

Homeless Assistance Grants Discussion

William Snow, HUD Office of Special Needs Assistance Programs

Thursday, September 29, 2022

NOFO Updates

- 2021 YHDP – Competition closed with anticipated announcement by the end of this year
- 2022 CoC Program – Competition closes tomorrow! Trying to announce by the end of this year but it may be early next year
- Special NOFO – Closes October 20, 2022 and trying to announce by the end of this year but it may be early next year
- And we'll do it all again next year (but not the Special NOFO)
- Timing of award and availability of funds is different

Annual Performance Reports

- Annual Performance Reports (APRs): Due 90 days after the grant expiration date. If they are not submitted for every single grant the recipient runs the risk of penalties or losing funding.
- We have several recipients that have not submitted an APR ever. That is a problem and a risk for you.
- Before submitting your APR look at LOCCS and verify it is all correct. Be prepared to respond to things that look off. What to look for:
 - Do LOCCS and the expenditures match?
 - Is your match recorded properly?
 - What does your utilization rate tell us?
 - What does your prior living situation flag about client eligibility?
- Be prepared to comment on anything that may appear off in the “Additional Comments” screen in Sage.

Expenditures and LOCCS

- LOCCS draws: The regulatory requirement is every 90 days (or quarterly). We have many recipients not doing that. If you do not make timely draws you run the risk of losing access to the funds.
- Expenditure report: This is a quarterly report sent to CoCs that reflects spending to date. The biggest thing to be aware of is flags on returned funding or flags on grants that are not likely to spend all of their funds.
 - This report flags helps CoCs see which grants to consider for technical assistance or reallocation
 - Goal – keep the money in the CoC but that means be smart about spending it
 - A sustained history of not spending down on a grant will create a flag

Expenditure Report

A		B		C		D		E		F		G		H		I		J		K		L		M		N	
CoC Number:				CA-600				CoC Name:				Los Angeles City & County CoC								Date:		6/30/2022					
CoC Competition Year	Grant Number (esnaps & LOCCS)	Project PIN	Recipient Name (LOCCS)	Project Name (esnaps)	Component (esnaps)	Project Subtype (esnaps)	Term (Months) (LOCCS)	Operating Start Date (LOCCS)	Expiration Date (LOCCS)	Total Original Contracted (LOCCS)	Total Current Contracted (LOCCS)	Total Balance (LOCCS)	Tech Change or Recaptured Total														
							12	4/1/2017	3/31/2018	\$442,157.00	\$326,617.00	\$0.00	(\$115,540.00)														
							12	4/1/2018	3/31/2019	\$391,721.00	\$330,142.04	\$0.00	(\$61,578.96)														
							12	1/1/2018	12/31/2018	\$1,230,803.00	\$904,966.20	\$0.00	(\$325,836.80)														
							12	1/1/2019	12/31/2019	\$1,276,595.00	\$1,276,595.00	\$117,173.27	\$0.00														
							12	1/1/2020	12/31/2020	\$1,701,486.00	\$1,701,486.00	\$126,299.90	\$0.00														
							12	1/1/2021	12/31/2021	\$1,828,542.00	\$1,828,542.00	\$224,013.28	\$0.00														
							12	1/1/2022	12/31/2022	\$2,077,158.00	\$2,077,158.00	\$1,706,498.36	\$0.00														
							12	6/1/2017	5/31/2018	\$407,620.00	\$407,620.00	\$0.00	\$0.00														
							12	6/1/2018	5/31/2019	\$407,620.00	\$407,620.00	\$0.00	\$0.00														
							12	6/1/2019	5/31/2020	\$407,620.00	\$407,620.00	\$0.00	\$0.00														
							12	6/1/2020	5/31/2021	\$407,620.00	\$407,620.00	\$0.00	\$0.00														
							18	6/1/2021	11/30/2022	\$407,620.00	\$407,620.00	\$317,364.00	\$0.00														
							12	1/1/2018	12/31/2018	\$188,099.00	\$179,847.91	\$0.00	(\$8,251.09)														
							12	1/1/2019	12/31/2019	\$195,167.00	\$195,167.00	\$13,158.05	\$0.00														
							12	8/1/2017	7/31/2018	\$68,288.00	\$42,488.20	\$0.00	(\$25,799.80)														
							12	8/1/2018	7/31/2019	\$70,832.00	\$48,904.21	\$0.00	(\$21,927.79)														
							12	8/1/2019	7/31/2020	\$76,160.00	\$76,160.00	\$31,758.55	\$0.00														
							17	8/1/2020	12/31/2021	\$91,718.00	\$91,718.00	\$15,598.90	\$0.00														

