Project Application
- [Performance Measures – Project Application Instructional Guide](#): Detailed instructions for completing the Performance Measures section of your Project Application.

Together, HUD's published documents are a comprehensive resource for working with your project applications in e-snaps, but we summarize steps to access and submit your Project Application below and follow with tips for how to specifically complete some elements of the application.

What are the steps to access and complete my Project Application?

1. **Complete your Applicant Profile:** To get started with your Project Application, you first need to complete your project Applicant Profile if you haven't already done so. See HUD's [Project Applicant Profile Instructional Guide](#) for step-by-step instructions. Also, see additional tips on completing your applicant profile on pages 6-7 below.
2. **Create and access your Project Application in e-snaps:** Once your Project Applicant Profile is updated and completed, you need to follow the instructions beginning on page 4 of HUD's [Accessing the Project Application Resource](#) to create your project application in e-snaps. Those steps are summarized here:
 - a. You must register your organization for the appropriate funding opportunity by selecting "Funding Opportunity Registrations" on the left menu bar.
 - b. Once on the "Funding Opportunity Registrations" screens, select the "Register" icon next to "Renewal Project Application FY2014."
 - c. The "Funding Opportunity Details" screen appears. 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. The screen will then indicate that the Applicant has been registered. Select the "Back" button to return to the "Funding Opportunity Registrations" screen.

- d. Next, you must create a project for the specific Application in e-snaps on the "Projects" screen.
 - Select "Projects" on the left menu bar.
 - The "Projects" screen appears.
 - Select "Renewal Project Application FY2014" from the "Funding Opportunity Name" dropdown.
 - The screen refreshes and an "Add" icon appears on the left side of the screen above the column headings.
 - Select the "Add" icon.
 - The "Create a Project" screen appears. Enter the required information on the screen. Unless HUD has instructed you otherwise, you should enter the project name exactly as it appears in the final approved [Grant Inventory Worksheet](#) (which we also distributed via email along with this guidance). This will be the project name that will appear in your grant award letter.
 - **VERY IMPORTANT: If you are creating a Renewal Project Application, you will see an "Import Data From:" field. To import the data from your project application from last year, you must select the project that is being renewed. This will ensure that your project information is imported and will decrease the amount of information that must be entered in the FY 2014 Project Application. If you don't import the data here, you will be starting your application from scratch, which will require more time and effort and may lead to application errors.**
 - Select "Save and Back."
 - The project name will be listed on the screen.
 - Repeat steps for each Project.
3. **Complete your Project Application(s):** Now that you have registered for the appropriate funding opportunity and created a project, you can follow HUD's [Renewal Project Application Instructional Guide and Renewal Project Detailed Instructions](#), the [Budgets – Project Application Instructional Guide](#), and the [Performance Measures – Project Application Instructional Guide](#) to complete and submit your application. Begin by navigating to the Submission screen on the left menu bar, select the orange folder next to your project, and begin the Project Application. Note that there may be several orange folders with similar project names. Make sure to select the project with "Renewal Project Application FY2014" listed in the "Funding Opportunity Name/Step Name" column. Some additional notes:
 - a. Within the Project Application, you must complete Part 1 (SF-424) and electronically sign the declaration at 1F before you will be able to access any other portions of the project application (Section 2).
4. **Submit your application(s) for PHB review:** Once you've completed your Project Application in *e-snaps*, follow the instructions on page 71 of the [Renewal Project Application Instructional Guide](#) to submit the application to PHB within *e-snaps*. It's important to note that within *e-snaps* you are only submitting the application for PHB's review. Only PHB can submit your application to HUD once we have determined that all of our CoC's applications are complete. **You must complete this step by 5:00 PM, Friday, October 10.**

TIPS FOR UPDATING YOUR APPLICANT PROFILE

The Applicant Profile stores important information for your organization and its designated contact person, as well as many of the attachments that are required to complete your Project Application. You will not be able to access your Project Application until you have completed the Applicant Profile (though see some notes about workarounds on page 7).

