

GRANT CYCLE – APPLICATION, AWARD, & AGREEMENT

RESOURCES

CONSULT THE CoC RULE

Interim Rule Subpart C

– Application and Grant Award Process

– 578.15–35:

<https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml#seqnum578>

CoC Program Grants

Administration User Guide:

<https://www.hudexchange.info/resource/2946/coc-program-grants-administration-user-guide/>

This resource is prepared by technical assistance providers and intended only to provide guidance. The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

SUMMARY

A projected assisted with CoC Program funds has three stages prior to implementation, with different requirements at each stage. Those stages are: Application, Conditional Award, and Grant Agreement.

GRANT APPLICATION

HUD publishes an annual CoC Program Notice of Funding Availability (NOFA) that starts the competitive process through which CoCs and their applicants secure project funds.

Eligible applicants may be nonprofit organizations, state or local governments, or their instrumentalities; for-profit entities are not eligible as applicants or as subrecipients. Applications are submitted through the local CoC, which will have its own procedures and criteria for accepting, scoring, and ranking new and renewal project applications. [See sidebar for links to past CoC program competition NOFAs](#); contact the local CoC for application timeline and details.

- **Important:** The application becomes part of the grant agreement. It details the recipient, the program component, the numbers/populations to be served, number and size of units, the budget line items and amounts, and match. Changing these later will require a grant amendment.

CONDITIONAL AWARD

Following the annual CoC program competition, HUD publishes the conditionally selected awards for each CoC. Applicants must meet all basic threshold requirements for their project type and must satisfy the following requirements:

- Establish site control (new projects only);
- Provide proof of match;
- Comply with environmental review; and
- Document financial feasibility within deadlines.

Applicants must satisfy these requirements within 12 months of the award announcement, or within 24 months in cases of new projects, to receive funds for acquisition, rehabilitation, or new construction. HUD may extend the 12-month deadline for new projects if the applicant can provide compelling reasons for the delay due to factors beyond their control. HUD may also impose conditions (for example, requests for supporting documentation, budget revisions, or project activity modifications) to ensure compliance. HUD will withdraw an award if the applicant doesn't satisfy all HUD conditions.

Site control: An executed deed or lease is evidence that the project sites are secured, and that recipients or subrecipients may operate in given locations. If CoC Program funds are to be used for acquisition, a signed purchase agreement is acceptable. Evidence should name the parties entering into the agreement, including the applicant or intended subrecipient

as defined in the CoC project application. As of the HUD award date, projects must complete site control as follows:

- Operating and/or supportive services funding – within 12 months
- Acquisition, new construction, and/or rehabilitation – within 24 months

The above site control requirements do not apply to housing that will eventually be owned or controlled by participants served, or supportive services to be provided in buildings not owned or operated by the recipient or subrecipient.

Match: [See Match At a Glance for details](#) on documentation.

Environmental review: An environmental review must be conducted for all projects for which CoC funds are being requested before funds (including non-HUD funds) are committed to the project.

GRANT AGREEMENT EXECUTION

The grant agreement, which includes the project application, is a legally binding document that establishes the rights and responsibilities of the recipient and HUD. **Recipients must read the project's grant agreement in its entirety each year** as their responsibilities may change from year-to-year even for renewal projects.

The recipient is responsible for ensuring that the grant agreement is executed with HUD and that the terms of the agreement are carried out. Both parties (the recipient and HUD) must execute the grant agreement by signing it no later than 45 days from the date on which all conditions are satisfied.

RECIPIENT RESPONSIBILITIES

GOVERNANCE

- Operate within the provisions of all applicable regulations, including but not limited to the CoC Program Interim Rule and NOFA
- Establish adequate fiscal control and accounting procedures in accordance with generally accepted accounting principles
- Establish policies and practices to support the educational and developmental needs of children in the program in accordance with subtitle B of title VII of the Act
- Place families with children as close as is practical to their school of origin so the children's education is not disrupted. Document barriers to this practice, if they exist, in the participant and project file
- Certify the recipient, the subrecipient(s), and partners are not debarred or suspended from doing business with the federal government
- Follow written standards developed by the CoC as they relate to program operations

OPERATIONS

- Secure match, document expenditures, and report match activity. See [Match At a Glance](#)
- Provide data, reports, and updates on project progress and participate in HMIS designated by the CoC as required by HUD
- Involve homeless individuals and families in as many aspects of project implementation as practical. See [At a Glance for Homeless Eligibility](#)
- Maintain confidentiality of records for individuals and families provided with domestic violence prevention or treatment
- Maintain confidentiality of domestic violence project locations
- Participate in the CoC's coordinated entry system

SUBRECIPIENT MANAGEMENT

- Execute subrecipient agreements that specify delegation of CoC Program duties and provide open access to all grant-related information, including participant and financial records (if applicable)
- Agree to monitor subrecipients at least annually (if applicable). See [Monitoring At a Glance](#).