For each grant, we can see the grant expiration date, the current balance, and recaptures (for old grants)

Spending Funds Wisely

- If you are returning a sizeable amount of your grant you should be evaluating what is driving that?
 - Has something changed in the way those you serve access services (it may increase or decrease service needs)?
 - Are you fully leasing your rental assistance vouchers?
 - If units are hard to find (and they are!) how is your grant structured to support people to access the units?
 - What are your CoC and provider partners doing to address similar issues?

PIT Count

- We plan to release the 2022 PIT count results by the end of this year
- We are working on updates to the 2023 HIC/PIT Count Notice
 - Only change (at this point) will be to expand ages that we collect on
- Is the 2023 count going to be required?
 - CoCs must conduct a full – sheltered and unsheltered – count at least every other year
 - If you conducted a full count in 2022 you will not be required to count in 2023
 - We strongly encourage you to conduct a full count but we respect the resource constraints

Updates to Race, Ethnicity, and Gender Data Elements

- HUD is working with federal partners to update the HMIS Data Standards
- Opportunity:
 - We have worked with stakeholder teams to identify changes to the race, ethnicity, and gender data elements
 - We will be sending the recommended updates to communities for feedback before officially finalizing them
 - This is an opportunity to work with people with lived homeless experience with diverse backgrounds to help them feel more welcome

CoC Program Grant Life Cycle

- Registration
- Grant Inventory Worksheet (GIW)
- CoC Program Competition
- Post Award
- Grant Implementation
- Closeout Process
- Other Issues to Consider

Registration

What is it?

- It is the process where CoCs
 - State their intent to participate in the CoC Program Competition
 - State their geography, which also establishes the CoC's Preliminary Pro Rata Need (PPRN) and confirms any mergers/splits that occurred after the last competition
 - Identify if they want to be a collaborative applicant or Unified Funding Agency (UFA) or High Performing Community (HPC)
- SNAPS publishes a Registration Notice stating how to complete the Registration – process has been “automated” as of 2019
 - Opens 2nd Tuesday of January and closes 1st Thursday of March each year
- CoCs submit any changes in *e-snaps*

Major actors

- **HUD SNAPS** – releases registration materials and opens *e-snaps* and reviews geographies, UFA, and HPC requests
- **CoC** – completes registration (if no changes, CoC can leave it alone)

Grant Inventory Worksheet (GIW)

What is it?

- It is the process where CoCs
 - Confirm what projects are eligible for the upcoming competition and for how much
 - Establish their Annual Renewal Demand (ARD), which is based on the sum of the amounts each eligible project can apply for
- The core purpose is to know the universe of projects and to finalize the Final Pro Rata Need (FPRN) for CoCs

Major actors

- **HUD SNAPS** – review past projects and get the GIW as complete as possible when published on the website
- **CoC** – review projects to ensure all are on the GIW
- **Project Recipient** – verify all projects with the correct budgets are present and work with the CoC process to make any corrections
- **HUD Field Office** – review any change requests and send to SNAPS

CoC Program Competition

What is it?

