FY 2021 Continuum of Care Notice of Funding Opportunity (CoC NOFO) Summary

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Noteworthy Changes

- $102,000,000 is available nationally for Domestic Violence Bonus projects (only $50,000,000 was available in 2019).

- Tier 1 is equal to a CoC's entire Annual Renewal Demand and Tier 2 is equal to the CoC Bonus amount.

- Tribes and Tribally Designated Housing Entities are eligible to apply for projects.

- CoCs may receive up to 10 bonus points on the CoC Application if the CoC Priority Listing includes new project applications created through reallocation or the CoC Bonus that utilizes housing subsidies or subsidized housing units funded through sources other than the CoC or ESG programs and healthcare provided through an array of healthcare services providers. See the

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- Community-Level Changes and Reminders section of this summary for more details.

Background

The U.S. Department of Housing and Urban Development (HUD) has released a Notice of Funding Opportunity (NOFO), signifying the beginning of a funding competition among approximately 450 Continuums of Care (CoC), the community stakeholder groups that guide local responses to homelessness. The 2021 CoC NOFO was released on August 18, 2021, opening the competition making available **approximately $2.7 billion nationally** to serve people experiencing homelessness. The information in the NOFO sets forth the competition rules and processes for 2021.

This summary includes the highlights of the FY 2021 CoC NOFO. New or revised policies relating to the FY 2021 CoC Program Competition are indicated as ****NEW IN 2021**** and ****REVISED IN 2021****, respectively. Additional information about project application requirements and standards will be available locally. Details about anything in this summary can be found in the NOFO, available at: https://www.hudexchange.info/programs/e-snaps/fy-2021-coc-program-nofa-coc-program-competition/

Important HUD-Required Dates

- **Wednesday, August 18, 2021** → The 2021 CoC Program NOFO is released.

- **Thursday, August 19, 2021**→ The CoC Application, CoC Priority Listing, and Project Applications are available in *e-snaps.*

- On or before **Sunday, October 17, 2021** (30 days prior to submission deadline) → All project applications are required to be submitted to the CoC.

- On or before **Monday, November 1, 2021** (15 days prior to submission deadline) → The CoC is required to notify all project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC.

- On or before **Sunday, November 14, 2021** (2 days prior to submission deadline) → CoCs must post on their website (or a partner's website) all parts of the CoC Consolidated Application, including the CoC Application attachments and the Priority Listing, and notify community members and key stakeholders that the CoC Consolidated Application is available.

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Submission Deadline:
Tuesday, November 16, 2021, at 8:00 PM EDT/7:00 PM CDT/5:00 PM PDT

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- HUD may issue more than one conditional funding announcement.

- **September 30, 2021** → All conditional funds awarded in the FY 2021 CoC Program Competition for FY2020 must be obligated.

- **September 30, 2023** → All conditional funds awarded in the FY 2021 CoC Program Competition for FY2021 must be obligated.

- **September 30, 2027** → Obligated funds awarded in the FY 2021 CoC Program Competition for FY2020 must be expended.

- **September 30, 2028** → Obligated funds awarded in the FY 2021 CoC Program Competition for FY2021 must be expended.

Funding Available for Our CoC

This year, in our CoC, the eligible application amounts are as follows:

- **Tier 1** (Annual Renewal): $3,143,010

- **Tier 2** (CoC Bonus): $175,902

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- **Domestic Violence (DV) Bonus**: $527,707

- **CoC Planning**: $105,541

2021 HUD CoC Policy Priorities

CoCs will be evaluated based on the extent to which they further HUD's policy priorities. The policy priorities listed this year are:

1. ****REVISED in 2021** Ending homelessness for all persons**

    a. To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness.

    b. CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, or those experiencing chronic homelessness).

    c. CoCs should partner with housing, health care, and supportive services providers to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing.

    d. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.

2. ****BACK AGAIN in 2021** Use a housing first approach**

    a. Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. CoC Program funded projects should help individuals and families move quickly into permanent housing, and the CoC should measure and help projects reduce the length of time people experience homelessness.

    b. Additionally, CoCs should engage landlords and property owners to identify an inventory of housing available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client-centered service methods.

    c. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.

