



Connecticut Balance of State Continuum of Care

Ending Homelessness in Connecticut | Email: ctboscoc@gmail.com | Website: www.ctbos.org

INSTRUCTIONS

2021 REQUEST FOR RRH & JOINT TH/RRH PROPOSALS FUNDED THROUGH DV BONUS

BACKGROUND

The Connecticut Balance of State Continuum of Care (CT BOS)¹ is seeking applications for new projects for inclusion in the CoC's 2021 application for HUD Domestic Violence Bonus funds. In light of the COVID-19 crisis, CT BOS has simplified this application to reduce its burden on applicant organizations. The deadline for submission of applications is **September 16, 2021**.

Each year CT BOS competes with other Continuums across the country to secure federal funds to end homelessness through the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care (CoC) program. This year, \$2,437,043 is available to CT BOS for the DV Bonus.

The CT BOS CoC is seeking DV Bonus applications for projects dedicated to serve survivors of domestic violence, dating violence, sexual assault, stalking, and other dangerous situations for inclusion in the CoC's 2021 application for HUD CoC funds. More information about the types of projects eligible to apply appears below.

CT BOS will convene a committee to review and score applications that are submitted in response to this RFP. The scoring sheet that will be used by reviewers is posted at <https://www.ctbos.org/hud-coc-application/> the week of 9/6/21. CT BOS uses those scores to determine which DV Bonus applications will be submitted to HUD. HUD makes final decisions regarding which applications are funded. DV bonus projects compete with other projects seeking DV Bonus funding nationally.

CT BOS encourages applications from applicants that have never previously received CoC funds as well as from applicants that are currently receiving or have in the past received CoC funds. CT BOS provides technical assistance to ensure that the process is accessible to all eligible applicants, including those who have not received CoC funds in the past.

Please note:

1. This document contains important background and instructions. All applicants are required to read and follow these instructions.
2. This document does not include the actual application form. All applications must be submitted in Zengine, CT BOS's web-based application system. Instructions for accessing the application in Zengine are included below.
3. These instructions and the 2021 CT BOS DV Bonus Application available in Zengine are based on the best information that is currently available, and CT BOS may need to revise the requirements described herein and/or request additional information based on additional guidance received

¹ For more information about CT BOS please see "An Introduction to the CT BOS Continuum of Care" available [here](#).

from HUD and/or decisions made by CT BOS Steering Committee².

4. CT BOS will disseminate all information about this funding opportunity as it becomes available through the CoC's email listserv. **To ensure that you receive the latest information please subscribe to the CT BOS mailing list by visiting: <http://www.ctbos.org>**

² The CT BOS is led by a Steering Committee comprised of representatives of a variety of government agencies, provider coalitions, advocates and people who have experienced homelessness. For more information about CT BOS, please visit <https://www.ctbos.org/>.

INSTRUCTIONS

This document contains instructions for the 2021 application for CT Balance of State Continuum of Care (CT BOS) DV Bonus funds, including Rapid Re-housing (RRH), and Joint Transitional Housing/Rapid Re-housing (Joint TH/RRH) funds

CT BOS is seeking applications for the following DV Bonus project types:

- **New Rapid Rehousing (RRH)** projects that will serve homeless individuals and/or families, including youth, who meet the criteria defined below. DOH will serve as the applicant and, if awarded, the grantee for this project type. Selected non-profit agencies responding to this RFP would serve as a subrecipient on any ultimate award.
- **New Joint Transitional Housing – Rapid Rehousing Projects (Joint TH/RRH).** CT BOS will only consider Joint TH/RRH project applications from existing CoC funded TH projects to increase exit options for CoC TH participants, reduce the length of stay in CoC TH projects, and/or address inadequate budgets in existing CoC TH projects. Participants must meet the criteria of paragraph 4 of the HUD Homeless Definition (See Appendix). Existing CoC TH projects wishing to convert to Joint TH/RRH and apply for new funds should submit a new Joint TH/RRH application through this RFP. Such applicants should complete the expansion section of the application.
- All projects funded through this RFP may serve only individuals and/or families, including unaccompanied youth, who qualify under the domestic violence criteria in paragraph (4) of the HUD definition of homelessness, including survivors of domestic violence, dating violence, sexual assault, stalking and other dangerous situations (see Appendix and Eligible Population section for more information).
- To be eligible for funding, projects must commit to using the Housing First model (see Appendix).

