

2019 Family Unification Program Notice of Funding Availability
Frequently Asked Questions

Questions submitted to 2019FUPNOFA@hud.gov will be answered in this document. The document will be updated periodically and reposted with the date it was updated.

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1. Accessing and Completing the NOFA

1.1. Question: I am having troubles with grants.gov unrelated to accessing the NOFA, how can I get assistance?

Answer: Please see the following webpage for support information:
<https://www.grants.gov/web/grants/support.html>

1.2 Question: Can the required Statement of Need or Rating Factor Certification be incorporated into the MOU, or does the Statement of Need have to be a separate document?

Answer: No. The Statement of Need, Rating Factor Certification, and MOU must be separate documents.

1.3. Question: How can I preview the NOFA without opening the zip file on grants.gov?

Answer: The NOFA may also be previewed at
https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/family.

1.4. Question: Does HUD have guidance on what must be included in the statement of goals and standards of success in administering the program?

Answer: HUD does not have guidance on this subject.

1.5. Question: How can I learn more about the Family Unification Program (FUP)?

Answer: More information about FUP is located at the following link:
https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/family.

1.6. Question: Would a PHA need to submit two MOUs if applying to serve both FUP families and FUP youth?

Answer: Only one MOU will be accepted per applicant. An MOU being submitted under this NOFA must meet all requirements as described in the NOFA. This includes how both FUP-eligible families and FUP-eligible youth will be served.

1.7. Question: Does the NOFA require matching funds?

Answer: The NOFA does not require matching funds.

1.8. Question: The NOFA states: Where there is more than one CoC in the PHA's jurisdiction, the PHA must determine whether it will enter into an agreement with more than one CoC." For our application, the PHA and PCWA intends to enter into agreements with multiple CoC's that fall within the PHA's jurisdiction. Are we allowed to send a separate MOU for each CoC we enter into agreement with, or do we have to require that all CoC's we are partnering with be on the same MOU?

Answer: Only one MOU will be accepted per applicant. An application that includes more than one MOU will fail the threshold review and will not be considered for further review.

1.9. Question: Where there are multiple CoCs, can each CoC signs the MOU.

Answer: Yes, PHAs are not limited in the number of partners that may sign the MOU.

1.10. Question: Is the MOU limited to the PHA, PCWA, and CoC, or may other partners sign the MOU?

Answer: The MOU is not limited to the PHA, PCWA, and CoC. The MOU may include other community partners.

1.11. Question: Does a PHA need to specify the minimum number of FUP vouchers it is requesting?

Answer: The NOFA did not require the provision of a minimum number of vouchers being requested.

1.12. Question: My grants.gov workspace for FUP says the SF-LLL Lobbying Disclosure form is mandatory for submission. But the announcement says, "if the form is not applicable do not include it with your submission." However, as it is identified as mandatory, I'm concerned I will not be able to submit the application without completing the form. Should I complete it anyway and put "N/A" for the lobbying information?

Answer: If the form is not applicable to your agency and you are not able to submit the application in Grants.gov without completing it, enter Not Applicable in all required fields of the form and submit.

1.13. Question: Do we need to include the estimated funding amounts for the services that will be provided to FUP participants by the PCWA and CoC?

Answer: The NOFA does not require the estimated funding amounts for services to be provided.

1.14. Question: If the relevant PCWA has chosen to enter into an MOU with a statewide housing agency for the purposes of responding to this NOFA, and has indicated a lack of interest in separately collaborating with additional local PHAs, is there an avenue for a local PHA to separately compete for funding with an understanding of cooperation with the statewide agency and PCWA?

Answer: The local PHA will need to have an MOU with the PCWA that will be providing the referrals and other PCWA responsibilities indicated in the MOU.

1.15. Question: Is the PHA applicant allowed to be the provider of supportive services to FUP eligible youth rather than the PCWA? If so, is laying this out in the MOU sufficient for showing this is being done by "agreement" between the PCWA and PHA, to fulfill the requirement that the services are being "provided to FUP-eligible youth by the PCWA or by another agency/organization under agreement/contract with the PCWA" in the NOFA?