3. ****NEW in 2021** Reducing unsheltered homelessness**

    a. In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the country. People living unsheltered have extremely high rates of physical and mental illness and substance use disorders.

    b. CoCs should identify permanent housing options for people who are unsheltered.

4. ****REVISED in 2021** Improving system performance**

    a. CoCs should be using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations) to determine how effectively they are serving people experiencing homelessness.

    b. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent.

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    c. CoCs should review all projects eligible for renewal in FY 2021 to determine their effectiveness in serving people experiencing homelessness, including cost-effectiveness.

    d. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.

    e. HUD recognizes the effects of COVID-19 on CoC performance and data quality and, compared to previous CoC NOFOs, reduces the points available for rating factors related to system performance. However, HUD plans to significantly increase the points available for system performance rating factors in the FY 2022 and subsequent CoC NOFOs.

5. ****NEW in 2021** Partnering with housing, health, and service agencies**

    a. Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. This is especially important as the CARES Act and American Rescue Plan have provided significant new resources to help end homelessness.

    b. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:

        (1) Work closely with public and private healthcare organizations and assist program participants to obtain medical insurance to address healthcare needs;

        (2) Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new HOME program resources provided through the Homelessness Assistance and Supportive Services Program that was created through the American Rescue Plan;

        (3) Partner with local workforce development centers to improve employment opportunities; and

        (4) Work with tribal organizations to ensure that tribal members can access CoC-funded assistance when a CoC's geographic area borders a tribal area.

6. ****NEW in 2021** Racial equity**

    a. In nearly every community, Black, Indigenous, and other people of color are substantially overrepresented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs.

    b. CoCs should review local policies, procedures, and processes to determine where and how to address racial disparities affecting individuals and families experiencing homelessness.

7. ****NEW in 2021** Persons with lived experience**

    a. HUD is encouraging CoCs to include in the local planning process people who are currently experiencing or have formerly experienced homelessness to address homelessness.

    b. People with lived experience should determine how local policies may need to be revised and updated, participate in CoC meetings and committees as stakeholders, provide input

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on decisions, and provide input related to the local competition process (e.g., how rating factors are determined).

c. CoCs should seek opportunities to hire people with lived experience.

Application Structure

The CoC Consolidated Application is made up of three parts:

1. **CoC Application** provides information about the CoC planning body, governance structure, overall performance, and the strategic planning process. This part of the application is scored and will determine the order in which CoCs are funded.

2. **Project Applications** are completed in e-snaps by agencies applying for projects.

3. **CoC Priority Listing** ranks all project applications in order of priority.

Review and Rank Changes and Reminders

HUD requires CoCs to review and rank projects submitted by project applicants (except CoC planning projects) having them fall into two Tiers based on a financial threshold. All projects must pass HUD's eligibility and threshold requirements to be funded, no matter their priority.

If a DV Bonus project is selected with DV Bonus funds, the project will be removed from the Priority Listing 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.

Tier 1

- Tier 1 projects will be conditionally selected from the highest-scoring CoC to the lowest-scoring CoC, provided the project applications pass both eligibility and threshold review.

- In the event insufficient funding is available under the NOFO to award all Tier 1 projects, Tier 1 will be reduced proportionately, which could result in some Tier 1 projects falling into Tier 2. Therefore, CoCs should carefully determine the priority and ranking for all project applications in Tier 1 as well as Tier 2.

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Tier 2

- Projects in Tier 2 are less likely to be funded, and every Tier 2 project will be scored using a 100-point scale based on three factors:
    - **CoC Score.** Up to 50 of 100 points will be awarded in direct proportion to the score received on the CoC Application.
    - **CoC Project Ranking.** Up to 40 of 100 points will be assigned directly related to the CoC's ranking of projects. Additional details are available on p. 14 of the NOFO.
    - ****REVISED in 2021** Commitment to Housing First.** Up to 10 points based on the project application's commitment to follow a housing first approach that that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold). Dedicated HMIS projects and coordinated entry SSO projects will automatically receive 10 points.

Important CoC Strategy Reminders

- HUD will not award funds to a new project unless the project was created through reallocation, or the CoC has demonstrated to HUD's satisfaction that projects are evaluated and ranked based on the degree to which they improve the CoC's system performance. Please see NOFO Section VII.B.2 for new guidance on the use of objective criteria, system performance measures, comparable database data, and severity of barriers experienced by program participants in the scoring process.

