# **Appendix A: Project Selection Process**

This Appendix establishes the funding criteria for projects under the Youth Homelessness Demonstration Program (YHDP). HUD is making available \$43 million in Fiscal Year (FY) 2017 to implement projects in up to 11 communities—5 of which will be rural communities—to demonstrate how a coordinated community approach to serving homeless youth, age 24 and younger, can dramatically reduce homelessness.

#### I. Overview

**A. Program Description**. As discussed in further detail in the full text of the NOFA, the YHDP was funded by Congress through the Consolidated Appropriations Act, 2017 (Public Law 115-31), "the FY 2017 HUD Appropriations Act," to implement projects that demonstrate how a comprehensive approach to serving homeless youth, age 24 and younger, can dramatically reduce homelessness. This Appendix provides information to selected communities, (as this term is defined in paragraph I.A.1 of the YHDP NOFA) about how they can apply for projects to support their community's coordinated community plan (as described in Section III.E.b. of the NOFA).

While this Appendix is the primary source of information for Project Applicants, Project Applicants should read the full YHDP NOFA in its entirety in conjunction with the Continuum of Care (CoC) Program interim rule (24 CFR part 578). All projects awarded through the YHDP will be administered in accordance with CoC Program requirements, however recipients may request waivers of specific provisions to carry out otherwise prohibited activities and practices. HUD also strongly encourages Project Applicants to review the FY 2017 General Section NOFA, published on September 30, 2016, and any additional Notices and HUD guidance provided in relation to the CoC Program.

**B.** Amounts Made Available. As discussed in the full text of the NOFA, up to \$43 million is available for projects under the YHDP. (Additional funds may become available for award under this NOFA as a result of HUD's efforts to recapture unused funds, use carryover funds, or because of the availability of additional appropriated funds.) HUD will make a minimum of \$1 million available to each selected community for project applications. The amount available to a selected community above \$1 million will be determined based on the percentage of youth among all selected communities that reside in each community and the poverty rate of each community. In the case of multiple projects in a selected community, the selected community will decide the amount of funds for which each project may apply.

## C. Overview of Application Process.

- 1. Community Selection Process. To be awarded projects under the YDHP, the community must have been selected by HUD to participate in the YHDP (see the main text of this NOFA for more information about how to apply to be a selected community).
- **2.** Project Selection Process. All project applications must be submitted through *e-snaps* following the process outlined in this Appendix.

## D. Highlights.

- 1. CoC Program Requirements. To be eligible for funding under the YDHP NOFA, Project Applicants must meet all statutory and regulatory requirements of the McKinney-Vento Homeless Assistance Act ("the Act") and 24 CFR part 578, unless a waiver to a provision in 24 CFR part 578 is approved by HUD (see Appendix B for more information). Project Applicants can obtain a copy of the Act and 24 CFR part 578 on the HUD Exchange.
- 2. Coordinated Community Plan. HUD's central requirement of the YHDP is that each selected community will develop a community plan to prevent and end youth homelessness. More information is provided in the full text of the NOFA on the community plan; however, for purposes of the project application, it is required that all projects submitted are consistent with the community plan. HUD will only award up to 30 percent of the selected community's available funds until HUD approves the coordinated community plan.
- 3. CoC Involvement. HUD expects CoCs to lead in the development and implementation of the community plan and the YHDP. In addition to the involvement described in the full text of the NOFA, as it relates particularly to the project applications, HUD requires each CoC to implement a thorough review and oversight process at the local level for project applications submitted to HUD as part of the YHDP. HUD expects CoCs to closely review information provided in each project application to ensure that:
  - **a.** All proposed program participants will be eligible for the program component type selected;
  - **b.** The proposed activities are eligible under the 24 CFR part 578, or sufficient evidence to support a request for waiver of non-statutory requirements of an eligible activity is provided with the application (see Appendix B for more information);
  - **c.** Each project narrative is fully responsive to the question being asked and that it meets all the criteria for that question as required by the YHDP NOFA and included in the detailed instructions provided by HUD;
  - **d.** The data provided in various parts of the project application are consistent and accurate; and
  - **e.** All required attachments correspond to the attachments list in this Appendix, and the attachments contain accurate and complete information.
- **4.** Youth Action Board Approval. It is important to HUD that youth, including homeless and formerly homeless youth, are involved in every step of the implementation of the YHDP at the local level, and it is for this reason that HUD is requiring selected communities to have a Youth Action Board. For purposes of the project applications, HUD expects that the Youth Action Board will have an opportunity to review all project applications thoroughly and that any input will be implemented to the extent that it is feasible within statutory and regulatory guidelines. Additionally, HUD

expects that the Youth Action Board will approve all projects submitted to HUD for review and consideration.

5. Serving Program Participants that Meet Paragraph (3) of the Definition of Homeless. Project Applicants may request, as part of this YHDP, that up to 10 percent of the funding awarded to its selected community under this demonstration be approved to serve homeless households with children and youth defined as homeless under other Federal statutes who are unstably housed (paragraph 3 of the definition of homeless at 24 CFR 578.3). To request approval, a Project Applicant must submit, with the first project application requesting approval to serve this population, documentation demonstrating that serving this population is of equal or greater priority. This means that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under Section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth, than serving the homeless as defined under paragraphs (1), (2), and (4) of the definition of homeless in 24 CFR 578.3. Additionally, Project Applicants must thoroughly describe how the requirements described in Section 427(b)(1)(F) of the Act will be met. The decision to request to serve this population must be reflected in the Coordinated Community Plan.

If HUD does not approve the Project Applicant's request, the award for that project will be conditioned or rejected and HUD will prohibit the use of such funds to serve homeless households with children and youth defined as homeless under other Federal statutes who are unstably housed (paragraph 3 of the definition of homeless at 24 CFR 578.3). However, the CoC may submit a subsequent request to serve this population with a subsequent project application.

If HUD approves the request, the Project Applicant must submit notification with each additional project application whether that project will be serving this population.

