



Connecticut Balance of State Continuum of Care

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

INSTRUCTIONS

2022 REQUEST FOR PROPOSALS FUNDED THROUGH PH BONUS, REALLOCATION, AND 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 2022 application for HUD CoC funds. The deadline for submission of applications is **June 6, 2022**.

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. In addition to the usual bonus funding awarded through this process, through the past several CoC competitions, HUD made funds available to fund Domestic Violence Bonus projects (DV Bonus)².

HUD has not provided information to determine the amount or type of new project funds for which CoCs will be eligible to apply through 2022 competition. The total funds available for new projects in 2022 will be determined based on the bonus amounts, as determined by HUD, combined with any amount of funding that the CT BOS Steering Committee³ determines shall be reallocated from existing renewal projects. CT BOS is anticipating the availability of significant new project funds and allowable project types that are consistent with recent CoC applications.

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 will be posted to the CTBOS [CoC Application page](#) as soon as it is available. CT BOS uses those scores to determine which applications are submitted to HUD and the order in which they are ranked. Projects that score higher will have a greater chance of being funded. HUD makes final decisions regarding which applications are funded.

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.

¹ For more information about CT BOS please see "An Introduction to the CT BOS Continuum of Care" [Presentation Slides: Introduction to CoC 2022](#) Recording: https://youtu.be/tyPoD_IM0sU

² DV Bonus projects must be dedicated to serve survivors of domestic violence, dating violence, stalking, and human trafficking who meet HUD's Category 4 definition of homelessness – see Appendix.

³ The CT BOS is led by a Steering Committee comprised of representatives of a variety government agencies, provider coalitions, advocates and people who have experienced homelessness. For more information about the CT BOS, please visit www.CTBOS.org

Please note:

- This document contains important background and instructions. All applicants are required to read and follow these instructions.
- 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.
- These instructions and the 2022 CT BOS New Project 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 from HUD and/or decisions made by CT BOS Steering Committee.
- 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>.**

INSTRUCTIONS

This document contains instructions for the 2022 application for CT Balance of State Continuum of Care (CT BOS) new project funds, including Permanent Supportive Housing (PSH) and Rapid Rehousing RRH funds. Projects may be funded through the permanent housing bonus, and any available reallocation funds, and/or any other sources made available to CoCs by HUD.

CT BOS is seeking applications for the following types of new projects:

- New **congregate Permanent Supportive Housing (PSH) projects that create new units** to serve 100 percent chronically homeless (CH) and/or Dedicated Plus (see appendix for definitions). Eligible projects are those with the following funding sources: Tax Credits, CT DOH Bond Financing, and HOME ARPA. While the new services must serve exclusively CH and/or Dedicated Plus, the project is permitted to also serve mixed-income units with other non-HUD funding. Only projects that will open within HUD's required timeline are eligible to apply. That timeline will be defined in the CoC Program NOFO and is anticipated to be 9/30/24. The CT Department of Mental Health and Addiction Services (DMHAS) will serve as the applicant and, if awarded, the grantee⁴ for this project type. Selected non-profit agencies responding to this RFP would serve as a subrecipient⁵ on any ultimate award. The eligible budget line items for this project type are Supportive Services and Project Administration.
- New **Permanent Supportive Housing (PSH) projects that will not create new units but will provide additional services to participants who are residing in PSH units that do not have designated funding for services from any public source (e.g., HUD or DMHAS).** Additional services funded through this RFP must be used to serve 100 percent chronically homeless and/or Dedicated Plus individuals and families (definitions are included in the appendix of this RFP). DMHAS 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. Interested applicants should consult with their CANs to determine which projects/participants are in need of designated services. Projects can serve participants in one or more existing PSH projects. The eligible budget line items for this project type are Supportive Services and Project Administration.

Note that PSH projects are not eligible for funding under the DV Bonus.

- New **Rapid Rehousing (RRH) projects that will create new units** to serve participants who are literally homeless (i.e., who meet the HUD Category 1 definition of homelessness) and/or or who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous situations (i.e., who meet the HUD Category 4 definition of homelessness - see Appendix for definitions). CT Department of Housing (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. If awarded, [Advancing CT Together](#) will serve as the fiduciary agency⁶ for rental assistance for regular CoC funds and the [CT Coalition Against Domestic Violence](#) will serve as the Fiduciary Agency for DV Bonus funds. The eligible

⁴ The grantee is the organization that receives CoC funds directly from and enters into a grant agreement with HUD.

⁵ A subrecipient is an organization that receives a subaward from and enters into a contract with the grantee.

⁶ Fiduciary agencies would receive a subaward from DOH and be responsible for paying rent to landlords. For more information see the [DOH RRH Operations Guide](#).

budget line items for this project type are Rental Assistance and Supportive Services. Project Administration is not an eligible budget line item for DOH subrecipients, however those projects may charge indirect rate. See information on indirect rate later in this document. **RRH projects are eligible for funding under the DV Bonus.**

Project applicants may apply for a new expansion project to expand an existing PSH or RRH project to:

- increase the number of units;
- allow the recipient to serve additional persons; and/or
- expand services available to eligible participants (PSH) only.

