

FY 2021 Project Application Frequently Asked Questions (FAQs)
(09/02/2021)

FAQ Question	FAQ Answer
Accessing the Project App	
When attempting to access Project Applications the following error appears: “The application is connected to an incomplete applicant profile. Complete and submit the applicant profile to correct this error and submit the application.” How do I correct this error?	<p>Please try the following:</p> <ul style="list-style-type: none"> • Log into <i>e-snaps</i>. • Click on "Applicants" from the left menu. • Select the orange folder next to the name of the applicant. • Click on "Submission Summary." • Click on the "Edit" button. • Select the “Profile Type” screen. Switch the “Project Applicant” to “Collaborative Applicant.” Save the change. Switch back to “Project Applicant.” Save the change. • Select “Submission Summary.” • Select "Complete." • Log out of <i>e-snaps</i>. • Log back into <i>e-snaps</i>. • Go to “Submissions” on the left menu bar and access your application. <p>By following these steps you should no longer see this message and have access to the Project Application. If you continue to receive the error message, please submit a question to e-snaps@hud.gov.</p>
Amending the Project App	
How can I make a change to the application after I submit the application in <i>e-snaps</i> ?	Once you submit the project application in <i>e-snaps</i> , the forms are locked in a “read-only” format for review by your Continuum of Care (CoC). To make changes to the application, send an email to your CoC’s Collaborative Applicant, requesting they amend the project application back to you. After making changes, you must resubmit the project application and follow-up via email to the CoC’s Collaborative Applicant to ensure they have uploaded to the appropriate Project Listing.
Budgets - General	
Are we required to provide details beyond total cost requests for leased structures supportive services,	You are not required to provide budget detail information in <i>e-snaps</i> beyond the total cost requests for leased structures, supportive services, operating, or HMIS BLIs in renewal project applications. HUD expects the details of past approved budgets to be the baseline

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operating, or HMIS Budget Line Items (BLIs) in renewal project applications?	for renewal grant requests (in line with 24 CFR part 578). Though HUD is not collecting detailed budget information as part of the application, all costs expended must meet the requirements of the 24 CFR part 578 and 2 CFR Part 200. HUD will continue to verify budget information and expenditures during monitoring.
CoC Planning Costs	
Can a CoC reduce or eliminate funds from a CoC planning grant awarded in a previous CoC Program Competition that has not yet been executed as part of the reallocation process to create a new permanent supportive housing or rapid re-housing project?	No, CoC planning funds cannot be included in the reallocation process since CoC planning funds are not renewable. Reallocation of grant funds is only permitted with eligible renewal projects (i.e., renewal grants that are expiring in Calendar Year 2022). For more information on using the reallocation process, see Section III.B.2.w. of the FY2021 CoC Program NOFO. of the FY 2021 CoC Program Competition Notice of Funding Opportunity (NOFO).
What is the maximum amount of CoC planning costs our Collaborative Applicant can apply?	A Collaborative Applicant may apply for up to 3 percent of the CoC's FY 2021 Final Pro Rata Need (FPRN) or \$1,250,000, (whichever is less). CoCs can only submit one CoC planning project application, which must be submitted by the CoC's designated Collaborative Applicant and must match the CoC's Organization information in the CoC Applicant Profile. See the FY 2021 Estimated ARD Report posted on HUD's website for the amount of planning funds available for you CoC.
Consolidation	
Can a consolidated application be submitted under the "Submit Without Changes" Function?	Yes. The "Submit Without Changes" option is available for renewal applications associated with the consolidation. This option includes the surviving grant and the terminating grants. Because HUD did not conduct a CoC Program Competition in FY 2020 and awarded renewal project funds via the FY 2020 Non-competitive Funding Notice, there is no way up update the FY 2021 project applications appropriately to account for any FMR bumps associated with actual rent, leasing, or operating costs associated with permanent housing projects. Therefore, any renewal projects that include a rental assistance line item and have identified rental assistance as "actual" rent instead of "fair market rent," leasing, or operating BLIs cannot "Submit Without Changes."

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<p>On the Renewal Grant Consolidation screen, question 2 asks if this individual project application is the surviving grant or a terminating grant. What do “surviving” and “terminating” mean in relation to the project applications?</p>	<p>Surviving means that if the consolidation is approved by HUD, the surviving project will absorb the identified terminating projects when the grant agreement is issued. Terminating means the project will be part of the surviving project and will no longer receive its own grant agreement, but the information in the project application, including the budget information will be included in the surviving project’s grant agreement.</p>
<p>How do we use the grant consolidation process to submit consolidated project applications?</p>	<p>To apply for renewal grant consolidation, the current grants must be under the same applicant and have the same component. Additionally, the grants must not have any serious operational issues as outlined in the FY 2021 CoC Program NOFO. The " Renewal Grant Consolidation or Renewal Grant Expansion" screen must be completed to request the consolidation of renewal projects. This new screen is toward the beginning of the application screens and immediately follows the "Recipient Performance" screen. Question 1 will ask if the project application is requesting to consolidate or expand and you will select ‘consolidate’. Once you select ‘consolidate’ if you respond “Yes,” to the 2nd question, a table will appear to enter information. You must submit separate renewal project applications for each of the renewal projects that are part of the proposed consolidation; one project application will be the surviving grant; the other project application(s) will be the terminating grants. Unlike previous years' Competitions, you will not submit a separate fully consolidated project application that contains the combined budgets and project information of all proposed consolidations. If the consolidation request is approved, HUD will combine the project information and budget during the post-award process and issue a single grant agreement.</p>
<p>DV Bonus Projects</p>	