HUD has published detailed step-by-step instructions for accessing, updating, and completing your Applicant Profile. They are contained in HUD's [Project Applicant Profile Instructional Guide](#). Please review that guide carefully; it should be very helpful. Some additional tips follow:

Which attachments to the Applicant Profile do we need to complete?

- Applicant/Recipient Disclosure/Update Report (HUD Form 2880):** This is a required form. You are required to submit one form per project. In 2014 HUD is again requiring that all projects upload a current date 2880 that accurately reflects the total amount requested in the 2014 competition. The form must be signed and dated no earlier than June 1, 2014. Make sure that the amount you enter for question #4 under the Applicant/Recipient Information section is exactly equal to the amount listed in your project application and in the final approved our [Grant Inventory Worksheet](#) (which we also distributed via email along with this guidance). For question #2 under the Part I Threshold Determinations section, most applicants will answer "no." Our understanding is that the question asks whether a specific project receives more than \$200k in HUD money in addition to what it receives through this CoC renewal application. If you have multiple projects, you must fill out one form per project and then combine the forms into one file as a zip file before uploading it. (Information on how to create a zip file is available [here](#).) Find blank HUD Form 2880s at [this link](#).
- Disclosure of Lobbying Activities (SF-LLL):** This form is required if your organization is a nonprofit organization and is engaged in lobbying. Here is what the form says about who must fill it out: "The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action." HUD requires that you update previous versions of this form with a new SF-LLL signed and dated within the past 12 months. If your agency is not engaged in lobbying associated with CoC, you should complete the form by filling in your agency name and address in 4; leaving 5, 8, and 9 blank; and filling in and signing info in 11. Scan and upload. If you are engaged in lobbying, you'll need to fill it out with that information instead. Find blank SF-LLL forms at [this link](#).
- Code of Conduct:** The 2013 instructions indicate that if you previously uploaded a copy of your Code of Conduct into *e-snaps* or your Code of Conduct is listed [here](#), you *will not* be required to submit another copy. Applicants not meeting these requirements or whose previously submitted Code of Conduct is no longer accurate (e.g. if the authorized representative has changed) should attach a copy of the Code of Conduct with the Applicant Profile.
- Drug-free Workplace Certification (HUD Form 50070):** In prior years, the 50070 and Code of Conduct were submitted together as a single document. In 2014, HUD requires that Applicants submit the 50070 as a separate document, even if it was previously attached in a prior competition. The form must be signed and dated no earlier than June 1, 2014. Find blank HUD Form 50070s at [this link](#).
- Non-profit documentation:** If you choose M or N for "Type of Applicant," you are required to upload non-profit documentation unless the documentation already appears in the "Nonprofit Document" screen *and* the documentation has not changed. If it has changed, delete the old document and upload the new.

- **Survey on Ensuring Equal Opportunities for Applicants:** The NOFA text indicates that “completion/submission of this survey is voluntary,” but the attachment appears to be required by e-snaps for all non-profits in 2014. HUD’s instructions indicate that you must replace an existing survey with a “new current date” version. Find blank Survey on Ensuring Equal Opportunities for Applicants forms at [this link](#).

If I’m waiting for signatures or other information on the Applicant Profile attachments, can I access my Project Application in the meantime? *E-snaps* does not allow you to access your Project Application until you have hit the “Complete” button on the Applicant Profile, and you can’t hit the “Complete” button until all required components are completed, including uploads of required documents. That said, you can upload “placeholder” documents (e.g. a blank HUD 2880 form instead of a complete, signed and scanned document), and then hit “Complete”. This will allow you to move on to access your Project Application. Later, when you get the completed, signed documents, you can edit your Applicant Profile by completing the following steps: 1) Click “Applicants” in the left hand column of the home screen in *e-snaps*, 2) Click the yellow folder next to your agency name, 3) Click “Submission Summary” in the left hand column, 4) Click “Edit”, 5) Choose the screen for the file you need to upload (in this example, click “Applicant/Recipient Disclosure/Update Report (HUD 2880)”), 6) Click the red “X” next to the uploaded placeholder file to delete it, 7) Upload the completed file, and click “Save,” 8) Return to the “Submission Summary” screen, 9) Click “Complete”.

