



Connecticut Balance of State Continuum of Care

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

INSTRUCTIONS

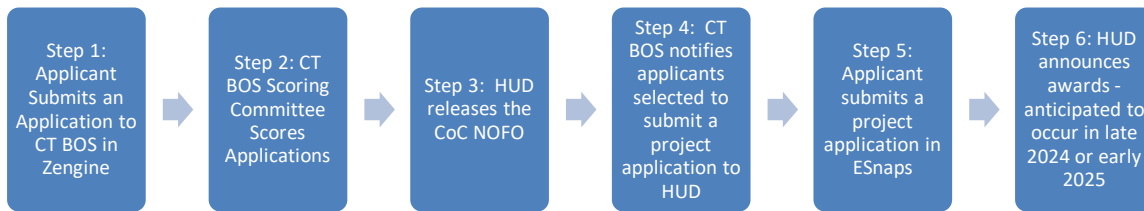
2024 REQUEST FOR PROPOSALS

BACKGROUND

The [Connecticut Balance of State Continuum of Care](#) (CT BOS)¹ is seeking proposals for new projects to include in its 2024 application for funding from the U.S. Department of Housing and Urban Development’s (HUD) Continuum of Care (CoC) program. The deadline to submit proposals is **3/20/24**. The deadline to submit questions about the funding opportunity is **3/06/24** to be included in the frequently asked questions document. However, questions may be submitted after this date and responses will be provided as time allows.

Each year, CT BOS competes with other Continuums across the country to secure federal funds to end homelessness through the [HUD CoC program](#). In 2024 we anticipate that HUD will fund new CoC Bonus projects² and new Domestic Violence Bonus projects (DV Bonus)³. HUD has not given details yet about the funds CT BOS can apply for in 2024. The final amount available will depend on CoC and DV Bonus amounts set by HUD. HUD will announce the types of projects that can apply and the eligibility criteria for those projects when they release the FY24 CoC Competition Notice of Funding Opportunity (NOFO). In the meantime, CT BOS is releasing this RFP in anticipation that the HUD requirements will not change much from last year.

CT BOS will set up a committee to review and score the proposals submitted in response to this RFP. The scoring sheet used by reviewers will be posted on the CT BOS [CoC Application page](#) when available. The scores help CT BOS decide which proposals to submit to HUD and in what order. Higher-scoring projects have a better chance of being included in CT BOS's application to HUD and of getting funded. CT BOS will inform applicants whether their proposals will be part of the CT BOS 2024 CoC Application to HUD. The final decisions on awards will be made and announced by HUD through the national CoC program competition. You can see this process illustrated below.



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 HUD usually funds new projects each year through the CoC Bonus. These projects can serve people who meet the HUD definition of homelessness, including but not limited to Category 4 – see Appendix

³ DV Bonus projects must be dedicated to serve exclusively survivors of domestic violence, dating violence, stalking, and human trafficking who meet HUD’s Category 4 definition of homelessness – see Appendix.

CT BOS welcomes applications from both newcomers who have not received CoC funds before and those who have received them in the past. CT BOS provides training and support to make the application process accessible to all. CT BOS strongly encourages all applicants to participate in the Bidders Conference webinar on 3/1/24, at 10 a.m. at this [link](#).

1. Read and Follow Instructions:	<ul style="list-style-type: none">• This document contains essential background information and instructions.• All applicants must read and follow these instructions.
2. Application Submission:	<ul style="list-style-type: none">• The actual application form is not in this document.• Submit all applications through Zengine, CT BOS’s web-based application system.• Instructions for accessing the application in Zengine are provided below.• Applicants that submitted an application in 2023 and wish to resubmit the identical application for consideration again in 2024 should follow the instructions provided below.
3. Stay Informed:	<ul style="list-style-type: none">• These instructions and the 2024 CT BOS New Project Application in Zengine are based on the best available information.• CT BOS may need to update requirements or request additional information based on guidance from HUD or decisions by the CT BOS Steering Committee.• CT BOS will share all information about this funding opportunity through the CoC’s email listserv.• To receive the latest updates, subscribe to the CT BOS mailing list at http://www.ctbos.org.