CT BOS will consider only one application from each applicant organization for the same component type per Coordinated Access Network (CAN)³. For example, an applicant may not submit two RRH applications both located in the Greater Hartford CAN. Applicants may, however, for example, submit an RRH and a Joint TH/RRH application both located in the Greater Hartford CAN. Applicants are not required to receive approval from their CAN(s) prior to submitting an application to CT BOS.

Existing CT BOS RRH DV Bonus renewal projects can be expanded using DV Bonus funds. Other non-DV Bonus CT BOS renewal projects, regardless of whether or not the existing project is designated to serve DV survivors, can also be expanded using DV Bonus funds; however, all DV Bonus funds must be used exclusively to serve eligible Category 4 participants as described in these instructions.

Applicants with an existing CT BOS renewal project may respond to this RFP for a new expansion project to:

- expand existing projects and increase the number of units in an existing CoC funded project;
- allow the recipient to serve additional persons in an existing CoC funded project; and/or

³ For more information on CANs, please see [“An Introduction to the CT BOS Continuum of Care”](#)

- expand services available to current eligible participants in a CoC funded project.

Projects may not apply for an expansion to replace other renewable funding sources.

Below is an explanation of which types of renewal projects can apply for which types of DV Bonus funded expansion:

Type of CT BOS Renewal Project	Applicable Type of DV Bonus Expansion
DV Bonus RRH	RRH
Regular (not DV Bonus) RRH	RRH
TH	Joint TH/RRH

All applicants with an existing CT BOS renewal project seeking funding to expand that project must complete the expansion section of the application. Applicants that do not currently have a CT BOS Renewal Project can apply ONLY for RRH funds and would not complete the expansion section of this application.

New projects to be included in the CT BOS 2021 CoC Application to HUD will be conditionally selected by an independent scoring committee and notified by CTBOS. Applicants will then be responsible for submitting the New Project Application(s) in e-Snaps. Final decisions regarding awards will be made and announced by HUD via the national CoC program competition.

The CoC reserves the right not to review late or incomplete applications or applications that do not meet the project requirements described in this RFP. The CoC also reserves the right not to review applications that do not meet HUD’s threshold eligibility criteria, see Threshold Requirements, Section V.C.3. starting on p.44 of the [FY2021 CoC NOFO](#).

All applications must be submitted in Zengine. THE DEADLINE FOR SUBMISSION OF APPLICATIONS IS September 16, 2021.

Accessing and Submitting the Application in Zengine

- **Instructions** for how to access and submit the application in Zengine are available here: https://www.ctbos.org/wp-content/uploads/2021/08/Provider-Instr-DV_Bonus-App-Profile-Submission.pdf.
- **Application Components** The application in Zengine is divided into 4 sections: the profile plus 3 sections in the new project application. Applicants must complete the applicable sections as follows:
 - **Applicant Profile** – Profile must be completed one time by all DV Bonus applicants; agencies applying for multiple DV Bonus projects must complete this section only once. Please note, even if agencies have already created an applicant profile in the previous CT BOS New Project Application process, they must create a new DV Bonus Applicant Profile.
 - **Application (s)** – Each applicant can submit one or more applications, as specified on page 4. For each application all of the following sections are required:
 - **Agency Information (Section #1)**
 - **RRH or TH/RRH (Section # 2)**
 - **Budget (Section #3)**

Steps to Proceed:

1. Read this document thoroughly to determine if the funding opportunity is a good fit for your organization

2. Create a Zengine DV Profile
3. Access the application in Zengine
4. Complete all relevant parts of the application for the project(s) you are submitting
5. Submit the application
6. If desired, print or save the application to PDF for your records
7. If you intend to submit additional applications, see the [instructions](#) for additional steps.

Project Requirements:

- Eligible localities:
 - Projects must be located within the CT BOS CoC regions of the State. This includes all the cities and towns in the following counties: Hartford, Litchfield, New Haven, New London, Windham, Tolland, and Middlesex.

- Eligible participant populations (See Appendix for definitions):
 - RRH: All projects must serve 100% families and/or single adults who qualify under the domestic violence criteria in category (4) of the HUD definition of homelessness, including survivors of domestic violence, dating violence, stalking or other dangerous situations.
 - Joint TH-RRH: All projects must serve 100% families and/or individuals who meet the criteria of the HUD homelessness definition under category (4), survivors of domestic violence, dating violence, stalking or other dangerous situations.

