

**DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**[Docket No. FR-5700-N-31A]**

**Notice of Fiscal Year (FY) 2013 Opportunity to Register and Other Important Information  
for Electronic Application Submission for the Continuum of Care (CoC) Program  
Competition**

**AGENCY:** Office of Community Planning and Development (CPD), HUD.

**ACTION:** Notice.

**SUMMARY:** For Fiscal Year (FY) 2013, HUD requires each Continuum of Care (CoC) Collaborative Applicant (also known as the CoC applicant) to register in advance of applying for the approximately \$1.7 billion of funding available under the FY 2013 CoC Program Competition. Collaborative Applicants must complete the annual registration using *e-snaps*, a web-based portal accessible at [www.hud.gov/esnaps](http://www.hud.gov/esnaps). CoC Registration and the CoC Consolidated Application will not be available at [www.grants.gov](http://www.grants.gov).

This Notice is intended to achieve two goals: (1) to provide Collaborative Applicants with an outline of the functions and requirements of the annual registration process in *e-snaps*, and (2) to provide Collaborative Applicants and project applicants with information necessary to prepare for the FY 2013 CoC Program competition, including continued implementation of the amendments to the McKinney-Vento Act (the Act) made by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. HUD strongly recommends referring to the [CoC Program interim rule](#) in conjunction with this Notice. The registration process described within this Notice applies only to Collaborative Applicants who will register a CoC for the FY 2013 CoC Program Competition. This registration process does not apply to project applicants or private individuals. HUD does not provide funding to private individuals. Therefore, such individuals should not attempt to complete the registration process, or apply for funding under the FY 2013 CoC Program Competition.

**DATES:** The registration deadline is **7:59:59 p.m.** Eastern Time on **September 23, 2013**. Registration submission must be received in *e-snaps* on or before the registration deadline. HUD will not accept registration submissions from Collaborative Applicants that do not submit a registration in *e-snaps* on or before the registration deadline. Failure to submit a registration in *e-snaps* by the deadline will result in the Collaborative Applicant being unable to access the FY 2013 CoC Consolidated Application, which includes the CoC Application and project applications for reallocated projects, renewal projects, CoC Planning projects, and Unified Funding Agency (UFA) costs. Consequently, the CoC will be unable to apply for funds. Therefore, it is imperative that ALL Collaborative Applicants meet this registration deadline. Collaborative Applicants that receive HUD approval of their registration submission must acknowledge that approval in *e-snaps*. Collaborative Applicants that do not receive HUD approval of their registration submission will be notified via *e-snaps* and will not be permitted to

access or submit the CoC Program Consolidated Application in the FY 2013 CoC Program Competition. HUD will notify and remind Collaborative Applicants of the registration deadline through its websites located at [www.hud.gov](http://www.hud.gov) and [www.onecpd.info](http://www.onecpd.info) and via the CoC Program email-based listserv. Visit the following website to join the listserv: <https://onecpd.info/maillinglist/>.

**FOR FURTHER INFORMATION CONTACT:** HUD staff will be available to provide general clarification on the content of this Notice, and information regarding the HEARTH Act amendments to the McKinney-Vento Act. However, HUD staff is prohibited from assisting any applicant in preparing its registration or application in *e-snaps*.

- A. Local HUD CPD Field Office.** For further guidance on the registration submission requirements, including the FY 2013 Grant Inventory Worksheet(s) (GIWs), and the requirements imposed under the Act and the CoC Program interim rule, Collaborative Applicants may contact the HUD CPD field office serving their area listed at: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/about/staff/fodirectors](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/staff/fodirectors).
- B. Training and Resources.** Collaborative Applicants that need assistance completing the registration process in *e-snaps* or understanding the program requirements under the CoC Program may access the CoC Program interim rule, training materials, and program resources via the OneCPD Resource Exchange [www.onecpd.info](http://www.onecpd.info).
- C. The OneCPD Ask A Question (AAQ).** Collaborative Applicants that require information and technical support concerning this Notice and the registration in *e-snaps* may submit an electronic inquiry via the OneCPD Ask A Question at [www.onecpd.info/ask-a-question](http://www.onecpd.info/ask-a-question). AAQ is accessible 24 hours daily. Starting on the day prior to the registration submission deadline, the AAQ Help Desk will respond only to emergency technical support questions up to the deadline.

Additionally, Collaborative Applicants and project applicants that have questions about the Act or CoC Program interim rule should submit these questions to AAQ.

- D. HUD Homeless Assistance Listserv.** HUD will notify and remind Collaborative Applicants of registration availability and deadline including the availability of the FY 2013 CoC Program Competition NOFA through its websites located at [www.hud.gov](http://www.hud.gov) and [www.onecpd.info](http://www.onecpd.info), and via the CoC Program email-based listserv. Visit the following website to join the listserv: [www.onecpd.info/maillinglist](http://www.onecpd.info/maillinglist).

## FULL TEXT OF ANNOUNCEMENT

This Notice is divided into five sections. Section I provides background information on the CoC Program, including information about funding limitations in FY 2013. Section II contains key terms used throughout this Notice and the registration process. Section III provides detailed information on completing the CoC registration process in *e-snaps*. Section IV provides information about policies being implemented for the FY 2013 CoC Program Competition and certain requirements that all applicants should consider. This should assist Collaborative

Applicants to better plan for the development of the FY 2013 CoC Consolidated Application. Section V provides registration resources to help Collaborative Applicants to successfully complete the registration process and to prepare for submission. This Notice includes citations to the CoC Program interim rule (24 CFR part 578); applicants and stakeholders should read the interim rule to increase their understanding of the CoC Program requirements.

## **I. OVERVIEW INFORMATION**

### **A. Background**

The CoC Program interim rule (24 CFR part 578) provides the requirements for implementation and administration of the CoC Program found in Subtitle C of Title IV of the Act. This regulation governs the FY 2013 CoC Program Competition including the registration process, the CoC Consolidated Application, and grant administration activities. The CoC Program improves administrative efficiency, enhances coordination requirements to better address the needs of homeless persons, and formalizes the CoC and the CoC's planning process.

It is imperative that Collaborative Applicants and project applicants read the CoC Program interim rule to gain an understanding of the requirements of this program before applying for funding.

### **B. FY 2013 Funding Limitations**

While the Act and CoC Program interim rule authorize increases in project administrative costs, leasing, rental assistance, and operating funds for renewal projects, HUD will not fund all of these increases at the maximum authorized levels. Although the maximum amount authorized for CoC planning funds is 3 percent, Collaborative Applicants may only request CoC planning costs up to 1.25 percent of the FY 2013 Final Pro Rata Need (FPRN) or \$250,000, whichever is less, in the FY 2013 CoC Competition. As a reminder, HUD will consider only one CoC planning application per CoC, and the organization applying for the funds must be designated by the CoC. In addition, although the maximum amount authorized for Unified Funding Agency costs is 3 percent, Collaborative Applicants that are designated as UFAs in the FY 2013 CoC Program Competition may only request 0.50 percent of the FPRN or \$100,000, whichever is less.

HUD anticipates that the appropriation for this program made available through the Consolidated and Further Continuing Appropriations Act, 2013 (Public Law 113-6, approved March 26, 2013) (the "HUD Appropriations Act"), as subject to sequestration, is insufficient to fund all projects eligible for renewal in the FY 2013 CoC Program Competition. As such, the only new projects that CoCs may apply for include those created through reallocation, CoC planning, and UFA costs. For more information about HUD's 2013 policy priorities, see Section IV of this Notice.

