



# **FY 2024 Continuum of Care Program Local Application Guidelines and Instructions Renewal, New, and Bonus Applications**

The Grand Rapids Area Coalition to End Homelessness (Coalition) invites applications under HUD's FY 2024 Continuum of Care (CoC) Program Competition for renewal, new, and bonus projects at this time. The opening of this local competition for projects serving Kent County is in accordance with the Notice of Funding Opportunity (NOFO) for the 2024 Continuum of Care Program by the U.S. Department of Housing and Urban Development.

## **COC PROGRAM PURPOSE AND OBJECTIVES**

The purpose of the CoC Program as established by the U.S. Department of Housing and Urban Development (HUD) is to:

- Promote a community-wide commitment to the goal of ending homelessness.
- Provide funding for efforts by nonprofit providers, states, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness
- Promote access to and effective utilization of mainstream programs by homeless individuals and families.
- Optimize self-sufficiency among those experiencing homelessness.

## **FY 2024 COC APPLICATION TIMING**

The Coalition will concurrently consider both renewal project applications as well as new and bonus projects (including permanent housing bonus projects and domestic violence bonus projects). The Coalition will submit one collaborative "Continuum of Care Application" for 2024 that reflects community-wide planning and performance. The score received for this application will be applied to funding requested for FY 2024 funds. It is expected that by October 30, 2024, the Coalition will submit completed HUD Project Applications and Priority Listings for the FY 2024 CoC Program Competition.

## **HUD FUNDING AMOUNT**

For FY 2024 renewal projects, the Coalition is eligible to apply to HUD for a maximum estimated amount of \$9,349,793, which constitutes the Annual Renewal Demand (ARD). The ARD is the total sum of all renewal projects eligible for renewal.

HUD will continue to require projects be ranked in two (2) tiers representing financial thresholds. It is possible that lower scoring CoC applicants will not have all projects ranked in the second tier funded. CoC Planning is not ranked, and therefore the funds are not included in either tier.

Any agency interested in voluntarily reallocating funding to better reach the goal of ending homelessness is encouraged to create a new project that will better achieve that goal. The types of new projects, created through either reallocation or bonus funds, allowed are outlined in the [2024 NOFO](#) on pages 39-40 and are as follows:

- a) Permanent housing-permanent supportive housing (PH-PSH) projects.
- b) Permanent housing-rapid rehousing (PH-RRH) projects.
- c) Joint transitional housing (TH) and rapid rehousing (PH-RRH) component projects.
- d) Dedicated HMIS project for the costs at 24 CFR 578.37(a)(4) that may only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant and is listed on the HMIS Lead form in the CoC Applicant Profile in e-snaps. Additionally, if the CoC has organizations within its geographic area that are victim service providers, the HMIS Lead, or subrecipient, may request HMIS funds for a comparable database. Victim service providers may also request HMIS funds in their project application budgets to enter data into a comparable database.
- e) Supportive services only coordinated entry (SSO-CE) project to develop or operate a centralized or coordinated assessment system.

**The amount anticipated to be available in general CoC Bonus projects is \$1,121,975** and more than one bonus project may be submitted to HUD by the CoC. Agencies may apply for the project types listed above. Please refer to pages 39-40 of the NOFO for more information about CoC Bonus projects.

**Agencies may also apply for domestic violence bonus projects that assist survivors of domestic violence, dating violence, sexual assault, or stalking. The estimated total amount available for these projects is \$1,008,678.** Agencies may apply for the following project types Rapid Rehousing (RRH) or joint transitional housing and permanent housing-rapid rehousing (Joint TH/PH-RRH) component projects which must follow a housing-first approach, or Supportive Services Only projects for the Coordinated Entry System (SSO-CE) to better meet the needs of people experiencing homelessness who are survivors of domestic violence, dating violence, sexual assault, or stalking. Renewal projects may submit an application for project expansion (see criteria below) for this application type. Detailed criteria for this application type may be found in the NOFO on page 44-45.