- Term – Projects may apply only for a one-year term.

- Eligible activities/projects for the funds:
 - All projects must be Rapid Re-Housing or Joint Transitional Housing/Rapid Re-housing
 - CT BOS will consider only one application from each applicant organization for the same component type per CAN. For example, an applicant may not submit two RRH applications both located in the Greater Hartford CAN.
 - Projects can request funds for⁴:
 - RRH: Rental assistance (tenant based only), supportive services, project administration. Note that DOH has opted not to apply for funds on the project admin budget line item. Subrecipients may claim indirect costs (see more information in the appendix).
 - Joint TH/RRH: TH Component: Operating, Leasing; RRH Component: Tenant-based Rental Assistance; Both Components: Supportive Services, Administrative Costs
 - HUD requires that the proposed project must provide enough rapid rehousing assistance to ensure that at any given time a program participant may move RRH or from transitional housing to RRH. This may be demonstrated by proposing a budget that has twice as many resources for the RRH portion of the project than the TH portion, by having twice as many RRH units at a point in time as TH units, or by demonstrating that the budget and units are appropriate for the population being served by the project.
 - When a participant is enrolled in a Joint TH-RRH component project, the project must be able to provide both components (i.e., TH and RRH). This does not mean that all program participants will receive assistance through both portions of the project. A participant may

⁴ See [CoC Program Interim Rule](#) for definitions of eligible costs

choose to receive only TH or only RRH assistance, but the project must make both types of assistance available to all participants and cannot require the participants first receive TH assistance prior to receiving RRH assistance.

- The RRH component of Joint TH/RRH Projects must follow [CT RRH Model Guidelines⁵](#), as amended by the CT BOS Steering Committee for DV Bonus RRH projects. CT BOS generally limits RRH assistance to 12 months, with an approval process for exceptions.
 - In all cases, participants should be moved as quickly as possible from TH to RRH or other permanent housing and receive the least amount of assistance necessary. HUD allows up to 24 months of Joint TH/RRH assistance in total, including any assistance provided through either the TH and/or the RRH component. Examples of allowable types and terms of assistance for a qualifying household are as follows, though as noted above approval for RRH assistance in excess of 12 months is required:
 - 3 months of TH and 21 months of RRH
 - 6 months of TH and 18 months of RRH
 - 12 months of TH and 12 months of RRH
 - 24 months of RRH
 - Projects cannot combine Rental Assistance and Operating types of assistance in a single structure or housing unit. Joint TH/RRH Projects may include Rental Assistance (RA) in both their TH and RRH component types, however, if RA is used in TH, Operating Costs may not also be used in TH. If Leasing is used in TH, Operating may also be used. The RRH component type must use RA for client rental expenses, and therefore Operating may not be used in the RRH portion of the Joint TH/RRH project.
 - Tenant-based Rental Assistance (TRA) follows the program participant. The participant locates qualified housing of their choice. If the participant moves, they can take the rental assistance to a new unit.
 - All units funded through this RFP must be newly created or newly designated to serve homeless people and ready for occupancy no later than 12 months after the award of funds. Awards are anticipated to occur in approximately December 2021.
 - Congregate projects must provide evidence demonstrating site control for a building or units and the evidence must document that the site control exceeds the requested grant term.
 - Unless the project has another source of funding for services, projects applying for RRH and Joint TH/RRH should include at least \$4,000 per household served at a point in time for supportive services, For example, if the project will support 20 households at a given point in time, the annual supportive services budget should be at least \$80,000.
 - RRH and Joint TH/RRH projects may not request more than \$7,500 per household annually for supportive services.
 - Projects must demonstrate that they meet HUD’s match requirements. Projects unable to meet this requirement will not be submitted to HUD for funding consideration. See Appendix for details.
- Additional information regarding Project Administrative and Indirect Costs⁶:
- CT BOS has established a maximum rate of 7% for project administrative costs **on RRH and Joint TH/RRH projects** (i.e., costs on the project administrative budget line item may not exceed 7% of the aggregated amount requested for all other budget line items.

⁵ Note approved [RRH DV Rent Payment Schedule](#)

⁶ See the appendix for more details on administrative and indirect costs.

For example, a project that requests \$500,000 annually for rental assistance and supportive services can request up to \$35,000 additional on the project administrative budget line item. Total CoC budget = \$535,000 in this example.