### **C. Summary of Registration**

Each Collaborative Applicant must complete and submit a registration on behalf of the CoC in *e-snaps*. Registration in *e-snaps* allows:

1. Collaborative Applicants to validate the CoC geographic area and merger status;
2. HUD to apportion "Preliminary Pro Rata Need" (PPRN) dollars associated with the CoC's geographic area;

3. Collaborative Applicants to identify grants that are eligible for renewal funding in the FY 2013 CoC Program Competition and record the Annual Renewal Demand (ARD) through the use of the GIW;
4. HUD to calculate the Collaborative Applicant's FPRN amount for the FY 2013 CoC Program Competition;
5. HUD to inform each CoC of the amount available for CoC Planning funds;
6. Collaborative Applicants to apply for a UFA designation;
7. HUD to inform Collaborative Applicants designated as a Unified Funding Agency (UFA) of the amount available for UFA costs; and
8. Collaborative Applicants to confirm their intent to submit an application in the FY 2013 Competition on behalf of the CoC.

HUD advises Collaborative Applicants to immediately register in *e-snaps* after viewing the GIW/Registration information that was provided at the end of the [FY 2012 CoC Program Competition Debriefing broadcast](#), carefully reading this Notice in conjunction with the General Section of HUD's FY 2013 NOFAs for Discretionary Programs (General Section), which was posted to [www.grants.gov](http://www.grants.gov) on August 8, 2012, and the CoC Program interim rule (24 CFR part 578), which is posted on the [OneCPD Resource Exchange](#). The General Section is available on HUD's website at:

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/grants/fundsavail](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail).

All project applicants are also required to register with Dun and Bradstreet (DUNS) if they have not already, and to complete or renew their registration in the Central Contractor Registration (CCR)/System for Award Management (SAM) registration. More information on DUNS numbers and CCR/SAM registration can be found at:

<http://portal.hud.gov/portal/page/portal/HUD/topics/grants>.

Collaborative Applicants must fully complete and update all parts of the CoC Applicant Profile in *e-snaps* during the CoC Registration process. Although the CoC registration process does not apply to project applicants, HUD encourages project applicants to immediately begin the process of verifying and updating information contained in the *e-snaps* Project Applicant Profile in order to be ready to apply for funding when the FY 2013 Continuum of Care Program Competition NOFA is published and the application becomes available. The CoC and Project Applicant Profiles are available for Collaborative Applicants and project applicants in *e-snaps* both during and outside of the competition period.

As an alternative to the electronic registration in *e-snaps*, Section III.E. of this Notice provides specific instructions for Collaborative Applicants:

1. located in one or more areas declared to be major disaster areas by President Obama under Title IV of the Robert T. Stafford Act; **and**
2. that intend to complete the FY 2013 CoC Program application process, but do not have the ability to complete and submit the registration in *e-snaps* by the deadline established in this Notice.

## D. CoC Program

The CoC Program interim rule includes detailed requirements for the CoC Program, including standards for application review, standards used in award selection, requirements for grant execution, eligible uses of CoC Program funds and matching funds, recipient reporting requirements, and standards for compliance monitoring. The CoC Program interim rule will govern the FY 2013 CoC Program Competition and the administration of all grants funded in the FY 2013 CoC Program Competition.

The Collaborative Applicant approved by HUD during the FY 2013 registration process must be the same entity that submits the CoC Consolidated Application—which includes the CoC Application, Project Priority Listings, and the project applications—during the FY 2013 CoC Program Competition. CoCs should not attempt to change Collaborative Applicants during the CoC Program Competition without HUD’s prior approval. HUD will approve Collaborative Applicant changes after the registration process under certain circumstances that include:

1. an error made by the Collaborative Applicant when entering the Collaborative Applicant’s name in the CoC Applicant Profile,
2. the Collaborative Applicant chosen by the CoC is no longer in business,
3. the Collaborative Applicant withdrew, or
4. the CoC withdrew the Collaborative Applicant.

In cases where the CoC needs to change the Collaborative Applicant approved during registration, the CoC must notify the local HUD CPD field office in writing stating the reason for the Collaborative Applicant change. The notice to HUD must provide documentation of the CoC’s approval of the change (e.g., a copy of the meeting minutes, to include the date and attendees).

CoC Program funds may be used for projects under five program components: permanent housing; transitional housing; supportive services only; Homeless Management Information System (HMIS); and homelessness prevention. Homelessness prevention is only an allowable component in CoCs designated as a High Performing Community (HPC), since only designated HPCs may carry out homelessness prevention activities through the CoC Program. There are currently no CoCs designated as an HPC.

In FY 2013, project applicants may request project administrative costs up to 10 percent of the total project budget; however, bonus points will be awarded to CoCs whose projects request no more than 7 percent for project administrative costs as recorded on the project administrative cost budget line item in the Summary Budget of the project application. Project applicants may increase project administrative requests to the 10 percent allowed in 24 CFR 578.59 for project administrative costs; however, this will result in the CoC receiving 0 bonus points. Applicants that increase project administrative costs beyond 7 percent must move funds from other budget line items (e.g., operations, supportive services, etc.), therefore decreasing the amount of funds used by the project for housing and services to the homeless. To maximize its competitive advantage, a CoC should consider limiting all projects to requesting no more than 7 percent for project administrative costs.

1. *First-Time CoC Program Renewals.* Projects that are requesting renewal under the CoC Program for the first time may request project administrative funds from HUD in an amount up to 7 percent of the total project budget without being required to move funds from another budget line item. This increase in the amount previously authorized under the Supportive Housing (SHP) and Shelter Plus Care (S+C) Programs will be funded by HUD. First-time renewal project applicants that request project administrative costs greater than 7 percent (up to the 10 percent maximum allowed in 24 CFR 578.59) may move an amount from another budget line item to add to the project administrative cost line item to be expended for allowable project administrative costs. Applicants should note that the movement of funds from another line item may adversely impact the ability to carry out the activities related to that line item.
2. *CoC Program Renewal Projects.* Those projects funded under the CoC Program in FY 2013 that intend to increase their project administrative requests to greater than 7 percent (up to the 10 percent maximum allowed in 24 CFR 578.59); may move an amount from another budget line item to add to the project administrative cost line item, provided that the total annual renewal amount for the project application does not increase. Applicants of renewing rental assistance projects may move funds out of the rental assistance line item to increase the project administrative cost line item up to 10 percent; however, applicants are prohibited from reducing the number of units assisted contained in the grant being renewed. Applicants should note that the movement of funds from another line item may adversely impact the ability to carry out the activities related to that line item.
3. *New Projects Created Through Reallocation.* Applicants requesting new reallocated projects are permitted to include a project administrative cost request of up to 10 percent; however, bonus points will only be given to CoCs that limit requests for this line item in all projects to 7 percent.

Project administrative costs may only be used for the administration of the awarded grant as outlined in §578.59 of the CoC Program interim rule. Applicants are prohibited from reducing the administrative budget line item in order to increase the amount in another approved budget line item (e.g., supportive services).

