HUD CONTINUUM OF CARE (CoC) 2013 RENEWAL APPLICATIONS
Guidance Document #3: Completing Section 2 of Your Renewal Project Application
December 20, 2013

This document provides updated information and tips on the Continuum of Care 2013 Renewal application process. We will continue to send out these updates as needed throughout the application process. Note that <u>as of mid-week this week, HUD has released comprehensive documentation of the step-by-step application process</u>. 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.

This guidance document focuses on completion of Section 2 of your Project Application in e-snaps, including your renewal project budget and performance measures.

Timeline reminder. Remember that HUD's 2013 NOFA requires that you complete your project application and submit it to PHB via e-snaps by **5:00 PM on Friday, January 3**. PHB will review your application and notify you of any required changes by Monday, January 13, and you must complete any required changes by **Wednesday, January 15**.

General updates regarding accessing and completing your renewal project application. Prior local guidance documents focused on changes to the FY 2013 CoC NOFA, our local CoC's strategies for responding to HUD-required cuts to existing renewal project funding, and basics on how to access and begin your renewal project applications. Please refer to those as needed.

Since we released that guidance, HUD has additionally made available the following detailed guidance documents, which you are encouraged to review:

- 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 Guidance Document #2, but it includes screen shots that may help you navigate e-snaps more effectively.
- Renewal Project Application Instructional Guide: These are the primary written instructions that will help you navigate both Section 1 and Section 2 of your Project Application.
- (New) Budgets – Project Application Instructional Guide: Newly published detailed instructions for completing the budget section of your Project Application
- (New) Performance Measures – Project Application Instructional Guide: Newly published detailed instructions for completing the Performance Measures section of your Project Application.

In addition to these resources, each page of the Project Application in e-snaps includes expandable instructions for that page. You are encouraged to review those instructions, as well. Collectively, this appears to be the full set of resources that HUD will publish to support the application process. We are not awaiting further guidance at this time.

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 HUD's OneCPD Resource Exchange: https://www.onecpd.info/e-snaps/fy-2013-coc-program-nofa-coc-program-competition/.

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 4-8 of the Project Applicant Profile Instructional Guide.

TIPS FOR COMPLETING SECTION 2 OF YOUR PROJECT APPLICATION

Our Guidance Document #2 covered basics of updating your Applicant Profile, accessing your Project Application, and completing Section 1 of the Project Application. This guidance focuses on completion of Section 2 of the application, including your project budget and performance measures. This guidance will be particularly important if your project's budget was reduced as a result of HUD-required cuts and our local funding strategies.

In general, the guidance below addresses questions that are specific to our CoC. The detailed instructions 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.

Screen 3A:
- **Where can I verify my Expiring Grant Number?** Find it either on your current grant agreement with HUD or listed in the Project Summary Excel spreadsheet that we distributed confirming your renewal grant amounts.
- **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 the Project Summary Excel spreadsheet that we distributed confirming your renewal grant amounts.

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 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 6a: How do I select the maximum length of rental assistance?** If your project is a transitional housing or rapid rehousing project, the maximum length cannot exceed 24 months. If it is a permanent supportive housing project, it must be unlimited. Otherwise, the length of assistance is based on your project's policies and procedures
- **Question 7a: How do I correctly identify the correct type of rental assistance?** Many projects transitioned from leasing to rental assistance projects last year. Answer in the same manner you did last year, or verify in the Project Summary Excel spreadsheet that we distributed confirming your renewal grant amounts.
- **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 renewing for the first time)**. All projects should answer "No" to this question. Though several projects renewed under these conditions last year, no projects in our local CoC are renewing for the first time under these conditions this year.

Screen 4A:
- **How do I answer the questions related to the education subtitles of the McKinney-Vento Act (1a and 1b)?** The 2013 NOFA requires that all new and renewing projects that serve families 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.

<u>For both questions, you should answer "yes", unless your project does not serve children, in which case you should answer "not applicable."</u> 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. However, if you will be decreasing the number of units served due to a decrease in your renewal budget, you may need to adjust numbers of units or beds here accordingly. 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: "VAWA: 42 USC Chapter 136 Section 13295 (b)(2) and FVPSA: 42 USC Chapter 110 Section 10406 (c)(5)."
- 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 (01/01/2012 – 12/31/2012). 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). You should estimate this based on your project's past performance and in light of any changes to your project budget. Via email, we previously distributed communications from Wendy Smith, our statewide HMIS administrator, which described a Service Point reports 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 - v1. 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 30, 2013).
- **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 has changed again this year, and instructions for screen 5B newly indicate that you must provide narrative description of "persons not represented by listed subpopulations" that you include elsewhere in the screen. By our read, that column will reflect any persons who are non-chronically homeless, non-veterans (e.g. members of non-chronically homeless, non-disabled families in rapid rehousing projects). HUD does not provide specific guidance on what they would like you to describe about these persons, but we encourage you to provide 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 24-25) of the FY2013-2014 CoC Program 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 NOFA shifts 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 2013 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 2012 and the following CoC Strategic Planning Objectives that HUD and/or our local continuum have established. Doing so may be difficult, though, as 2012 was a transitional year in which HUD changed data collection and reporting standards for the CoC NOFA. As such, you may not have a full year of project data in the format that they describe through the FY2013 NOFA:

CoC Objective	HUD National Benchmark	2012 Local CoC Actual Performance
Percentage of participants remaining in permanent housing or moving from transitional to permanent housing	80%	N/A
Percentage of participants in CoC funded transitional housing that move into permanent housing	N/A	80%
Percentage of participants in all CoC funded projects that obtain employment during program participation	20%	N/A
Percentage of participants in all CoC funded projects that have income from sources other than employment	54%	N/A

If your project's actual performance relative to these benchmarks 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 face changes in their project budgets this year, *it is very important that you carefully review your project budget application against the budget that is listed in the Project Summary Excel spreadsheet that we distributed confirming your renewal grant amounts.*

On Screen 7A (Funding Request):
- **Pay special attention to question 3** ("Are the requested renewal funds reduced from the previous award using reallocation?"). In order to fund all of the renewals within our CoC this year, we had to reduce the budgets of several projects that saw "windfalls" of funding in 2012. The mechanism by which we did so was the "reallocation" process. Confirm whether your project was subject to this reallocation by checking the Project Summary Excel spreadsheet; If the value in the column labeled "$ Difference vs. 2012" is a negative number, you should answer "Yes" to Question 3. If there was no change in your project award versus 2012, you should answer "No."

- **Question 4** is new this year. 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. If you use an indirect cost rate, the application notes that you will be required to submit your indirect cost rate proposal to HUD at the point of conditional award (not during the application process). 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 "2013 Total Budget Request" in the Project Summary Excel spreadsheet. The Project Summary Excel spreadsheet was attached to the same email to which these tips were attached.

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 "2013 Max Admin" in the Project Summary Excel spreadsheet. This amount is the lower of: a) the admin amount in your 2012 budget, or b) 7% of the subtotal of your 2013 non-admin CoC-funded project costs. Note that the CoC Interim Rule, the 2013 NOFA, and the budget section of the application state that projects may apply for up to 10% admin, however (as in prior years) the FY2013 NOFA also states that HUD will rank CoCs higher if they limit all project applicants to no more than 7% admin. As such, we are locally limiting projects to no more than 7% admin. 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.

If your 2013 Total Budget Request is <u>the same as</u> your 2012 Total Budget Awarded (i.e. your project's budget was not cut): You should enter your line-item budget application amounts exactly they appear in 2012 budget information in the Project Summary Excel spreadsheet. If you have a rental assistance budget, note that the only way to generate a rental assistance budget that matches that in the Project Summary Excel spreadsheet is to input the exact unit mix listed in the spreadsheet. Note that this unit mix does not have to be fully reflective of the actual units and households served by your project.

If your 2013 Total Budget Request is <u>less than</u> your 2012 Total Budget Awarded (i.e. your project was subject to cuts): You must choose where and how you will absorb the cuts within your individual project line-item budget. If you expect that these funding reductions will reduce the total number of units or households that you will be able to serve, make sure that when you adjust your project budget for these cuts that you are also making changes (if appropriate) to your Project Description narrative (3B), the Total Units and Beds in Housing Type and Location (4B), Project Participants screens (5A, 5B, and 5C), and Performance Measures (6A). Depending on the allowable activities funded in your project you may have several options, including:
- **Reduce Rental Assistance costs:** For most projects facing funding reductions in 2013, this will be the most viable way to absorb required cuts. Under HUD's NOFA conditions and budget forms within e-snaps there are three ways that you can functionally make changes to your rental assistance budget in e-snaps (each is described below). Note that in each scenario the number and size of units described in your rental assistance budget detail *does not* have to exactly correspond to the number and type of units or households that you expect to actually

serve (as you describe in 3B, 4B, 5A, 5B, 5C, and 6A). Because many households that you serve may rent units below fair market rent and/or have income such that they pay some portion of their rent, you will probably be able to serve more households/units than you will use to set your budget in the Rental Assistance Budget Detail form. The number of units described in the rental assistance budget detail is used primarily to establish your project budget; It does not necessarily directly correspond to the number of households you expect to serve. <u>To help you calculate changes to your budget, you may want to use the "Rental Assistance Worksheet" tab in the Project Summary Excel spreadsheet.</u>

These are your functional options for making changes to your rental assistance budget in e-snaps:

1. **Reduce the number of units:** Within the Rental Assistance Budget Detail form in e-snaps, reduce one or more units compared to your request in prior years. Depending on the size of the unit(s) you remove and the applicable FMR, you will be able to get close to (but not likely exactly to) your required cut amount. You may need to make up the balance through cuts to other line-items (see below). This reduction in your total units will very likely be permanent, as HUD has not previously allowed renewal projects to add total units.