Answer: The PHA or another agency/organization may be the provider of the required supportive services to FUP-eligible youth. The organization providing the services and resources must be identified in the MOU. The MOU is sufficient to meet the "under agreement" requirement.

1.16. Question: The rating factor certification for Rating Factors 1, 2, 4, and 5 includes this question, "Does MOU specify the service provider(s)?" Does the MOU need to identify specific service provider(s) in the MOU to be eligible for full points under those rating factors?

If we, or our system partners, commit to funding the activities in those rating factors, do we need to also identify the specific agencies that will be contracted to provide the service? In some cases, it may make sense to wait until we know the scale of the FUP award to determine the specific provider(s) that will deliver the services.

If we include a specific commitment in the MOU to fund the activities for all FUP families and youth, is that sufficient to receive full points for these rating factors?

Answer: NOFA reviewers will verify that the MOU specifies the specific service provider. HUD is reviewing the NOFA to determine who, if the applicant is awarded funding under the NOFA, has been identified to provide the services.

1.17. Question: In the NOFA preview link on Grants.gov there is a “Download Instructions” button. When I select the button, it opens a blank Microsoft Word document. Where can I find the instructions for completing the NOFA?

Answer: Instructions for the 2019 FUP NOFA are embedded in the NOFA.

1.18. Question: The sample Memorandum of Understanding included in the NOFA indicates under PHA, PCWA, and CoC responsibility sections and how the PHA, PCWA or CoC will fulfill each of the listed responsibilities needs to be addressed. Does this mean that listing each responsibility is insufficient and that additional information is required? Can you provide an example of how, for instance, the PHA responsibility should be addressed?

Answer: The sample MOU demonstrates the requirements listed in Section III.F.7. of the NOFA. Additional specificity is provided at the applicant’s discretion. For example, under PHA Responsibilities, the text may read, “[Insert PHA Name] commits to the following activities.” The MOU would then include items 1 – 9. This would meet the threshold requirement.

1.19. Question: The form HUD-52515 is included in the forms to be completed the FUP NOFA. However, the application package in Grants.gov does not include this form. Where may this form be found?

Answer: The form may be found at the following link:
https://www.hud.gov/sites/dfiles/PIH/documents/HUD-52515_.pdf.

1.20. Question: Should the form HUD-52515 be uploaded as an attachment? Would the same file name guidelines used for other attachments also apply?

Answer: The Funding Application (form HUD-52515) is required and must be submitted as an attachment. The form should be labeled using the following structure [PHA Code_HUD-52515_2019FUPNOFA].

1.21. Question: Is the Rating Factor Certification available for download?

Answer: The Rating Factor Certification is provided for in the Appendix of the NOFA. You may copy the content and paste it in a program such as Microsoft Word.

1.22. Question: Are all community partners required to be listed in the Introduction and Goals section of the MOU?

Answer: The MOU must meet the requirements of the NOFA. This includes referencing the appropriate entity as required. For the Introduction and Goals section, the PHA, PCWA, and CoC must be included. The inclusion of additional entities in this section is at the discretion of the applicant.

1.23. Question: Regarding the Statement of Need, is there a specific 12-month period that is required (i.e. Federal Fiscal Year, or 12-months from now) for the data to be pulled for each category?

Answer: The NOFA does not define the 12-month period. Applicants have discretion in how they present the data. For example, Federal Fiscal Year, 12-month period from application, or Calendar Year 2020, would be acceptable.

2. Eligibility

2.1. Question: If my PHA already administers the Family Unification Program (FUP), are we eligible to apply under this NOFA for new incremental FUP vouchers?

Answer: PHAs that already administer the FUP are eligible to apply under this new NOFA opportunity.

2.2. Question: What department would need to apply for the grant? Would it be Housing or Social Services? Or would we both be applying together?

Answer: HUD is unable to make a determination as to what part of an otherwise eligible organization assembles the application for the NOFA.

2.3. Question: Can any PHA apply for the FUP Grant that has an existing ACC with HUD for HCVs AND have demonstrated a commitment to administer FUP, which shall be verified by an executed MOU between the PHA, PCWA, and CoC or only PHAs that already have an allocation of UFP vouchers?