- For RRH projects, DOH has opted not to request funding on the project admin budget line item. Applicants may only request indirect costs (see additional information below).

- Project Admin costs do not include staff time and overhead directly related to carrying out CoC Program eligible activities, because those costs are eligible on the relevant budget line item, not on the project administrative costs line. For example, the cost of conducting Housing Quality Standards (HQS) inspections and determining rent reasonableness are eligible on the rental assistance line NOT the admin line. The costs of office supplies and supervision for case managers are eligible on the supportive service line NOT the admin line.
- Project Admin costs must be allocated only to the eligible activities as defined in the [CoC Program Interim Rule](#) (see appendix for more information on the project admin budget line item).
- Indirect costs are those that cannot be relatively easily and with a high degree of accuracy directly assigned to an eligible CoC activity, such as project admin, rental assistance, operating or supportive services. Rather, indirect costs are incurred for common or joint purposes benefitting multiple projects and cannot be readily associated with a particular CoC project. Salaries for IT staff who maintain the agency's network, or costs associated with payroll management are examples of common indirect costs (see appendix for more information on indirect costs). There is no separate budget line item for indirect costs in a CoC project. Indirect costs are budgeted on other budget line items (e.g., supportive services). For an up-to-date toolkit and additional guidance on indirect costs in the CoC program please see these resource: <https://files.hudexchange.info/resources/documents/Indirect-Cost-Toolkit-for-CoC-and-ESG-Programs.pdf>, and <https://www.ctbos.org/wp-content/uploads/2021/04/IDC-Guidance.pdf>

- **Eligible applicants:**

- Eligible project applicants for the CoC Program Competition are nonprofit organizations, States, local governments, and instrumentalities of State and local governments, public housing agencies, and Indian Tribes or tribally designated housing entities (TDHEs) as defined in section 4 of the [Native American Housing Assistance and Self-Determination Act of 1996 \(25 U.S.C. 4103\)](#).

- Applications shall only be considered from project applicants in good standing with HUD, which means that the applicant does not have any open monitoring or audit findings, history of slow expenditure of grant funds, outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon, or history of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

- CT BOS will only consider Joint TH/RRH project applications from existing CoC funded TH projects in order to increase exit options for CoC TH participants, reduce the length of stay in CoC TH projects, and/or address inadequate budgets in existing CoC TH projects.

- Other Requirements

- Projects must commit to using a Housing First Model (see Appendix).
- Projects, except victim service providers (see Appendix) as defined by HUD, must agree to enter client data into the CT HMIS. Excepted projects must enter data into a comparable database.
- Projects must agree to participate in the annual homeless point-in-time count (PIT Count).
- Project must agree to participate in the applicable Coordinated Access Network(s) (CAN) and accept referrals only from the Statewide by-name list. See additional guidance on this on p.23 of the [CT RRH Model Guidelines](#), and in the [CT Coordinated Access Network Policies and Procedures](#) with DV-specific information on pages 20 and 29.
- Projects must comply with all HUD requirements and CT BOS CoC Policies⁷.
- Applications must demonstrate:
 - A plan for **rapid implementation** of the program; the project narrative must document how the project will be ready to begin housing the first program participant within 12 months of the award (i.e., anticipated to be December 2022).
 - Experience in operating a successful **housing first** program and a program design that meets the definition of Housing First as adopted by the CT BOS CoC SC (see the CT BOS Housing First Principles in the Appendix).
 - A plan for helping participants to obtain and stabilize in permanent housing, increase income, and access mainstream resources.

IMPORTANT INFORMATION ABOUT MATCH REQUIREMENTS

- All DV Bonus projects conditionally selected for submission to HUD will be required to demonstrate that they meet HUD's match requirements prior to submission of the final project application to HUD. Projects unable to meet this requirement will not be submitted to HUD for funding consideration.

Match is actual cash or in-kind resources contributed to the grant. All costs paid for with matching funds must be for activities that are eligible under the CoC Program. All grant funds except leasing must be matched with an amount no less than 25% of the awarded grant amount (with cash and/or in-kind resources). Match resources may be from public or private resources. Because documentation requirements for in-kind match are significantly more onerous, CT BOS strongly encourages use of cash match whenever feasible. For more information about matching requirements see the appendix.