- 6. Project Types. Projects funded under the YHDP may be renewed under the CoC Program; therefore, Project Applicants will be permitted to apply for all projects permitted under the CoC Program Competition so long as the projects limit their assistance to unaccompanied youth and pregnant and parenting youth. However, HUD recognizes that this is a demonstration designed to test models of assistance that could improve the effectiveness in reducing youth homelessness. Therefore, HUD will entertain waiver requests with project applications of nonstatutory requirements and will also accept applications for project types that are not eligible under the CoC Program regulation where it is necessary to implement the community's coordinated community plan to end youth homelessness. HUD has suggested some projects types in Section II.C.3.b. of this Appendix. Additionally, HUD is open to considering other models and waivers of existing nonstatutory program requirements that are necessary to assist a Project Applicant or recipient of funds under the YHDP and has provided additional information in Appendix B of the YHDP NOFA.
- **7.** *Grant Terms.* Projects awarded under YHDP, except for planning projects, will be awarded for 2-year grant terms and eligible for renewal under the CoC Program when the initial grant term expires. Project Applicants should ensure that the budgets

- requested will be adequate to fund the project for the full 2 years. Planning grants will be awarded for a 1-year grant term and are nonrenewable.
- **8.** Fair Market Rent (FMR). Funds awarded for rental assistance will be awarded using the FMRs published for FY 2018.
- 9. Resubmitting Previously Rejected Projects. There is nothing in this Appendix that prohibits a Project Applicant from resubmitting a project application that has been previously rejected or not funded by HUD in the YHPD competition. However, the Project Applicant should carefully review the reasons that HUD rejected the project and make necessary revisions to ensure that the project passes the quality and threshold review. Applicants must submit all project applications, including resubmitted project applications, by the application deadline (see Section VI.A. of the YHPD NOFA).
- **E. Definitions and Concepts**. The definitions contained in this section include terms that are important for all Project Applicants to understand in order to complete all parts of the Project Application in *e-snaps*.

#### 1. Definitions from 24 CFR 578.3

- a. Applicant
- **b.** Centralized or coordinated assessment system
- c. Collaborative applicant
- **d.** Continuum of Care
- e. Consolidated Plan
- **f.** Eligible applicant
- **g.** Homeless
- **h.** Homeless Management Information System (HMIS)
- i. Permanent Housing
- **j.** Permanent Supportive Housing (PSH)
- k. Private Nonprofit Organization
- **l.** Program participant
- m. Project
- n. Recipient
- **o.** Subrecipient
- p. Transitional Housing
- **q.** *Unified Funding Agency (UFA)*

- **2. YHDP Project Selection Process Definitions.** The following terms are not found in 24 CFR part 578, but are used in this Appendix to define concepts that specifically apply to the project selection process for the YHDP.
  - **a.** Coordinated community plan. The plan developed by a selected community includes the following components and addresses the issues identified in Section III.E.b. of the NOFA:
    - (1) A statement of need concerning at risk and homeless unaccompanied youth and pregnant or parenting youth in the geographic area;
    - (2) A shared vision, list of goals, objectives, and action steps, including which partners are responsible for each action step;
    - (3) A list of partners, and a description of their involvement, that includes the following stakeholder groups to the greatest extent possible:

CoC and ESG Program Providers	Local and State Law Enforcement
Public Child Welfare Agencies	Faith-based institutions
Youth Action Board	Landlords
Local and State Government	Public Housing Authorities
Local and State Educational Agencies	Institutions of Higher Education
Runaway and Homeless Youth Program	Community Development Corporations
Providers	
Non-Profit Youth Organizations	Affordable Housing Developers
Health, Mental Health, and Substance Abuse	Local Advocacy, Research, and Philanthropic
Agencies	Organizations
Juvenile and Adult Corrections and Probation	Privately Funded Homeless Organizations
Workforce System Partners	

- (4) A list of new projects, to be funded by HUD and other sources, that will support the implementation of the coordinated community plan;
- (5) A governance structure, including an organizational chart and decision-making process;
- (6) A plan for continuous quality improvement during the implementation of the coordinated community plan;
- (7) A signature page that includes the signatures of official representatives of *at least* the following systems:
  - The Continuum of Care
  - Public Child Welfare Agency
  - Local Government Agency
  - Youth Action Board

- **b.** *Congregate Living*. Independent living in separate rooms or units, with opportunities to share activities of daily living with other residents, as one chooses.
- **c.** *Crisis Residential Transitional Housing*. A form of transitional housing that is short-term, low-barrier, utilizes a congregate living setting, and provides access to the following supportive services in particular: family engagement and unification, case management, emergency triage services and other supportive services whose purpose is to move youth rapidly into stable housing.
- **d.** Host Home and Kinship Care. A model in which a family agrees to permit a youth to reside with them. Recognizing that the addition of another person in the home may increase costs to the family, HUD will entertain applications that propose to house youth with families and to subsidize the additional costs attributable to housing the youth. The subsidies must be for eligible costs of the CoC program for the grant to be renewable. The residence is in a community-based setting and the youth is without a lease or an occupancy agreement. The family could be related to the youth and the length of stay may be time-limited or without time limits.
- **e.** *Housing First.* A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold).
- **f.** Positive Youth Development (PYD) Model. Defined by the Federal Interagency Working Group on Youth Programs as an intentional, pro-social approach that engages youth in a manner that is productive and constructive; recognizes, utilizes, and enhances youths' strengths; and promotes positive outcomes for young people by providing opportunities, fostering positive relationships and furnishing the support needed to build on their leadership strengths. PYD programs are generally focused on the following six youth outcomes: Confidence; Character; Connection; Competence; Caring; and Contribution. See the page entitled "Positive Youth Development" at: <a href="http://youth.gov/youth-topics/positive-youth-development">http://youth.gov/youth-topics/positive-youth-development</a>.
- **g.** *Pregnant or Parenting Youth.* Individuals who are age 24 or younger who are pregnant or who are the parents or legal guardians of one or more children who are present with or sleeping in the same place as that youth parent, and where there is no person over age 24 in the household.
- **h.** *Selected Community*. A community that is selected by HUD to participate in the YHDP.
- **i.** *Shared Housing*. A model of housing assistance where rental assistance is provided for a youth to reside with a family. The youth leases from the property owner and shares the unit with the family. The unit may be a house

or an apartment. For this Demonstration "immediate family member" is defined to mean parents, grandparents, siblings and legal guardians.