INSTRUCTIONS

These are the instructions for 2024 proposals to CT Balance of State Continuum of Care (CT BOS) for new project funds. **THE DEADLINE FOR SUBMISSION OF APPLICATIONS IS 3/20/24. The deadline for submission of questions related to this funding opportunity is 3/6/24** in order for them to be included in the Frequently Asked Questions (FAQ) document. Questions submitted later will be reviewed and responded to as time allows.

The CoC reserves the right not to review:

- late or incomplete applications
- applications that do not meet the project requirements described in this RFP.
- applications that exceed word counts specified in this RFP
- applications that do not meet HUD’s threshold eligibility criteria
- applications submitted through any means other than Zengine

CT BOS will use CoC Bonus, DV Bonus, any available reallocation funds, and/or any other sources made available to CoCs by HUD to fund proposals submitted under this RFP. CT BOS is seeking applications for Permanent Supportive Housing, Rapid Rehousing, and Joint Transitional and Rapid Rehousing projects as described below:

Permanent Supportive Housing (PSH) projects

- 100% of households served using CoC PSH funds must meet HUD’s definition of Dedicated Plus homelessness (see Appendix)
- New rental assistance units must be ready for occupancy no later than 12 months after the award of funds. Awards are anticipated to be announced by HUD in late 2024 or early 2025. 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 9/30/26. Preference will be given to projects that can begin operating sooner.
- Preference will be given to projects that can demonstrate that at least 25% of units designated to serve people experiencing homelessness are subsidized by a source other than CoC or Emergency Solutions Grant funding.
- The [CT Department of Mental Health and Addiction Services](#) (DMHAS) will serve as the applicant and, if awarded, the grantee⁴ for PSH projects, including those serving participants meeting the HUD definition of disability, but not the DMHAS definition. Non-profit agencies responding to this RFP would serve as a subrecipient⁵ on any award and would be required to enter into a contract with DMHAS. For more information about the roles and responsibilities of each project partner see the [CT PSH Operations Guide](#).
- To help ensure that PSH participants receive adequate services, all PSH projects will be funded at \$9,000 per year per household for supportive services. Projects that have another funding source for services are required to report that amount and source in their application. CT BOS funding for services will be adjusted accordingly so that the total amount available from all sources is \$9,000 per year per household.
- PSH projects are only eligible to apply under the CoC Bonus and are not eligible for funding under the DV Bonus.

Allowable PSH Project Types:

- **TYPE 1:** Projects can propose to fund rental assistance to create new congregate or scattered site units. These projects may only apply to serve adult households. This includes youth aged 18-24. These projects may not apply to serve families with minor children. The [eligible budget line items](#) for Type 1 PSH are Rental Assistance, Supportive Services, Project Administration, and VAWA. CT BOS is prioritizing funding to create new PSH units for people aged 60 and over and will set aside funds for this purpose. At least 25% of units funded in this project type must serve people aged 60 and over to be considered for this set aside. The amount of this set-aside will be determined after HUD releases the NOFO.
- **TYPE 2:** Projects can also propose to provide only supportive services and not to fund rental assistance. These projects will be required to provide enhanced services for existing PSH units. CT BOS is prioritizing funding to ensure adequate services for people already living in PSH and will set aside funds for this purpose. The amount of this set-aside will be determined after HUD releases the NOFO. Preference will be given to proposals to enhance services for people living in CoC funded PSH projects with no designated services funding. This [list](#) provides information about where CoC projects with no designated services are located. Applicants can propose to serve participants in one or more existing PSH projects. Eligible projects can only provide services in non-CoC PSH projects that do not have designated funding for services from any public source (e.g., HUD or DMHAS) and/or CoC-

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.

funded PSH projects that have supportive services funds at an amount that is below \$5,000 per household per year. Applicants may propose to provide enhanced services for eligible individuals and families in existing PSH projects. This includes youth aged 18-24. The [eligible budget line items](#) for Type 2 PSH are Supportive Services, Project Administration, and VAWA.