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<p>The FY 2021 CoC Program Competition NOFO states DV Bonus funds are available from both the FY 2020 Further Consolidated Appropriations Act, 2020 and the Consolidated Appropriations Act, 2021. How do I know which year of DV Bonus funds may be used if my new DV Bonus project application is selected for conditional award?</p>	<p>HUD will prioritize new DV Bonus project awards for completing the post-award process that will result in enough of these projects receiving the grant agreement for execution prior to September 1, 2022 to meet the obligation deadline for the FY 2020 funds. Therefore, if you think your new DV Bonus project application can complete the post-award process within this timeframe you should check the box on Screen 6A, question 1a. to indicate your new DV Bonus project anticipates it can have an executed grant agreement by September 15, 2022. Regardless of how you answer, once the new DV Bonus project conditional awards are announced, the HUD field offices will reach out to new DV Bonus funded projects to determine readiness for the grant agreement process in an effort to ensure a minimum of \$50,000,000 is obligated prior to the September 15, 2022 deadline. All such DV Bonus projects will be funded from the FY 2020 appropriations. All remaining DV Bonus projects will be funded from FY 2021 appropriations with grant agreements executed by September 15, 2023.</p>
<p>In <i>e-snaps</i> on screen 6A. question 1a. asks to check a box if, "DV Bonus Only: This project can realistically be under grant agreement by September 15, 2022." Since the statutory requirement of September 2023 is in question 1., why is this second question being asked?</p>	<p>Due to HUD awarding DV Bonus funds from FY 2020 and FY 2021 appropriations, HUD will prioritize post-award processing for \$50,000,000 to ensure FY 2020 funds are obligated with an executed grant agreement prior to September 15, 2022. If you think your new DV Bonus project can realistically complete the post-award process by September 15, 2022, check the box. Checking the box does not mean you are required to obligate the grant by September 15, 2022, but it will be helpful for HUD planning purposes.</p>
<p>Can a new DV Bonus project apply as an expansion of a DV Bonus project awarded last year?</p>	<p>Yes. You may apply to expand an existing renewal project in accordance with Section II.B.11.e of the FY 2021 CoC Program Competition NOFO, including one that was previously funded with DV Bonus funding. DV Bonus funds can only be used to expand an existing renewal project if the expansion project is dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3. For projects that are expanding their current CoC Program-funded project, project applicants will be required to submit:</p> <ol style="list-style-type: none"> (1) the renewal project application that will be expanded; and (2) a new project application with just the expansion information.

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<p>How do I apply for the Domestic Violence (DV) Bonus funds? Are there special instructions for DV Bonus project applications?</p>	<p>New projects categorized as "DV Bonus" must serve survivors of domestic violence, dating violence, sexual assault, or stalking and are limited to the following components: (1) Permanent Housing-Rapid Rehousing, (2) Joint TH and PH-RRH component projects, or (3) Supportive Services Only-Coordinated Entry projects. You must also follow the eligibility criteria for program participants described in the FY 2021 NOFO, including the definition of homeless in paragraph (4) of 24 CFR 578.3. To apply for DV Bonus in <i>e-snaps</i>: 1. Screen 3B. Description - New projects applying for a Joint TH and PH-RRH component, PH-RRH, or SSO-CE project with DV Bonus funds must also include in the description how these funds will be dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking as defined in paragraph (4) at 24 CFR 578. 3. Screen 4A. Supportive Services for Participants - Describe how participants will be assisted to obtain and remain in permanent housing: New projects applying for DV Bonus funds must tailor the description to include how survivors of domestic violence, dating violence, sexual assault, or stalking as defined in paragraph (4) at 24 CFR 578.3 will be assisted to obtain and remain in permanent housing that addresses their particular needs, including safety, and includes trauma-informed, victim-centered approaches. 3. Screen 6A, Question 2 - identify the project as being created using the "DV Bonus" project. Note: Timeliness Standards per the FY 2021 NOFO, all conditional funds awarded in the FY 2021 CoC Program Competition must be obligated by HUD by September 30, 2022, for FY 2020 funds, and September 30, 2023, for FY 2021 funds. Obligated funds remain available for expenditure until September 30, 2027, for FY 2020 funds, and September 30, 2028, for FY 2021 funds. Please see related FAQ on obligation deadlines.</p>
<p>Expansion</p>	
<p>Are applicants required to use specific naming conventions for new expansion grants?</p>	<p>HUD does request that you use at least a portion of the renewal project name and add the word "Expansion" at the end of the name as this will further help match the eligible renewal and new expansion project applications.</p>

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<p>What has changed in the FY 2021 Expansion Process?</p>	<p>Three significant changes have occurred to streamline the expansion process. First, unlike the FY 2019 CoC Program Competition, the FY 2021 CoC Program Competition will not allow you to request both a consolidation and expansion for the same project application. Instead, you can either consolidate or expand a project, but not do both. In addition, you must complete the “Renewal Grant Consolidation or Renewal Grant Expansion” screen to request a project expansion. The third major change from the last competition is for expansion projects is that you only submit the eligible stand-alone renewal project application and the new stand-alone project application. HUD has discontinued the use of a combined renewal expansion project application as this created confusion and significant errors. If the expansion request is approved, HUD will combine the project information and budget during the post-award process and issue a single grant agreement.</p> <p>If the “Stand-alone Renewal” project is rejected or not accepted for conditional award, the “Stand-alone New” expansion project application will not move forward. If the “Stand-alone New” expansion project is rejected, the “Stand-alone Renewal” project application can still move forward for conditional award if it meets all requirements.</p> <p>NOTE: YHDP renewal and replacement project applications cannot use the expansion option.</p>
<p>Other than the standard application information, what additional information is required for new expansion projects?</p>	<p>You will enter information in the appropriate screens for the Renewal and New project applications that ties your expansion request together.</p> <p>The renewal project application will include a table where:</p> <ul style="list-style-type: none"> • you complete some cells related the renewal project; and • two rows where you will enter the name of the new expansion project and the amount of new funds requested. <p>The new project application will include:</p> <ul style="list-style-type: none"> • the PIN of the renewal grant number; • renewal project name; and • information regarding what the new project will expand (e.g., number of program participants, units).