Applicants are responsible for reading and following all instructions contained in this document and in Zengine. Please contact ctboscoc@gmail.com for questions about the application form or process.

⁷ See, for example: [CoC Program Interim Rule](#); [Uniform Administrative Requirements, Cost Principles, & Audit Requirements for Federal Awards](#); [HUD CoC Program Notices](#); [CT BOS Policies](#); [CT CAN Policies](#), [CT RRH Model Guidelines](#); [Approved DV Rent Payment Schedule](#)

APPENDIX

DEFINITIONS OF KEY TERMS:

Category 4 – HUD Homeless Definition – Fleeing/Attempting to Flee DV, dating violence, sexual assault, stalking, or other dangerous conditions

Individual or family who:

- (i) Is fleeing, or attempting to flee, domestic violence; dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks to obtain other permanent housing.

Human Trafficking – HUD has clarified that persons who are fleeing or attempting to flee human trafficking may qualify as homeless under category (4) of the homeless definition at 24 CFR 578.3; 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 category (4) of the definition of homelessness at 24 CFR 578.3.

Victim Service Provider – a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Examples include rape crisis centers, battered women's shelters, domestic violence transitional housing programs and other programs.

CT BOS Housing First Principles

Housing First is a programmatic and systems approach that centers on providing homeless people with housing quickly and *then* providing services as needed using a low barrier approach that emphasizes community integration, stable tenancy, recovery and individual choice.

Low barrier approach to entry:

- Housing First offers individuals and families experiencing homelessness immediate access to housing without unnecessary prerequisites. For example:
 - a. Admission/tenant screening and selection practices do not require abstinence from substances, completion of or compliance with treatment, or participation in services.
 - b. Applicants are not rejected on the basis of poor or lack of credit or income, poor or lack of rental history, minor criminal convictions, or other factors that might indicate a lack of “housing readiness.”
 - c. Blanket exclusionary criteria based on more serious criminal convictions are not applied, though programs may consider such convictions on a case by case basis as necessary to ensure the safety of other residents and staff.
 - d. Generally, only those admission criteria that are required by funders are applied, though programs may also consider additional criteria on a case by case basis as necessary to ensure the safety of tenants and staff. Application of such additional criteria should be rare, and may include, for example, denial of an applicant who is a high risk registered sex offender by a

project serving children, or denial of an applicant who has a history of domestic violence involving a current participant.

Community integration and recovery:

- Housing is integrated into the community and tenants have ample opportunity and are supported to form connections outside of the project.
- Housing is located in neighborhoods that are accessible to community resources and services such as schools, libraries, houses of worship, grocery stores, laundromats, doctors, dentists, parks, and other recreation facilities.
- Efforts are made to make the housing look and feel similar to other types of housing in the community and to avoid distinguishing the housing as a program that serves people with special needs.
- Services are designed to help tenants build supportive relationships, engage in personally meaningful activities, and regain or develop new roles in their families and communities.
- Services are recovery-based and designed to help tenants gain control of their own lives, define their personal values, preferences, and visions for the future, establish meaningful individual short and long-term goals, and build hope that the things they want out of life are attainable. Services are focused on helping tenants achieve the things that are important to them and goals are not driven by staff priorities or selected from a pre-determined menu of options.

Lease compliance and housing retention

- Tenants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction. Visitors are expected to comply with requirements in the lease agreement.
- Leases do not include stipulations beyond those that are customary, legal, and enforceable under Connecticut law.
- No program rules beyond those that are customary, legal, and enforceable through a lease are applied (e.g., visitor policies should be equivalent to those in other types of permanent, lease-based housing in the community). Housing providers may ask for identification from visitors.
- Services are designed to identify and reduce risks to stable tenancy and to overall health and well-being.
- Retention in housing is contingent only on lease compliance and is not contingent on abstinence from substances or compliance with services, treatment or other clinical requirements. For example:
 - a. Tenants are not terminated involuntarily from housing for refusal to participate in services or for violating program rules that are not stipulated in the lease.
 - b. Transitional housing programs offer participants due process to resolve issues that may result in involuntary discharge (unless immediate risk to health and safety)
 - c. PH providers only terminate occupancy of housing in cases of noncompliance with the lease or failure of a tenant to carry out obligations under Connecticut's Landlord and Tenant Act (Chapter 830 of the Connecticut General Statute <http://www.cga.ct.gov/2011/pub/chap830.htm>).
 - d. In order to terminate housing, PH providers are required to use the legal court eviction process.