TIPS FOR COMPLETING YOUR PROJECT APPLICATION

Thankfully, all of the work that you did last year to enter your Project Application into *e-snaps* will import directly into your Project Application this year. Projects are strongly encouraged to import the information from your 2013 Project Application and to change that information only when you know it is incorrect and/or requires update. Please review each question carefully to make sure data that you're importing from your 2013 Project Application is still accurate.

In general, the guidance below addresses questions that are specific to our CoC. HUD's detailed instructions linked above and on each page within e-snaps (accessible by clicking on "Instructions: [show]" at the top of each page), address how to answer many of these questions. If this guidance does not specifically address how you should answer a given question, please consult HUD's instructions.

How do I name my project? Unless HUD has instructed you otherwise, you should enter the project name exactly as it appears in the [Grant Inventory Worksheet](#) (which we also distributed via email along with this guidance). This will be the project name that will appear in your grant award letter.

How should I answer each of the specific questions in the SF-424 (Section 1)? In general, you are strongly encouraged to complete the Section 1 with the same information that you provided last year, unless that information has changed. Throughout the Project Application, several fields are intentionally left blank and you will not be able to edit them. Other answers are imported directly from your Applicant Profile, and may only be changed by leaving the Project Application, editing your Applicant Profile, and returning to your Project Application. It may be helpful to verify these types of details by clicking "[show]" next to the word "Instructions" at the top of each page within the Project Application. Tips relating to specific questions are also highlighted below.

Form 1A. Application Type, question 5b. (Federal Award Identifier) must be answered with the project's correct expiring grant number as it was listed on our [Grant Inventory Worksheet](#).

On Form 1C. Application Details, the funding opportunity number for the 2014 application should auto-populate, but it's FR-5800-N-30.

On Form 1D. Congressional Districts, Question 17 (Proposed Start Date), you should enter the day after your current grant end date as the Start Date. For example, if your current grant end date is 06/30/2015, then you should enter 07/01/2015 as your Proposed Start Date. Your Proposed End Date should be one-year later (in this example, it should be 06/30/2016). Confirm your current grant end date in our [Grant Inventory Worksheet](#).

On Form 1E. Compliance, Question 19 reads: "Is the Application subject to review by State Executive Order 12372 Process?" You should answer: "Program is subject to E.O. 12372 but has not been selected by the State for review," and leave blank the date the application was made available to the State for review.

Screen 3A:

- **Where can I verify my Expiring Grant Number?** Find it either on your current grant agreement with HUD or listed in our [Grant Inventory Worksheet](#).
- **What is our CoC Number and Name?** OR-501 Portland/Gresham/Multnomah County CoC
- **How do I answer “Project Status”?** Standard
- **Where do I find my project component type?** Verify your component type in our [Grant Inventory Worksheet](#).

Screen 3B (Note that this screen and the question numbering may look different depending on your project type (e.g. PH vs. TH) and whether the project includes rental assistance):

