



## Policy for the HUD FY2021 CoC NOFA Competition

### Introduction

In response to the Notice of Funding Availability (NOFA) for the 2021 Continuum of Care (CoC) Program Competition that the Department of Housing and Urban Development (HUD) released on August 18, 2021, Partners for HOME (PFH), as the Collaborative Applicant for the Atlanta CoC, provides the following guidance for the competition process.

As the Collaborative Applicant for the Atlanta Continuum of Care (CoC), Partners for HOME is responsible for organizing, collecting and submitting the CoC Consolidated Application for the FY21 CoC funding. This includes the CoC Application as well as the CoC Priority Listing. Included in this process is the oversight of the local competition to determine the CoC Priority Listing composition.

- This announcement is being provided in accordance with the [HUD CoC Program Competition and related guidance](#).
- Additionally, updated information and materials will be [posted on the Partners for HOME website](#).

While this document will provide an overview of the NOFO and Atlanta CoC process, **all interested parties and applicants should read the NOFO and all related materials in their entirety**, as well the materials that will be posted on the Partners for HOME and HUD CoC Program Competition websites throughout this process. Some key points from the NOFO that will apply to project applications and the CoC application, are listed below.

### HUD NOFO Priorities<sup>1</sup>

- Ending homelessness for all persons.
- Using a Housing First approach.
- Reducing unsheltered homelessness.
- Improving system performance.
- Partnering with housing and health service agencies.
- Racial equity.
- Persons with lived experience.

### Atlanta CoC Strategic Plan Goals<sup>2</sup>

- End veteran homelessness by 2017.
- End chronic homelessness by 2019.
- End youth homelessness by 2020.
- End family homelessness by 2020.

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<sup>1</sup> Detailed on pages 9 through 11 of [HUD FY2021 NOFO](#)

<sup>2</sup> Detailed on page 6 of [ClearPath Strategic Plan](#).



## Important Dates

Please refer to the Partners for HOME website for the complete timeline, but some important dates include:

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| • NOFO Released   | August 18, 2021                        |
| • Policy and Applications Released ( <i>tentative</i> ) | September 3, 2021                      |
| • FY21 HUD NOFO Presentation                            | September 7, 2021 (virtual) at 10 a.m. |
| • SurveyMonkey Applications Due                         | October 8, 2021 at noon                |
| • Preliminary Scores Released                           | October 22, 2021, 2021                 |
| • Deadline for Scoring Appeals                          | October 25, 2021                       |
| • CoC Application Inclusion Notifications               | October 29, 2021                       |
| • <i>e-snaps Applications Due (Accepted projects)</i>   | November 1, 2021 at noon               |
| • <i>e-snaps</i> Feedback to Applicants                 | November 5, 2021                       |
| • Final <i>e-snaps</i> Applications Due                 | November 8, 2021 at noon               |
| • NOFO Submission ( <i>tentative</i> )                  | November 12 2021                       |

## Rank and Review

The Rank and Review Committee is an independent group comprised of community members and Atlanta CoC representatives that are approved by the Atlanta CoC Governing Council. The Rank and Review Committee will score and rank project applications based on HUD and CoC priorities. The recommendations from this Committee will be presented to the Atlanta CoC Governing Council for approval. Approvals will then be announced to the CoC membership.

Partners for HOME will rank all new and renewal projects per the ranking criteria described in the FY21 NOFO. Partners for HOME will prioritize projects as follows:

- Permanent Supportive Housing (Renewal- Tier 1)
- Rapid Rehousing (Renewal Tier 1)
- HMIS (Renewal Tier 2)
- Coordinated Entry (Renewal Tier 1)
- Permanent Supportive Housing (New Tier 2 – CoC Bonus)
- Rapid Rehousing (New Tier 2 – CoC Bonus)
- Domestic Violence (New Tier 2- DV Bonus)

To submit as strong an application as possible, the Rank and Review Committee will also score and rank projects primarily based on scores and criteria derived from the HUD priorities as well as guidance provided in the NOFO.

As the scoring criteria for renewal projects will be based primarily on performance data, newly awarded renewal projects which have not been operating long enough to have sufficient performance data and therefore cannot be ranked accordingly, will receive the median score for all data driven questions that cannot be derived.

New projects may be ranked above renewal projects that are underperforming. This includes new projects created from CoC Bonus funds. The Rank and Review Committee will take project scores, project spending, NOFO guidance and strategy, and CoC principles into account when determining rank order.