Answer: PHAs that do not presently administer the FUP, but are otherwise eligible, may apply.

2.4. Question: Can families apply for housing assistance through this NOFA?

Answer: No. Families interested in the FUP should reach out to their PCWA, PHA, or CoC, to determine availability of the program in their community. The funds made available through this NOFA are provided only to PHAs to administer the program. HUD does not administer the assistance directly to families.

2.5. Question: Are PHAs that do not currently administer the FUP eligible to apply?

Answer: Yes. PHAs do not have to previously have experience administering the FUP.

2.6. Question: Our community has FUP vouchers available through the local PHA. Our need for these vouchers exceeds supply. Can our community apply for an additional allocation of FUP vouchers? If so, who is eligible?

Answer: PHAs that already administer the FUP are eligible to apply under this new NOFA opportunity. Only PHAs that have an existing ACC with HUD for HCVs are eligible to apply for funding under the NOFA. See the NOFA for additional eligibility information.

2.7. Question: Can these funds be used for home repairs?

Answer: Funding under this NOFA may be used to provide tenant-based or project-based housing assistance.

2.8. Question: Is this grant direct funding to support the described placements, or is it vouchers for which we would need to find providers to accept them?

Answer: This NOFA is for new incremental Housing Choice Vouchers (HCVs). These HCVs may be used in the form of tenant-based assistance or project-based assistance. Tenant-based FUP vouchers are used to find housing in the private market. The MOU must describe the assistance that will be provided to FUP families and youth in locating housing units and working with landlords to secure appropriate eligible units.

2.9. Question: My PHA only administers the Public Housing program. Are we eligible to apply for this NOFA?

Answer: Only PHAs that have an existing ACC with HUD for HCVs are eligible to apply for funding under this announcement.

2.10. Question: We are a PHA/non-profit agency that administers Mainstream vouchers-only. Are we eligible to administer the FUP?

Answer: Per the NOFA, only PHAs that have an existing ACC with HUD for HCVs are eligible to apply for funding under this announcement. This excludes non-profits that administered Mainstream prior to its conversion to section 8(o) under the Frank Melville Supportive Housing Investment Act of 2010 and was classified as a PHA only for purposes of administering the Mainstream program.

2.11. Question: My PHA applied for and received vouchers under the Foster Youth to Independence (FYI) initiative. Are we eligible to apply for assistance under this NOFA?

Answer: Administering an FYI Tenant Protection Voucher (TPV) does not preclude eligibility under the NOFA.

2.12. Question: Is administering a Family Self-Sufficiency (FSS) program an eligibility requirement?

Answer: Administration of an FSS program is not a requirement of the NOFA. Applicants may receive up to 12 Rating Factor points for meeting the Rating Factor 6 Self-Sufficiency Programs section of the NOFA.

3. Utilization

3.1. Question: My PHA has a FUP utilization of 85 percent. Are we eligible to apply under the NOFA this year?

Answer: For PHAs presently administering FUP vouchers, the following eligibility threshold to receive additional vouchers applies:

- a. FUP utilization rate of 90 percent or greater; or
- b. Absent a utilization rate of 90 percent or greater, the adoption of an action plan to achieve full utilization within 12 months from date of application to this NOFA.

See Section III.F. of the NOFA for additional information.

3.2. Question: Our PHA and partner PCWA received new FUP vouchers in the FY17/FY18 awards and are participating in the HHS-funded evaluation of FUP, as used for families. Due to necessary approvals to participate in the evaluation, we got a late start referring families to FUP. Furthermore, the need to refer enough families to account for all new FUP vouchers as well as a control group has increased the time needed to fully lease up our vouchers. Can HUD please clarify the new FY19 NOFA in terms of what FUP voucher utilization requirements we have this year and in the future?

Answer: HUD expects full utilization of FUP vouchers. HUD uses the NOFA utilization threshold to prioritize PHAs that have shown an ability to successfully administer the program over PHAs with lower utilization. In the previous NOFA, HUD established a 90 percent FUP utilization threshold for PHAs with an existing allocation. This resulted in PHAs with a utilization of less than 90 percent not being eligible for new FUP vouchers in the NOFA. Such PHAs were instructed to focus on fully utilizing their existing FUP vouchers.