- YHDP rental assistance cannot be provided to a youth to reside in a unit occupied by its owner or occupied by a person with any interest in the unit if the youth is an immediate family member.
- YHDP rental assistance may be provided to a youth in a shared housing unit leased by a family if both the family and the youth are unrelated to the property owner or landlord. Both the family and the youth would have a lease for the entire unit. The youth may be an immediate family member of the family.
- **j.** *Trauma Informed Care (TIC) Model.* An approach that recognizes the widespread impact of trauma and understands potential paths for recovery, recognizes the signs and symptoms of trauma in clients, families, staff, and others involved with the system, responds by fully integrating knowledge about trauma into policies, procedures, and practices and seeks to actively resist re-traumatization. TIC models generally include a focus on the following: Safety; Trustworthiness and Transparency; Peer Support; Collaboration and Mutuality; Empowerment; Voice and Choice; and Cultural, Historical, and Gender Issues.
- **k.** *Unaccompanied Youth*. Persons who are age 24 or younger, who are not part of a family with children, and who are not accompanied by their parent or guardian during their episode of homelessness. This also includes two or more youth age 24 or younger who are presenting together as a family without children.
- **I.** Youth Action Board. A group of youth, age 24 and younger (of at least 3 members), at least two-thirds of whom are homeless or formerly homeless, that has full membership in the CoC and are included in policymaking decisions of the CoC, particularly on policies that relate to preventing and ending youth homelessness.

# II. Eligibility Information

**A. Eligible Applicants (24 CFR 578.15).** Eligible Applicants for YHDP project funding (Project Applicants) are nonprofit organizations, States, local governments, and instrumentalities of State and local governments. For-profit entities are not eligible to apply for grants or to be subrecipients of grant funds.

All subrecipients must also meet the eligibility standards as described above. HUD will review project subrecipient eligibility as part of the threshold review process. Project Applicants are required to submit documentation of their subrecipients' eligibility with the application.

Collaborative Applicants that are not UFAs may designate an Eligible Applicant to apply for and be the recipient of a planning grant. UFAs must apply for and be the recipient of all grants for their CoCs.

**B.** Matching (24 CFR 578.73). Provisions at 24 CFR 578.73 establish match requirements. As authorized by the FY 2017 HUD Appropriations Act, program income may be used as a source of match. If program income is used as a source of match the project applicant must describe this in the project application.

# C. Other Project Eligibility Requirements

- **1.** *Grant Terms*. All projects—except planning grants—will be awarded with 2-year grant terms. Planning grants will be awarded with a 1-year grant term.
- 2. Eligible Program Participants.
  - **a.** Funds awarded under the YHDP may only be used to serve unaccompanied youth and parenting or pregnant youth that meet HUD's definition of homeless at 24 CFR 578.3.
  - b. Selected Communities may request, as part of this YHDP, that up to 10 percent of the funding awarded to projects for the selected community be approved to serve homeless households with children and youth defined as homeless under other Federal statutes who are unstably housed (paragraph 3 of the definition of homeless at 24 CFR 578.3). To request approval, a Project Applicant must submit, with the first project application requesting approval to serve this population, documentation demonstrating that serving this population is of equal or greater priority, which means that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under Section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth, than serving the homeless as defined under paragraphs (1), (2), and (4) of the definition of homeless in 24 CFR 578.3. Additionally, Project Applicants must thoroughly describe how they will meet the requirements describe in Section 427(b)(1)(F) of the Act.
- 3. Eligible Components and Costs. Since the purpose of the YHDP is to demonstrate how a comprehensive approach to serving homeless youth can dramatically reduce homelessness, HUD will also allow selected communities to apply for projects that are not eligible through the CoC Program Competition in order to implement their coordinated community plan to prevent and end youth homelessness. To be renewable in the CoC program, the projects must meet statutory requirements; however, because HUD recognizes the purpose of a demonstration is to evaluate new and creative ways of addressing programs HUD will permit applicants to propose projects that do not meet statutory requirements. The project application must demonstrate to HUD's satisfaction why the program design should be tested and, if approved by HUD, the project will not be renewable. Also, certain regulatory requirements that are specifically mentioned in this section may be waived upon HUD making a finding of good cause in connection with HUD's approval of the project for conditional award. Therefore, in addition to grants for Planning projects, Project Applicants may create new projects including:
  - **a.** Program Components established at 24 CFR 578.37:

- (1) Permanent housing, including PSH and RRH
- (2) Transitional housing, including Crisis Residential transitional housing
- **(3)** *HMIS*
- (4) Supportive Service Only (SSO), including, but not limited to, projects dedicated to coordinated entry, housing search and placement services, case management, drop-in centers, legal services, or street outreach;
- **b.** Projects or activities that are fundable under the Demonstration, do not require a waiver, and are renewable under the CoC program include:
  - (1) Host Homes and Kinship care. YHDP funds may be used to subsidize the increased costs to the family that are attributable to housing the youth, if those costs are eligible CoC program costs. An example of eligible costs would be additional food costs, which are eligible supportive services under 24 CFR 578.53(e)(7). The project application must describe how the costs will be determined by the project applicant. HUD will be flexible in determinations of amount and supporting documentation.
  - (2) *Shared housing*. YHDP funds may be used to provide tenant-based rental assistance for a youth to reside with a family. All CoC requirements that apply to rental assistance would apply to rental assistance provided in shared housing. These requirements include the following:
    - i. There must be a rental assistance agreement between the recipient or the subrecipient and the owner;
    - ii. The housing meets CoC habitability standards;
    - iii. The rental assistance is provided in accordance with applicable written standards;
    - iv. Rental assistance is not provided to a program participant who is receiving project-based rental assistance or operating assistance, through other public sources; and
    - v. The shared housing must meet the rent reasonableness standards.