### **Tier 1 (more secured funding)**

Tier 1 is equal to 100% of the CoC's Annual Renewal Demand (ARD) as described in Section III.B.2.a of the NOFO. For Partners for HOME, Tier 1 funding availability is equal to \$8,429,227. Project applications in Tier 1 will be conditionally selected from the highest scoring CoC to the lowest scoring CoC, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold. Any type of new or renewal project application can be placed in Tier 1 except for CoC planning which is not ranked. If a DV Bonus project ranked in Tier 1 is selected with DV Bonus funds, the project will be removed from this tier and the projects below it will move up one rank position. However, if a new DV Bonus project is not selected with DV Bonus funds, the project will retain its ranked position (see Section II.B.11.e of the NOFO). In the event insufficient funding is available to award all Tier 1 projects, Tier 1 will be reduced proportionately, which could result in some Tier 1 projects falling into Tier 2.

- Component Types will be ranked by score. If any projects receive the same score, they will be ranked alphabetically per their Agency Name.
- There are a few system projects such as Supportive Services for Outreach, Coordinated Access first time renewals, and HMIS that will be ranked at 50% of the ARD within Tier 1 to ensure they're protected for the benefit of the Atlanta Continuum of Care.

### **Tier 2 (less secure funding)**

Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for except for CoC planning or projects selected with DV Bonus funds. For Partners for HOME, Tier 2 funding availability is \$421,461 (5% of ARD). If a DV Bonus project ranked in Tier 2 is selected with DV Bonus funds, the project will be removed from this tier and the projects below it will move up one rank position. However, if a new DV Bonus project is not selected with DV Bonus funds, the project will retain its ranked position (see Section II.B.11.e of the NOFO).

Project applications placed in Tier 2 will be assessed for project eligibility and project quality threshold requirements, and if applicable, project renewal threshold requirements, and funding will be determined using the CoC Application score as well as the factors listed in Section II.B.11 of the NOFO. HUD will award a point value to each new and renewal project application that is in Tier 2 using a 100-point scale.

- Up to 50 points in direct proportion to the core the CoC receives.
- Up to 40 points for the CoCs ranking of project applications.
- Up to 10 points for the project application's commitment to Housing First.

### **Projects Straddling Tiers**

If a project application straddles the Tier 1 and Tier 2 funding line, HUD will conditionally select the project up to the amount of funding that falls within Tier 1. Using the CoC score, and other factors described in Section II.B.11 of the NOFO, HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award the project at the reduced amount, provided the project is still feasible with the reduced funding (e.g., is able to continue serving homeless program participants effectively).

### **Planning Projects**

Planning projects will not be ranked and will not be included in Tier 1 or Tier 2.



### **Reduction and Reallocation**

Partners for HOME will use the reallocation process to ensure all renewing projects are cost-effective and in line with the U.S. Department of Housing and Urban Development's guidelines and recommendations to end homelessness. The reallocation process also allows the CoC to redirect funding away from agencies that are underutilizing resources or underperforming. These may then be redirected to where they can best be used to end homelessness.

Projects scoring below 40 will be required to submit a corrective plan outlining the steps the agency will take to improve performance. Agencies scoring below 40 are ineligible to apply for new projects through the FY21 HUD CoC Program Competition. Expansion applications of existing projects will be evaluated based on quality of application and project performance while they are undergoing a corrective plan. Projects with two consecutive years of corrective planning status may be at risk of losing funds per the recommendation of the Rank and Review Committee.

### **New Projects**

For the FY21 HUD CoC Program NOFO, funding for new projects will be available through reallocation; CoC Bonus funds; a combination of reallocation and CoC Bonus; new DV Bonus projects; CoC planning project; and if applicable, UFA Costs project. While HUD is allowing CoCs to submit new project applications for a few different project types (PSH, RRH, Joint TH-RRH, SSO for CE or HMIS), ***it is up to the CoC to determine the need for their community.***

In the Atlanta CoC's *ClearPath* Strategic Plan, there is a community goal of using the annual HUD CoC Program Competition NOFO to add new units through PSH and rapid rehousing. **Any reallocated or CoC Bonus funding will be used for projects that coordinate with housing and healthcare organizations to provide permanent supportive housing and rapid rehousing services described in Section II.B.4 of the NOFO.**