2. **Scale down the overall unit mix:** Within the Rental Assistance Budget Detail form in e-snaps, shift some of your larger units to smaller units (e.g. move one or more two-bedroom units to one-bedroom or studio units). The corresponding decrease in FMR will reduce your budget request. As with cutting units (method #1 here), this change in your unit mix will likely be permanent and will get you close, but not exactly to required cut amounts.

3. **Base your per-unit cost on an amount less than the FMR:** The [FY2013 NOFA](#) allows projects to request rental assistance budgets using per-unit amounts less than the local FMR (see Sections II.B.6 (p. 13) and III.I.1.b (p.19) for more detail). Using this option may allow you to get closer to (if not exactly to) your required cut amount without reducing your total number of units. As with other changes to your rental assistance budget, we expect this change to be permanent. The NOFA indicates that if you choose this option, future rent increases for your project will be based on the average increase in FMRs for the Portland area, rather than actual increases in the individual FMR for each unit size. To adjust your budget using this method, choose "Yes" for the question "Does the applicant request rental assistance funding for less than the area's per unit size fair market rents" on the Rental Assistance Budget Detail form. This will allow you to edit the values in the "HUD Paid Rent" column to make budget adjustments.

- **Reduce Administration costs:** The Project Summary spreadsheet identifies the maximum admin amount for which you are eligible to apply in 2013. You may choose to absorb some of your funding cut by further reducing your Administration costs below that maximum amount. Beware, though, that HUD's past practice has been to limit projects' future administration costs to those in the projects' most recent grant agreement. If you choose to cut your administration costs below the maximum allowed this year, you may be limited in your ability to raise the administration costs in future years.

- **Reduce Operating costs:** If your project budget includes operating costs, this is a relatively straightforward way to absorb cuts. Make sure that the change is appropriately reflected in the requested amounts and "Quantity and Description" section of the Operating budget screen (7H).
- **Reduce Supportive Service costs:** If your project budget includes supportive service costs, you may be able to make reductions to this section of your budget. Make sure that the change is appropriately reflected in the requested amounts and "Quantity and Description" section of the Supportive Service budget screen (7F). Also, be careful that reductions in your supportive service costs do not negatively affect your project's ability to meet performance measures and supportive services for participants as described elsewhere in your project application (section 6A and 4A, respectively).

How do I enter match and leverage in the project budget?
Match and leverage amounts are entered in the "Sources of Mathc/Leverage Detail" form in e-snaps. That page contains detailed guidance regarding match and leverage under the "Instructions: [show]" link on that page. 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 2013, 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 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. Your project's required match amount is listed in the column labeled "2013 Required Match" in the Project Summary Excel spreadsheet. Record match amounts in the Summary Budget (Screen 7I). This [short podcast](#) provides a good summary of match requirements.
- **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 February 3 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 <u>we strongly recommend detailing as much leverage as you can realistically document</u>. 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 February 3. You will need to have your commitment letters in a file by the time we submit your Project Application to HUD on February 3, but not until then. Eventually any in-kind commitments of match will need to be documented with an 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 January 3, 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.

Our CoC has to rank renewal projects this year, but it will be a simple ranking based on existing reports. 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?

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 serices to meet the needs of program participants including: counseling; developing, securing and coordinating srvices, coordinated asssessment, 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 includng 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	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. (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. (ii) Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling. (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. (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.
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	Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including: (i) Providing an analysis or assessment of an individual's health problems and the development of a treatment plan; (ii) Assisting individuals to understand their health needs; (iii) Providing directly or assisting individuals to obtain and utilize appropriate medical treatment; (iv) Preventive medical care and health maintenance services, including in-home health services and emergency medical services; (v) Provision of appropriate medication; (vi) Providing follow-up services; and (vii) Preventive and non-cosmetic dental care.
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.

Outreach Services	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. (i) Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach. (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.
Substance Abuse Treatment Services	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.
Transportation	Eligible costs are: (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. (ii) Mileage allowance for service workers to visit program participants and to carry out housing quality inspections; (iii) The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants; (iv) The cost of gas, insurance, taxes, and maintenance for the vehicle; (v) The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and (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: (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); (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 (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.
Utility Deposits	This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.
HMIS	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: (i) Purchasing or leasing computer hardware; (ii) Purchasing software or software licenses; (iii) Purchasing or leasing equipment, including telephones, fax machines, and furniture; (iv) Obtaining technical support; (v) Leasing office space; (vi) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;

	(vii) Paying salaries for operating HMIS, including: (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; (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; (ix) Paying staff travel costs to conduct intake; and (x) Paying participation fees charged by the HMIS Lead, as authorized by HUD, if the recipient or subrecipient is not the HMIS Lead.
Project Administration: General Management, Oversight and Coordination	Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following: (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: (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. (ii) Travel costs incurred for monitoring of subrecipients; (iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and (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.