FMR will be adjusted to the youth's pro-rata share of the FMR for the shared housing unit size. For example, in the case of a single youth who will occupy one bedroom in a 4-bedroom house, the FMR used would be the youth's pro-rata share of the 4 bedroom FMR (i.e. ¼ of the 4-bedroom FMR).

**c.** Some projects or activities that could be applied for and funded under the Demonstration, are renewable under the CoC program, but require a waiver include:

- (1) Rapid-rehousing 2.0: Under current program regulations rapid-rehousing is limited to short and medium-term tenant-based rental assistance by 24 CFR 578.37(a)(ii). HUD recognizes that not all youth might be best served by this model. Some youth may need longer term assistance. Others may be unable to find landlords that are willing to rent to minors or young adults, in which case alternatives such as sponsorbased rental assistance, or the recipient using leasing funds to rent a unit it then would sublease to the youth, may better meet the needs of the individual homeless youth. HUD encourages applicants to design projects that will allow them to address the actual needs of the homeless youth they serve. This could include requesting funds for both rental assistance and leasing in the same project, with an assurance that the funds would not be used for the same individual or family and not in the same unit. HUD will consider requests to waive regulations that limit rapid re-housing to shortor medium-term tenant-based rental assistance. HUD will also consider requests to waive the prohibition against combining rental assistance and leasing costs or rental assistance and operating costs in the same structure that is found in 24 CFR 578.87(c)(4) & (5), however the assistance may not be provided to the same individual or family or the same unit.
- (2) Transition Aged Youth Rental Assistance. Applicants could design a PH-RRH project that would provide medium-term rental assistance under 24 CFR 578.51(a)(1)(i) to transition aged youth for 12 months or until the program participant turns 25, whichever is longer. To serve program participants who are under 23 years old, applicants would need to secure a waiver of 24 CFR 578.37(a)(1)(ii)(C), so that rental assistance could be provided for more than twenty-four months. HUD will also consider requests for a waiver of 24 CFR 578.37(a)(1)(ii)(E), the requirement to reassess a program participant's continued eligibility for assistance annually because HUD recognizes that some youth may exit a program but not necessarily into stable housing and may need ongoing but intermittent assistance. Project Applicants must demonstrate in their application that the CoC has developed policies and procedures for determining and prioritizing which eligible youth will receive this assistance.
- (1) *Increased Security Deposits*. Because some landlords are reluctant to rent to youth for reasons such as lack of credit history and have concerns about property damage, they may demand additional security to rent units to be occupied by youth. To address this barrier to housing, HUD will consider waiving the two-month limitation on security deposits found at 578.49(b)(4) for leasing funds and 578.51(a)(2) for rental assistance. When requesting a waiver, applicants need to show good cause for the waiver and that landlords are requesting additional security for units that will be occupied by youth. The security deposits paid must be required in the written lease. For example, the lease must say a security deposit in the amount of 4 months' rents is required.

Good cause for a waiver would require showing that individual landlords are demanding extra security for minor and youth tenants and would also require showing that the increased deposit is permitted under State and local laws and ordinances. In jurisdictions where security deposits are limited by law to 2 months, no waiver can be granted.

- (2) Post-Transitional Housing (TH) Assistance. A model which permits recipients of TH to provide security deposit and first and last month's rent assistance to program participants moving from TH to Permanent Housing (PH). The Project Applicant may propose to use grant funds to be used to pay for:
  - (a) security deposits for permanent housing; and
  - (b) first and last month's rent for permanent housing.

In order to be approved to carry out this alternative model, a Project Applicant must demonstrate in its application why it cannot use program participants occupancy charges from their stay in transitional housing to assist with these costs as permitted in 24 CFR 578.97(c). The application should also show evidence that a young person's savings from their stay in transitional housing will not be enough to cover the costs of security deposits and first and last month's rent in permanent housing.

- **d.** Some projects or activities that could be applied for and funded under the YHDP, but cannot be renewed under the CoC program include:
  - (1) Host Homes and Kinship care. For the purposes of this Demonstration, recipients can use YHDP for other costs of the host family such as additional utility costs. However, under the Act, these utility costs are not eligible. Therefore, this activity is not renewable under the CoC program. Similar to paying food or meals costs to a host home, the project application must describe how the costs will be determined by the project applicant. HUD will be flexible in determinations of amount and supporting documentation.

#### III. Threshold Criteria.

HUD will only select projects for funding that pass the following threshold criteria. If a project does not originally pass threshold criteria and is rejected by HUD, the selected community may resubmit the project application to HUD; however, the Project Applicant and the selected community should review the project carefully prior to resubmitting and address all deficiencies.

**A.** Ineligible Applicants. HUD will not consider an application from an ineligible Project Applicant. For grants for planning funds for a UFA, the application must be from the UFA. For a dedicated HMIS grant, the application must either be from the Collaborative Applicant or the HMIS Lead that will be the grant recipient.