- HUD will prioritize funding for CoCs that have demonstrated the capacity to reallocate funding from lower to higher performing projects.

Eligible New Projects

- CoCs may apply for new projects created through reallocation, CoC Bonus, a combination of reallocation and CoC Bonus, DV Bonus, and CoC planning.
    - Because new project applications may be created through the reallocation or CoC Bonus processes, if HUD determines that a project applicant or a CoC incorrectly classified one or more new projects as reallocation or CoC Bonus, HUD may reclassify the project(s) as either reallocation or CoC Bonus if the CoC exceeded either its reallocation or CoC Bonus amount.
    - If a project applicant uses both reallocation and CoC Bonus amounts to create a single new project but did not have enough available from either source, HUD will reduce the project to the amount available, if any.

- HUD will review all new project applications to determine if they meet project quality threshold requirements. See pp. 45-48 of the NOFO for details.

Allowable Grant Terms

- The initial grant term for new project applications may be one year, two years, three years, four years, five years, or 15 years, but there are limitations depending on the grant type. Please see pp. 32-34 of the NOFO for details. The grant term may be extended consistent with 2 CFR 200.308 and 2 CFR 200.309. Please note that the total grant amount is divided among the grant years (e.g., you can receive $100,000 for one year, or $33,333 for 3 years).

- HUD will allow new projects to request one year of funding with a longer initial grant term not to exceed 18 months. HUD has determined that most new projects requesting one year of funding normally take approximately three to six months to begin fully operating the new project (e.g.,

hiring staff, developing partnerships with landowners if leasing or renting). Therefore, a new project requesting one year of funding may request a grant term of 12-18 months that will allow for the additional start-up process.

Transition Projects

- Applicants may transition their project(s) from one CoC Program component to another (e.g., Transitional Housing to Rapid Rehousing, Rapid Rehousing to Permanent Supportive Housing) over a one-year grant cycle.

- To create a transition grant, the CoC must wholly eliminate one or more projects and use those funds to create the single, new transition grant.

- The applicant must have the consent of the CoC, as indicated by:
    - The project application identifying the project as a transition project, and
    - The CoC ranking the new transition grant project on the New Project Listing in the FY 2021 CoC Priority Listing.

Consolidation Projects

- ****REVISED IN 2021**** Applicants may consolidate up to ten renewal projects into one project during the application process.

- This means that a CoC Program recipient does not have to wait for a grant agreement amendment to be executed to consolidate two or more grants before it can apply for a single consolidated project in the CoC Program Competition.

- The projects being combined during a grant consolidation will continue uninterrupted.

- To be eligible for consolidation, projects must have the same recipient and be for the same component; and they will be funded in this competition only with FY 2021 funds (meaning no funds recaptured from prior years will be awarded to the project).

- A transitional housing and a permanent housing project cannot consolidate to form a Joint TH and PH-RRH component project. Transition grants cannot consolidate with any other project.

Expansion Projects

- HUD will allow project applicants to apply for a new expansion project under the DV Bonus, reallocation, and CoC bonus processes to expand existing projects by adding units, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-Coordinated Entry projects within the CoC geographic area.

- ****REVISED in 2021**** To request an expansion for a current CoC-Program-funded project, applicants will be required to submit two project applications:
    1. The renewal project application that will be expanded; and
    2. A new project application with just the expansion information.

- For the new expansion project to be selected for a conditional award the renewal project application must also be selected for conditional award.

Eligible Types of New Projects Created Through Bonus or Reallocated Funding

- **Permanent Housing-Permanent Supportive Housing** projects for chronically homeless at program entry or who meet the definition of DedicatedPLUS as described in Section III.B.2.g of

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the NOFO (in which case all units funded by the project must be used to serve program participants who meet the qualifications for DedicatedPLUS).

- **Permanent Housing-Rapid Rehousing** projects for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 (and paragraph (3) if the CoC is approved to serve this population).

- **Joint Transitional Housing and Rapid Rehousing** component projects for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 (and paragraph (3) if the CoC is approved to serve this population).

- **Dedicated HMIS** project for the costs at 24 CFR 578.37(a)(2) that can 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.