- **TYPE 3:** Projects can also propose to combine Types 1 and 2 described above in a single project. For example, a project could propose to use the rental assistance and supportive services budget line items to provide 10 new scattered site PSH units (Type 1) AND to use the supportive services budget line item to provide case management services to 15 existing PSH tenants in a PSH project that has no designated or inadequate services (Type 2). The [eligible budget line items](#) for Type 3 PSH are Rental Assistance, Supportive Services, Project Administration, and VAWA.

Rapid Rehousing (RRH) projects

- 100% of households served using CoC RRH funds must meet HUD’s definition of homelessness under Category 1 (literal homelessness) or Category 4 (fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous situations) – see appendix for definitions.
- New RRH units must be ready for occupancy no later than 12 months after the award of funds. Awards are anticipated to be announced by HUD in late 2024 or early 2025.
- [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 award and would be required to enter into a contract with DOH.
- If awarded, the entity designated by DOH will serve as the fiduciary agency.⁶ Currently, [Advancing CT Together](#) serves as the fiduciary agency for rental assistance for regular CoC funds, and the [CT Coalition Against Domestic Violence](#) serves as the Fiduciary Agency for DV Bonus funds.
- For more information about the roles and responsibilities of each project partner see the [CT RRH Operations Guide](#).
- The [eligible budget line items](#) for RRH projects are Rental Assistance, Supportive Services Project Administration, and VAWA.
- To help ensure that RRH participants receive adequate services, all RRH projects will be funded at \$9,000 per year per household for supportive services. Projects that have another funding source for services are required to report that amount and source in their application. CT BOS funding for services will be adjusted accordingly so that the total amount available from all sources is \$9,000 per year per household.
- RRH projects are eligible for funding under both the CoC Bonus and the DV Bonus.

Allowable RRH Project Types:

- **TYPE 1:** Projects can propose to fund rental assistance to create new RRH scattered site housing opportunities. These projects may apply to serve both individuals and families. This includes youth aged 18-24. The [eligible budget line items \(BLI\)](#) for Type 1 RRH projects are Rental Assistance, Supportive Services, Project Administration, and VAWA. For DV Bonus projects, HMIS is also an eligible BLI.

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](#).

- **TYPE 2:** Projects can also propose to provide only supportive services and not to fund rental assistance. These projects will be required to provide enhanced services for existing RRH units. Interested applicants should consult with their CANs to determine which projects/participants are in need of designated services. Applicants can propose to serve participants in one or more existing RRH projects. This type of application can provide services only in CoC-funded RRH projects that have supportive services funds at an amount that is below \$5,000 per household per year. Applicants may propose to provide enhanced services for eligible individuals and families in existing RRH projects. The [eligible budget line items](#) for Type 2 RRH projects are Supportive Services, Project Administration, and VAWA. For DV Bonus projects, HMIS is also an eligible BLI.
- **TYPE 3:** Projects can also propose to combine Types 1 and 2 described above in a single project. For example, a project could propose to use the rental assistance and supportive services budget line items to provide 10 new scattered site RRH units (Type 1) AND to use the supportive services budget line item to provide case management services to 15 existing RRH tenants in a CoC-funded RRH project that has inadequate services (Type 2). The [eligible budget line items](#) for Type 3 RRH projects are Rental Assistance, Supportive Services, Project Administration, and VAWA. For DV Bonus projects, HMIS is also an eligible BLI.