- **B. DUNS Number Requirement.** All Project Applicants seeking funding under the YHDP NOFA must have a DUNS number and include the number in the Standard Form 424 (SF-424). The SF-424 must be submitted along with the project application in *e-snaps*. See Section IV. of the FY 2017 General Section for additional information.
- C. Active Registration in SAM. All Project Applicants seeking funding under the YHDP NOFA must have an active SAM registration. HUD will not issue a grant agreement for awarded funds to a Project Applicant until it verifies that its SAM registration is active. See Section V.A.1. of the FY 2017 General Section for additional information.
- **D. Project Eligibility Threshold**. HUD will review all projects to determine if they meet the following eligibility threshold requirements on a pass/fail standard. If HUD determines that the applicable standards are not met for a project, the project will be rejected. However, there is nothing to prohibit a project that has been rejected from addressing the deficient project application and resubmitting it to HUD, with the approval of the selected community, for consideration. Further, HUD reserves the right to condition a project, rather than reject it provided that the Project Applicant will address the deficiency and pass the threshold criteria before HUD signs a grant agreement. A determination that a project meets the project eligibility threshold is not a determination by HUD that a recipient is in compliance with applicable fair housing and civil rights requirements.
  - 1. Project Applicants and potential subrecipients must meet the eligibility requirements of the CoC Program as described in 24 CFR part 578 and provide evidence of eligibility required in the project application (e.g., nonprofit documentation).
  - 2. Project Applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and to administer Federal funds. Demonstrating capacity may include a description of the Project Applicant or subrecipients experience with similar projects and with successful administration of CoC Program funds or other Federal funds.
  - 3. The population to be served must meet program eligibility requirements as described in the Act and NOFA, and the project application must clearly establish the eligibility of Project Applicants and subrecipients.
  - **4.** The project must be cost effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.
  - 5. Project Applicants, for anything other than SSO grants for coordinated entry and for Planning costs, must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database.
  - **6.** The population to be served must meet program eligibility requirements as described in the Act and the NOFA, and the project application must clearly establish the

eligibility of Project Applicants. This means that all persons served must be youth aged 24 or younger, including unaccompanied youth and pregnant or parenting youth, and the following:

- **a.** Dedicated HMIS grants may only be used for recipient costs of implementing or expanding youth specific HMIS system components (e.g., adding youth-specific data standards, evaluating this program, or to develop YHDP specific reports) or to add youth organizations to the HMIS;
- **b.** SSO grants specifically for coordinated entry process may only be used to implement the youth specific component of a community's coordinated entry process; and
- **c.** Grants for CoC planning funds may only be used for the costs of planning activities at 24 CFR 578.39 as it relates to preventing and ending youth homelessness in the selected community (e.g., developing youth specific guidance for the 2018 PIT Count or developing the Youth Action Board).
- 7. The project must be listed in the coordinated community plan. If a project is submitted before HUD has approved the coordinated community plan, the Project Applicant must describe how the project will fit into the coordinated community plan to the best of its ability. If HUD determines that a previously approved project does not align with a subsequently submitted plan, HUD reserves the right to withhold approval of the coordinated community plan and not to award funds to projects for the remaining 70 percent of the community's available funds until the plan is corrected or to require the Project Applicant to amend the project to align with the submitted coordinated community plan.
- **8.** Projects providing supportive services or housing assistance to program participants must incorporate Positive Youth Development (PYD) and Trauma Informed Care (TIC) models of housing and service delivery.
- **E. Project Quality Threshold**. HUD will review all project applications to determine if they meet the following project quality threshold requirements with clear and convincing evidence. These projects are required to meet the requirements outlined in this section of this Appendix. The housing and services proposed must be appropriate to the needs of the program participants, unaccompanied youth age 24 and younger and pregnant and parenting youth age 24 and younger, and the community. A determination that a project meets the project quality threshold is not a determination by HUD that a recipient is in compliance with applicable fair housing and civil rights requirements. HUD will reject projects that do not meet the minimum point requirements described in this section.
  - 1. To be considered as meeting project quality threshold, all projects must meet the following criteria related to project eligibility, capacity, timeliness, and performance:
    - **a.** Project Applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for any existing grant(s), as applicable, that are funded under the CoC Program, as evidenced by timely reimbursement of

- subrecipients (as applicable), quarterly drawdowns, and timely resolution of monitoring findings; and
- **b.** Project Applicants must demonstrate that they will be able to meet all timeliness standards established at 24 CFR 578.85.
- 2. To be considered as meeting project quality threshold, housing projects (i.e., permanent housing and transitional housing) must receive at least 3 out of the 5 points for the following criteria:
  - **a.** Whether the type, scale, and location of the housing fit the needs of the program participants (1 point);
  - **b.** Whether the type and scale of the supportive services fit the needs of the program participants—this includes all supportive services regardless of funding source (1 point);
  - **c.** Whether the specific plan for ensuring program participants will be individually assisted to obtain the benefits of the mainstream health, social, education, and employment programs for which they are eligible to apply meets the needs of the program participants (1 point);
  - **d.** Whether program participants are assisted to obtain and remain in housing in a manner that fits their needs (1 point); and
  - **e.** Whether 100 percent of the proposed program participants meet paragraphs 1, 2, and 4 of the definition of homeless found at 24 CFR 578.3 (1 point).
- **3.** To be considered as meeting project quality threshold, SSO projects—except for SSO projects specifically for coordinated entry—must receive at least 2 out of the 3 points available for the following criteria:
  - **a.** Whether the type, scale, and location of the supportive services fit the needs of program participants (1 point);
  - **b.** Whether the supportive services are clearly designed to help youth quickly exit homelessness by obtaining or retaining housing (1 point); and
  - **c.** Whether 100 percent of the proposed program participants meet paragraphs 1, 2, and 4 of the definition of homeless found at 24 CFR 578.3 (1 point).
- **4.** To be considered as meeting project quality threshold, SSO projects specifically for coordinated entry must receive at least 2 out of the 4 points available for the following criteria:
  - **a.** Whether the coordinated entry process is easily accessible for all youth within the CoC's geographic area who are seeking information regarding homeless assistance (1 point);