For the 2019 FUP NOFA, HUD maintained a 90 percent utilization requirement to be eligible for new FUP vouchers. However, two exceptions were created to introduce greater flexibility for PHAs interested in pursuing new FUP vouchers, and to account for the most recent allocation.

1. Alternative qualification. Absent a utilization rate of 90 percent or greater, a PHA remains eligible for new FUP vouchers if they adopt an action plan to achieve full utilization of their FUP vouchers within 12 months from the date of application to the NOFA as described in the NOFA. Failure to meet this standard may negatively affect eligibility under future FUP NOFAs.
2. New awards. PHAs awarded new incremental FUP vouchers under the previous NOFA are not held to the 90 percent utilization threshold standard under the NOFA. These PHAs had a utilization of 90 percent or higher prior to the award of new FUP vouchers and should be working to achieve full utilization.

HUD cannot speak to whether similar requirements will be included in future NOFAs.

4. FUP Program Requirements

4.1. Question: The NOFA mentions two eligible populations:

1. Families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child, or children, in out-of-home care; or the delay in the discharge of the child, or children, to the family from out-of-home care; and
2. Youth at least 18 years and not more than 24 years of age, who left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in Section 475(5)(H) of the Social Security Act and are homeless or are at risk of becoming homeless at age 16 or older.

Is the NOFA for both populations, or may PHA apply to serve just one category?

Answer: By Statute, both populations are eligible to be assisted under the FUP. PHAs may not exclude a Statutorily eligible population from participation in the FUP.

4.2. Question: May one MOU be used to cover FUP awards made under different years?

Answer: Yes, a PHA may have one MOU. An MOU being used under the new NOFA must meet all requirements as described in the NOFA.

4.3. Question: The MOU must include a statement that the required services “will be provided for a period of at least 18 months to FUP-eligible youth receiving rental assistance through the use of a FUP voucher regardless of age.” Does the requirement to provide services remain only 18-months even through the FUP voucher length for FUP youth is now 36 months?

Answer: A minimum of 18 months of supportive services must be provided. This NOFA awards Rating Factor points for the provision of supportive services beyond 18 months.

4.4. Question: Will the administrative fees associated with FUP vouchers be fully funded?

Answer: Administrative fees for FUP, other special purpose vouchers (SPVs) and regular vouchers will be prorated at the national proration. Administrative fees for FUP vouchers is based on units leased reported in VMS as of the first of the month, which is consistent with regular vouchers.

4.5. Question: The MOU must be approved by our Board of Supervisors and we will not have enough time to prepare the MOU and have this approval prior to the application due date. As such, we are asking if an unsigned draft can be included along with our currently active MOU in place for the FUP program, or perhaps letters of intent instead of the new MOU?

Answer: The application must include an MOU executed by the official representative of the 1) PHA, 2) PCWA, and 3) CoC. This is a threshold requirement. Applicants who fail to meet a threshold eligibility requirement will be deemed ineligible. Applications from ineligible applicants will not be evaluated. No exceptions or extensions to this requirement are allowed.

4.7. Question: In order for the youth to be eligible for the FUP vouchers they need to be 90 days from closing or closed with the PCWA? According to the FUP eligibility requirements, youth may be open with the PCWA but have left foster care, would these youth open with the PCWA but who have left foster care be eligible for the FUP vouchers?

Answer: The youth eligibility requirements are limited to those stated in the NOFA as follows:

Youth at least 18 years and not more than 24 years of age (have not reached their 25th birthday), who left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in Section 475(5)(H) of the Social Security Act and are homeless or at risk of becoming homeless at age 16 or older.

Continued involvement with the PCWA is not a determinant for eligibility, except that the PCWA is responsible for determining eligibility for the FUP.

4.8. Question: Can a PHA pass through any of their administrative fees for operating the FUP voucher program to a nonprofit agency that they may subcontract with to provide housing location and stabilization services to families in the program?

Answer: A PHAs may choose to use a portion of the administrative fees for eligible activities to be carried out by a third-party.