- **Question 2 (Does your project participate in a CoC Coordinated Assessment System)?** Most projects will answer “no,” since our CoC does not yet have a complete Coordinated Assessment System, but if your project participates in population-specific coordinated entry systems (e.g. the Homeless Youth Continuum or the Homeless Family System of Care) you can answer “yes.”
- **Question 4 (TH and SSO ONLY): Do you plan to on serving youth under category 3...?** You should answer “No.” Our CoC is not eligible to deliver these services.
- **Question 5 (PH ONLY - Does the project follow a Housing First model?):** If you answered “Yes” in 2013, you must answer “Yes” again in 2014. Anyone answering “Yes” should specifically address how the project uses the Housing First model in its general project description (3B, question 1). See additional HUD guidance in the [FY 2014 Renewal Project Detailed Instructions](#).
- **Question 5 (TH ONLY - How do I select the maximum length of assistance?):** If your project is a transitional housing project, the maximum length cannot exceed 24 months, but your project may have shorter maximum length of assistance based on the project’s policies and procedures
- **Question 6: How do I identify the correct type of rental assistance?** Answer in the same manner you did last year, unless you changed your assistance type through a grant amendment with HUD.
- **Question 7b: Describing the method for determining type, amount, and duration of rental assistance.** We recommend using the same language that you used last year. In general, that should look something like this for:
 - **PSH:** “Program participants meet periodically to determine supportive housing needs, and Program staff will meet with program participants initially and at least annually thereafter to determine resident rent as required by Section 578.77(c) of the CoC Interim Rule. Some program participants, especially those achieving greater levels of self-sufficiency, may choose to move on to other permanent housing opportunities.”
 - **RRH:** “Assistance is determined on an individual basis and on household size consistent with policies and procedures established by the Continuum of Care and with applicable parts of the CoC Interim Rule. Program participants will meet with program staff to assess need and eligibility at least annually (as required at Section 578.37(a)(1)(ii)(E) of the CoC Interim Rule) and will meet with a case manager not less than once per month to develop and implement a client case plan includes a plan for increasing self-sufficiency that coincides with reduced assistance over time (as required at Section 578.37(a)(1)(ii)(F) of the CoC Interim Rule).”

- **Question 7c: (SHP projects approved to revise from leasing to rental assistance).** If your project is already a rental assistance project, choose “No.” If yours is one of the few projects who were approved by HUD to transition from leasing to rental assistance via the 2014 Grant Inventory Worksheet, choose “Yes.”

Screen 4A:

- **How do I answer the questions related to the education subtitles of the McKinney-Vento Act (1a and 1b)?** The 2014 NOFA requires that all new and renewing projects that serve unaccompanied youth of families with children assure compliance with the education subtitles of the McKinney-Vento Act, and the Project Application includes questions that verify these assurances:
 - Applicants must demonstrate that the project is establishing policies and practices that are consistent with, and do not restrict the exercise of rights provided by the educational subtitle of the McKinney-Vento Act, and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness; and
 - Applicants that provide housing or services to families must demonstrate that a staff person is designated to ensure that children are enrolled in school and connected to the appropriate services within the community, including early childhood programs such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney-Vento education services.

For both questions, you should answer “yes”, unless your project does not serve children, in which case you should answer “not applicable.” If you have any concerns related to the degree to which your project complies with these assurances, we can provide further guidance regarding sample policies and practices.

Screen 4B. (Housing Type and Location). Again, you should essentially repeat your response from prior years. In general, the number of beds described here should be consistent with the number of Total Persons that you propose to serve in Screen 5A.

Screen 4C: Homeless Management Information System Participation.

- Question 1: The only projects that should answer “no” are projects that serve survivors of domestic violence or new projects that are not yet operational. All other projects should answer “yes.” **Domestic violence service providers** should choose “Federal Law Prohibits” as their reason (question 2a) and can should include this narrative for the specific citation: “HMIS participation prohibited by VAWA: 42 USC Chapter 136 Section 13295 (b)(2) and FVPSA: 42 USC Chapter 110 Section 10406 (c)(5); Project uses comparable database for information collection and management as required in 24 CFR 578.57.”
- For all projects answering “yes,” you can generate the required data for questions 2a, 2b, and 3 by running the “HUD APR (0625)” in Service Point with the time period (01/01/2013 – 12/31/2013). Note that this will reflect all participants served during this time period, which may differ from your responses in 5A and 5B (5A and 5B look only at a single point in time).

Parts 5A and 5B (Participant Screens):