- **b.** Whether there is a strategy for advertising the coordinated entry process that is designed to specifically reach youth experiencing homelessness with the highest barriers within the CoC's geographic area (1 point);
- **c.** Whether the coordinated entry process has a standardized assessment process that is appropriate for youth (1 point); and
- **d.** Whether the coordinated entry process ensures that youth are directed to appropriate housing and services that fit their needs (1 point).
- **5.** To be considered as meeting project quality threshold, dedicated HMIS projects must receive at least 3 out of the 4 points available for the following criteria:
  - **a.** How the HMIS funds will be expended in a way that furthers the CoC's implementation concerning youth (1 point);
  - Whether the HMIS collects all Universal Data Elements as set forth in the HMIS Data Standards as listed here:
     https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf (1 point);
  - c. Whether the HMIS un-duplicates client records (1 point); and
  - **d.** Whether the HMIS produces all HUD required reports, and provides data as needed for HUD reporting (e.g., APR, quarterly reports, data for CAPER/ESG reporting) and HHS/RHY reporting as applicable (1 point).
- **6.** To be considered as meeting project quality threshold, projects for Planning funds must receive at least 3 out of 4 points using the following criteria:
  - **a.** Whether the CoC conducts meetings that are inclusive and open to all members, including youth (1 point);
  - **b.** Whether the CoC has CoC-wide planning committees, subcommittees, or workgroups that are tasked with specifically addressing the needs of youth experiencing homelessness in the CoC's geographic area and that recommend or set policy priorities for the CoC (1 point);
  - c. The proposed planning activities that will be carried out with grant funds are compliant with the provisions at 24 CFR 578.7 except that they are limited to planning related to preventing and ending youth homelessness in the selected community (1 point); and
  - **d.** The funds requested will improve the ability to evaluate the CoC's success at preventing and ending youth homelessness in the selected community (1 point).
- **F.** Resolution of Outstanding Civil Rights Matters Threshold. In order for a project application to be eligible for funding by HUD, the Project Applicant and the proposed

subrecipient must meet the civil rights threshold requirements in Section V.B.1. of the FY 2017 General Section.

- **G.** Certification of Consistency with the Consolidated Plan. Each Project Applicant must submit a certification by the jurisdiction in which the proposed project will be located that the Project Applicant's application for funding is consistent with the jurisdiction's HUD-approved consolidated plan. The certification must be made in accordance with the provisions of the consolidated plan regulations at 24 CFR part 91, subpart F. Applicants must complete and submit form HUD-2991.
- **H. Obligation Deadlines.** All Project Applicants must demonstrate in their application that they will be able to meet statutory deadlines in order for HUD to obligate their grant funds by September 30, 2019, as required in the FY 2017 HUD Appropriations Act.

# IV. Other Requirements.

The list below highlights requirements contained in the FY 2017 General Section (and in other regulations) that is especially important for selected communities and Project Applicants to review in detail. This is not an exhaustive list of all HUD requirements. All the requirements of the FY 2017 General Section apply to projects funded under the YHDP, except as otherwise specified in the YHDP NOFA.

A Project Applicant can access the General Section of HUD's FY 2017 NOFA. The General Section of the FY 2017 NOFA is critical and must be carefully reviewed to ensure an application can be considered for funding, with the exception of reference to the <a href="www.grants.gov">www.grants.gov</a> application process and other exceptions specifically listed in this NOFA. The community selection application is completed using <a href="www.grants.gov">www.grants.gov</a>; the project application is completed using <a href="e-snaps">e-snaps</a> will be released directly to selected communities and via HUD's web community located at <a href="www.hud.gov">www.hud.gov</a> and <a href="www.hud.gov">www.h

- **A. Fair Housing and Equal Opportunity**. See 24 CFR 578.93 and 24 CFR 5.105(a) for specific requirements related to Fair Housing and Equal Opportunity.
- **B.** Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity. HUD published a Final Rule titled "Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs," on September 21, 2016 (81 Fed. Reg. 64763) and all requirements of that Final Rule will apply to projects awarded under the YHDP. See also 24 CFR 5.106.
- **C. Integration.** Recipients must administer their programs and activities in the most integrated setting appropriate to the needs of qualified individuals with disabilities. Recipients operating projects serving homeless youth must ensure individuals with disabilities can interact with individuals without disabilities to the fullest extent possible (24 CFR 8.4(d)).
- **D. Debarment and Suspension**. See Section B.B.4. of the FY 2017 General Section. Additionally, it is the responsibility of the recipient to ensure that all subrecipients are not debarred or suspended. (24 CFR 578.23((3)(c)(4)(v).

- **E. Delinquent Federal Debts**. See Section V.B.2. of the FY 2017 General Section.
- **F.** Compliance with Fair Housing and Civil Rights. See Section V.C.1.a. of the FY 2017 General Section.
- G. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (LEP). See Section V.C.1.d. of the FY 2017 General Section.
- H. Economic Opportunities for Low- and Very Low-income Persons (Section 3). See Section V.C.1.c. of the FY 2017 General Section. For project applicants that plan to use funding for construction and/or rehabilitation, the project applicant must include information that describes the actions that will be taken by project applicants that receive funding to comply with Section 3 of the Housing and Urban Development Act of 19968 (12 U.S.C. 1701u) (Section 3) and HUD's implementing rules at 24 CFR part 135 to provide employment and training opportunities for low- and very low-income persons, as well as contracting and other economic opportunities for businesses that provide economic opportunities to low-and very low-income persons. This does not affect project applicants' existing responsibilities to provide training, employment, and other economic opportunities pursuant to Section 3 that result from their receipt of other HUD funding.
- **I. Real Property Acquisition and Relocation**. See Section V.C.7. of the FY 2017 General Section.
- J. Conducting Business in Accordance with Core Values and Ethical Standards/Code of Conduct. See Section V.C.15. of the FY 2017 General Section.
- **K. Prohibition Against Lobbying Activities**. See Section V.C.16. of the FY 2017 General Section.
- **L. Participation in HUD-Sponsored Program Evaluation**. See Section V.C.5. of the FY 2017 General Section. Additionally, as a condition of the receipt of a project funded under this Program NOFA, all Project Grant Recipients will be required to cooperate with all HUD staff, HUD contractors, or selected recipients performing research or evaluation studies funded by HUD.
- **M. Environmental Requirements**. Notwithstanding provisions at 24 CFR 578.31 and 24 CFR 578.99(a) of the CoC Program interim rule, and in accordance with Section 100261(3) of MAP-21 (Pub. L. 112-141, 126 Stat. 405), activities under the YHPD NOFA are subject to environmental review by a responsible entity under HUD regulations at 24 CFR part 58.
  - 1. Additionally, HUD has clarified two requirements for projects categorized as Categorically Excluded from review under the National Environmental Policy Act and not subject to 58.5 (CENST):
    - **a.** All scattered-site projects, where participants choose their own unit and are not restricted to units within a pre-determined specific project site or sites, are categorized in 24 CFR 578.35(b)(1) as CENST. This now includes both tenant-based rental assistance and scattered-site leasing projects where the

