

FY2016 HUD CoC Program Competition: Threshold Requirements

Continuum of Care
Board: The District of
Columbia Interagency
Council on
Homelessness

Collaborative
Applicant: The
Community Partnership
for the Prevention of
Homelessness

Background

Pursuant to Notice of Funding Availability (NOFA) for the FY2016 Continuum of Care (CoC) Program Competition FR-6000-N-25, the Collaborative Applicant, in consultation with the Director of the Interagency Council on Homelessness, which serves as the CoC Board, has established minimum threshold requirements that all project applications must meet to be included in the District of Columbia Consolidated Application. Thresholds have been developed in accordance with HUD guidance, including:

- I. Project Eligibility
- II. Project Renewal
- III. Matched and Leveraged Resources
- IV. Consistency with the Policy and Program Priorities

The CoC Board (or its designee) will review applications prior to final submission and reject those that the Board (or its designee) determines do not meet the minimum threshold requirements.

CoC Funding Priorities

The CoC Board has established ranking criteria and funding priorities consistent with the requirements and program and policy priorities stated in the FY2016 NOFA. The CoC Board will ranking all projects according to the established ranking to create the CoC Priority Listing and make decisions about Tier 1 and Tier 2.

The CoC Board will prioritize projects for funding as follows:

1. Renewal Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH), and Youth Transitional Housing
2. New Reallocated PSH
3. New Reallocated RRH
4. Permanent Housing Bonus Project
5. Renewal Transitional Housing
6. Renewal HMIS
7. Any other project application submitted by the CoC that was not on the HUD-approved GIW

I. Project Eligibility

The CoC Board (or its designee) will review all project application to determine if they meet the following eligibility threshold criteria on a pass/fail standard. If the CoC Board (or its designee) determines that a project application does not meet the minimum threshold standards, that project application will be rejected from inclusion in the District of Columbia's Consolidated Application.

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 application. A full list of requirements can be found at: <https://www.hudexchange.info/resources/documents/FY-2016-CoC-Program-NOFA.pdf>.
2. Project applicants must submit the required certifications with their project applications. Certification's must be date between May 1 and September 14, 2016:
 - a) Form HUD-2880
 - b) Applicant/Recipient Disclosure/Update Report
 - c) Applicant Code of Conduct
 - d) SF-LLL, Disclosure of Lobbying Activities
 - e) Form HUD-50070
 - f) Certification for a Drug Free Workplace
3. The population to be served must meet program eligibility requirements as described in the HEARTH Act, and the project application must clearly establish eligibility of project applicants.

II. Project Alignment with Homeward DC and Opening Doors

The CoC Board must consider whether or not renewal projects help the CoC meet the goals, objectives, and milestones in *Opening Doors: the Federal Strategic Plan to Prevent and End Homelessness* and *Homeward DC: the DCICH Strategic Plan 2015 - 2020*; renewal projects that do not help the CoC achieve these goals, objectives, and milestones may be rejected for funding and/or reallocated to create new programming that better meets the needs of the CoC.

III. Matched and Leveraged Resources

HUD and the CoC intend for all projects to have diverse funding streams to ensure projects are not over-reliant on any one source and can continue operations should there be a delay in grant execution (as often happens with HUD CoC resources). Therefore, all project applications must meet minimum match requirements as stated in 24 CFR 578.73.

IV. Consistency with Policy and Program Priorities

This NOFA sets the following program priorities:

Create a systemic response to homelessness

Strategically allocate resources

1. End chronic homelessness
2. End family homelessness
3. End youth homelessness
4. End veteran homelessness
5. Use a Housing First approach

Every project application is required to:

- ▶ State by name the policy priority/ies the project supports;
- ▶ Explicitly state how the project operates in support of the stated policy priority/ies.

Any project application that does not adequately address consistency with the stated policy and program priorities will be rejected by the CoC and not included in the District's Consolidated Application.

HUD Role in Determining Funding

HUD reserves the right to reduce or reject a funding request from the project applicant for the following reasons:

Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;

1. Audit finding(s) for which a response is overdue or unsatisfactory;
2. History of inadequate financial management accounting practices;
3. Evidence of untimely expenditures on prior award;
4. History of other major capacity issues that have significantly affected the operation of the project and its performance;
5. History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and
6. History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

HUD Role in Determining Funding

When considering renewal projects for award, HUD will review information in eLOCCS; Annual Performance Reports (APRs); and information provided from the local HUD CPD Field Office, including monitoring reports and A-133 audit reports as applicable, and performance standards on prior grants, and will assess projects using the following criteria on performance standards on prior grants, and will assess projects using the following criteria on a pass/fail basis:

1. Whether the project applicant's performance met the plans and goals established in the initial application, as amended;
2. Whether the project applicant demonstrated all timeliness standards for grants being renewed, including those standards for the expenditure of grant funds that have been met;
3. The project applicant's performance in assisting program participants to achieve and maintain independent living and records of success, except HMIS-dedicated projects that are not required to meet this standard; and,
4. Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site.

Approval of new and renewal projects is not a determination by the CoC Board (or its designee) or HUD that a project applicant is in compliance with applicable fair housing and civil rights requirements.

Contacts

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