Renewal projects may opt to apply for a project expansion to expand existing projects to increase the number of units, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-CE projects. Interested applicants should complete the renewal application for their existing project as well as a new project application for the additional amount they seek. If both are approved and submitted to HUD by the Coalition, and HUD awards both grants, HUD will approve the single renewal application submitted in e-snaps. The project will then be eligible for renewal funding in next year's competition. See page 43-44 in the NOFO for more details.

Renewal applicants may choose to consolidate 2-10 projects into one individual project. Projects to be combined must have the same recipient and be for the same component. To consolidate projects, applicants must submit separate renewal applications for each existing project and each project application will identify the grant number that will survive which must be the grant number with the earliest start date in CY 2025. Individual renewal project applications will be ranked, and if all grants are selected by HUD for funding, HUD will award the single consolidated grant. Transitional housing and rapid rehousing projects may not use consolidation to form a joint TH/RRH project. For more details on consolidation, please see pages 45-46 in the NOFO.

Renewal projects may also submit projects for transition grants to reallocate their project to a new project type. This process allows providers to receive funding for one year to transition the project to the new project type (e.g., a provider with a RRH project submits a transition grant to change the project to PSH). Providers should submit a new project application for the transition grant. For a new project to be considered a transition grant, the new project applicant must be the recipient listed on the current grant agreement for the eligible renewal grant(s) being eliminated and must include the grant number(s) of the project(s) being eliminated to create the new project and attach a copy of the most recently awarded project application. If the new project is selected for funding this year, the project will be eligible for renewal funding under the new project type next year. Transition grants must meet the criteria set forth in Section I.B.2.b(30) of the NOFO and have the consent of the Coalition. For more information on this application type, please see pages 21-22 of the NOFO.

Agencies wishing to reallocate and apply as a new project or wishing to submit a bonus project application have the ability to do so at this time. All agencies considering applying for a new or bonus project should familiarize themselves with HUD eligibility and quality threshold requirements that can be found in Section III the NOFO. *Agencies who are considering applying for a bonus or consolidation project are strongly encouraged to contact Courtney Myers-Keaton ([cmyers-keaton@hwmuw.org](mailto:cmyers-keaton@hwmuw.org)) ahead of submission.*

## **HUD PROJECT SELECTION PRIORITIES**

Given the limited availability of funding, HUD asks communities to ensure CoC resources are used in the most strategic way possible.

HUD's Homeless Policy and Program Priorities for the 2024 fiscal year are as follows (pgs. 7-10 in NOFO):

- Ending Homelessness for All Persons
- Use a Housing First Approach
- Reducing Unsheltered Homelessness
- Improving System Performance
- Partnering with Housing, Health, and Service Agencies
- Racial Equity
- Improving Assistance to LGBTQ+ Individuals
- Persons with Lived Experience
- Building an Effective Workforce
- Increasing Affordable Housing Supply

Communities receiving higher scores on the FY 2024 CoC Application will be in the strongest position to have Tier 2 projects, bonus projects, and domestic violence bonus projects funded. The selection process will seek to maximize the community's ability to secure and retain funds by ranking projects in line with HUD priorities.

## **DEVELOPMENT OF LOCAL PRIORITY LISTING**

The Coalition's Funding Review Committee is responsible for reviewing all applications and making funding recommendations to the Steering Council for approval. The committee is responsible for determining ranking, or Priority Listing, of the projects to be included with the Coalition's annual submission to HUD.

Local priorities will focus on funding for permanent housing programs and infrastructure that are essential to helping people experiencing homelessness obtain permanent housing as quickly as possible, and with appropriate services to ensure housing stability, as well as building available housing resources for focus populations.

The Funding Review Committee currently consists of representatives from the following organizations: Cornerstone University, Fair Housing Center of West Michigan, Kent County Health Department, and Kent District Library. The panel also includes two local community members who do not represent a particular agency.

Further information regarding eligible applicants and projects, grant terms, and project evaluation criteria and ranking is detailed in subsequent sections of this document.