Separation of housing and services

- Projects are designed in such a manner that the roles of property management (e.g., housing application, rent collection, repairs, and eviction) and supportive services staff are clearly defined and distinct.
 - Property management and support service functions are provided either by separate legal entities or by staff members whose roles do not overlap.

- There are defined processes for communication and coordination across the two functions to support stable tenancy.
- Those processes are designed to protect client confidentiality and share confidential information on a need to know basis only.

Tenant Choice

- Efforts are made to maximize tenant choice, including type, frequency, timing, location and intensity of services and whenever possible choice of neighborhoods, apartments, furniture, and décor.
- Staff accepts tenant choices as a matter of fact without judgment and provides services that are non-coercive to help people achieve their personal goals.
- Staff accepts that risk is part of the human experience and helps tenants to understand risks and reduce harm caused to themselves and others by risky behavior.
- Staff understands the clinical and legal limits to choice and intervenes as necessary when someone presents a danger to self or others.
- Staff helps tenants to understand the legal obligations of tenancy and to reduce risk of eviction.
- Projects provide meaningful opportunities for tenant input and involvement when designing programs, planning activities and determining policies.

ADDITIONAL INFORMATION ON PROJECT ADMINISTRATIVE BUDGET LINE ITEM AND INDIRECT COSTS

Project Administration Budget Line Item

- Applicants should note that, though project admin is budgeted as a percentage of the total amount requested for the other CoC project budget line items, it cannot be billed that way. Project Admin costs are billed as direct costs. They must be billed based on actual costs incurred and be supported by backup documentation for staff hours/fringe and reimbursable expenses. One way to ensure you have appropriate backup documentation for all staff-related direct costs, such as Project Admin, Rental Assistance, Supportive Services, and Operating is to ensure that staff working on more than one project or budget line item complete a personnel activity log (sample available at <http://www.ctbos.org/wp-content/uploads/2019/05/Sample-Personnel-Activity-Log.xlsx>).
- **Project Admin costs must be allocated only to these eligible activities as defined in the CoC Program Interim Rule:**
 - General management oversight and coordination
 - Salaries, wages, and related costs of recipient staff, subrecipient⁸ staff, or other staff engaged in program administration including:
 - Preparing program budgets and schedules and amendments to those budgets and schedules
 - Developing systems for assuring compliance with program requirements
 - Monitoring program activities for progress and compliance with program requirements
 - Preparing reports and other documents directly related to the program for submission to HUD

⁸ A subrecipient is an organization that receives a subaward from and enters into a contract with the recipient (grantee).

- Coordinating the resolution of audit and monitoring findings
- Evaluating program results against stated objectives
- Managing or supervising persons whose primary responsibilities with regard to the program include such assignments
- Travel costs incurred for monitoring of subrecipients;
- Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and
- Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
- Costs of providing training on CoC requirements and attending HUD-sponsored CoC trainings
- Costs of carrying out the HUD required environmental review responsibilities.

Information Regarding Indirect Costs

- There are also two types of indirect rates: Negotiated Indirect Cost Rate Agreement (NICRA) and the 10% de minimis rate.
- Agencies that have a NICRA must use that rate; Agencies that have never had a NICRA may elect to charge the de minimis 10% of Modified Total Direct Costs - information on calculating MTDC is here: <https://www.ctbos.org/wp-content/uploads/2021/04/IDC-Guidance.pdf>, and <https://files.hudexchange.info/resources/documents/Indirect-Cost-Toolkit-for-CoC-and-ESG-Programs.pdf>. NOTE: the 10% de minimis rate is not 10% of the total HUD grant award. Please see the guidance from HUD which lists all CoC eligible costs which must be excluded when calculating the MTDC base on which the 10% is charged. If an agency elects to charge the 10% de minimis rate, they must consistently apply this to all Federal grants and contracts.
- Unlike project admin, indirect costs are not budgeted on a separate line item. Rather, indirect costs are applied to other budget line items. For example, projects claiming the 10% de minimis rate would include indirect costs on their CoC supportive services, operating, and/or project admin budget lines.
- If HUD conditionally awards the grant, agencies with a NICRA will be required to submit the documentation supporting the NICRA in e-snaps during the post-award process.
- Agencies claiming either a NICRA or de minimis indirect rate may charge up to the full allowable indirect costs.
- More information about project admin and indirect costs is here: <https://www.ctbos.org/wp-content/uploads/2021/04/IDC-Guidance.pdf>, and <https://files.hudexchange.info/resources/documents/Indirect-Cost-Toolkit-for-CoC-and-ESG-Programs.pdf>

GUIDANCE ON RENTAL ASSISTANCE BUDGETS FOR RRH IN SINGULAR RRH PROJECTS AND JOINT TH/RRH PROJECTS

RRH Projects and the RRH component of Joint TH/RRH Projects must follow [CT RRH Model Guidelines and the DV RRH Rent Payment Schedule](#).