- **Supportive services Only projects for Coordinated Entry** project to develop or operate a centralized or coordinated assessment system.

Eligible Types of New Projects Created Through Domestic Violence (DV) Bonus

- Through this NOFO, up to $102 million is available nationally for DV Bonus projects, which are dedicated to survivors of domestic violence, dating violence, and/or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3.

- A CoC may apply the following types of projects:

  o **Rapid Rehousing** that adopts a housing first approach and is dedicated to serving survivors of domestic violence, dating violence, and/or stalking;

  o **Joint Transitional Housing and Rapid Rehousing** that adopts a housing first approach and is dedicated to serving survivors of domestic violence, dating violence, and/or stalking; and

  o **Supportive Services Only projects for Coordinated Entry** 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, and/or stalking (e.g., to implement policies and procedures that are trauma-informed, client- centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different).

- **Number of Applications.** A CoC may apply for any number of PH-RRH and Joint TH and PH-RRH projects provided that each application is for at least $50,000. A CoC can only submit one project application for an SSO-CE project.

- **Expansion Projects.** A CoC may apply to expand an existing renewal project, including one that was previously funded with DV Bonus funding. DV Bonus funding may be used to expand an existing renewal project that is not dedicated to serving survivors of domestic violence, dating violence, and/or stalking so long as the DV Bonus funds for expansion are solely for additional units, beds, or services dedicated to persons eligible to be served with DV Bonus funding.

- ****REVISED in 2021** Project Quality Threshold for DV Bonus.** To be eligible to receive a DV Bonus project for PH-RRH or Joint TH and PH-RRH, a CoC must demonstrate it ranks projects based on how they improve system performance as outlined in Section VII.B.2.b of the NOFO. Additionally, to be eligible to receive a DV Bonus project for PH-RRH or Joint TH and PH-RRH component, all projects funded through the DV Bonus must adopt a housing first approach.

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- **Ranking.** CoCs are required to rank all DV Bonus projects on the New Project Listing of the CoC Priority Listing with a unique rank number and the corresponding renewal project application must be on the Renewal Project Listing with a unique rank number. 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.

- **Scoring.** For new projects the CoC indicates it would like considered as part of the DV Bonus, HUD will award a point value to each project application combining both the CoC Application score and responses to the domestic violence bonus specific questions in the CoC Application using the following 100-point scale:

  - ****REVISED in 2021**** For Rapid Rehousing and Joint Transitional Housing and Rapid Rehousing component projects:

    - *CoC Score.* Up to 50 points in direct proportion to the score received on the CoC Application.

    - *Need for the Project.* Up to 25 points based on the extent the CoC quantifies the need for the project in its portfolio, the extent of the need, and how the project will fill that gap.

    - *Quality of the Project Applicant.* Up to 25 points based on the previous performance of the applicant in serving survivors of domestic violence, dating violence, and/or stalking and their ability to house survivors and meet safety outcomes. Additionally, Rapid Rehousing and Joint TH and PH-RRH component projects must follow a housing first approach.

  - For Supportive Services Only Projects for Coordinated Entry:

    - *CoC Score.* Up to 50 points in direct proportion to the score received on the CoC Application.

    - *Need for the Project.* Up to 50 points based on the extent to which the CoC demonstrates the need for a Coordinated Entry system that better meets the needs of survivors of domestic violence, dating violence, sexual assault, and/or stalking and how the project will fill this need.

Important Points for Renewal Projects

- To be eligible for renewal in FY 2021, a project must have an executed grant agreement by December 31, 2021 and have an expiration date in Calendar Year (CY) 2022 (between January 1, 2022, and December 31, 2022).

- **Grant Term.** All CoC Program renewal project applications are limited to a one-year grant term and one year of funding. The grant term may be extended consistent with 2 CFR 200.308 and 2 CFR 200.309.

- ****REVISED in 2021** Project Quality Threshold.** Any project requesting renewal funding will be considered as having met the project quality threshold requirements through its previously approved grant application unless information to the contrary is received (e.g., monitoring findings, results from investigations by HUD's Office of Inspector General, the recipient routinely does not draw down funds from eLOCCS at least once per quarter, consistently late APR submissions) and/or if the renewal project has compliance issues which results in the project not operating in accordance with the Rule.