Additionally, CoCs may request up to 1.25 percent of FPRN or \$250,000, whichever is less, for CoC planning costs. Collaborative Applicants that are designated as a UFA may request up to an additional 0.50 percent of FPRN or \$100,000, whichever is less, for UFA costs. To apply for funding under HUD's FY 2013 CoC Program Competition, the Collaborative Applicant for each CoC must complete its GIW and submit to the local HUD CPD field office for review and conditional approval to determine the CoC's ARD, which must be recorded in *e-snaps* by the registration submission deadline. The GIW must include all eligible renewal projects and reflect accurate budget amounts, including any CoC planning costs that were awarded in the FY 2012 CoC Program Competition. It should be noted that in the FY 2013 CoC Registration process, the GIW is not a required attachment in *e-snaps*. However, the final HUD-approved GIW, which confirms that all projects listed are eligible for renewal in the FY 2013 CoC Program

Competition and that the requested amount is consistent with the current grant agreement, will be a required submission as part of the Collaborative Applicant's CoC Consolidated Application submission, and CoCs will be held to the final HUD-approved ARD amount. See Section III.A.1. of this Notice for additional information.

## II. KEY TERMS USED AS PART OF THE REGISTRATION PROCESS

**A. Definitions.** The key terms contained in this Notice are important for Collaborative Applicants to understand and complete the FY 2013 registration in *e-snaps* on behalf of the CoC. A more extensive list of definitions can be found in the CoC Program interim rule at 24 CFR 578.3.

1. The following terms are defined in 24 CFR part 578. Applicants must refer to the CoC Program interim rule for the definitions contained in this section.
  - a. *Annual Renewal Amount (ARA)*
  - b. *Centralized or Coordinated Assessment System*
  - c. *High Performing Community (HPC)*
  - d. *Subrecipient*
  - e. *Unified Funding Agency (UFA)*
  
2. **CoC Registration Notice Definitions and Concepts.** The following terms are not found in 24 CFR 578.3 but are used in the FY 2013 CoC Registration Notice to define concepts that pertain specifically to the CoC Registration process:
  - a. *Annual Renewal Demand (ARD).* The ARD is the sum of the ARA amounts for projects eligible for renewal in the FY 2013 CoC Program Competition. ARD incorporates funding only for eligible activities—operating, supportive services, leasing, rental assistance, Homeless Management Information Systems (HMIS), and project administrative costs—that were funded in the original grant (or the original grant as amended), less the non-renewable activities—new construction, acquisition, rehabilitation, and any project administrative costs related to these activities.
 

CoC planning costs awarded in the FY 2012 CoC Program Competition are included in the ARD. Therefore, CoCs that were awarded CoC Planning costs in the FY 2012 CoC Program Competition must include these grants on the GIW so that it is calculated in the CoCs ARD. CoCs that fail to list their planning or any eligible renewal project on their GIW, risk losing funding for that project.

Any funding for new construction, acquisition, or rehabilitation, and any project administration costs related to those activities, is not renewable and; therefore, should not be calculated in the project ARA. If the grant being renewed includes these non-renewable activities, project administrative costs must be recalculated

to reduce the amount for such related activities. Project administrative costs must not exceed 10 percent of the grant awarded, the maximum allowed in 24 CFR 578.59. See Section I.D. of this Notice for further information on project administrative costs.

- b. ***Continuum of Care Final Pro Rata Need (FPRN)***. The higher of PPRN or ARD for the CoC is the FPRN, which is the basis for the maximum award amount available for the CoC.
- c. ***Continuum of Care Merger***. The Continuum of Care Merger is a process to merge two or more CoCs that registered separately in the FY 2012 CoC Program Competition. At least one CoC may have FPRN based on the ARD amount that exceeds the PPRN and at least one other CoC may have a FPRN based on PPRN. Under this process, HUD calculates the newly merged CoC's FPRN based on the higher FPRN for each CoC that participates in a merger. CoCs approved to merge under the CoC Merger process in FY 2013 will be permitted to continue to use this process in FY 2014. CoCs that merged using the ARD merger process in FY 2012 may continue to use this process in FY 2013 to determine FPRN.
- d. ***Continuum of Care Preliminary Pro Rata Need (PPRN)***. The amount of funds a CoC could receive based upon the geographic areas HUD approves as included in the CoC. To determine the homeless assistance need of a particular jurisdiction, HUD will use the formula set forth in the CoC Program interim rule at §578.17(a). These amounts are published annually on the OneCPD website. A CoC's PPRN is determined by adding together the published PPRN of each jurisdiction within the HUD-approved CoC.
- e. ***Continuum of Care Registration***. The first step in the annual CoC Program application process, which requires that each CoC identify its geographic area, appoint a Collaborative Applicant that will be responsible for submitting the electronic application in *e-snaps* and for completing the GIW, which must be reviewed and updated in order to obtain the ARD amount that must be recorded in the registration forms in *e-snaps*.  
  
This process establishes the CoC's FPRN amount, CoC planning, and UFA costs that CoCs are eligible to request. The process also confirms the Collaborative Applicant's intent to submit an application in the FY 2013 CoC Program Competition on behalf of the CoC.
- f. ***Changes in the Continuum of Care's Geographic Area***. CoCs that voluntarily choose to change their geographic area prior to the registration process are asked to notify Michael Roanhouse at [Michael.Roanhouse@hud.gov](mailto:Michael.Roanhouse@hud.gov) to obtain a new CoC name that clearly identifies the geographic area of the newly formed CoC. HUD will accept requests submitted for the following actions prior to the initiation of the FY 2013 CoC Competition Registration process but not later than 20 days before the end of the CoC Registration:

- (1) The merger of two or more CoCs;

- (2) The separation of one or more geographies from one or more CoCs to other CoCs; or
  - (3) The splitting of an existing CoC and the division of its geographies/resources into two or more CoCs.
- g. *Establishing Reductions in Awards.*** In FY 2013, HUD anticipates that funds available are less than the amount required to renew all projects eligible for renewal. Therefore, HUD will follow the process described in the CoC Program interim rule at §578.17(a)(4) and will inform CoCs of the amount that every CoC will be required to deduct from renewal projects.
- h. *Grant Inventory Worksheet (GIW).*** The GIW is an inventory of all projects within a CoC's geographic area eligible for renewal in a particular year, including CoC Planning projects awarded in the FY 2012 CoC Program Competition, submitted on a HUD-issued Excel spreadsheet. The GIW is a tool that is used to determine which projects are eligible to receive renewal funding and to ensure an accurate calculation of the CoC's ARD. The Collaborative Applicant will be required to upload the final HUD-approved GIW to the CoC Application into *e-snaps* prior to submitting the CoC's Consolidated Application in the FY 2013 CoC Program Competition. HUD will adjust any ARD amount that exceeds the ARD amount listed in the final HUD-approved GIW.

The GIW must include the correct line item budget information for each project, including eligible renewal CoC planning projects awarded in FY 2012, and the correct unit configuration for rental assistance projects in order to calculate the ARD for the CoC. HUD will only approve project budget requests that reflect the information as submitted on the final HUD-approved GIW.

The applicants are responsible for ensuring that the renewal budget and total number of units for all renewal projects match the amounts and units approved by HUD on the GIW. HUD will apply all updates to the operating, leasing, and rental assistance line items after the competition closes, but before grants are conditionally awarded. As necessary, HUD will reduce the requested budgets and units to match the budgets and total number units on the CoC's final HUD-approved GIW(s).