### **PROJECT MATCH REQUIREMENTS**

All eligible funding costs except leasing must be matched with no less than a 25% cash or in-kind match. Project administration must be matched. For further information, see 24 CFR 578.73.

### **REQUEST FOR PROPOSAL SUBMISSION**

Applicants must submit to the Coalition a completed Local Application Form in the manner detailed below. Further, for an application to be considered complete, an applicant must also submit a project application via HUD's "e-snaps" system.

- 1) Local Application Form. Applicants are to complete an electronic Local Project Application Form for each project based on the project type (new housing project, renewal housing project, or infrastructure project). Each applicant must also complete one electronic Local Supplemental Agency Application form.

All questions within the application pertaining to data or outcomes reference either the Annual Performance Report (APR) or CAPER report in HMIS, or funding tracked in eLOCCS. Domestic violence service providers should use data from a system comparable to HMIS.

You will receive a reply confirming the application was received within 24 hours. Please note this response confirms receipt only. No review will have occurred at this point.

- 2) E-snaps. In addition to the Local Project Application and Supplemental forms, project applications are required be entered into the electronic grants management system managed by HUD's Office of Special Needs Assistance Programs known as "e-snaps". If the agency is new to e-snaps or if there are staff within the agency who require access, guidance is available on the following HUD website:  
<https://www.hudexchange.info/programs/e-snaps/>.

*e-snaps* application forms are to be saved and submitted as saved PDF documents (no scanned documents). Files should be saved by the name:

“AgencyNameProjectNameES24” wherein the Agency and Project names should be inserted where indicated.

NOTE: HUD is offering projects with no changes the option to select “Submit Without Changes” which will prepopulate the e-snaps application for the agency.

**APPLICATION DEADLINE: 5:00 PM, WEDNESDAY, SEPTEMBER 25, 2024**

**Late applications will not be accepted.**

### **SIGNATURE**

An original signature is not required, but the name and title of the authorized agency representative must be included in the application.

The Coalition reserves the right to request additional information, as determined necessary, to review any application. All information submitted through this solicitation becomes the property of the Coalition.

### **QUESTIONS**

Please direct questions regarding this application opportunity to Courtney Myers-Keaton at [cmyers-keaton@hwmuw.org](mailto:cmyers-keaton@hwmuw.org) and Craig Heerema at [cheerema@hwmuw.org](mailto:cheerema@hwmuw.org). There is no guarantee of reply for inquires made after 5:00 PM on Friday, September 20, 2024.

### **IMPORTANT NOTICE**

Applicants are strongly encouraged to review *e-snaps* requirements well in advance of the application deadline as there are items (e.g. changing the authorized representative) that may require additional processing time.

Further, applicants are strongly encouraged to review HUD’s Notice of Funding Opportunity (NOFO) for the FY 2024 CoC Program Competition and other resources referenced in this document. This document is not intended to serve as a substitute for HUD’s NOFO or the CoC Program Interim Rule.

### **ELIGIBILITY INFORMATION**

The CoC Program Interim Rule (24 CFR Part 578) provides detailed information about allowable activities, documentation requirements, and other regulatory requirements with which applicants should be familiar. HUD’s FY 2024 NOFO further restricts allowable activities and sets additional requirements. The Interim Rule and NOFO will govern use of all grant funds applied for under this solicitation. Requirements summarized here are not all inclusive. Applicants are strongly encouraged to review the Interim Rule and NOFO directly and in detail.

## ELIGIBLE PROJECT APPLICANTS

- Include Coalition member agencies that meet the CoC Program definitions of eligible applicant as such term is defined in 24 CFR 578.15 (i.e. nonprofit organizations, states, local governments, or instrumentalities of state or local governments), and public housing agencies as such term is defined in 24 CFR 5.100. Per the CoC Program Interim Rule, for-profit entities are not eligible to apply for grants or to be subrecipients of grant funds.
- Must have a UEI number and be registered in the System for Award Management (SAM). Applicants must maintain an active SAM registration with current information while they have an active Federal award or an application or plan under consideration by HUD.
- Must meet all statutory and regulatory requirements in the McKinney–Vento Homeless Assistance Act, as amended, and CoC Program Interim Rule.