- **Eligible Program Participants**

- o **PH-PSH projects** must serve one of the following:

    - Program participants who are eligible for assistance under the project's current grant agreement;

    - Persons eligible to be served by DedicatedPLUS projects as described in Section III.B.2.g of the NOFO where all units funded by this project must be used to serve program participants who meet the qualifications for DedicatedPLUS; or

    - Persons experiencing chronic homelessness at the time they initially enrolled in the project.

- o **PH-RRH, Joint TH and PH-RRH component, TH, and SSO projects** may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3. Additionally, these projects may serve persons who qualify as homeless under paragraph (3) of 24 CFR 578.3 if the CoC is approved to serve persons in paragraph (3).

- o Renewal projects originally awarded under a previous year's **DV Bonus** must continue to serve survivors of domestic violence, dating violence, sexual assault, and/or stalking.

Important Points for All Project Applicants

- **Youth.** Youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under the NOFO. Any youth-serving provider (a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under) funded under the NOFO may serve unaccompanied youth aged 24 and under or families headed by youth aged 24 and under who have an unsafe primary nighttime residence and no safe alternative to that residence. These youth-related requirements supersede any conflicting requirements under the NOFO or the CoC Program Interim Rule.

- **DUNS/SAM Registration.** All project applicants must have a Dun & Bradstreet Data Universal Number System (DUNS) number and an active System for Award Management (SAM) registration, and the process can take up to four weeks to complete.

- **Code of Conduct.** All project applicants must ensure their organization has a Code of Conduct that complies with the requirements of 2 CFR part 200 and is on file with HUD. Be sure to review the Code of Conduct for HUD Grant Programs page on HUD's website to ensure your organization is listed (which means you have submitted an approved Code of Conduct. If you do not see your organization on the list, be sure to attach a current and complete Code of Conduct to your Project Applicant Profile in *e-snaps*.

- **2022 FMRs Will Apply.** Because the application submission deadline falls in FY 2022, HUD will use FY 2022 FMRs for funding amounts.

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Community-Level Changes and Reminders

- ****NEW in 2021** Indian Tribes and Tribally Designated Housing Entities (TDHE).** Tribes and TDHEs are eligible to apply for projects through existing CoCs. Projects sited on trust land or reservations may be eligible if applicants obtain a certification that the projects are consistent with an approved Consolidated Plan. If a Collaborative Applicant is submitting an application for a project sited on trust land or reservations, they should follow the steps described in I.G. of the NOFO to update their CoC Geographic Area. Additionally, applicants that propose to claim a reservation or trust land geographic area and to locate a project on a reservation or trust land must include a tribal resolution from the tribe authorizing the applicant to do so. Tribes do not need to include a tribal resolution to claim their own reservation or trust land or to site a project on their own reservation or trust land. A tribal resolution is the formal manner in which the tribal government expresses its legislative will in accordance with its organic documents. In the absence of such organic documents, a written expression adopted pursuant to tribal practices will be acceptable.

- ****NEW in 2021** Leveraging Housing Resources.** CoCs may receive up to 5 bonus points on the CoC Application if the CoC Priority Listing includes at least one new permanent supportive housing or rapid rehousing project application created through reallocation or the CoC Bonus that utilizes housing subsidies or subsidized housing units funded through sources other than the CoC or ESG programs. The full 5 points will be awarded if at least 25 percent of the units (PSH) or participants (RRH) will be supported with non-CoC funded housing. CoCs must attach letters of commitment, contracts, or other formal written documents that demonstrate the number of subsidies or units being provided to support the project. See Section VII.B.6.a of the NOFO for additional details.

- ****NEW in 2021** Leveraging Healthcare Resources.** CoCs may receive up to 5 bonus points on the CoC Application if the CoC Priority Listing at least one new permanent supportive housing or rapid rehousing project application created through reallocation or the CoC Bonus that leverages healthcare resources to support program participants. This must be documented with a written commitment from a health care organization to provide substance use treatment or recovery services to all interested program participants who qualify or to provide services equal in value to 25 percent of the funding being requested by the project. See Section VII.B.6.b of the NOFO for additional details.