- i. *Homeless Management Information Systems (HMIS) (§§578.3 and 578.57).*** An HMIS is a computerized data collection application designed to capture client-level information over time on the characteristics of housing and service needs of men, women, and children experiencing homelessness, while also protecting client confidentiality. An HMIS aggregates client-level data to generate an unduplicated count of clients served within a community's system of homeless services, and can provide data on client characteristics and service utilization. HUD will only allow only one applicant for all HMIS dedicated grants within a CoC. This applicant must be the HMIS Lead designated by the CoC and must be listed under the HMIS Lead form in the CoC Applicant Profile in *e-snaps*. HUD may reject the project application without review if the HMIS Lead in the CoC Applicant Profile does not match the organization that submits the dedicated HMIS project application.

- j. ***Homeless Management Information Systems (HMIS) Lead (§578.3).*** The HMIS Lead is designated by the CoC as the responsible entity to manage the CoC's HMIS. The HMIS Lead is the only entity eligible to apply for dedicated HMIS funds including leasing a structure in which the HMIS project is located, and for HMIS costs related to establishing, operating, and customizing a CoC's HMIS.
- k. ***Project Applicant.*** The project applicant is the entity that completes a project application for funding to operate a housing or service project.
- l. ***Reallocation.*** A CoC may reallocate funds in whole or part from existing eligible renewal projects to create one or more projects. All CoCs may use the reallocation process, regardless of their funding status. In FY 2013 CoCs may only use reallocation to create new permanent supportive housing projects that serve the chronically homeless or, for CoCs that are able to demonstrate that they are addressing the chronic homeless population through other means, including other reallocated projects, to create new rapid re-housing projects for families. CoCs may choose to eliminate or reduce one or more projects to create one or more reallocated projects. The amount eliminated or reduced for the purposes of reallocation will be retained by the CoC, provided that the new proposed project(s) meets eligibility and quality thresholds established by HUD in order to be conditionally selected for funding. The selection criteria will be described in the FY 2013 CoC Program Competition NOFA. Additionally, CoCs are prohibited from reallocating administration costs to create new projects.

### III. COMPLETING THE REGISTRATION PROCESS

Accessing and completing the registration process in *e-snaps* will include the following steps:

#### A. Step One: Obtain and Complete the HUD-issued Grant Inventory Worksheet (GIW).

- 1. ***Identifying Projects to be Included on the GIW.*** Before beginning the registration process in *e-snaps*, CoCs must produce an inventory of all projects eligible for renewal funding in the FY 2013 CoC Program Competition, which are projects expiring during Calendar Year (CY) 2014 (between January 1, 2014 and December 31, 2014). CoCs must enter the inventory on the HUD-issued Excel spreadsheets. HUD Headquarters will email the GIWs to the appropriate CoC contacts, with a copy to the appropriate local HUD field office, as listed in the CoC Applicant Profile in *e-snaps*. CoCs that did not complete the registration process in FY 2012 should contact the local HUD CPD field office to obtain a blank GIW.

Collaborative Applicants must submit the GIW to the appropriate HUD CPD field office for review within 2 weeks of recipient receipt from HUD Headquarters. The local HUD CPD field office will review and approve no later than 1 week prior to submission deadline of the CoC Registration in *e-snaps*. Collaborative Applicants will use the GIW to establish the CoC's FY 2013 ARD, which must be recorded in the Maximum Funding Need form in *e-snaps*. The GIW will be used by HUD as the basis for award amounts approved for all eligible renewal projects. Any changes to the GIW after CoC Registration must be approved by the local HUD CPD field office, in consultation with

HUD Headquarters, within 7 days after the publication of the FY 2013 CoC Program NOFA. Collaborative Applicants will be required to attach the HUD-approved GIW that contains the final HUD-approved ARD to the FY 2013 CoC Consolidated Application. No changes to the GIW will be considered after the 7-day grace period.

Collaborative Applicants are responsible for ensuring that the GIWs accurately list all projects eligible for renewal funding in the FY 2013 CoC Program Competition, including CoC planning costs awarded in the FY 2012 CoC Program Competition. In order to finalize the GIW for HUD approval, the Collaborative Applicant must reconcile the GIW with the local HUD CPD field office. To assist in this process, HUD has pre-populated the GIWs with the grants that were awarded 1 year of funding (renewal and new) in the FY 2012 CoC Competition and grants that may not have been submitted for renewal funding yet from the FY 2007 CoC Competition. This initial listing may be incomplete or inaccurate, therefore the Collaborative Applicant, in consultation with the local HUD CPD field office, must ensure that the following eligible projects are included on the GIWs:

- a. Grants awarded prior to the FY 2012 CoC Program Competition (i.e., SHP or S+C grant) that expire in CY 2014 (January 1, 2014 through December 31, 2014).
  - b. Any renewal grants that received 1 year of funding in the FY 2012 CoC Program Competition.
  - c. Any new 1-year grants awarded under the FY 2012 CoC Program Competition that have an executed grant agreement at time of application submission, **and** that will expire in CY 2014. This includes CoC Planning grants awarded.
  - d. Any S+C grants awarded prior to FY 2002 for which funding is expected to run out in CY 2014, and which has never received renewal funding.
  - e. Any grant originally awarded in the FY 2007 CoC Homeless Assistance Grants Competition, that has funds expiring in CY 2014 or later and has not been renewed in a previous competition. Funds for these grants will expire and will no longer be available after September 30, 2014. Therefore, renewal funding is imperative for continued project operations. Funds from these expiring grants will be recaptured and returned to the U.S. Treasury and will no longer be available for expenditure, regardless of whether the end date established in the grant agreement is beyond September 30, 2014. Grants awarded in the FY 2007 CoC Homeless Assistance Grants Competition are not eligible for renewal in the FY 2013 CoC Program Competition if they expire in CY 2013 (January 1, 2013 through December 31, 2013), and were not renewed in a previous competition, or were not approved for extension into CY 2014 or later.
2. ***First-Time TRA and SRA Renewals.*** For applicants with projects previously funded as Tenant Based (TRA) and Sponsor Based (SRA) components of S+C that renew in the FY 2013 CoC Program Competition for the first time and request more units than approved in the original application, the number of renewable units is determined by the number of units under lease at the time of submission of the GIW to HUD. To support the addition of units beyond the initial award, the applicant must provide the local HUD CPD field office with copies of all executed leases at the time of submission of its GIW.

HUD will consider the additional units under lease at the time of GIW submission to determine the maximum number of units that can be renewed in FY 2013. Renewal projects that increase the number of units are subject to the requirements for renewals as stated in §578.33(d) of the CoC Program interim rule. For additional information about that provision, please refer to HUD's December 18, 2012, webinar entitled *Homeless Programs: Transition Policies and Changes* which can be found at: <https://www.onecpd.info/resource/2727/homeless-programs-transition-policies-and-changes-webinar/>.

3. ***Failure to Include Renewal Projects on the GIW.*** If the CoC fails to include a project on its GIW, this could result in the project not receiving renewal funding from HUD. Including a project on the GIW does not guarantee that the project will receive funding in FY 2013, as the project must meet the threshold requirements detailed in the NOFA. Applicants must submit a project application in *e-snaps* for renewal funding in the FY 2013 CoC Program Competition. HUD will not fund projects that fail to submit a project application in *e-snaps* by the competition deadline regardless of whether the project was included on the GIW and/or priority listing. HUD retains the discretion to withhold funding, in whole or part, for any project that has significant capacity issues related to performance, financial management, or other unresolved audit or monitoring findings.
4. ***Special Instructions for CoCs without Expiring Renewal Grants.*** CoCs that do not have any projects within their geographic area that are eligible for renewal funding in the FY 2013 CoC Program Competition and that **will not** request UFA status or funding for CoC planning or UFA costs in FY 2013 are not required to complete the registration. However, CoC Registration is strongly encouraged so that HUD is informed of the CoC's active status.