- program participant chooses their unit. Previous guidance included only tenant-based rental assistance as eligible CENST projects.
- **b.** The exempt or CENST form is only required for each project, not each unit. Previous guidance instructed recipients to complete and exemption or CENST form for each unit.
- 2. For activities under a grant to a Project Grant Recipient other than a State or unit of general local government that generally would be subject to review under part 58, HUD may make a finding in accordance with 24 CFR 58.11(d) and may itself perform the environmental review under the provisions of 24 CFR part 50 if the Project Grant Recipient objects in writing to the responsible entity's performing the review under 24 CFR part 58.
- 3. Irrespective of whether the responsible entity, in accordance with 24 CFR part 58, or HUD, in accordance with 24 CFR part 50, performs the environmental review, the Project Grant Recipient must supply all available, relevant information necessary for the responsible entity (or HUD, if applicable) to perform for each property any required environmental review. The Project Grant Recipient also must carry out mitigating measures required by the responsible entity (or HUD, if applicable) or select alternative property.
- 4. The Project Grant Recipient, its project partners, and their contractors are prohibited from acquiring, rehabilitating, converting, leasing, repairing, disposing of, demolishing, or constructing property for a project under the YHPD NOFA, or commit or expand HUD or local funds for such eligible activities under this NOFA, until the responsible entity (as defined by 24 CFR 58.2(a)(7)) has completed the environmental review procedures required by 24 CFR part 58 and the environmental certification and Request for Release of Funds (RROF) have been approved or HUD has performed an environmental review under 24 CFR part 50 and the Project Grant Recipient has received HUD approval of the property. HUD will not release grant funds if the recipient or any other party commits grant funds (i.e., incurs any costs or expenditures to be paid or reimbursed with such funds) before the recipient submits and HUD approves its RROF, where such submission is required.
- N. Drug-Free Workplace. See Section V.C.11. of the FY 2017 General Section.
- O. Safeguarding Resident/Client Files. See Section V.C.12. of the FY 2017 General Section.
- P. Compliance with the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. 209-282) (Transparency Act), as amended. See Section V.C.13. of the FY 2017 General Section.
- **Q. Lead-Based Paint Requirements**. For housing constructed before 1978 (with certain statutory and regulatory exceptions), YHDP Program Project Grant Recipients must comply with the requirements of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801, *et seq.*), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851, *et seq.*); and implementing regulations of HUD, at 24 CFR part 35; the

Environmental Protection Agency (EPA) at 40 CFR part 745, or State/Tribal lead rules implemented under EPA authorization; and the Occupational Safety and Health Administration at 29 CFR 1926.62 and 29 CFR 1910.1025.

# V. Application and Submission Information

- **A. Application Package.** The submission summary in *e-snaps* provides the list of elements required to complete each type of project application. A Project Applicant will not be able to submit a project application to HUD until all required parts are completed. Once available, the project application can be accessed at <a href="https://esnaps.hud.gov/">https://esnaps.hud.gov/</a>.
- **B.** Content and Form of Submission. Collaborative Applicants must approve all project applications submitted to HUD. Each project application must also include the following parts, all of which must be submitted through *e-snaps* or uploaded attachment:
  - 1. Project application charts, narratives, and attachments;
  - 2. SF-424 Application for Federal Assistance;
  - **3.** The SF-424 Supplement, Survey on Ensuring Equal Opportunities for Application is for private nonprofit organization applicants only and completion/submission of this survey is voluntary;
  - **4.** Document of Applicant and Subrecipient Eligibility—all Project Applicants must attach documentation of eligibility—subrecipient eligibility must also be attached to the project application;
  - **5.** Applicant Certifications:
    - **a.** Form HUD-2880, Applicant/Recipient Disclosure/Update Report. The HUD-2880 must include the correct amount of HUD assistance requested;
    - **b.** SF-LLL, Disclosure of Lobbying of Activities (if applicable);
    - c. Applicant Code of Conduct. The Code must be attached in *e-snaps* or on file with HUD at <a href="http://portal.hud.gov/hudportal/HUD?src=/program\_offices/administration/grants/conduct">http://portal.hud.gov/hudportal/HUD?src=/program\_offices/administration/grants/conduct</a>;
    - **d.** Form HUD-50070, Certification for a Drug-Free Workplace dated no earlier than January 1, 2017;
    - **e.** HUD-2991, Certification of Consistency with the Consolidated Plan must be from the jurisdiction(s) where the projects will be located.

## VI. Submission Dates and Times

**A. Deadline.** The project application submission period will be open to selected communities on March 1, 2018 and Project Applicants may submit projects on a rolling basis until September 1, 2019. HUD will reject any projects that are submitted by communities that HUD has not selected to apply for funding under YHDP. Additionally, for selected

- communities, HUD will only approve projects in an amount up to 30 percent of what is made available to the selected community until HUD approves the coordinated community plan.
- **B.** Exporting Project Application for Applicant Records. HUD strongly encourages Project Applicants to use the "Export to PDF" functionality of *e-snaps* to print a hard copy of all submission documents for their records. This can be completed prior to or after submission.