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	<p>Before submitting the renewal and new project applications, review the information carefully to ensure what you entered is correct.</p>
<p>Can we request a new Joint TH – PH-RRH project under the new expansion project option?</p>	<p>Yes, you can apply for a new project that will expand an existing eligible CoC Program renewal project (Section III.B.2.j of the NOFO) so long as it is the same component (including Joint TH-PH-RRH). To apply for a new project that will expand an existing eligible CoC Program renewal project, you would create and submit two Joint TH-PH-RRH project applications: a “Stand-alone New” and a “Stand-alone Renewal.”</p>
<p>What projects are eligible for the expansion process? Is a non-CoC funded PH-PSH project that wants to expand eligible?</p>	<p>Not all CoC Program funded renewal project can request a new expansion. You cannot request an expansion for: TH as this component is not eligible for new projects and SH as this component was rescinded by the McKinney-Vento Homeless Assistance Act As amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009.</p> <p>If you have a project that receives funds through another funding source that you want to “expand” by adding CoC Program funds for an eligible activity, you can submit a new project application. On Screen 3C. Project Expansion Information you will select ‘no’ since you will not expand an existing CoC Program funded renewal project.</p>
<p>Housing for Participants</p>	
<p>Is HUD attempting to phase out all CoC-funded transitional housing?</p>	<p>HUD recognizes that transitional housing can be an effective tool for addressing the needs of specific subpopulations – such as underage homeless youth, safety for persons fleeing domestic violence, and the homeless with substance abuse addiction. However, recent research shows that transitional housing is generally more expensive than other housing models serving similar populations with similar outcomes. It is often more service-intensive than most homeless households need, and the criteria for entry into many transitional housing programs are so rigorous that transitional housing beds are under-utilized because homeless households cannot overcome the barriers to entry. HUD is strongly encouraging CoCs and recipients to carefully review the transitional housing projects within the geographic area for cost-effectiveness, performance, and for the number and type of eligibility criteria to determine if rapid re-housing may be a better model for the CoC’s geographic area.</p>

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Leasing	
When can leasing funds be used?	Under the CoC Program, recipients may use leasing funds only when there are actual leasing costs associated with housing or providing services to individuals and families experiencing homelessness. Funds designated for leasing may only be used for the actual costs of leasing a structure or unit. For leasing funds, the lease is between the recipient or sub-recipient and the landowner. Leasing funds may not be used to pay a project subrecipient's monthly mortgage obligation or other costs of building operations. Also, leasing funds cannot be used for buildings that are owned by the Project Applicant, subrecipient, or parent companies. See 24 CFR 578.49 for more information.
Match Requirements	
What are HUD's requirements for documentation of third-party in-kind match contributions in the project application?	24 CFR 578.73(c)(3) requires that in-kind services, to be provided by a third party, must be documented by a memorandum of understanding (MOU) between the recipient or subrecipient and the third party that will provide the services before execution of the grant. You will attach 3 rd party documentation on Screen 7A in <i>e-snaps</i> which only appears if you selected "Yes" in response to question 1 on Screen 6I (New Projects) or 6D (Renewal). HUD strongly recommends that you attach the MOU to the application in <i>e-snaps</i> if available at the time of application. If you do not attach an MOU that documents in-kind match HUD will place a condition on the project, and if selected for a conditional award, you must provide the MOU to your HUD field office representative before the grant agreement can be executed.
If project applicants intend to use program income as match, are project applicants required to provide any information as part of their project application?	If your project will use program income as match you must complete questions 1, 1a. and 1b on the Match screen in <i>e-snaps</i> .

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<p>Under which circumstances can Medicaid be used as match in CoC Program-funded projects?</p>	<p>You can use the value of services reimbursed through Medicaid as the match in your renewal project if the Medicaid services are provided directly to the project (e.g., if the project has one or more staff persons who provide services to program participants and those services are funded through Medicaid). To count the value of match; you must demonstrate that the services are being contributed directly to the project. The match can be done through a Memorandum of Understanding (MOU) or contract with a partner organization that provides services reimbursed through Medicaid to program participants. You should attach the MOU or commitment letter to the application on Screen 7A in <i>e-snaps</i>. In-Kind MOU Attachment,” if available at the time of project application.</p> <p>If the Medicaid services are not being contributed to the project, meaning they are being provided directly to program participants regardless of their participation in the CoC Program project, or there is no MOU or contract in place, then these Medicaid services cannot be considered match for the project.</p> <p>Several resources provide general information on the match requirements and how in-kind services should be handled. Please refer to the following:</p> <ul style="list-style-type: none"> • Section 578.73(c)(1), “The recipient or subrecipient may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible under Subpart D, or, in the case of HPCs, eligible under 578.71.” • The Importance of Documenting Match Under the CoC Program Podcast. The podcast, created by a HUD-approved technical assistance provider is available on the HUD Exchange in both audio or as a transcript, https://www.hudexchange.info/resource/3113/importance-of-documenting-match-under-the-coc-program/.
<p>New Projects</p>	