If a CoC has never received funding or has no renewals for projects within the geographic area **but plans to submit a request for funding under the FY 2013 CoC Program Competition**, the Collaborative Applicant must obtain a blank GIW from the local HUD CPD field office. The CoC must note on the GIW that it has never received funding, or does not have eligible renewal projects. Contact information for each CPD field office is available at: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/about/staff/odirectors](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/staff/odirectors).

5. ***CoCs Merged via the Merger Process in FY2012.*** CoCs that merged using the ARD merger process in FY 2012 may continue to use this process in FY 2013 to determine FPRN.
6. ***Submit the Completed GIW to the Appropriate HUD Field Office for Review.*** Collaborative Applicants must submit the completed GIW to local HUD CPD field office prior to submission of CoC Registration.

**B. Step Two: Log in to *e-snaps* to Access the Registration Forms.** Any Collaborative Applicant primary contact person, who has accessed the registration forms in *e-snaps* in previous competitions, is referred to by HUD as a “returning *e-snaps* user”. These users will have access to the FY 2013 registration forms in *e-snaps*. For FY 2013, returning users may use the same username and password previously created. First-time users of *e-snaps* must create an *e-snaps* user account by completing the *e-snaps* user profile information. Each person who creates a user account for the first time must be granted permission by the primary authorized *e-snaps* user of the Collaborative Applicant in order to access the FY 2013 registration forms.

OneCPD AAQ is also available to provide assistance with adding and deleting users in *e-snaps*. For instruction on contacting the AAQ, see Section C of the “FOR FURTHER INFORMATION CONTACT” section at the beginning of this Notice.

**C. Step Three: Complete/Update Applicant Profile.** The Applicant Profile allows CoC and project applicants to update the contact information for the primary and alternate contacts to ensure that HUD has up-to-date information on file. The information in the Applicant Profiles is available for updates throughout the year and applicants are strongly encouraged to keep the contact information updated as changes occur. Returning Collaborative Applicants must update, as necessary, the CoC Applicant Profile in *e-snaps*. This will include any required changes to the Collaborative Applicant Primary and Alternate contacts, HMIS Lead and Contact Person, and Homeless Resources Contact Person. Collaborative Applicants representing new CoCs must complete the Applicant Profile information in full. Information on how to complete or update the Applicant Profile can be found at: [www.onecpd.info](http://www.onecpd.info).

**D. Step Four: Complete the Registration Forms.** All Collaborative Applicants registering, returning or for the first time, must input all information relevant to the FY 2013 registration. The CoC Registration Training Guide provides instruction on how to complete this process. The rest of this section highlights information that must be entered into *e-snaps* to complete and submit the registration.

**1. CoC Type.** CoC Applicants will have the option to register as a Collaborative Applicant or a Collaborative Applicant applying for Unified Funding Agency (UFA) designation. HUD will notify Collaborative Applicants of the final approved designation as Collaborative Applicant or UFA during the CoC Registration process. CoC Applicants requesting UFA designation must meet the selection criteria as outlined in 24 CFR 578.11 of the CoC Program interim rule and have financial systems that meet the standards set forth in 24 CFR 84.21 (for nonprofit organizations) and 24 CFR 85.20 (for State and local governments). Collaborative Applicants requesting UFA designation must fully answer all questions in the FY 2013 CoC Registration forms and attach all required documents in order to submit the registration in *e-snaps*. If the Collaborative Applicant is unable to answer all questions or attach the required documentation it will be required to change the designation request from UFA to Collaborative Applicant before the forms may be submitted.

2. **Identify CoC Mergers.** For CoCs that merge before the end of the registration process, the FY 2013 registration must capture the total ARD amount and the total FPRN of the merged CoCs. To determine these totals, HUD will make available guidance on eligibility and procedures via the [Worksheet and Guidance on CoC Merger](#).

The *Worksheet* will indicate whether a CoC may benefit from merging under the CoC Merger option in FY 2013 and will be available in *e-snaps* and at [www.onecpd.info](http://www.onecpd.info). In FY 2013, the completed *Worksheet* must be attached in *e-snaps* to the CoC's registration submission, except where all of the merging CoCs are in the same need status (i.e., all in ARD status or all in PPRN status). In FY 2013, CoCs approved to use the Merger process must enter in *e-snaps* the FY 2013 ARD amount and the merged FPRN amount as calculated by the *Worksheet*.

3. **Identify the CoC's Geographic Area.** All Collaborative Applicants must notify HUD of the geographic area(s) included in the CoC. This notification is completed in *e-snaps* during CoC Registration. Each geographic area is associated with a PPRN amount. HUD has posted a list of each geographic area and the associated PPRN amount at [www.onecpd.info](http://www.onecpd.info).

HUD has made changes to the jurisdictions eligible to receive a PPRN amount in the FY 2013 CoC Program Competition. It is important that Collaborative Applicants identify all areas within the CoC's jurisdiction during the registration process in *e-snaps*. The areas added to the PPRN calculation in the FY 2013 CoC Program Competition are: Cathedral City, CA; Lake Elsinore, CA; Menifee, CA; Temecula, CA; Jupiter, FL; Palm Coast, FL; Wellington, FL; West City, FL; Smyrna City, GA; Hendersonville, TN; Mansfield, TX; South Jordan, UT; Marysville, WA; and Redmond, WA. The following areas were removed from the PPRN calculation in FY 2013 CoC Program Competition: Sebastian City, FL; and Richardson, TX.

The CoC Program interim rule states in 24 CFR 587.35(d) if more than one CoC claims the same geographic area, HUD will award funds to the Collaborative Applicant(s) whose application(s) have the highest total score. No projects will be funded from the lower scoring CoC. No project applications that are submitted in two or more competing CoC Consolidated Applications will be funded. HUD will not correct errors made by Collaborative Applicants that fail to claim a geographic area claimed in the past.

4. **Capacity.** Collaborative Applicants are required to provide information concerning the current capacity of the CoC to implement the CoC Program. HUD will use this data for information purposes only.
5. **UFA Designation.** Collaborative Applicants requesting UFA designation will be required to complete the UFA forms in *e-snaps* and attach the CoC's written policies, procedures, and plans that document responses provided in registration. HUD will assess all submitted responses and required documents to determine if the Collaborative Applicant is currently performing the required duties of a UFA or has the capacity to

perform all of the required functions of a UFA. Collaborative Applicants that meet all requirements will be designated as a UFA and will be allowed by HUD to apply as such during the FY 2013 CoC Program Application process.

- a. Criteria.** Collaborative Applicants will be assessed based on a 65 point scale. In order to receive UFA designation, a Collaborative Applicant must receive a minimum of 22 out of 25 points in the UFA Capacity–CoC Responsibilities section, and 40 out of 40 points in the UFA Financial Management and Subrecipient Responsibilities sections. Therefore, the minimum score a Collaborative Applicant must receive in order to be designated as a UFA is 62 points. Regulatory citations have been added to the requirements in this section so that Collaborative Applicants can easily refer to the CoC Program interim rule for additional information.
- b. UFA Capacity.** CoC Responsibilities will be reviewed and scored on the following criteria with a possible total of 25 points available. In order to be designated as a UFA, the Collaborative Applicant must be able to clearly demonstrate that the CoC is in compliance with the requirements of §578.7.