## VII. Other Submission Requirements

# Waiver of Electronic Submission Requirements.

- **A.** The regulatory framework of HUD's electronic submission requirement is the final rule established in 24 CFR 5.1005. Project Applicants seeking a waiver of the electronic submission requirement must request a waiver in accordance with 24 CFR 5.1005. HUD regulations allow for a waiver of the electronic submission requirement for good cause. Similar to the CoC Program Competition, HUD is defining good cause for the YHDP Competition as follows:
  - 1. there are no computers that could be used by the Project Applicants or the Collaborative Applicant that are newer than 5 years old anywhere within the selected community's geographic area; or
  - **2.** there are no computers that could be used by Project Applicants or the Collaborative Applicant anywhere within the selected community's geographic area; or
  - **3.** there is no internet access that could be used by Project Applicants or the Collaborative Applicant anywhere within the selected community's geographic area.
- **B.** To request a waiver of HUD's electronic submission requirement, the Collaborative Applicant should address written notification to Norm Suchar, Director, Office of Special Needs Assistance Programs (SNAPs), and submit the request to <a href="YouthDemo@hud.gov">YouthDemo@hud.gov</a>.
- C. If SNAPs grants the waiver, its response will include instructions on how and where the paper project application must be submitted. HUD will not extend the application deadline for Project Applicants that are granted a waiver of the electronic submission requirement. Therefore, Project Applicants seeking a waiver of the electronic submission requirement should submit their waiver request with sufficient time to allow HUD to process and respond to the request. For this reason, HUD strongly recommends that if a Project Applicant finds it cannot submit its project application electronically and must seek a waiver of the electronic grant submission requirement, it should submit the waiver request SNAPS at <a href="YouthDemo@hud.gov">YouthDemo@hud.gov</a> no later than 30 days after the opening of the project application portion of the competition. To expedite the receipt and review of each request, Project Applicants may fax their written requests to Norm Suchar, at (202) 401-0053. If HUD does not have sufficient time to process the waiver request, HUD will not grant a waiver. Finally, HUD will not consider paper applications received without a prior approved waiver or after the established deadline.

#### VIII. Award Administration Information

#### A. Award Notices

- 1. Conditional Selection. HUD will notify conditionally selected Project Applicants in writing. HUD may subsequently request conditionally selected applicants to submit additional project information—which may include documentation to show the project is financially feasible; documentation of firm commitments for match; documentation showing community control; information necessary for HUD to perform an environmental review, where HUD determines to conduct the environmental review in accordance with 24 CFR 58.11(d); a copy of the organization's Code of Conduct; and such other documentation as specified by HUD in writing—to the Project Applicant, that confirms or clarifies information provided in the project application. HUD will require the submission of the additional project information no later than 30 days after the date of the letter for such information, except as otherwise provided in 24 CFR 578.21(c). In the event that a community must withdraw from the demonstration, HUD will reallocate the remaining balance to the other selected communities or to alternative communities if appropriate communities can be identified and sufficient funds are available.
- **2. Applicant Debriefing**. See Section V.C.13 of the General Section of HUD's FY 2017 NOFA for applicant debriefing procedures.

## **B.** Administrative and National Policy Requirements

**Participation in a HUD-Sponsored Program Evaluation**. As a condition of the receipt of a project funded under this NOFA, all recipients will be required to cooperate with all HUD staff, contractors, or selected recipients performing research or evaluation studies funded by HUD.

# C. Reporting

- 1. In accordance with program regulations at 24 CFR 578.103, Project Applicants must maintain records and within the time frame required, make any reports, including those pertaining to race, ethnicity, gender, and disability status that HUD may require. Recipients may report this data as part of their APR submission to HUD. Also, recipients who expend \$750,000 or more in 1 year in Federal awards are reminded they must have a single or program-specific audit for that year in accordance with the provisions of 2 CFR part 200, subpart F.
- 2. Section 3 Reporting Regulations. In accordance with 24 CFR 135.3(a)(2), the Section 3 requirements apply to housing and community development assistance that is used for housing rehabilitation, housing construction and other public constructions. Recipients of YHDP project funds must submit Form HUD-60002 to the Office of Fair Housing and Equal Opportunity (FHEO) at the time they submit their APR to the Office of Special Needs Assistance Programs. This form can be completed electronically at <a href="https://www.hud.gov/section3">www.hud.gov/section3</a>.
- **3.** Award notices may also include requirements for sub-award reporting in compliance with the requirements of the Federal Financial Assistance Accountability and Transparency Act of 2006 (Pub. L. 109-282) (Transparency Act) See Section V.C.13 of the General Section of HUD's 2017 NOFA for further information.

- **4.** Agency Contacts. HUD staff will be available to provide general clarification on the content of the YHDP NOFA. Until HUD has selected the selected communities that will be participating in the YHDP, HUD staff is prohibited from assisting any Project Applicant in preparing the project application(s). However, once the selected communities have been selected by HUD, HUD staff and technical assistance providers may assist Project Applicants in preparing their project application(s) in *e-snaps*.
- **A. Assigned Technical Assistance Provider.** Each selected community will be assigned technical assistance providers. Communities and Project Applicants should use their assigned technical assistance provider to advise them how to design and implement the coordinated community plan as well as to design and implement projects that support the coordinated community plan.
- **B. Training and Resources.** Project Applicants that need assistance completing the applications or understanding the program requirements under this NOFA may access training materials, and program resources via the HUD Exchange at <a href="https://www.hudexchange.info/homelessness-assistance/">www.hudexchange.info/homelessness-assistance/</a>.
- C. The HUD Exchange Ask A Question (AAQ). Project Applicants that require information and technical support concerning the YHDP NOFA and the project applications may submit an electronic inquiry via the HUD Exchange at <a href="www.hudexchange.info/get-assistance/">www.hudexchange.info/get-assistance/</a>. The AAQ is accessible 24 hours each day. Starting 2 days prior to the application deadline for funds, the AAQ will respond only to emergency technical support questions up to the deadline of 11:59:59 p.m. Eastern time. Project Applicants that are experiencing technical difficulty should contact the AAQ immediately for assistance and document their attempts to obtain assistance.
- **D. HUD Homeless Assistance Listserv.** HUD may provide Project Applicants with additional information through HUD web site located at <a href="www.hud.gov">www.hud.gov</a> and <a href="www.hudexchange.info">www.hudexchange.info</a>, and via the CoC Program listserv. Visit the following web site to join the listserv: <a href="www.hudexchange.info/mailinglist">www.hudexchange.info/mailinglist</a>. This additional information will not change the selection criteria or selection process included in this NOFA, but may include items such as updates on the status of *e-snaps* and reminders of impending deadlines.