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<p>What is a DedicatedPlus project?</p>	<p>A DedicatedPLUS project is a permanent supportive housing (PH-PSH) project where the entire project will serve individuals and families that meet one of the following criteria at project entry (See also Section III.B.2.g of the FY 2021 CoC Program Competition NOFO):</p> <ol style="list-style-type: none">1. Experiencing chronic homelessness as defined in 24 CFR 578.3;2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;3. Residing in a place not meant for human habitation, emergency shelter, or Safe Haven and had been admitted and enrolled in a permanent housing project within the last year but were unable to maintain a housing placement and met the definition of chronic homeless as defined in 24 CFR 578.3 prior to entering the project;4. Residing in transitional housing funded by a Joint Transitional Housing (TH) and Permanent Housing-rapid rehousing (PH-RRH) (Joint TH and PH-RRH) component project and who were experiencing chronic homelessness as defined in 24 CFR 578.3;5. Residing and has resided in a place not meant for human habitation, Safe Haven, or emergency shelter for at least 12 months in the last three years but has not done so on four separate occasions and the individual or head of household mee the definition of “homeless individual with a disability”; or6. Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system. <p>A renewal project where 100 percent of the beds were dedicated to chronically homeless individuals and families, as described in Section III.B.2.g of the FY 2021 NOFO may either become a DedicatedPLUS project or may continue to dedicate 100 percent of its beds to chronically homeless individuals and families.</p>
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	<p>If a renewal project that has 100 percent of its beds dedicated to chronically homeless individuals and families elects to become a DedicatedPLUS project, the project will be required to adhere to all fair housing requirements in 24 CFR 578.93. Projects that were awarded DedicatedPLUS in a previous CoC Program Competition are required to include households with children to qualify as a DedicatedPLUS project.</p>
<p>For DedicatedPLUS projects, are there any particular requirements for how recipients must prioritize households for assistance, including in the event that there are no households meeting the eligibility requirements outlined in the NOFO?</p>	<p>Yes, some requirements exist for prioritizing households in DedicatedPLUS projects. This response explains how to prioritize eligible households in DedicatedPlus Projects and then explains prioritizing in DedicatedPLUS projects when there are not any eligible households.</p> <p><i>Prioritizing Eligible Households in DedicatedPlus Projects</i> HUD's option of DedicatedPLUS provides CoCs with more flexibility to serve vulnerable populations and to more effectively and more immediately address the needs of persons experiencing chronic homelessness, at risk of experiencing chronic homelessness, or who were chronically homeless prior to being housed and who have recently become homeless again. In general, households that meet any of the criteria in Section III.B.2.g CoC Program NOFO may be served in any order established by the CoC, though the CoC must incorporate any orders of priority into their written standards for prioritizing assistance in PSH. When making changes to their written standards, HUD encourages CoCs to continue adopting prioritization standards based on the length of time a potential program participant resided on the streets, in an emergency shelter, or in a safe haven along with the severity of their service needs.</p> <p>For dedicated PSH beds—as defined in Section III.B.2.b of the FY 2021 CoC Program NOFO—CoCs must follow existing CoC written standards for prioritizing assistance for persons experiencing chronic homelessness in those beds (i.e., if the CoC has adopted the orders of priority in Notice CPD-16-11, the recipient will be required to fill these dedicated beds consistent with Section III.A of that Notice).</p> <p><i>Prioritizing in DedicatedPLUS Projects When There Are No Eligible Households</i> Consistent with HUD's expectations for recipients of dedicated permanent supportive housing (PSH) projects, recipients of DedicatedPLUS projects will be expected to exercise</p>

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due diligence when conducting outreach and assessment to locate and engage eligible households as outlined in Section III.B.2.g. of the FY 2021 CoC Program NOFO. HUD recognizes that some persons might require significant engagement and contacts prior to their entering or re-entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH. However, please note that street outreach providers are expected to continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and recipients of DedicatedPLUS projects should be following a Housing First approach to the maximum extent practicable.

At the point in which a vacancy occurs, if there are no eligible households identified who are ready to accept assistance, recipients should consider the following:

- Where there are no chronically homeless persons identified, Dedicated PSH beds included in DedicatedPLUS projects may fill the vacancy either in accordance with section III.B.1.(b)-(d) of Notice CPD-16-11 or households eligible for DedicatedPLUS as outlined in Section III.B.2.g of the NOFO. The CoC must document how these beds will be prioritized in the event of such a vacancy in the CoC's written standards.
- Where there are no persons meeting the eligibility criteria for DedicatedPLUS as outlined in Section III.B.2.g of the NOFO, recipients are encouraged to follow the order of priority outlined in Section III.B.1.(b)-(d) of Notice CPD-16-11 to fill any vacancies. At a minimum, the CoC should consider the total length of time the potential program participant has been residing in a place not meant for human habitation, emergency shelter, or safe haven and severity of service needs. The CoC must document how these beds will be prioritized in the event of such a vacancy in the CoC's written standards.
- The recipient must always continue to prioritize households that are eligible for DedicatedPLUS (and dedicated PSH, if applicable). This means that anytime there is a new vacancy, the recipient must always first seek to fill it with an eligible household even if it was most recently used to serve a household that would not otherwise be eligible due to the circumstances outlined above.

The recipient of DedicatedPLUS PSH projects must maintain records to document efforts

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	<p>to locate persons meeting the eligibility criteria in Section III.B.2.g of the NOFO. Ideally, the CoC should have comprehensive and high-quality data on all households that are currently presenting for assistance within the CoC that is informed by a comprehensive outreach strategy. To justify serving a non-eligible household, a recipient of DedicatedPLUS projects must have documentation from the CoC that demonstrates that outreach is occurring regularly and that the CoC is making reasonable efforts to locate and identify all persons experiencing homelessness within the community.</p>
<p>What is the Joint TH – PH-RRH component type and are there special requirements that interested project applicants need to be aware of?</p>	<p>A Joint transitional housing (TH) and rapid re-housing (PH-RRH) component project includes two existing program components—TH and PH-RRH—into a single project to serve individuals and families experiencing homelessness. If funded, HUD will limit eligible costs to:</p> <ol style="list-style-type: none"> 1. Leasing of a structure or units, and operating costs to provide transitional housing; 2. Short- or medium-term tenant-based rental assistance on behalf of program participants in the rapid re-housing portion of the project; 3. Supportive services; 4. HMIS; and 5. Project administrative costs. <p>If awarded, recipients or subrecipients must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all program participants up to 24 months as needed by the program participants. For example, a program participant may only need the temporary stay in transitional housing unit, but the recipient or subrecipient must be able to make available the financial assistance and supportive services that traditionally comes with rapid re-housing assistance to that program participant. However, this does not mean that the applicant must request funding from the CoC Program for both portions of the project (e.g., the project applicant may leverage other resources to pay for the transitional housing portion of the project).</p> <p>Applications for Joint TH and PH-RRH component projects must demonstrate that the</p>