  - (1) CoC Structure (5 points).** HUD will award up to a total of 5 points for Collaborative Applicants that demonstrate that the CoC holds meetings of the full membership (including published agendas) at least semi-annually (§578.7(a)(1)), has an open invitation process for new members to join at least annually (§578.7(a)(2)), and that the CoC has adopted and is following a written process to select the Board of Directors to act on behalf of the CoC (§578.7(a)(3)). The Collaborative Applicant must submit documentation that lists all committees, subcommittees, and workgroups that are active in the CoC (§578.7(a)(4)). That documentation may be the CoC governance charter, if the governance charter includes this information. Collaborative Applicants cannot receive maximum points for these criteria unless they clearly demonstrate meetings are held at least semiannually by attaching meeting agendas between July 1, 2012 and July 1, 2013.
  - (2) Governance Charter (§578.7(a)(5)) (1 point).** HUD will award up to 1 point for Collaborative Applicants that attach a governance charter that was developed in consultation with the Collaborative Applicant and HMIS Lead, clearly showing that the parties involved follow the governance charter and that this document is updated at least annually. In order to receive the full points, the governance charter must be attached to registration in *e-snaps* and include the following:

    - (a)** Date of the last update to the governance charter;
    - (b)** the policies and procedures needed to comply with subpart B of 24 CFR part 578 and with 2010 HMIS Data Standards; and

- (c) a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board.

HUD will review the CoC governance charter to determine if it incorporates all elements required in (§578.7(a)(5)). Governance charters that do not meet the criteria established in the CoC Program interim rule will receive no points.

- (3) Project Performance (6 points). HUD will award up to 4 of the 6 points for Collaborative Applicants that have established performance targets for CoC-funded projects, and that can demonstrate that it has established, in consultation with recipients and subrecipients, performance targets appropriate for the population and program types, and how the CoC monitors performance, evaluates outcomes, and takes actions towards poor performing projects (§578.7(a)(6)). Additionally, the Collaborative Applicant must describe how it evaluates the outcomes for projects funded under the Emergency Solutions Grants (ESG) and CoC programs (§578.7(a)(7)). To receive the full points for this section, the descriptions must provide clear details on the successful method(s) the CoC uses to gather recipient and subrecipient information to determine appropriate performance targets for the population(s) served, how poor performing projects are mentored to improve performance, and the specific evaluation methods used to determine if the outcomes from ESG and CoC programs are sufficient to address the reduction of homelessness in the CoC's geographic area. Finally, HUD will award 2 of the 6 points to Collaborative Applicants who attach the written standards created and followed by the CoC, in consultation with ESG recipients (ESG-CoC Written Performance Standards), that include at the minimum information found in 24 CFR 578.7(a)(9)(i-vi).
- (4) Centralized or Coordinated Assessment System (§578.7(a)(8)) (1 point). HUD will award 1 point to Collaborative Applicants whose CoC has established and operates a centralized or coordinated assessment system, in consultation with the ESG recipients, that covers the CoC's geographic area. The system must demonstrate how services and housing are matched to participants needs. A copy of a description of the centralized or coordinated assessment system must be attached to the registration that clearly demonstrates how the system used is successfully implemented, including details of the protocol used by the CoC within the geographic area to assist the homeless in obtaining the necessary referrals for housing and services. Additionally, the protocols must clearly state the CoC's specific policy on how the system addresses the specific needs of those who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers.

- (5) **HMIS Structure (4 points).** HUD will award up to 4 points for Collaborative Applicants that have a single HMIS that has been designated for the CoC (§578.7(b)(1)), and that clearly describe the process used to ensure consistent participation of recipients and subrecipients in the designated HMIS (§578.7(b)(4)), including how aggregate data from domestic violence service providers is handled. Additionally, the CoC must also designate the HMIS Lead (§578.7(b)(2)), and the HMIS Lead must have the following plans, approved by the CoC, in place: privacy plan, security plan, and data quality plan (§578.7(b)(3)). Additionally, Collaborative Applicants must clearly describe how they ensure the HMIS is administered in compliance with the 2010 HMIS Data Standards (§578.7(b)(5)).
- (6) **Coordination (6 points).** HUD will award up to 6 points for Collaborative Applicants that demonstrate that a Point-in-Time (PIT) count is conducted for sheltered (at least annually) and unsheltered (at least biennially) homeless by indicating the date of the most recent PIT count for both sheltered and unsheltered homeless (§578.7(c)(2)), and must demonstrate that a gaps analysis of needs and services is conducted by the CoC at least annually (§578.7(c)(3)). Additionally, the CoC must describe coordination efforts to implement a housing and service system that meets the needs of homeless individuals (including unaccompanied youth) and families (§578.7(c)(1)). The Continuum of Care plan developed by the CoC to address the coordination effort (CoC Housing and Services System/ Coordination Plan) must be attached to the registration and clearly outline the methods for outreach, engagement, and assessment; shelter, housing, and supportive services; and prevention strategies. The Collaborative Applicant must document how the CoC actively participates in the jurisdiction(s) Consolidated Plan which includes the specific activities that it performs during the development or update of the jurisdiction(s) Consolidated Plan (§578.7(c)(4)). Finally, the Collaborative Applicant must provide a description of how the CoC consults with ESG Program recipients for the allocation of ESG funds and document whether a plan has been developed for joint reporting guidelines for ESG recipients and subrecipients. If a plan has been developed, describe what is included in the plan that has been approved by both the CoC and ESG recipients (§578.7(c)(5)).
- (7) **Monitoring Subrecipients (§578.11(b)(4)) (2 points).** HUD will award up to 2 points to Collaborative Applicants that attach the CoC's comprehensive written policies and procedures for monitoring subrecipients (Monitoring Guide for Subrecipients) that include the frequency of monitoring, examples of forms used, samples of letters used to notify the subrecipient of concerns and/or findings, how these can be resolved, ramifications of failing a monitoring visit and/or refusing to abide by corrective actions, and any other CoC-approved requirements.

**c. UFA Financial Management and Subrecipient Responsibilities** will be reviewed and scored on the following criteria with a possible 40 points available. In order to receive the available 40 points for these two sections, the Collaborative Applicant must clearly demonstrate through the written responses in *e-snaps* and required attachments adequate financial management practices.

(1) UFA Financial Management (§578.11(b)(2)) (20 points). HUD will award 20 points to Collaborative Applicants that demonstrate financial management capacity by providing detailed information on internal procedures and an A-133 audit as detailed below. The criteria for this section will be evaluated on a pass/fail standard. For each of the three criteria below, Collaborative Applicants will receive the points indicated if the criterion is satisfied, or zero points if the criterion is not satisfied.

(a) A-133 Audit (10 points). The collaborative applicant must demonstrate that it has a financial management system that meets the standards set forth in 24 CFR 84.21 (for nonprofit organizations) and 24 CFR 85.20 (for States or local governments). To receive full points for this section, the Collaborative Applicant must: provide a description that clearly details how the Collaborative Applicant is successful at meeting each of the requirements of 24 CFR 84.21(a)-(b) (for nonprofit organizations) and 24 CFR 85.20(a)-(b) (for States or local governments); and provide the most recent OMB Circular A-133 audit(s), which must indicate that the Collaborative Applicant has no material weaknesses, deficiencies, or concerns that HUD considers to be relevant to the financial management of the CoC Program. If the A-133 identified weaknesses or deficiencies, the Collaborative Applicant must provide documentation showing how those weaknesses have been removed or are being addressed. Collaborative Applicants must meet all the criteria to receive any points in this section.