## ELIGIBLE PROJECTS

### Infrastructure Projects

- Projects for HMIS and Supportive Service Only projects for coordinated entry must use the Infrastructure Project Application form available on the Coalition’s website.
- Consistent with the previous year’s funding process, infrastructure projects will not be scored, but will be reviewed in the context of their impact on the community’s housing system, provision of housing services, and alignment with HUD priorities.

### Renewal Projects

- To be eligible as a renewal project, the application must:
  - (1) be for the same amount of funding before any adjustments described in the NOFO (e.g. FMR adjustments), or the amount reduced due to reallocation of a CoC;
  - (2) be for the same program component;
  - (3) in the case of CoC renewal projects, must continue to serve program participants who are enrolled in the project under the project’s current grant agreement; and
  - (4) in the case of DV Bonus renewal projects and YHDP
- Renewal projects, must continue to serve the same subpopulation
- Project must be currently in operation and have an executed grant agreement that is dated no later than December 31, 2024 and expire in CY 2025. (Note: Prospective applicants are responsible for knowing when grant terms expire and must anticipate when to apply for renewal funding. If an applicant fails to apply for a renewal in the appropriate year, it will not be eligible for renewal in the next funding competition.)
- May not request total funding in excess of the FY 2024 Annual Renewal Amount approved by HUD for that project in the renewal application. Any additional funding requested must be done through a new project application.
- Must be included on the Grant Inventory Worksheet (GIW) accepted by HUD as part of the FY 2024 CoC Program Registration process.
- Permanent Housing-Permanent Supportive Housing (PH-PSH) renewal projects must serve one of the following:
  - (i) persons eligible to be served by DedicatedPLUS projects as described in section I.B.2.b.(7) of this NOFO where all units funded by this project must be

- used to serve program participants who meet the qualifications for DedicatedPLUS; or
- (ii) persons experiencing chronic homelessness at the time they initially enrolled in the project.
- PH-RRH, Joint TH/PH-RRH component, Transitional Housing (TH), and SSO projects may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.
- See pages 31-32 of the NOFO for more detail.

#### New Projects through Reallocation or General CoC Bonus Projects

- Will only be considered for applications within the FY 2024 CoC Program Competition process for:
  - PH-PSH projects that serve one of the following:
    - a) persons eligible to be served by DedicatedPLUS projects as described in section I.B.2.b.(7) of the NOFO in which case all units funded by the project must be used to serve program participants who meet the qualifications for DedicatedPLUS; or
    - (b) persons who are experiencing chronic homelessness at the time they initially enroll in the project
  - New PH-RRH, Joint TH/PH-RRH, and SSO-CE projects must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3, Section 103(b) of the McKinney-Vento Homeless Assistance Act
  - New DV Bonus projects (RRH, Joint TH/PH-RRH, and SSO-CE) must serve survivors of domestic violence, dating violence, sexual assault, or stalking who qualify as homeless under paragraph (1) or (4) of 24 CFR 578.3 or Section 103(b) of the McKinney-Vento Homeless Assistance Act.
- Projects must meet the project eligibility and quality threshold requirements established by HUD in the NOFO on pages 54-60.
- More than one CoC Bonus projected may be submitted by the Coalition for FY 2024 funding as long as the total does not exceed the total amount of bonus projects allotted to the CoC for FY 2024.

#### Domestic Violence Bonus Projects

- Must be dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking who qualify under the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act. As described in the NOFO, survivors of human trafficking may qualify as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act because they are often also victims of domestic violence, dating violence, sexual assault, or stalking; however, a DV Bonus project may not exclusively serve people fleeing or attempting to flee human trafficking
- New projects that want to be considered for the DV Bonus must be:
  - Rapid Rehousing (PH-RRH) and Joint Transitional Housing and Permanent Housing-Rapid Rehousing (Joint TH/PH-RRH) which follow a housing first approach
  - SSO-CE project to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of people experiencing homelessness who are survivors of domestic violence, dating violence, sexual assault, or stalking

- DV Bonus funds can only be used to expand an existing renewal project if the expansion project is dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act
- Detailed criteria for this application type may be found in the NOFO on pages 28-30.
- New projects created through a domestic violence bonus application must meet the project eligibility and quality threshold requirements established by HUD in the NOFO on pages 54-60.
- More than one DV bonus project may be submitted by the Coalition for FY 2024 funding as long as the total does not exceed the total amount of bonus projects allotted to the CoC for FY 2024.