- Data entered in 5A and 5B should reflect your estimate of the number of participants in the program when the program is at full capacity (at a point in time, *not* over the course of the year). Unless you anticipate significant changes in populations served between your 2013 grant and 2014 grant, you should repeat the values from your 2013 grant application. If you expect differences in client populations, you should estimate this based on your project's past performance and in light of any changes to your project budget. If you're making changes, Service Point includes a report that may assist you in completing this section. The report is available within Service Point at: Public Folder > Continuum of Care Reports > 0636 - Project Participant 5A-5B NOFA 2013-2014. If you need assistance determining a specific night at which you were at full capacity, it may help to use the Service Point "0315 Program Daily Census" report (Provider Information folder). That report only produces program census for a one-month period, so you may have to run multiple months to find a night when your program was at maximum capacity. When in doubt, though, you can use the information based on the date of our most recent point in time count (January 29, 2014). Again, you only need to run these Service Point reports if you believe your population served in 2014 will be significantly different than that described in your 2013 application.
- **How does the change to the definition of "chronically homeless person" affect my Project Application sections describing project participants?** In 2010, the definition of chronically homeless person was expanded to include families. The HEARTH Act and CoC Interim Rule solidified the change in definition of "chronically homeless person" to include an unaccompanied homeless individual with a disabling condition or an adult member of a homeless family who has a disabling condition who has either been continuously homeless for 1 year or more, OR has had at least four episodes of homelessness in the past 3 years. For the full definition, see 24 CFR 578.3 "Chronically homeless" in the [CoC Interim Rule](#). Renewing projects serving families may include chronically homeless families under the appropriate subpopulation on the "Project Participants – Subpopulations" screen. Again, the count should be based on your assessment of the number of participants served by the program on a particular night or day when the program is at full capacity.
- Screen 5B again includes a column for "persons not represented by listed subpopulations" that you include elsewhere in the screen. That column should reflect any persons who are non-chronically homeless, non-veterans (e.g. members of non-chronically homeless, non-disabled families in rapid rehousing projects). It's not clear whether HUD will require narrative describing these persons, as HUD did last year. If HUD does require narrative, we encourage you to provide brief narrative that explains who the persons are (e.g. members of non-chronically homeless, non-disabled families) and that they meet existing eligibility criteria under the CoC Interim Rule and any additional relevant NOFA conditions.

When completing screen 5C (Outreach to participants), make sure to note any client eligibility restrictions associated with your original CoC grant application. For instance, if your project was awarded under the Permanent Housing Bonus, you will generally be restricted to serving only clients who come from the street, shelter, or Safe Havens. See more about eligible client populations at Section V.E.2.d.(4) (page 26-27) of the [FY2014 CoC NOFA](#).

How should I complete the Performance Measures sections of the Project Application? As in prior years the Project Application includes a section on performance measures that are specific to the type of project you are renewing. Full instructions for completing the section are in HUD’s [Performance Measures – Project Application Instructional Guide](#).

Your project’s future performance in your APR will be measured against the performance measures you enter here, so we encourage you to establish performance measures that are consistent with your actual project performance, rather than aspirational. We also encourage you to keep performance measures relatively simple and do not encourage you to record additional performance measures in Screen 6B unless they are core to your program and part of your routine data collection and reporting.

HUD has identified specific options for the types of performance measures you can choose to track. These options vary by project type and are listed in *e-snaps* in the appropriate fields of the Project Application Performance Measures section:

- **Permanent Housing:** All applicants for permanent housing projects are required to set a housing stability goal to be accomplished by the end of the upcoming operating year and reported in the APR. Applicants must also identify a goal for one income-related measure on which data will be reported in the APR. Applicants may also include up to three additional measures to be accomplished by the end of the upcoming operating year and reported in the APR.
- **Transitional Housing:** Transitional housing applicants are required to set a housing stability goal to be accomplished by the end of the upcoming operating year and reported in the APR. Applicants must also identify a goal for one income-related measure on which data will be reported in the APR. Applicants may also include up to three additional measures to be accomplished by the end of the upcoming operating year and reported in the APR.
- **Supportive Services Only:** The performance measure options for SSO applicants will depend on your responses to the question on the 4B “Supportive Services Only” form.

The 2013-14 NOFA shifted HUD’s competitive scoring of CoCs significantly toward performance objectives, some of which are different from the performance objectives they have used in prior competitions. While the 2014 NOFA, *e-snaps* instructions and other HUD policy guidance do not specifically address how to develop your performance measures, you may want to consider your performance against the measures you established in 2013 and the following CoC Strategic Planning Objectives that HUD and/or our local continuum have established:

CoC Objective	HUD National Benchmark	2013 Local CoC Actual Performance
Percentage of participants remaining in permanent housing or moving from transitional to permanent housing	80%	92%
Percentage of participants in all CoC funded projects that increase income from employment from entry to exit	20%	19%
Percentage of participants in all CoC funded projects that increased income from sources other than employment	20%	17%

If your project’s actual performance is significantly lower, you should consider program improvements that will allow the project to set performance measures that are closer to these benchmarks.