4.9. Question: Are youth who leave foster care before the age of 18 with a transition plan (adoption, guardianship to a relative, reunification with family), but ultimately experience homelessness, eligible?

Answer: Such youth may still meet the eligibility definition assuming that they are not more than 24 years of age.

4.10. Question: Are youth who leave the system without a transition plan (left without notice) and experiencing homelessness eligible for the program?

Answer: Such youth may still meet the eligibility definition assuming that they are not more than 24 years of age.

4.11. Question: Our PHA has been giving wait list ‘preference points’ to Emancipated Youth over the past several years to help decrease the wait list time to be housed. This is without actual FUP vouchers. Our question is whether we would be permitted to ‘re-assign’ actual FUP vouchers to eligible youth currently housed under the HCVP program to free up our vouchers that are currently being used. Would this be permissible?

Answer: With the information provided in this question, these youth would not meet the eligibility requirements for FUP. Specifically, if these youth are already assisted they are not homeless or at-risk of homelessness.

4.12. Question: Is the PCWA allowed to prioritize, for example, younger FUP-eligible youth for referral over older FUP-eligible youth, based on a belief that those who are younger are in greater need of a voucher? Is there any additional general guidance or rules governing how a PCWA prioritizes its referrals more generally?

Answer: HUD has not issued guidance or rules governing how a PCWA prioritizes referrals to FUP. It should be noted that eligibility for FUP is defined in the NOFA. Providers of FUP assistance cannot use alternative eligibility requirements. For example, the PCWA cannot limit access to FUP to youth that are less than 20 years of age. The NOFA did not define how PCWA’s prioritize access to FUP for youth. HUD encourages PCWAs to leverage CoC experience in prioritizing those with the highest level of need, which may include a variety of factors.

4.13. Question: The sentence structure and placement of “at age 16 or older in the definition of youth eligibility is creating some confusion. This seems like it should be clarified so that the age qualifier is related to the foster care history, not a qualifier of homelessness risk.

Answer: HUD agrees that the age qualifier is related to foster care history. HUD has interpreted the statutory language in the following way.

Eligible youth must meet the following conditions:

1. Has attained at least 18 years and not more than 24 years of age;
2. Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act at age 16 or older; and
3. Is homeless or is at risk of becoming homeless.

4.14. Question: Does the term “living in overcrowded housing” apply to just families, or families and youth?

Answer: For the purpose of determining eligibility for FUP, the term “living in overcrowded housing” applies to the determination as to whether a family lacks adequate housing. The term “living in overcrowded housing” is not used in making a determination as to whether an otherwise eligible youth qualifies for FUP as a result of being at-risk of or experiencing homelessness.

4.15. Question: Are grantees able to change service providers during the term of the grant- and if so- would that require a new MOU?

Answer: Changes to the service provider partners identified in the MOU may be changed after an award has been made without submitting a new MOU to HUD. Grantees should refer to the terms of their MOU as to the requirements for making changes.

4.16. Question: Will the effective date of awards be April 1, 2020?

Answer: The effective date included in the NOFA is an estimate. Upon notification of award, the PHA will be advised of the option to request an alternative effective date to the one proposed by HUD. HUD may place parameters on the selection of an alternative effective date to the one identified by HUD.

5. Project-Basing FUP

5.1. Question: May a PHA project-base a FUP voucher?

Answer: Yes. All statutory and regulatory requirements that apply to the PBV program apply. No additional requirements are placed on project-basing FUP vouchers.

5.2. Question: If a PHA were to project-base a FUP voucher, what period of time would the contract be valid. Would the voucher renew beyond an initial tenancy?

Answer: FUP vouchers that have been project-based are no different from regular HCVs. The limit on the length of assistance for FUP youth is the only exception. For example, a PHA may enter into a new PBV HAP contract with an owner with an initial term of up to 20 years. This is the case for both regular HCVs and FUP vouchers.

After the initial funding increment expires, FUP vouchers are rolled into the PHA's renewal formula and funding for those FUP vouchers is included in the PHA's main HCV renewal increment. Renewal funding is based on validated leasing and cost data in VMS and is subject to subsequent renewals from future appropriations.