### **Consolidated Projects**

HUD is allowing agencies to combine two, but not more than 10, eligible renewal projects. To be eligible for consolidation, the projects must have the same recipient; be for the same component; and will only be funded in this competition with FY21 funds. To request the consolidation of eligible renewal projects, project applicants must submit renewal projects for the individual projects to be included in the consolidation and each project application will identify the grant number that will survive which must be the grant number with the earliest start date in CY22. Project applications for the grants that are proposed to be part of the consolidation must be ranked with a unique rank number for each project, and if all those grants are selected, HUD will conditionally award the single surviving grant based on its ranked position to include the amount of funding of all grants included in the consolidation. All other project applications included in the surviving grant will be removed from the CoC's ranking resulting in project applications below to slide up one ranked position. A project applicant cannot submit a consolidated project application that contains two different components (e.g., permanent housing and transitional housing).



### **Expansion Funding**

HUD is permitting CoCs to allow renewal projects to submit a new project application, in addition to the renewal application, if an agency wishes to expand an existing funded project. The Atlanta CoC is looking to use any reallocated or Bonus funding for new housing and healthcare coordination and domestic violence projects. Renewal projects eligible for expansion must clearly document their coordination with housing and healthcare service agencies.

### **Domestic Violence (DV) Bonus**

There is a separate pool of funding available for CoCs to apply for projects specifically for survivors of domestic violence. A CoC can apply for rapid rehousing and supportive services only projects providing Coordinated Entry.

The Atlanta CoC can apply for up to **\$824,550** and applications for RRH projects from agencies and an SSO-CE project from Partners for HOME, which will be procured out in the event it is awarded, will be accepted. The Rank and Review Committee will review available data to ascertain the need for such dedicated projects and if applicable, select and rank any such projects.

A new DV Bonus project that expands an existing renewal project will only be selected if the renewal project is conditionally selected in Tier 1 or 2. If the renewal project application is selected for conditional award with CoC Program funds and the new DV Bonus expansion project is approved for selection, HUD will only select the new DV Bonus project with DV Bonus funds and HUD will remove the new DV Bonus project from the New Project Listing and all other project applications ranked below the new DV Bonus project will move up one rank position.

If HUD does not select a project that the CoC lists as a DV Bonus project for the DV Bonus funds, the project will remain on the CoC priority list and may be funded as a new project. However, since the Atlanta CoC is looking to use any non-DV Bonus funding for new housing/healthcare coordination projects, any DV Bonus applications selected for ranking will be ranked at the bottom of Tier Two, so that any available funds are first used for housing/healthcare coordination projects.

### **Chronically Homeless Dedicated and DedicatedPLUS**

All renewal PSH projects in the Atlanta CoC are currently 100% dedicated to serve the chronic homeless population. HUD is again allowing new and renewal projects to be either dedicated to serving people who are chronically homeless or to be DedicatedPLUS projects, which expands the population that can be served. However, since any PSH projects that are DedicatedPlus need to serve both individuals and families, the Atlanta CoC renewal projects will remain 100% dedicated to serve the chronically homeless population and all new project applications will also need to be dedicated to serve 100% chronically homeless.

### **Project Application Appeals Process**

In accordance with *24 CFR part 578* and the NOFO, applicants have the right to appeal if they believe that they were improperly denied the right to participate in the CoC planning process in a reasonable manner; were improperly denied or decreased funding; or were improperly denied a Certification of Consistency from the local government with the Consolidated Plan. The appeal must be carried out as outlined in the [Project Application Appeal Process](#).



### **General Information**

In addition to submitting the project application and all related materials to Partners for HOME to be scored and ranked, all new and renewal applications must also complete the HUD application process in *e-snaps*.

**Failure to do so will result in disqualification for funding.**

This is a competitive process, within the CoC as well as within all other CoCs nationwide. Submitting an application to be scored, completing the *e-snaps* process, and/or being included in the CoC application to HUD does not guarantee funding.

While Partners for HOME, as the Collaborative Applicant for the Atlanta CoC, will email additional details of the competition, information will also be posted on the [Partners for HOME website](#). It is the responsibility of the applicants to ensure that they check the website, as well as the [HUD Exchange website](#).

Partners for HOME reserves the right to update or correct any of the information provided in this document, in the event of additional guidance from HUD, error or omission.

### **Contact**

Please direct questions about this process to Summer Duperon, vice president of development at Partners for HOME, via email at: [sduperon@partnersforhome.org](mailto:sduperon@partnersforhome.org) or by phone at 404-546-3071.