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	<p>project will have the capacity to provide both transitional housing assistance and rapid re-housing assistance, as needed, to each program participant. Review the FY 2021 CoC Program Competition NOFO for a complete list of requirements, including the requirements to distinguish the two forms of housing. All Joint TH and PH-RRH projects must input data on Screen 4B, Housing Type and Location, which presents a summary chart of the units and beds included in the project according to the following categories:</p> <ul style="list-style-type: none"> • Total Units. Includes all units in the project, regardless of size. • Total Beds. Includes all beds in the project, regardless of unit configuration. <p>Additionally, there are three columns:</p> <ul style="list-style-type: none"> • Total; • TH; and • PH-RRH. <p>The Total summary fields are compiled from all individual housing locations listed below the totals. These fields will populate and update automatically when new housing types and locations are added to the list. The TH and PH-RRH columns must be completed by the project applicant to differentiate the units and beds that will be used in each part of the project. The sum of the beds and units in the TH and PH-RRH columns must not be greater than the sum of the beds and units in the Total column.</p>
<p>If my project chooses to become DedicatedPLUS, what documentation will HUD expect to see in the client's file to demonstrate compliance with the expanded population?</p>	<p>Recipients who receive funding as a DedicatedPLUS project must document eligibility of all program participants served. As a reminder, DedicatedPLUS projects must serve individuals and families with one or more disability and who meet one or more of the criteria in Section III.B.2.g of the NOFO.</p> <p>For all program participants, recipients must obtain the following documentation:</p> <ol style="list-style-type: none"> 1. Evidence that the individual or family member (if qualifying as chronically homeless or previously chronically homeless, this must be the head of household) has a qualifying disability as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)). 2. Evidence that the program participant is currently residing in a location that makes them eligible.

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	<p>3. Where the program participant does not presently meet the definition of chronically homeless, evidence of the length of time they resided in an emergency shelter, safe haven, or place not meant for human habitation prior to residing in the location that made them lose their chronically homeless status to determine whether they previously met the criteria for chronic homelessness at 24 CFR 578.3.</p> <p>In obtaining the documentation above, recipients must follow HUD’s documentation requirements. This means to document disability status of the head of household (#1 above), recipients must obtain third-party documentation that meets the standards described in FAQ 2763.</p> <p>For all other criteria (#2 and #3 above), recipients must follow HUD’s orders of priority for obtaining evidence as third-party documentation first, intake worker observation second, and certification from the person seeking assistance third.</p> <p>Recipients of DedicatedPLUS projects are not required to follow the recordkeeping requirements included in the final rule on Defining Chronically Homeless for beds not dedicated to individuals and families experiencing homelessness. However, HUD expects recipients to obtain as much third-party evidence as possible when documenting length of time homeless.</p> <p>Recipients should demonstrate due diligence at collecting third-party evidence (e.g., phone calls or emails to other providers) as well as case worker judgement when third-party evidence is limited.</p> <p>To ensure consistency across all recipients, CoCs should consider adopting specific standards for DedicatedPLUS projects on the extent in which third-party documentation is required for documenting the length of time program participants resided in a place not meant for human habitation, an emergency shelter, or a safe haven.</p> <p>Below are some examples of the type of documentation that HUD would accept as adequately documenting that an individual or family met the DedicatedPLUS criteria.</p>
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	<ul style="list-style-type: none">• For individuals and families experiencing chronic homelessness as defined in 24 CFR 578.3, the documentation required in the Defining Chronically Homeless Final Rule;• For individuals and families who are residing in transitional housing project that will be eliminated through reallocation, transitional housing funded through the Joint TH and PH-RRH Component project, or receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program evidence that the individual or head of household:<ul style="list-style-type: none">○ has a qualifying disability,○ was residing in an emergency shelter, safe haven, or place not meant for human habitation immediately prior to entering one of these projects, and○ Met the criteria of the definition of chronic homelessness as defined at 24 CFR 578.3 prior to entering the permanent housing project. <p>Additionally, the intake worker should include in the case file one of the following, depending upon the location from which the individual or family is currently residing:</p> <ul style="list-style-type: none">○ For individuals and families coming from TH that is being eliminated through reallocation, evidence that the TH project was eliminated in the FY 2018 CoC Program Competition through reallocation (e.g., a copy of the CoC's reallocation charts)○ For individuals and families coming from TH funded through a Joint TH and PH-RRH Component project, evidence that the individual or family is coming from that project (e.g., a written referral on letterhead from the agency that identifies the name of the project); or○ For individuals and families receiving assistance through a VA-funded homeless assistance program, evidence that they are receiving assistance through a VA-funded homeless assistance program (e.g., a written referral from the VA program that identifies the name of the project and that it is funded by the VA).
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	<ul style="list-style-type: none"> • For individuals and families who are currently residing on the streets, in a safe haven, or in an emergency shelter that do not currently meet the definition of chronically homeless because they recently resided in a permanent housing project, evidence that the individual or head of household: <ul style="list-style-type: none"> ○ Is currently residing in a place not meant for human habitation, emergency shelter, or safe haven; ○ Resided in a permanent housing project within the last year prior to intake; ○ Has a qualifying disability; and ○ Met the criteria of the definition of chronic homelessness as defined at 24 CFR 578.3 prior to entering the permanent housing project. <p>Note, if the individual or family had multiple permanent housing project placements in the prior year, the evidence should come from the first permanent housing project the individual or family resided in.</p> • For individuals and families who had experienced episodic homelessness over the past three years whose total length of time residing on the streets or in emergency shelters or safe havens equaled 12 months, evidence that the individual or head of household: <ul style="list-style-type: none"> ○ has a qualifying disability; ○ was residing in an emergency shelter, safe haven, or place not meant for human habitation immediately prior to entering one of these project; and ○ had resided in an emergency shelter, safe haven, or in a place not meant for human habitation for at least than 12 months in the last three years in fewer than four occasions.
Other Projects	