HUD requires applications to budget each unit at the full FMR for 12 months. For example, a JT TH/RRH project requesting 1 year of funding for 10 RRH units with an FMR of \$1000/month would be required to budget rental assistance at $10 \times 1000 \times 12$ per year or \$120,000 annually. This does not mean that you must provide rental assistance at full FMR or for a full year for all or any project participants.

RRH projects may anticipate serving more than one household during a year in a single budgeted unit. This does not mean that households are sharing units, rather that you are using the available budget to serve as many households as possible. For the purposes of the annual project budget, even if average length of rental assistance needed by participants is anticipated to be shorter or longer than 12 months, each unit included in the budget must be budgeted at 12 months.

For example, a project anticipating average length of rental assistance at full FMR for 4 months per household, would budget each unit included in the application at the full 12 months and anticipate serving 3 households in each budgeted “unit” during the year. In this example, assuming FMR of \$1000/month, the project might budget 10 units as follows: $10 \times 12 \times 1000 = \$120,000$. If each participant actually receives full FMR for 4 months, the cost would be \$4,000/household. With \$120,000, the project would have sufficient funds to serve 30 households during the year ($\$120,000/\$4,000 = 30$), even though only 10 units were budgeted. If in reality the households served need less than the full FMR or fewer than 4 months of assistance, the project may serve more households than indicated in the application.

Similarly, for the purposes of the annual project budget, even if the average amount of rental assistance required by participants is anticipated to be less than full FMR, each unit included in the budget must be budgeted at full FMR. Here’s another example: a project anticipating average length of rental assistance at 50% of FMR for 4 months per household, would budget each unit included in the application at the full 12 months and anticipate serving 6 households in each budgeted unit during the year. In this example, if FMR is \$1000/month, each household would be anticipated to receive \$500/month in rental assistance (i.e., 50% of full FMR) for 4 months. You would budget each unit at the full 12 month FMR (i.e., $12 \times \$1,000$ or \$12,000/unit/year). But you would anticipate serving, 6 households during the year in that “unit” (i.e. each household receives \$500/month for 4 months (or \$2000 during the year) and six households per year receive \$2000 ($6 \times 2,000 = \$12,000$) and, thus, you will have fully expended the \$12,000 you budgeted for one unit for one year. Again this does not mean, that households are sharing units, rather that you are using the available budget to serve as many households as possible.

In order to ensure cost effectiveness and maximize the number of participants who can be assisted, CTBOS encourages participants to design their projects in a manner that provides the least assistance necessary to prevent a return to homelessness. Some households may need a small amount of assistance for only one month. Others may need a deeper subsidy for a longer period

of time. You should plan to serve at least the number of households proposed in your application, but can serve as many households as possible given the available budget. You should be certain to include adequate supportive services funds to enable you to serve all of the households anticipated to receive rental assistance.

ADDITIONAL INFORMATION REGARDING MATCHING REQUIREMENTS

Match is only in-kind if it is a donation of services, goods, materials, or equipment. Donations are typically from a third party. In-kind match from a third-party requires an MOU with the entity providing the match. Agencies providing the required match using volunteer time should indicate this as in-kind match. Agencies providing the match using paid staff time should indicate this as cash match and list the source of the funds used to pay for those staff salaries. For example, an agency that will provide assistance identifying potential project participants and helping them to document eligibility using PATH funded outreach staff, would identify this as cash match with SAMSHA PATH as the source.

Match, whether cash or in-kind, can only be used on eligible CoC Program costs, i.e., any cost that is defined as eligible in the CoC Program Interim Rule – this is not limited to approved budget line items for the particular project. For example, case management is an eligible CoC Program cost. You can use other funds that support case management services for project participants as cash match for a project, regardless of whether or not the project has requested CoC funds for supportive services.