TIPS FOR UPDATING YOUR PROJECT APPLICATION BUDGET

For step-by-step guidelines on completing your Project Application budget, see HUD's [Budgets – Project Application Instructional Guide](#). Because several projects faced changes in their project budgets last year, *it is very important that you carefully review your project budget application to make sure it exactly matches the budget that is listed in our [Grant Inventory Worksheet](#)*. All of your individual budget line items, as well as your total project budget, *must exactly equal* those included in the Grant Inventory Worksheet.

On Screen 7A (Funding Request):

- **Question 3** (“Are the requested renewal funds reduced from the previous award using reallocation?”): Because we do not anticipate funding cuts similar to those we saw last year, your project budget should exactly match that listed in the Grant Inventory Worksheet, and you should answer “No” to this question. We do not expect to reduce renewal funds using reallocation this year.
- **Question 4:** Most projects bill directly for actual costs incurred, but some may bill using an indirect cost rate (particularly for admin). Consult with your accounting staff regarding how you bill. For more on eligible indirect costs, see Section 578.63 of the [CoC Interim Rule](#).

How do I find our total project budget amount? Your total project budget(s) entered into *e-snaps* must match those listed in the column labeled “Total ARA” (Column AU) in the [Grant Inventory Worksheet](#).

What is the maximum amount of Administrative funds I can request? The maximum admin entered into *e-snaps* must match those listed in the column labeled “Administrative Costs Requested” (Column AS) in the Grant Inventory Worksheet. This amount is the lower of: a) the admin amount in your 2013 budget, or b) 7% of the subtotal of your 2014 non-admin CoC-funded project costs. Note that the CoC Interim Rule, the 2014 NOFA, and the budget section of the application state that projects may apply for up to 10% admin, however in the 2013 NOFA HUD will rank CoCs higher if they limited all project applicants to no more than 7% admin (ours did). The 2014 NOFA requires that all CoCs that limited to 7% admin in 2013 also limit to 7% admin in 2014. Additionally, for projects with no change in total budget, HUD limits admin to the amount listed in the Grant Inventory Worksheet, which is based on the project’s existing grant agreement with HUD.

How do I enter match and leverage in the project budget?

Match and leverage amounts are entered in the “Sources of Match/Leverage Detail” form in *e-snaps*. Under the CoC Interim Rule, HUD significantly changed (and generally simplified) requirements around match. That said, HUD also reintroduced competitive ranking points for demonstrating leverage across the full CoC – both renewing projects and new projects. HUD’s guidance regarding match and leverage has been piecemeal and sometimes contradictory, but here’s what we know at this point:

- **Match:** HUD simplified the match requirements via the CoC Interim Rule. In 2014, the total of all project costs other than leasing must be matched with 25% cash or in-kind resources. The match is to the total requested budget amount, and does not have to be on an activity-by-activity basis. It must, however, be cash or in-kind resource dedicated to eligible activities under the Subpart D of

the [CoC Interim Rule](#). Those eligible activities are summarized in Appendix A of this document. Record match amounts in the Summary Budget (Screen 7J). This [short podcast](#) provides a good summary of match requirements. In order to maximize the amount that you can claim as leverage, you are strongly recommended to include only 25% as match. All other cash or in-kind commitment that you bring to the project should be characterized as leverage.

- **Leverage:** Any cash or in-kind support dedicated to the project beyond the required 25% match should be listed as leverage in the “Sources of Leverage” screen. Cash or in-kind leverage is not limited to eligible activities under the CoC Interim Rule (e.g. It can include the value of case management activities that are not explicitly included as eligible activities under the CoC Interim Rule.), but leverage must be committed to the project, not specifically to project participants (e.g. TANF payments to project participants cannot be claimed as leverage).