- It is the process where CoCs and Project Applicants apply for CoC Program funding
- There are several elements to the CoC Program Competition that will be covered in the next slides
- Timing: ideally issued in late Spring, with due date no later than September 30 (CoCs set their project application due dates)
- CoC and Project Applicants submit using *e-snaps*

Major actors

- **HUD SNAPS** – prepares and releases all application materials and reviews applications
- **CoC** – run local competition, review project application, and prepares and submits CoC application
- **Project Recipient** – participation in local competition and submits project applications

CoC Program Competition: NOFO

SNAPS announces the CoC Program Competition through a **Notice of Funding Opportunity (NOFO)**

- The NOFO outlines
 - HUD's Policy priorities
 - Project eligibility requirements
 - Application process
 - Selection and award process

The NOFO relies heavily on the CoC Program Interim Rule and adds additional competitive criteria each competition beyond the statutory and regulatory requirements

CoC Program Competition: Application Process

There are 3 core elements of the CoC Consolidated Application

- **CoC Application** – the CoC reports its progress in meeting HUD's priorities
- **Project Application** – the project applicant states its eligibility and what it intends to do with the funding
 - Renewal projects and new projects are treated different in the statute and regulation and there are different requirements for them in the NOFO
- **CoC Priority Listing** – the CoC ranks each of its eligible projects and reports to HUD which projects it intends to apply for in the Competition

CoC Program Competition: Selection and Award

- SNAPS reviews every application according to the standards stated in the NOFA and CoC Program Interim Rule
 - CoC Applications – each CoC Application is reviewed and scored
 - Renewal Project Applications – each renewal project application is reviewed based on eligibility
 - New Project Applications – each new project application is reviewed for eligibility and scored
- In the past few years, SNAPS has used tiering to do awards
 - Tiering is a way for CoCs to rank their projects based on local priorities
 - SNAPS funds all eligible projects in Tier 1
 - SNAPS funds all eligible projects in Tier 2 based on their score and the amount of money HUD has
 - HUD announces the awards through a press release (usually Dec or Jan)
- There are a few reasons projects won't get funded
 - The CoC decided to not fund them during the local rating and ranking process
 - HUD determines the project is ineligible during its review process
 - There are insufficient funds to award a project

Post Award

What is it?

- The process where
 - The Field Office communicates issues and conditions to the conditionally awarded grant recipients
 - The grant recipients resolve any issues and conditions
 - The Field Office and grant recipients execute the grant
- Grant recipients submit using *e-snaps*

Major actors

- **HUD SNAPS** – process funding amounts and develop documents for grant agreement execution
- **HUD Field Office** – work with recipients to resolve issues/conditions, execute grant agreement, spread funding in LOCCS
- **Project Recipient** – work with HUD Field Office to resolve issues/conditions and execute grant agreement

Grant Implementation

What is it?

- The process where the grant recipients execute the grant
- If the recipient desires to change the grant, the recipient works with the Field Office to determine if a change is allowable and proceeds accordingly
 - Some changes require a formal grant agreement amendment
 - Other changes require interaction with the Field Office but do not require the recipient to execute a formal grant agreement amendment
- Grant agreement amendments done through *e-snaps (timing)*

Major actors

- **Project Recipient** – implement grant, including documenting eligibility of people served and activities taken, and regular draws
- **HUD Field Office** – work with recipient to address questions and process grant amendments as needed and monitor on occasion
- **CoC** – monitor project recipients

Grant Closeout

What is it?

- The process where the Project Recipients indicate they have completed their obligations under the grant agreement
- Recipient need to
 - Complete their final draws in LOCCS
 - Submit their Annual Performance Report (APR) to HUD via *e-snaps*
 - Submit closeout documentation, including the closeout certification

Major actors

- **Project Recipient** – complete draws and APR
- **HUD Field Office** – complete closeout certification, review APR, resolve any outstanding issues like unresolved monitoring findings and closeout grant
- **HUD SNAPS** – recapture outstanding funding

Other Issues to Remember

There are many requirements of both CoCs and Project Recipients outside of the CoC Program Competition

Some common issues that often come up in Technical Assistance (TA) engagements include

- CoC Governance
- Written standards
- HMIS implementation
- System change

Questions?