## **GRANT TERM**

CoC Program renewal project applications, except for those receiving project-based rental assistance or operating costs, are limited to a 1-year grant term and one year of funding. The initial grant term for new projects created through reallocation and permanent housing bonus projects may vary. Refer to the NOFO on pages 39-40 for detailed information on renewal grant terms.

## **PROJECT REVIEW AND RANKING**

All applicants/projects must meet basic eligibility and quality threshold requirements (see NOFO pages 34-38). The Coalition reserves the right to reject any application that is not consistent with the CoC Program Interim Rule and/or the FY 2024 NOFO.

### **PROJECT EVALUATION CRITERIA**

Local project evaluation criteria are guided primarily by relevant HUD policy priorities and Criteria for Applicants identified in the FY 2024 NOFO. The specific criteria that will be used are reflected in the project applications and scorecards.

### **PROJECT RANKING**

Once applications are reviewed and scored using the above-described criteria, projects will be ranked by score and HUD Policy Priorities and local priorities. Adjustments may be made to the rankings to:

- Maximize funds for projects identified in Tier I.
- Ensure adequate resources for system infrastructure by ranking HMIS and coordinated entry projects within Tier I.

If funded, domestic violence bonus projects will be pulled from the CoC's Priority Listing, and all projects ranked below them will move up one rank. Consistent with last year's process, PH bonus projects will not be ranked higher than renewal projects.


### **APPEALS**

Applicants may appeal the scoring decision made by the Funding Review Committee. Appeals will be reviewed by an Appeals Panel, comprised of one member of the Funding



Review Committee, one Steering Council member, and recruited members from Continuums of Care outside of Kent County. The meeting of the Panel will be facilitated by Coalition staff. For completing an appeal, applicants should use the Appeals Application and closely follow the guidelines outlined in the CoC’s Funding Decision Appeal Policy; both documents are available on the Coalition’s website. Appeals must be received by 5:00 PM, Thursday, October 16, 2024, for consideration.

## RESOURCES

Document Name	Document Link
CoC Website	<a href="https://endhomelessnesskent.org/">https://endhomelessnesskent.org/</a>
 2024 CoC Program Competition Announcement	<a href="https://www.hud.gov/program_offices/comm_planning/coc/competition">https://www.hud.gov/program_offices/comm_planning/coc/competition</a>
FY 2024 CoC Program Competition Notice of Funding Opportunity Availability (NOFO)	<a href="https://www.hud.gov/sites/dfiles/CPD/documents/FY2024_FY2025_CoC_and_YHDP_NOFO_FR-6800-N-25.pdf">https://www.hud.gov/sites/dfiles/CPD/documents/FY2024_FY2025_CoC_and_YHDP_NOFO_FR-6800-N-25.pdf</a>
CoC Program Competition: e-snaps Resources	<a href="https://www.hudexchange.info/programs/e-snaps/">https://www.hudexchange.info/programs/e-snaps/</a>
Continuum of Care Program: Interim Final Rule	<a href="https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/">https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/</a>
CoC Renewal Project Application Detailed Instructions	<a href="https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY-2024-CoC-Application-Detailed-Instructions.pdf">https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY-2024-CoC-Application-Detailed-Instructions.pdf</a>
CoC New Project Application Detailed Instructions	<a href="https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY-2024-CoC-NEW-Application-Detailed-Instructions-7-31-2024.pdf">https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY-2024-CoC-NEW-Application-Detailed-Instructions-7-31-2024.pdf</a>