(b) The Collaborative Applicant must submit a copy of its written financial management policies and procedures, including an organizational chart that sets forth lines of responsibility. (5 points)

(c) Collaborative Applicants must submit written policies and procedures that detail how CoC Program funds will be distributed to subrecipients within 45 days of the subrecipient providing source documentation of eligible costs and that a process is in place to ensure CoC Program funds are drawn from LOCCS at least once per quarter. The written policies and procedures must be attached to the registration (LOCCS/Drawdown Procedures). (24 CFR 578.85(c)) (5 points)

(2) Subrecipient Responsibilities (20 points). HUD will award 20 points to Collaborative Applicants that meet the criteria described below. The

criteria for this section will be evaluated on a pass/fail standard. For each of the 4 criteria below, Collaborative Applicants will receive 5 points if the criterion is satisfied, or zero points if the criterion is not satisfied.

- (a) Collaborative Applicants must affirmatively indicate that they have obtained documentation evidencing approval (e.g., a letter from each potential subrecipient signed by the authorized official) from all potential subrecipients to which CoC program funds will be allocated, documenting that each organization will allow the UFA, if designated, to become the recipient for grant funds.
  - (b) Collaborative Applicants must provide a copy of written policies and procedures currently in place to bring noncompliant subrecipients into compliance.
  - (c) Collaborative Applicants must provide a copy of written policies and procedures to ensure “high risk” subrecipients receive proper oversight and monitoring.
  - (d) Collaborative Applicants must provide a copy of written policies and procedures to review for evidence of conflict of interest, either between the UFA and subrecipient or between the subrecipient and its contractor(s).
- d.** Required Application Documents. The following is a list of attachments that will correspond to the UFA registration questions and will be required at time of submission for Collaborative Applicants requesting UFA designation. The information provided in response to the questions in registration must correspond to the information provided in the attached documents in order for a Collaborative Applicant to receive UFA designation. These documents must be uploaded as an attachment in *e-snaps* prior to the Collaborative Applicant’s registration submission.

**(1)** Attachments to Satisfy CoC Program interim rule requirements:

- (a) CoC Meeting Agendas/Minutes (from III.D.5.b.(1) of this Notice, as applicable)
- (b) CoC Governance Charter (from III.D.5.b.(2)) of this Notice
- (c) ESG-CoC Written Performance Standards (from III.D.5.b.(3) of this Notice)
- (d) Description of Centralized or Coordinated Assessment System (from III.D.5.b.(4) of this Notice)
- (e) CoC Housing and Services System/Coordination Plan (from III.D.5.b.(6) of this Notice)
- (f) Monitoring Guide for Subrecipients (from III.D.5.b.(7) of this Notice)

**(2) Other Required Attachments:**

- (a) A-133 Audit (from III.D.5.c.(1)(a) of this Notice)
- (b) Financial Management Systems Policies and Procedures (from III.D.5.c.(1)(b) of this Notice)
- (c) LOCCS/Drawdown Procedures (from III.D.5.c.(1)(c) of this Notice)
- (d) Policies and Procedures for Managing Non-Compliant Subrecipients (from III.D.5.c.(2)(b) of this Notice)
- (e) Procedures for High-Risk Subgrantee Management (from III.D.5.c.(2)(c) of this Notice)
- (f) Policies and Procedures for Subrecipient Conflict of Interest (from III.D.5.c.ii.(2)(d) of this Notice)
- (g) Other attachments submitted by the CA (optional)

The CoC is responsible for creating all the documents listed above. If a committee, subcommittee, or workgroup developed the document, the CoC must provide a listing of the members who were involved in the development, along with their organization type (e.g., domestic violence, transitional housing, local government, etc.) and the last date the documents were reviewed and approved by the CoC membership.

- 6. *Submit Registration to HUD.*** All CoC applicants must submit their FY 2013 registration to HUD through *e-snaps* no later than **7:59:59 p.m. on September 23, 2013**. CoCs that fail to submit their registration by the designated deadline will not have access to the FY 2013 CoC Consolidated Application, including project applications for renewal projects.

**E. Special Registration Instructions for CoCs in Disaster Areas as Declared under Title IV of the Robert T. Stafford Act.**

CoCs located in areas declared to be major disaster areas by President Obama under Title IV of the Robert T. Stafford Act, may request that HUD submit their registration in *e-snaps* on their behalf, if the CoC's capacity to complete the annual registration process in *e-snaps* was degraded and/or destroyed, as a direct result of a major natural disaster. Collaborative Applicants may send this request via the AAQ at [www.onecpd.info/ask-a-question/](http://www.onecpd.info/ask-a-question/). Collaborative Applicants must include the following information in the request:

- 1. *Geographic areas claimed by the CoC.*** List the geographic areas that are eligible to be covered by the CoC.
- 2. *Contact information.*** Provide current contact information for the Collaborative Applicant so that HUD may contact the CoC in regard to this request, as needed.

3. **Grant Inventory Worksheet.** As stated in Section III.A. of this Notice, HUD Headquarters will email GIW (Excel spreadsheets) to all CoC lead agency contacts for the purpose of completing their grants inventory. HUD will pre-populate the GIWs with the renewal grants that received 1 year of funding and 1-year new grants in the FY 2012 CoC Program Competition. The initial GIW provided by HUD may not include a complete listing. Along with the request, disaster-affected CoCs must confirm, to the best of their knowledge, that the information on the GIW is accurate. If the CoC is able to identify any additional renewal grants, it should provide the previous grant number of any such renewals so that HUD can add it to the list. HUD Headquarters will work with the local HUD field office to identify any additional grants not identified by the Collaborative Applicant.

#### IV. HUD'S HOMELESS POLICY AND PROGRAM PRIORITIES

A. **Policy Priorities.** In addition to the Department priorities, Goal 2. Meet the Need for Quality Affordable Rental Homes and Goal 3. Utilize Housing as a Platform for Improving Quality of Life, outlined in the FY 2013 General Section NOFA, applications submitted to HUD for the FY 2013 CoC Program Competition will be evaluated in part based on the extent to which they further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (FSP)*. Specifically, the FY 2013 CoC Program Competition will prioritize CoC and project applications that address the goals listed below:

- **Meet the Need for Quality Affordable Rental Homes:** End homelessness and substantially reduce the number of families and individuals with severe housing needs (HUD Strategic Plan);
- **Opening Doors:** End chronic homelessness by 2015;
- **Opening Doors:** End veteran homelessness by 2015;
- **Opening Doors:** End family and youth homelessness by 2020.

Below is a brief description of HUD's policy priorities, related to these goals, for the FY 2013 CoC Program Competition.

1. **Strategic Resource Allocation:** Each CoC is encouraged to conduct a comprehensive analysis of its existing projects to determine the extent to which each project addresses the goals above. CoCs should reallocate those projects that are underperforming, obsolete, or ineffective. CoCs may only request new projects through reallocation.
2. **Ending Chronic Homelessness:** In order to meet the first goal of *Opening Doors*, CoCs must implement strategies to ensure that the chronically homeless are prioritized in existing permanent supportive housing beds, increase the total number of permanent supportive housing beds dedicated to this population, and adopt promising models, such as Housing First.