How do I have to document the match and leverage that I include in my Project Application? You will need to have commitment letters dated prior to October 30, 2014, on file for any leverage or match that you enter in the project budget, but you do not need to upload commitment letters to *e-snaps*. The written commitment must be documented on letterhead stationery, signed and dated by an authorized representative, and must, at a minimum, contain the following elements: the name of the organization providing the contribution; the type of contribution (e.g., cash, child care, case management, etc.); the value of the contribution; the name of the project and its sponsor organization to which the contribution will be given; and, the date the contribution will be available. Written agreements could include signed letters, memoranda of agreement, and other documented evidence of a commitment. The value of commitments of land, buildings, and equipment are one-time only and cannot be claimed by more than one project or by the same project in another year. For example, the value of donated land, buildings or equipment claimed in FY2013, or before, for a project cannot be claimed as leveraging by that project or any other project in subsequent competitions.

Eventually any in-kind commitments of match will need to be documented with a memorandum of understanding (MOU) that is completed prior to your renewal grant execution.

How much leverage and match should I post in my budget this year? In prior competitions we discouraged renewals from posting leverage, but HUD’s shift to ranking CoCs based on leverage from all projects requires that we strongly recommend detailing as much leverage as you can realistically document. In general, projects should attempt to post at least 150% leverage beyond their required match amounts. At a minimum, make sure that you have secured enough leverage to successfully operate your project and to assure HUD that your project is feasible.

What if I don’t have all my leverage and match in-hand right now? For your Project Application, list all the leverage and match that you expect to have in hand by October 30. You will need to have your commitment letters in a file by the time we submit your Project Application to HUD on October 30, but not until then. Eventually any in-kind commitments of match will need to be documented with a memorandum of understanding (MOU) that is completed prior to your renewal grant execution.

What if my leverage or match includes cash or in-kind from my own organization? That is fine, you just need to have a commitment letter in your files from your organization.

How can I make sure my Project Application is complete and correct before submitting it? Once you have completed your Project Application, you can export it to a PDF in *e-snaps* and save it onto your computer. Once you submit your Project Application via e-snaps on or before October 10, it will come to the Portland Housing Bureau, not HUD. We will have a chance at that point to review it and, if necessary, to return it to you for edits before we submit it to HUD. However, we cannot make edits directly to your application. HUD has improved the performance of e-snaps this year, such that returning Project Applications to you for additional editing is less cumbersome.

HUD will conduct an additional threshold review of our project before awarding funds. How can we make sure we'll pass the threshold review? The NOFA provides detailed information on HUD's threshold review of renewal projects, but in general, it will include: 1) Is your project performing well against its stated goals? 2) Is the project spending funds in a timely manner with at least quarterly draw-down of funds? 3) Is the project assisting participants to achieve and maintain independent living? 4) Does the project have any unresolved HUD site visit findings or other significant ongoing contract violations? If you have any concerns regarding your project's ability to meet these threshold criteria, please contact us immediately.

Appendix A
Match-Eligible Activities Under Subpart D of the CoC Interim Rule

Match-Eligible Activities	
Assessment of Service Needs	
Assistance with Moving Costs	
Case Management	The costs of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of program participants including: counseling; developing, securing and coordinating services, coordinated assessment, obtaining benefits, monitoring and evaluating participant progress; providing info and referral to other providers; providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault and stalking; and developing individualized housing and service plans.
Childcare	establishing and operating childcare, and providing childcare vouchers for children from families experiencing homelessness including providing meals and snacks, and comprehensive and coordinated development activities
Education Services	The costs of improving knowledge and basic educational skills are eligible. (i) Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). (ii) Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.
Employment Assistance and job training	The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost. (i) Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. (ii) Services that assist individuals in securing employment consist of: (A) Employment screening, assessment, or testing; (B) Structured job skills and job-seeking skills; (C) Special training and tutoring, including literacy training and pre-vocational training; (D) Books and instructional material; (E) Counseling or job coaching; and (F) Referral to community resources.
Food	The cost of providing meals or groceries to program participants is eligible
Housing Search and Counseling Services	Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible. (i) Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements. (ii) Other eligible costs are: (A) Mediation with property owners and landlords on behalf of eligible program participants; (B) Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and