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<p>How should our Youth Homeless Demonstration Project (YHDP) that are renewing in the CoC Competition apply?</p>	<p>Youth Homeless Demonstration Project (YHDP) recipients should contact their YHDP desk officer at HUD headquarters to determine if a project is eligible to renew in under the FY 2021 CoC Program NOFO. See the YHDP Detailed Instructions and <i>e-snaps</i> Renewal YHDP Navigational Guide, on the FY2021 CoC Program Competition page on HUD’s website.</p>
<p>Where can I find the HUD-2991, the Certification of Consistency with the Consolidated Plan?</p>	<p>The HUD-2991 Certification of Consistency with the Consolidated Plan is posted on HUD's website. See the FY 2021 CoC Program NOFO for additional information regarding who completes and submits the HUD-2991.</p>
<p>What is the “PIN” number?</p>	<p>The Personal Identification Number (PIN) is the first 6 digits of a project’s grant number. The first two letters represent the state abbreviation, and the following four digits are a number unique to that project within the State. For example, KY0097 is project number 97 from Kentucky. While the full grant number will change with each renewal, the PIN (first 6 digits) remains the same from the first award to each subsequent renewal.</p> <p>For renewal applications, the PIN is populated provided you followed the instructions to import your previous year’s renewal project application. Confirm the PIN is correct on Screen 1A, question 5b. of the project application.</p> <p>For a first-time renewal application, use your current grant agreement, or grant agreement as amended, to ensure you enter the correct PIN on Screen 1A, question 5b. of the project application.</p> <p>Project Applicants for the FY 2021 CoC Program Competition must either enter or confirm the correct PIN on Screen 1A of the project application.</p>
<p>Reallocation</p>	
<p>What is the policy on projects eligible for reallocation in the FY 2021 renewal application process?</p>	<p>Project applicants may only reallocate eligible CoC Program projects that have previously been renewed under the CoC Program. CoCs cannot reallocate a project originally funded under the CoC Program that is expiring for the first time. Section II.B.2.w of the FY 2021 CoC Program NOFO provides additional information. To be eligible for reallocation, an expiring project has to be eligible to renew in this year's Competition and must be under a grant agreement by December 31, 2021.</p>

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<p>What is reallocation, and how does it work?</p>	<p>Section III.B.2.w of the FY 2021 CoC Program Competition NOFO defines Reallocation as a process that CoCs use to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without affecting the CoC's Annual Renewal Demand. CoCs may use relocation to create new:</p> <ul style="list-style-type: none"> • PSH; • RRH; • Joint TH/PH-RRH component; • Dedicated HMIS; or • SSO for coordinated assessment.
<p>If a CoC eliminates an eligible renewal transitional housing project to create a new permanent supportive housing project for persons experiencing chronic homelessness using reallocation, can the applicant plan for the new permanent supportive housing project to have an operating start date immediately after the expiration of the transitional housing project?</p>	<p>The only option for a new project created from reallocation to have an operating start date tied to the expiration date of the expiring reallocated grant is to apply as a Transition Grant, explained in Section III.B.2.z of the FY 2021 CoC Program Competition NOFO. If the new project is awarded under a grant type other than a Transition Grant, the operating start date of the new project will be based on the date the new grant agreement is executed and the first draw of funds for project related costs.</p>
<p>Renewal</p>	
<p>For renewal projects, which organization should be the applicant for the FY 2021 project application and what should I do if the current recipient is different than the one listed on the FY 2021 GIW?</p>	<p>For renewal projects, applications may only be submitted by the current "grant recipient of record." For renewal projects, the "grant recipient of record" is the recipient recognized on the grant agreement, or grant agreement as amended, at time of submission of the renewal application. Applicants who need to confirm the name of project recipient on the grant agreement or believe that the FY 2021 Grant Inventory Worksheet (GIW) listed the incorrect project recipient must contact the Collaborative Applicant and the local HUD CPD field office immediately.</p>

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<p>How does the Submit Without Changes option work for renewal project applicants?</p>	<p>To submit a renewal without making any changes on the Submit Without Changes Screen your renewal project information must match the FY 2019 renewal project application unless changes were required by HUD before grant agreement execution or your organization requested a grant agreement amendment. If your project does not have changes from the FY 2019 submission you can submit your FY 2021 renewal project application with no changes; other than those required annually. If this is a first-time renewal project you must complete the entire renewal project application.</p> <p>STOP and Review: If any of the following apply, you cannot use the submit without changes process:</p> <ul style="list-style-type: none"> • HUD placed a condition on your FY 2019 application requiring your organization to adjust information (e.g., units, unit configuration, BLIs); or • You executed a grant agreement amendment resulting in changes needed to the renewal project application (e.g., units, unit configuration, population served, BLIs). <p>You must ensure your FY 2021 renewal project application mirrors the final HUD approved information in either the grant agreement or grant agreement amendment. However, if your organization executed an FY 2018 and/or FY 2019 grant agreement amendment to move funds among BLIs to address COVID-19 and those changes were intended to be temporary (i.e., for the duration of the FY 2018 and/or FY 2019 grant term) you may submit without changes.</p> <p>Data can be imported into an FY 2021 renewal project application from a FY 2019 new or renewal project application. For a project application that did not import last year's FY 2019 information, <i>e-snaps</i> will automatically be set to "Make Changes" and all questions on each screen must be updated. For specific instructions on submitting a renewal without changes, see the FY 2021 Renewal Project Application Detailed Instructions Submit Without Changes section starting on page 13, https://www.hud.gov/sites/dfiles/CPD/documents/FY-2021-Renewal-Project-Application-Detailed-Instructions.pdf.</p>
<p>Which projects are eligible for renewal in the FY 2021 CoC Program competition?</p>	<p>An eligible renewal project is one that will be under grant agreement by December 31, 2021 and will have an expiration date Calendar Year FY 2022 (between January 1, 2022 and December 31, 2022).</p>