3. *Ending Family Homelessness:* Rapid re-housing is a model of housing that has proven to be effective for households with children. CoCs are encouraged to target rapid re-housing resources to homeless families—particularly those that are unsheltered. CoCs may request new reallocated rapid re-housing projects for homeless families with children; however only if they are able to document that chronic homelessness will be adequately addressed through other resources.
4. *Removing Barriers to CoC Resources:* The FY 2013 CoC Application will contain questions to determine the extent to which CoCs are making progress in implementing a coordinated assessment system, using transitional housing as a tool to serve specific subpopulations—such as homeless youth, domestic violence survivors, and homeless populations with substance abuse issues, and systematically prioritize households most in need.
5. *Maximizing the Use of Mainstream Resources:* Each CoC and project applicant should ensure that it is maximizing the use of all mainstream services available. CoCs should be proactively seeking and providing information to recipients about mainstream resources and funding opportunities, including upcoming implementation of the Affordable Care Act.
6. *Building Partnerships:* CoCs should proactively seek to engage in partnerships with Public Housing Agencies (PHA)—through PHA membership in the CoC or working together to implement a homelessness preference or priority for formerly homeless families and individuals moving out of permanent supportive housing (called a “move-up strategy”). CoCs should also consider the extent to which philanthropy could play a role within the community.
7. *Other Priority Populations:* CoCs must also consider the needs of other homeless populations that may be prevalent within the CoC’s geographic area, especially the needs of veterans and their families and unaccompanied youth. HUD strongly encourages CoCs to coordinate with housing and services funded through other sources (e.g., HUD-VASH) that serve these populations.

**B. CoC Program Implementation.** The following list highlights important information that applicants should consider to prepare for CoC Registration and the FY 2013 CoC Program Competition. This is not an exhaustive list of considerations or requirements—all applicants and CoC stakeholders should carefully review the CoC Program interim rule.

1. The activities of renewing SHP and S+C projects have been consolidated into one program. To continue ongoing leasing, operations, supportive services, rental assistance, HMIS, and project administration activities, SHP and S+C projects are renewable under the CoC Program Competition as set forth in §578.33 of the interim rule.
2. Projects and activities that were eligible under SHP and S+C but are no longer eligible under the CoC Program (e.g., safe havens, projects limited to persons with specific disabilities or diagnoses), will continue to be eligible for renewal under the original grant

terms as long as the recipient does not significantly change the project after submission of the FY 2013 CoC Program application. HUD has determined that this protection is necessary to continue housing and services to vulnerable populations that will be at-risk if funding is withdrawn.

3. The CoC Program interim rule describes in detail the difference between costs used for leasing and those used for rental assistance (§§ 578.49 and 578.51). Only those eligible first-time renewal grants formerly funded under the SHP program that include a leasing budget line item will have the opportunity to change the budget funding type from leasing to rental assistance in FY 2013 in accordance with the CoC Program interim rule. Recipients with grants that include a leasing budget should carefully review the nature of the project to determine if a change should be made from leasing to rental assistance for the project. In accordance with 24 CFR 578.49(b)(8), leasing funds will be renewed as rental assistance if the funds are used to pay rent on units where the lease is between the program participant and the landowner or sublessor. Under this type of agreement, the project applicant may change the budget information from leasing to rental assistance and use the area(s) Fair Market Rent (FMR) amount to determine the budget amount. Eligible first-time renewal project applicants that are eligible to change the budget from leasing to rental assistance must provide copies of the lease to the local HUD CPD field office prior to the close of the FY 2013 CoC Program Registration process. Additionally, if the project applicant is a nonprofit organization, it must obtain a letter of commitment from a unit of local government, State, or PHA that it will administer the rental assistance on behalf of the nonprofit organization. Projects that were submitted in the FY 2012 CoC Program Competition and awarded funding are not eligible to change from leasing to rental assistance as HUD allowed such projects to make this change as part of the FY 2012 GIW and CoC Registration process.

A project application is prohibited from including both leasing and rental assistance unless the project is paying for a structure to provide supportive services (i.e., leasing a structure for a case management office) in addition to units in which the program participants hold the lease with the landlord. HUD provided training materials and conducted a broadcast on September 4, 2012, to specifically address how current leasing projects will determine eligibility that will result in the change from leasing to rental assistance.

4. HUD will allow new reallocated projects to request funding for 1 year to facilitate implementation of CoC strategies to reduce gaps in permanent housing. Any new reallocated projects requesting capital costs (i.e., new construction, acquisition, or rehabilitation) are not eligible for 1-year requests and will be increased to 3-year grant terms if submitted for 1-year.
5. HUD will continue to limit the grant term for renewal grants to 1 year of funding. Requests for multiple years of funding will be reduced to 1-year amounts.
6. HUD will continue the Reallocation process. All CoCs may reduce and/or eliminate funds for renewal projects, including first-time renewal projects formerly funded under the S+C program, to develop new projects. CoCs may use the reallocation process to

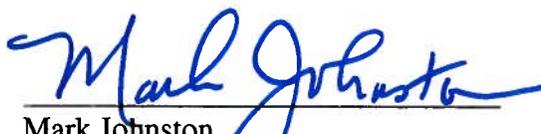
create new permanent supportive housing projects for the chronically homeless, or, when the CoC is able to demonstrate that chronic homelessness is being addressed by other means, for rapid re-housing projects for families.

7. Collaborative Applicants were required to submit their FY 2013 Housing Inventory Count and Point-in-Time Data directly into the HUD Homelessness Data Exchange (HDX) website on behalf of the CoC. The submission deadline was April 30, 2013.
8. CoCs will be required to rank all projects submitted by project applicants in *e-snaps*: renewal and new reallocated projects, including CoC planning projects and UFA cost projects. HUD will not review any project that is rejected by the CoC. Only one CoC planning application and one UFA cost application (if UFA designation is approved) may be submitted per CoC, and they must be submitted by the Collaborative Applicant.
9. HUD will continue the Tier 1 and Tier 2 funding process. Tier 1 is equal to the CoC's ARD amount approved in Registration, less the national percentage funding cut as identified in the NOFA. Tier 2 is the amount between a CoC's Tier 1 and the CoC's ARD, plus any approved amounts for CoC planning and UFA costs.
10. HUD intends to continue the two-step funding announcement process in FY 2013. Funding for renewal applicants will be awarded first. All other projects, including reallocation projects, and other new applications, including CoC planning and UFA costs, will be awarded at a later date.

## V. GETTING INFORMATION AND ASSISTANCE

**One CPD Website.** Prospective Collaborative Applicants are advised to review the numerous resources available online at [www.onecpd.info](http://www.onecpd.info), to help successfully complete the registration process, prepare for application submission, and understand CoC Program requirements. All *Federal Register* publications, user guides, and other resources related to the registration process, the FY 2013 CoC Program Competition, and the CoC Program may be obtained from the OneCPD website. HUD will also post on this website responses to frequently asked questions regarding the registration process. CoC applicants are advised to reference this site and its resources to all persons that will be working on the registration process or completing the CoC Application.

Date: 8/21/13

  
 Mark Johnston  
 Deputy Assistant Secretary  
 for Special Needs

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