If the project proposing to expand is already a CoC funded project, such projects will submit an expansion project application in eSnaps. HUD has clarified that the component type for the existing project and the new expansion project must be identical (e.g., an existing PSH project may only apply for a PSH expansion). Projects may not apply for an expansion to replace other renewable funding sources.

The CT BOS 2022 new project application includes questions specifically related to expansion projects. All existing projects proposing to expand must complete the expansion section of the local application, regardless of whether or not the existing project is CoC funded. This includes all PSH projects that will not create new units but will provide additional services to participants. However, only CoC funded projects will submit an expansion application in eSnaps.

New projects to be included in the CT BOS 2022 CoC Application to HUD will be conditionally selected by an independent scoring committee and notified by CTBOS. 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 exceed word counts specified in this RFP or do not meet HUD's threshold eligibility criteria.

All applications must be submitted in Zengine. THE DEADLINE FOR SUBMISSION OF APPLICATIONS IS June 6, 2022.

Accessing and Submitting the Application in Zengine

- **All applications must be submitted in Zengine.** Applicants are responsible for following the [Instructions](#) for how to access and submit the application in Zengine.
- **Application Components** The application in Zengine is divided into 4 sections: the applicant 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 applicants; agencies applying for multiple projects must complete this section only once. Please note:
 - DV Profiles and CoC Bonus/Reallocation profiles are separate (if applying for both, 2 profiles must exist)
 - Providers who applied for funding last year in Zengine will have a profile saved. See Zengine instructions for additional details.
 - **Application (s)** – Each applicant can submit one or more applications. For each application all of the following sections are required:
 - **Agency Information (Section #1)**
 - **PSH or 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 or update [Zengine CoC Bonus/Reallocation Project Application Profile](#) / [Zengine DV Bonus Application 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 in Zengine.
6. If desired, print or save the application to PDF for your records.
7. To submit additional applications, see the Zengine instructions linked in #2 above for additional steps.

Project Requirements and Priorities:

- 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):
 - PSH:
 - All projects must dedicate 100% of units and/or provide services exclusively to chronically homeless and/or Dedicated Plus individuals and/or families, as defined by HUD.
 - All projects must serve exclusively disabled households as defined by HUD
 - RRH: All projects must serve 100% homeless families and/or individuals who meet the criteria of the HUD homelessness definition under categories 1 (literally homeless, including people coming from TH) or 4 (fleeing are attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous situations).
 - DV Bonus projects may serve only persons who qualify under the domestic violence criteria in paragraph (4) of the HUD definition of homelessness, including persons fleeing or attempting to flee human trafficking (see Appendix).
- Term – Projects may apply only for a one-year term.
- Eligible activities/projects for the funds:
 - All projects must be Permanent Supportive Housing or Rapid Re-housing
 - Projects can request funds for:
 - PSH: supportive services and/or project administration; PSH projects are not eligible for funding under the DV Bonus.
 - RRH: Tenant-based Rental Assistance⁷ and Supportive Services. This project type is eligible for funding under the DV Bonus.

⁷ Tenant-based Rental Assistance 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.

- For more information about requirements for DMHAS PSH Projects that use CoC Rental Assistance see the [DMHAS CoC RA Operations Guide](#).
- RRH projects funded under this RFP must adhere to the requirements contained in the [DOH RRH Operations Guide](#).
- All new units created through this RFP must be newly available for occupancy or newly designated to serve homeless people. New RRH units must be ready for occupancy no later than 12 months after the award of funds. Awards are anticipated to occur in approximately December 2022. New congregate PSH units must be available for occupancy within HUD's required timeline. That timeline will be defined in the CoC Program NOFO and is anticipated to be 9/30/24.
- Congregate PSH 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 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.
- Unless the project has another source of funding for services, projects applying for PSH should include at least \$5,000 per household annually for supportive services.
- PSH and RRH projects may not request more than \$9000 per household annually for supportive services.
- For projects that will not create new PSH units but will provide additional services to participants in existing PSH, CT BOS requires that the existing project does not already have designated funding for services from any public source (e.g., HUD or DMHAS).
- RRH 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. See Appendix for details.
- DMHAS will provide the required match for PSH projects.
- Additional information regarding Project Administrative and Indirect Costs⁸:
 - CT BOS has established a maximum rate of 7% for project administrative costs (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. For example, a project that requests \$100,000 annually for rental assistance and supportive services can request up to \$7,000 additional on the project administrative budget line item. Total CoC budget = \$107,000 in this example.
 - 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).

⁸ See the appendix for more details on administrative and indirect costs.