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<p>If a renewal project is already 100% dedicated to serve chronically homeless persons, can project applicants change the project to DedicatedPLUS in the FY 2021 renewal application or must they first request a grant agreement amendment?</p>	<p>Project applicants may change any eligible renewal project that is currently 100% dedicated to DedicatedPLUS in the FY 2021 CoC Program renewal application in <i>e-snaps</i> without an amendment using the single drop down on Screen 3C and selecting “DedicatedPlus.” However, these projects cannot begin serving program participants under the DedicatedPLUS definition until the FY 2021 grant begins which is the day after the FY 2020 grant expires.</p>
<p>When is my application required to answer the Replacement Reserve question?</p>	<p>The replacement reserve question is only applicable to projects with an "Operating" BLI (. This question is not available for projects that do not have an "Operating" BLI.</p> <p>First-Time Renewals – If you are renewing a project for the first time in <i>e-snaps</i>, you must enter all data in the renewal project application as you cannot bring forward data from the new project application previously submitted and awarded. If the renewal project has an "Operating" BLI, you will check the box for “Operating” on-screen 6A Funding Request in <i>e-snaps</i>, enter the amount for "Operating" on the Summary Budget screen and click save. Once this is completed, the new "Replacement Reserve" question will appear on screen 3A, and you must navigate to this screen to complete the additional question(s) before you can submit the renewal project application.</p> <p>Regular Renewals – Renewal projects that are not first-time renewals but have an "Operating" BLI will see the "Replacement Reserve" question on 3A where you will indicate whether you intend to request replacement costs for your project in this year’s Competition.</p> <p>You cannot increase your Operating BLI to accommodate replacement costs, you must work within the confines of the renewal Operating BLI.</p>

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<p>If YHDP applicants apply for renewal funding under an incorrect funding opportunity in the FY 2021 CoC Program Competition, could this affect the CoC's overall funding?</p>	<p>Yes. Requesting YHDP renewal funding incorrectly could have adverse consequences on the CoC's overall funding request.</p> <p>YHDP applicants must use <i>e-snaps</i> to create renewal project applications and must select YHDP Renewal Project Application from the Funding Opportunity screen options. (See the How to Access the Project Application guide.) If applicants submit renewal projects under an incorrect funding opportunity, the following steps must be taken to remedy the problem:</p> <ol style="list-style-type: none"> 1. The YHDP renewal project applicant must inform their CoC they submitted the renewal project under the incorrect funding opportunity. 2. The YHDP renewal project applicant must submit a new renewal project application under the YHDP Renewal Project Application funding opportunity. 3. The CoC must reject/remove the original project applied for under the incorrect funding opportunity from the CoC Priority Listings. 4. The CoC reviews the renewal project applied for under the correct funding opportunity, based on actions in steps 2, which places the renewal project on the YHDP Project Listing.
<p>Will the PIN number automatically update from previous grant year for renewal project applications?</p>	<p>Yes, the PIN will automatically update if you imported the previous year's renewal project application when creating the project in <i>e-snaps</i>.</p> <p>If this is a first-time renewal project application, you will need to enter the PIN on Screen 1A, question 5b. of the renewal project application. Use your current grant agreement, or grant agreement as amended, to ensure you enter the correct PIN. The PIN is the first six digits of the grant number. For example, the PIN for grant number CA0512L5F021900 = CA0512.</p> <p>HUD will update the actual grant number as appropriate if the renewal project is selected for conditional award. For example, if selected for award in FY 2021, the grant number will update to CA0512L5F022101.</p>
<p>Rents</p>	

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<p>If one or more of a CoC’s eligible renewal projects that include a rental assistance BLI, chooses to reduce their budget by requesting less than FMR per unit, can the CoC use the amount that was reduced to create a new, reallocated project in the FY 2021 CoC Program Competition?</p>	<ul style="list-style-type: none"> • Yes. If one or more projects that currently receives funds for rental assistance where the grant amount is based on Fair Market Rent (FMR) chooses to reduce their grant amount by requesting actual rents instead of FMR, CoCs may reallocate the difference between the Annual Renewal Amount (ARA) on the FY 2021 Grant Inventory Worksheet (GIW) and the actual amount requested by a renewal project applicant in the application. Before requesting a rental assistance amount that is based on an amount less than FMR, though, the renewal project must ensure the move from FMR to actuals will yield sufficient ongoing funding for the rental assistance units as HUD will continue to expect the renewal project to serve the same number of people in the same number of units. <p>Note: Any new projects created through reallocation that request rental assistance funding must request an amount based on the full FMR amounts for the initial grant term.</p>
<p>Since renewal projects in the FY 2020 competition were awarded noncompetitively, are there any changes in this year’s Competition to the budgets for renewal projects?</p>	<p>Yes. Renewal projects that included rental assistance at FMR and permanent housing projects that included actual rental assistance amounts or included leasing, leased structures or operating costs may have received increases for these BLIs. Because FY 2020 funds were awarded non-competitively, these projects are not in <i>e-snaps</i> with the FY 2020 amounts and the project’s budget numbers are currently populated in <i>e-snaps</i> with the FY 2019 amounts. Therefore, you should pay close attention to the funding line items that are being requested. Any renewal project that has a rental assistance line item with “actual” costs (not FMR costs) must make an adjustment to the project’s budget. Additionally, renewal projects that have leasing, leased structures or operating costs in a renewal project will also need to make an adjustment to their project’s budget. NOTE: You should not use the “Submit Without Changes” if your FY 2020 award included an increase in actual rental assistance, leasing, or operating costs.</p> <p>If your rental assistance project uses full Fair Market Rents for your rental assistance funding request, you are not impacted, and will not need to make any budget adjustments in <i>e-snaps</i>.</p> <p>Renewal projects that are awarded funds for rental assistance that request less than FMR (i.e., a per-unit amount based on the actual rent costs per unit) may be increased based on the average increase in FMR amounts within the CoC’s geographic area, weighted for</p>