	(C) The payment of rental application fees.
Legal Services	<p>the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.</p> <p>(i) Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.</p> <p>(ii) Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.</p> <p>(iii) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.</p> <p>(iv) Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.</p>
Like Skills Training	The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.
Mental Health Services	Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
Outpatient Health Services	<p>Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:</p> <p>(i) Providing an analysis or assessment of an individual's health problems and the development of a treatment plan;</p> <p>(ii) Assisting individuals to understand their health needs;</p> <p>(iii) Providing directly or assisting individuals to obtain and utilize appropriate medical treatment;</p> <p>(iv) Preventive medical care and health maintenance services, including in-home health services and emergency medical services;</p> <p>(v) Provision of appropriate medication;</p> <p>(vi) Providing follow-up services; and</p> <p>(vii) Preventive and non-cosmetic dental care.</p>
Rental Assistance Costs	Any rental assistance costs funded by sources other than the CoC project budget and used in accordance with regulations at Section 578.51 of the CoC Interim Rule.
Leasing or Operating Costs	Any Leasing or Operating costs funded by sources other than the CoC project budget costs used in accordance with regulations at Sections 578.49 and 578.55, respectively, of the CoC Interim Rule.

<p>Outreach Services</p>	<p>The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.</p> <p>(i) Eligible costs include the outreach worker’s transportation costs and a cell phone to be used by the individual performing the outreach.</p> <p>(ii) Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.</p>
<p>Substance Abuse Treatment Services</p>	<p>The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.</p>
<p>Transportation</p>	<p>Eligible costs are:</p> <p>(i) The costs of program participant’s travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section.</p> <p>(ii) Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;</p> <p>(iii) The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;</p> <p>(iv) The cost of gas, insurance, taxes, and maintenance for the vehicle;</p> <p>(v) The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and</p> <p>(vi) If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:</p> <p>(A) Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);</p> <p>(B) Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and</p> <p>(C) The recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.</p>
<p>Utility Deposits</p>	<p>This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.</p>
<p>HMIS</p>	<p>The recipient or subrecipient may use Continuum of Care program funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care, including the costs of:</p> <p>(i) Purchasing or leasing computer hardware;</p> <p>(ii) Purchasing software or software licenses;</p> <p>(iii) Purchasing or leasing equipment, including telephones, fax machines, and furniture;</p> <p>(iv) Obtaining technical support;</p> <p>(v) Leasing office space;</p> <p>(vi) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;</p>

	<p>(vii) Paying salaries for operating HMIS, including:</p> <ul style="list-style-type: none"> (A) Completing data entry; (B) Monitoring and reviewing data quality; (C) Completing data analysis; (D) Reporting to the HMIS Lead; (E) Training staff on using the HMIS; and (F) Implementing and complying with HMIS requirements; <p>(viii) Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;</p> <p>(ix) Paying staff travel costs to conduct intake; and</p> <p>(x) Paying participation fees charged by the HMIS Lead, as authorized by HUD, if the recipient or subrecipient is not the HMIS Lead.</p>
<p>Project Administration: General Management, Oversight and Coordination</p>	<p>Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:</p> <p>(i) Salaries, wages, and related costs of the recipient’s staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:</p> <ul style="list-style-type: none"> (A) Preparing program budgets and schedules, and amendments to those budgets and schedules; (B) Developing systems for assuring compliance with program requirements; (C) Developing agreements with subrecipients and contractors to carry out program activities; (D) Monitoring program activities for progress and compliance with program requirements; (E) Preparing reports and other documents directly related to the program for submission to HUD; (F) Coordinating the resolution of audit and monitoring findings; (G) Evaluating program results against stated objectives; and (H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section. <p>(ii) Travel costs incurred for monitoring of subrecipients;</p> <p>(iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and</p> <p>(iv) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.</p>