Below are some examples of cash and in-kind match:

- CASH MATCH: Recipient or sub-recipient agency staff provide case management funded through a State contract
- CASH MATCH: Building utilities not covered by the CoC grant are paid by the recipient agency and funded through private sources
- CASH MATCH: Mental health services are provided to participants by a sub-recipient and funded through SAMSHA.
- In-Kind: Board member provides legal services at no cost
- In-Kind: FQHC operated by a community partner provides outpatient health services to participants
- In-kind: Food bank operated by a community organization donates food to project participants.

The recipient may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that, if the recipient had to pay for them with grant funds, the costs would have been eligible. Any such value previously used as match, may not be used again (i.e., cannot be claimed by more than one project or by the same project in another year).

To avoid delays in grant execution, CT BOS encourages applicants to submit match documentation with their project applications in eSnaps. This step will occur later, if your grant is selected by the CoC to be included in the final application to HUD.

When the match source is cash, recipients/subrecipients must provide HUD with match documentation prior to grant agreement execution. Documentation can be attached to the project

application in eSnaps or, if it is not available at application submission and HUD conditionally awards the project, submission of the documentation will be a condition for grant execution.

Written documentation of cash match must be provided on the source agency's letterhead, (e.g., if you are using case management services funded by State as cash match, the letter must come from the State entity and be on their letterhead), the letter be signed and dated by an authorized representative of the source agency, and, at a minimum, must include the following: amount of cash to be provided to the recipient for the project, specific date the cash will be made available, the project name and fiscal year to which the cash match will be contributed, the time period during which funding will be available, and allowable activities to be funded by the cash match (e.g., case management or rental assistance for project participants). If awarded the grant by HUD, to document cash match, agencies must show that the funds were recorded on the agency's books and expended on eligible expenses during the grant operating year.

If using in-kind match, the applicant should submit with the project application in eSnaps an MOU with the donor entity. If the MOU is not available at application submission and HUD conditionally awards the project, submission of the MOU will be a condition for grant execution.

If awarded the grant by HUD, to document in-kind match of donated services the recipient and/or sub-recipient must keep and make available, for inspection by HUD and/or the CoC, records documenting that the service hours were actually provided. They must also keep the MOU with the donor entity on file. Requirements for the MOU, include: establish the unconditional commitment of the services being donated, provide the name of the project and operating year to which the match is being contributed, describe the specific service to be provided (must be a CoC program eligible activity), indicate total point-in-time number of clients receiving the service and total clients receiving the service over the grant term, state profession and qualifications of the persons providing the service, state hourly cost of the service to be provided, indicate that the services are valued at rates consistent with those ordinarily paid for comparable services in that locality.

If awarded the grant by HUD, to document in-kind match of donated goods, property or equipment, the recipient and/or sub-recipient must keep and make available for inspection by HUD and/or the CoC: documentation that the in-kind donation was actually received, including value of the donation (must be documented on source agency letterhead, signed & dated). Must indicate that the value is consistent with the cost ordinarily paid for similar goods in the local market. The documentation must indicate the date on which the in-kind donation was provided, the project and operating year to which the match was contributed, and the CoC Program allowable activities provided by the donation (e.g., donation of food for meals for project participants, or donation of tenant rights and responsibilities booklets to provide tenant counseling services).

Since the documentation requirements for in-kind match are significantly more onerous than for cash match, CT BOS encourages agencies to use cash match sources whenever possible.

Since eligible project administrative costs are capped by HUD at 10% of the grant awarded, if your application includes project administrative costs of less than 10% of the grant awarded, you may use, as cash match, funds that support staff time for eligible project administrative costs up to the

difference between the allowable and the claimed level of project administrative costs. You may not use, as match, funds that support staff time for administrative costs that exceed the 10% cap established by HUD.

Similarly, since eligible indirect costs are also capped by HUD, if your application includes indirect costs that are less than the applicable cap, you may use, as cash match, funds that support staff time for eligible indirect costs up to the difference between the allowable and the requested level of indirect costs. You may not use, as match, funds that support staff time for indirect costs that exceed the allowable indirect costs of 10% of MTCD or the NICRA applied to the appropriate cost base.

Please note the restrictions on eligible direct and indirect administrative costs and the difference between project administrative and indirect costs described in the RFP.

More information on match is available [here](#).