- 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). See [HUD's toolkit on indirect costs](#) for more information.
- Eligible applicants:
 - Eligible project applicants for the CoC Program Competition are nonprofit organizations, States, local governments, instrumentalities of State and local governments, and Public Housing Authorities.
 - 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.
- Other Requirements
 - Projects, except victim service providers as defined by HUD, must agree to enter client data into the [CT HMIS](#). Excepted projects must enter data into an HMIS 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.
 - Projects must comply with all HUD requirements and CT BOS CoC Policies⁹.
 - 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/serving the first program participant within the required time frame: for RRH and PSH expanding services in an existing project within 12 months of the award (i.e., by no later than December 2023); for new congregate PSH units as defined in the CoC Program NOFO and - anticipated to be by 9/30/24.
 - 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).

⁹ 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; DOH RRH Operations Guide; DMHAS CoC RA Operations Guide.](#)

- A plan for helping participants to obtain and stabilize in permanent housing, increase income, and access mainstream resources.

IMPORTANT INFORMATION ABOUT MATCH REQUIREMENTS

- RRH 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.
- DMHAS will provide the required match for PSH projects.

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, in the [Zengine Instructions](#) and embedded in the Zengine application. Please contact ctboscoc@gmail.com for questions about the application form or process.

APPENDIX

DEFINITIONS OF KEY TERMS:

HUD defines four categories under which individuals and families may qualify as homeless. Category 1 and Category 4 are relevant to this RFP:

Category 1 – HUD Homeless Definition – Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- (i) Has a primary nighttime residence that is a public or private place not meant for human habitation;
- (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs; or
- (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

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.

Chronically Homeless. The definition of “chronically homeless”, as stated in Definition of Chronically Homeless final rule is:

1. **(a)** A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long

as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

(b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;

(c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.

Dedicated Plus - A Dedicated Plus project is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals, households with children, **and** unaccompanied youth that at intake are:

- (1) experiencing chronic homelessness (CH); or
- (2) residing in a Transition Housing (TH) project that will be eliminated and was chronically homeless when entered TH project; or
- (3) residing in Emergency Shelter, Safe Haven or unsheltered location and had been admitted and enrolled in a PSH or RRH project (having met CH criteria upon entering) within last year, but was unable to maintain housing placement; or
- (4) residing in TH funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness prior to entering the project; or
- (5) residing in Emergency Shelter, Safe Haven or unsheltered location for at least 12 months in the last three years, but has not done so on four separate occasions and the individual or head of household meet the definition of 'homeless individual with a disability'; or
- (6) receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

How is a Dedicated Plus project similar to a project that is 100% dedicated to chronic?

- The criteria for Dedicated Plus and chronic are pretty similar, for example, DedicatedPLUS projects still must serve only households with a disabled adult or head of household who have been homeless for a least 12 months.
- The following are required in all PSH projects, including Dedicated Plus projects:
 - Serving households who have a disabled adult or head of household and have been homeless for a least 12 months; AND
 - Prioritizing PSH applicants based on both length of homelessness AND severity of service needs (applicants are prioritized and referred by the applicable CAN and both types of projects may only accept referrals from the applicable CAN).
- Neither chronic dedicated nor Dedicated Plus projects are required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH.

How is a Dedicated Plus project different than a project that is 100% dedicated to chronic?

- A Dedicated Plus project can prioritize serving some people who don't meet the strict HUD definition of chronic homelessness, for example people who have been homeless for 12 months

over 3 years during fewer than 4 separate occasions and some people who had been admitted and enrolled in a PSH or RRH project within the last year, who were unable to maintain the housing placement. These people can also currently be served in a chronic dedicated bed, but only if there is no eligible chronic person who wants that bed.

Disabling Condition:

Disabling Condition is defined by HUD as a condition that: (i) Is expected to be long-continuing or of indefinite duration; (ii) Substantially impedes the individual’s ability to live independently; (iii) Could be improved by the provision of more suitable housing conditions; and (iv) Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury; (2) A developmental disability, as defined in this section; or (3) The disease of acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).

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 www.ctbos.org).

- 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, subrecipient 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
 - 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

- 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.
- 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://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.
- Though CT BOS caps the project admin budget line item at 7% for PSH projects, agencies claiming either a NICRA or de minimis indirect rate may charge up to the full allowable indirect costs.
- 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.
- DOH has opted not to apply for funds on the project admin budget line item. Subrecipients may claim indirect costs only.
- For PSH projects, agencies can include both project admin and indirect costs in their project budgets; however, costs must be established by your agency as either direct or indirect, and the same expense cannot be charged to both indirect and any direct budget line item, such as project admin, rental assistance, operating or supportive services.
- Note information about project admin and indirect costs is here: <https://files.hudexchange.info/resources/documents/Indirect-Cost-Toolkit-for-CoC-and-ESG-Programs.pdf>

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 permanent supportive 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.

GUIDANCE ON BUDGETING FOR RRH

The RRH must follow [DOH RRH Operations Guide](#).

HUD requires applications to budget each unit at the full FMR for 12 months. For example, a 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 ($\$120,00/\$4,000 = 30$), 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.

RRH Projects must be consistent with [DOH RRH Operations Guide](#). 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 DMHAS 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 DMHAS 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 DMHAS as cash match, the letter must come from DMHAS 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](#).