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	<p>population density. The same is true for projects with leasing, leased structures or operating costs in a CoC Renewal project.</p> <p>The Grant Inventory Worksheets (GIWs) posted for each CoC included the correct updated budget numbers for each budget line item (BLI). Every project that is renewing with a rental assistance BLI that selected “actual” (not FMR) will need to enter the correct amounts in the budget(s) for their <i>e-snaps</i> application. In the last week of August/first week of September, 2021 HUD HQ will provide a list to Collaborative Applicants that contains the “Actual Rents” for all projects in that CoC that are not at the FMR level. The CoC will forward that information to the Renewal projects with the adjusted actual rents for rental assistance. This report contains the adjusted amount for each bedroom size with assisted units. The GIW does not list the amount at the bedroom size level, just at the BLI level. The renewal applicant will update their budget in <i>e-snaps</i> with these updated amounts.</p> <p>NOTE: Every renewal project with leasing, leased structures or operating cost BLIs will need to enter the correct BLI amounts from their 2021 GIW into their project application budget.</p>
Submission	
Do project applicants need to attach the required HUD certifications?	No. HUD has built the following forms directly into the project application: SF-424; HUD-2880 (Applicant/Recipient Disclosure/Update); HUD-50070 (Certification for a Drug Free Workplace); Certification Regarding Lobbying; SF-LLL (Disclosure of Lobbying Activities), SF-424B, and SF-424D. To accommodate project applicants with more than one project, HUD has also built the HUD-2880 into the Project Applicant Profile so you only need to fill out most of field for this form once.
Subrecipients	
May a project subrecipient submit a Project Application in <i>e-snaps</i> on behalf of the Applicant?	No. The Applicant's Authorized Representative is the only person who can submit the Project Application in <i>e-snaps</i> . However, the project subrecipient may assist in entering data into the Project Application in <i>e-snaps</i> . To assist in completing the Project Application, the Applicant's Authorized Representative must give the project subrecipient access to the Project Application (i.e., must add the person as a 'registered user' who is

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	associated with the application). Refer to the Adding and Deleting Registrants resource for instructions. The instructions for adding a registered user are in each of the SF-424 training modules as well. HUD will not award funding to projects if the Project Applications refer to the subrecipient organization as the Project Applicants.
Can a project subrecipient be a “for-profit” entity?	No. For-profit entities are not eligible to be Project Applicants or subrecipients.
Transition	
How do renewal project applicants designate a project application as a Transition grant?	In the FY 2021 CoC Program Competition you can request to transition eligible renewal project(s) from their original component(s) to another eligible component. To utilize the transition grant process, you must fully reallocate the renewal project(s) funds that will transition to the new component and you must submit a new project application in <i>e-snaps</i> . Eligible components for new projects in the transition process are: PH-PSH, PH-RRH, Joint TH and PH-RRH, SSO-CE, and HMIS. See Section III.B.2.w (reallocation) and Section III.B.2.z (transition grant) of the NOFO for additional information and requirements, including notification to the CoC of your organization’s intent to use the transition grant process. Also refer to the FY 2021 New Project Detailed Instructions, <i>Important Reminders</i> https://www.hud.gov/sites/dfiles/CPD/documents/FY-2021-New-Application-Detailed-Instructions.pdf for additional guidance, Note: If you are using the transition grant process you cannot consolidate or expand a project that is transitioning.
YHDP Grants	
How do I apply for a renewal of an expiring Youth Homeless Demonstration Program grants?	Youth Homeless Demonstration Program (YHDP). YHDP projects that were initially awarded in FY 2018 may be eligible for renewal in the FY 2021 CoC Program Competition, provided they meet the requirements of the CoC Program. The following applies to YHDP projects renewing in the FY 2021 CoC Program Competition: a. may only request one year of renewal funding; and b. if the project applicant has more than one YHDP project eligible for renewal in FY 2021, the project applicant can consolidate the renewing YHDP projects through the

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	<p>renewal application provided it follows the process outlined in Section II.B.6 of the FY 2021 CoC Program NOFO.</p> <p>These projects cannot consolidate with a non-YHDP project. However, YHDP projects cannot use the expansion process outlined in Section III.B.2.j of this NOFO or the or reallocation process outlined in Section III.B.2.w of this NOFO.</p>
<p>Who can apply for the YHDP Replacement funding opportunity?</p>	<p>Only YHDP communities that have a YHDP Renewal project, originally awarded under one of the YHDP NOFOs, that is eligible to be replaced can apply for the YHDP Replacement funding opportunity.</p>
<p>What is the YHDP Replacement funding opportunity?</p>	<ol style="list-style-type: none"> 1. The YHDP Replacement funding opportunity is a funding mechanism to allow YHDP communities to replace old YHDP projects with new YHDP projects. See Section V.B.4.(5) of the FY 2021 CoC Program NOFO for more information. 2. In the past, YHDP communities have not been able to replace under-performing projects. The YHDP Replacement funding opportunity allows YHDP communities to replace under-performing projects and apply for projects that have shown more success in their communities or innovative projects that have not been seen in the community before.
<p>How does the YHDP Replacement funding opportunity work?</p>	<ol style="list-style-type: none"> 1. A YHDP Replacement project application must replace a YHDP Renewal project. An applicant cannot apply for a YHDP Replacement project and maintain all their YHDP Renewal projects. One YHDP Renewal must be replaced. Unlike the regular CoC reallocation that can allow multiple Renewal projects to be reallocated into one New project, the YHDP Replacement is a one to one replacement. Only one YHDP Renewal can be used for one YHDP Replacement. 2. YHDP Project applicants do not have to go through reallocation to apply for the YHDP Replacement project. Project applicants can simply apply under the YHDP Replacement funding opportunity and submit their project. If an application is submitted for both a YHDP Replacement and the YHDP Renewal being replaced, HUD HQ will determine which project will be awarded. Only one will be awarded, never both. 3. The YHDP Replacement cannot request more funding than what the YHDP Renewal was awarded for in the most recent CoC competition or under the YHDP NOFO if this is a first-time renewal in the CoC Program. For example, if the

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	<p>YHDP PSH Renewal had a total budget of \$100,000 the YHDP Replacement can apply for up to \$100,000. The YHDP Replacement can apply for less than \$100,000, but it cannot apply for more.</p> <ol style="list-style-type: none">4. YHDP Replacement projects can apply for component types and conduct services that are currently allowed under the Youth Demonstration program. Please refer to Section V.B.4.(5) of the FY 2021 CoC Program NOFO for more details.5. YHDP Replacement projects can only apply for 1-year grant terms.
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