- ****REVISED in 2021** Racial Disparities.** Promote equity throughout the CoC's homeless response system for Black, Indigenous, Hispanic (non-white), and LGBTQ persons who are disproportionally more likely to experience homelessness than their white, straight, and cisgender counterparts. Efforts to prevent and end homelessness must appropriately address any racial inequities to achieve positive outcomes for all persons experiencing homelessness (e.g., receiving necessary services and housing to exit homelessness).

- ****REVISED in 2021** Administrative, National and Department Policy Requirements for HUD recipients.** For this NOFO, the following Administrative, National and Department Policy Requirements and Terms for HUD Financial Assistance Awards apply:
  - Compliance with Non-discrimination and Related Requirements:
    - Compliance with Fair Housing and Civil Rights Laws, Which Encompass the Fair Housing Act and Related Authorities (cf. 24 CFR 5.105(a)).
    - See 24 CFR 578.93(c) for specific Affirmatively Furthering Fair Housing requirements that apply to the CoC program.
    - Economic Opportunities for Low-and Very Low-income Persons (Section 3).
    - Improving Access to Services for Persons with Limited English Proficiency (LEP).
    - Accessible Technology.

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- o Equal Access to Housing Regardless of Sexual Orientation or Gender Identity Requirements
- o Ensuring the Participation of Small Disadvantaged Business, and Women-Owned Business
- o Equal Participation of Faith-Based Organizations in HUD Programs and Activities
- o Uniform Relocation Act – Real Property Acquisition and Relocation Requirements
- o Participation in HUD-Sponsored Program Evaluation
- o Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- o Drug-Free Workplace
- o Safeguarding Resident/Client Files
- o Compliance with the Federal Funding Accountability and Transparency Act of 2006 (Pub. L.109-282) (Transparency Act), as amended
- o Accessibility for Persons with Disabilities
- o Violence Against Women Act
- o Conducting Business in Accordance with Ethical Standards/Code of Conduct
- o Environmental Requirements, which include compliance with environmental justice requirements under Executive Order 12898

- **Reallocation.** CoCs may only reallocate eligible renewal projects that have previously been renewed under the CoC Program.

- **Homelessness and Human Trafficking.** HUD is clarifying that persons who are fleeing or attempting to flee human trafficking may qualify as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3; and, therefore, the individuals may be eligible for certain forms of homeless assistance under the CoC Program, subject to other restrictions that may apply. HUD considers human trafficking, including sex trafficking, to be "other dangerous or life-threatening conditions that relate to violence against the individual or family member" under paragraph (4) of the definition of homeless at 24 CFR 578.3.

- **Compliance with Violence Against Women Act (VAWA) Rule. VAWA** provides various protections to victims of domestic violence, dating violence, sexual assault, and stalking under the CoC Program and other HUD programs. The grants to be awarded under the NOFO must comply with the VAWA rule as provided in 24 CFR 578.99(j). Among other obligations to comply, each CoC must have an established emergency transfer plan (24 CFR 578.7(d)) and make related updates to the written standards for administering CoC program assistance under 24 CFR 578.7(a)(9)(ii), (iii) and (v).

Resources

- 2021 CoC NOFO Competition Page: https://www.hudexchange.info/programs/e-snaps/fy-2021-coc-program-nofa-coc-program-competition/
- 2021 CoC NOFO: https://www.grants.gov/web/grants/search-grants.html?keywords=hud%20coc%20nofo
- CoC Program Interim Rule (24 CFR part 578): https://www.govinfo.gov/content/pkg/CFR-2018-title24-vol3/xml/CFR-2018-title24-vol3-part578.xml
- Application Pages
  - o Access E-snaps Application System: https://esnaps.hud.gov

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- o E-snaps Information: https://www.hudexchange.info/programs/e-snaps/
- o Code of Conduct for HUD Grant Programs: https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants
- o Dun & Bradstreet Data Universal Number System (DUNS): http://dnb.com/duns-number.html
- o System for Award Management (SAM): https://www.sam.gov/SAM

- Miscellaneous HUD Websites
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  - o Training and Resources: www.hudexchange.info/homelessness-assistance/
  - o Subscribe to HUD Listserv: www.hudexchange.info/mailinglist
  - o Ask A Question (AAQ) Portal: https://www.hudexchange.info/program-support/my-question/