6. Other

6.1. Question: Can you tell me if specific PHAs have applied for the NOFA?

Answer: HUD is not able to provide this information.

6.2. Question: Is using CoC program-funded rapid re-housing assistance

Answer: Questions regarding eligible uses of CoC program funds should be directed to the Ask a Question feature on HUD Exchange: <https://www.hudexchange.info/program-support/my-question/>.

6.3. Question: Does HUD prefer that communities leverage non-HUD resources for moving costs, security deposits, and utility startups?

Answer: The NOFA does not speak to such preference.

6.4. Question: What happens if we have leftover money at the end of the grant period? Not from leasing up applicants but perhaps from our initial request amount?

Answer: Any initial funding not used by the PHA during the year from any incremental award rolls over to its program reserves. The initial FUP funding can be used to augment any HAP FUP requirements in the subsequent year to augment FUP costs. However, be advise that the Voucher appropriations language allows the use of any excess program reserves to offset future shortfalls and to increase the national renewal proration. Excess program reserves that emanate from FUP funding may be subject to this future offset.

6.5. Question: What happens if we are able to lease up over the amount of vouchers we initially requested? We are looking at asking for 10 voucher but what if we lease 11 or 12? Are we able to do that and will we receive admin fee for those additional voucher holders?

Answer: Please see [PIH Notice 2019-08](#) regarding the prohibition on over-leasing.

6.6. Question: We had to make changes to our NOFA submission prior to the deadline. What version of the NOFA will HUD review?

Answer: HUD will only review the most recent version.

6.7. Question: When I spoke to someone who works with the CoC, they stated the committee would probably not approve the CoC responsibilities outlined in Section VIII. Part A. “Integrate the prioritization and referral process for FUP-eligible youth into the CoC’s coordinated entry process”. I was told the CoC doesn’t include “at risk” people. They deal with homelessness. I believe the drawback would be the prioritization, and the referral process. The staff person wanted to know what the prioritization is (HCV waiting list prioritization?), the referral process (through the PCWA?), and the issue of “at risk” compared to homelessness. I have been looking through the NOFA and would like some guidance.

Answer: Questions regarding eligible uses of CoC program funds should be directed to the Ask a Question feature on HUD Exchange: <https://www.hudexchange.info/program-support/my-question/>.

See <https://www.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf> for Coordinated Entry Core Elements including the concepts of prioritization and referral. Within the requirements of the NOFA (e.g., required certification of referrals), communities will define for themselves what the prioritization and referral process looks like for accessing FUP vouchers.

The terms at-risk of becoming homeless and homeless are defined in the NOFA by the way of regulatory citation. (See Section I of the NOFA under program definitions.)

6.8. Question: The NOFA indicates a maximum of \$1,200,000. Is this a cash grant in addition to a request for vouchers or is that the value of the vouchers?

Answer: The amounts provided are an estimate of the value of the of the maximum award based on the maximum number of vouchers.

6.9. Question: Please explain what a COC is?

Answer: A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

Please visit the following website to learn more about the Continuum of Care Program: <https://www.hudexchange.info/programs/coc/>.

6.10 Question: Can HUD confirm that earning Rating Factor 5 points requires case management services only for FUP-Eligible Families, and that case management services to FUP-Eligible Youth are not required to earn Rating Factor 5 points?

Answer: Rating Factor 5 is specific to FUP families only.

6.11 Question: We have a question regarding the statement below from the NOFA “Youth who are part of the PCWA’s active caseload do not have to be added to the CoC’s coordinated entry process.”

Knowing that youth have to be referred through Coordinated Entry for FUP- this sentence seems to indicate otherwise and contradict that requirement. Hoping for clarification on that statement from the NOFA.

Answer: Youth currently within the PCWA’s caseload do not need to be referred through coordinated entry. The requirement to establish and implement a system to identify FUP-eligible youth, including integrating the prioritization and referral process into the local CoC’s coordinated entry process only applies to youth not currently within the PCWA’s caseload.

6.12. Question: Does this NOFA offer Opportunity Zone preference points?

Answer: This NOFA does not offer Opportunity Zone preference points.