Joint Transitional Housing/Rapid Rehousing (Joint TH/RRH)

- Projects can propose to create new Joint TH and RRH units.
- Joint TH/RRH projects may apply to serve both individuals and families. This includes youth aged 18-24.
- 100% of households served using CoC Joint TH/RRH funds must meet HUD’s definition of homelessness Category 4 (fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous situations) – see appendix for definitions.
- New RRH units must be ready for occupancy no later than 12 months after the award of funds. Awards are anticipated to be announced by HUD in late 2024 or early 2025.
- [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 award and would be required to enter into a contract with DOH.
- If awarded, the entity designated by DOH will serve as the fiduciary agency.⁷ Currently, the [CT Coalition Against Domestic Violence](#) serves as the Fiduciary Agency for DV Bonus RRH funds.
- For more information about the roles and responsibilities of each project partner see the [CT RRH Operations Guide](#).
- The [eligible budget line items](#) for Joint TH/RRH projects are Rental Assistance, Leasing, Operating, HMIS, Supportive Services, Project Administration, and VAWA. Note that leasing and operating may be used in the transitional component only.
- Joint TH/RRH projects are only eligible for funding the DV Bonus. Joint TH/RRH projects may not apply for funding under the CoC Bonus.

Expansion projects

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

⁷ 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](#).

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

Projects may not apply for an expansion to replace other renewable funding sources. The CT BOS 2024 new project application in Zengine 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 applications for Type 2 or Type 3 PSH and RRH projects.

Accessing and Submitting the Application in Zengine

- **All applications must be submitted in Zengine.** CT BOS will not accept applications submitted in any other format. Applicants are responsible for following the instructions (linked below) for how to access and submit the application in Zengine.

- Applicants that already submitted an application in Zengine in 2023 may opt to resubmit the identical application for consideration again in 2024 only if 1)their application was selected by CT BOS to be included in the application to HUD; and 2)their application was not selected for funding by HUD. Such applicants would have submitted an eSNAPS new project application in 2023. If your organization did not submit an eSNAPS new project in 2023 you are not eligible to use this option.
- If an eligible applicant elects to use this option, their 2023 application score will carry forward to 2024. The Scoring Committee will not re-score the application.
- Applicants can check their [2023 application scores](#). Applicants that would like the opportunity to improve their score must submit a new 2024 application in Zengine.
- To resubmit a 2023 application for consideration in 2024, the applicant must submit a statement to ctboscoc@gmail.com by the application deadline indicating:
 - they are submitting their 2023 Zengine application without changes for funding consideration in 2024
 - the name of the person authorizing the resubmission
 - the name of the 2023 project as submitted 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:
 - Unlike previous years, DV Profiles and CoC Bonus/Reallocation profiles are not separate (if applying for both types of funding, only one profile is required)
 - DV Providers who have previously submitted only DV Bonus applications will be required to complete a new profile in this year’s application. However, the cut and paste feature may be used to complete questions and responses that remain the same.
 - Providers who applied for regular bonus funding for any year from 2021 through 2023 in Zengine will have their profile(s) saved. See Zengine instructions for additional details on how to update that profile.

- **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, RRH, or Joint 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 or update [Zengine Project Applicant Profile](#) or follow the instructions above to resubmit a 2023 application without changes - resubmissions will skip steps 3-7 below.
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 more than one application, see the Zengine instructions linked in #2 above for additional steps.

Project Requirements and Priorities:

- Eligible localities:
 - Projects must be located exclusively within the CT BOS CoC regions of the State. This includes all 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 Dedicated Plus households as defined by HUD.
 - All projects must serve exclusively disabled households as defined by HUD.
 - PSH Applicants must indicate the number of households they are proposing to serve who will meet the DMHAS definition of disability (see definitions) and the number who will not meet the DMHAS definition of disability.
 - CT BOS is prioritizing funding to create new PSH units for people aged 60 and over and will set aside funds for this purpose. Projects must serve people aged 60 and over in at least 25% of units funded in this project to be considered for this set aside. The amount of this set-aside will be determined after HUD releases the NOFO.
 - 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).
 - Joint TH/RRH: All projects must serve 100% homeless families and/or individuals who meet the criteria of the HUD homelessness definition under category 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 meet the criteria of the HUD homelessness definition under category 4 (see Appendix).

- Term – Projects may apply only for a one-year term. Projects are renewable on an annual basis through the CoC Competition.
- Eligible activities/projects for the funds:
 - All projects must be Permanent Supportive Housing, Rapid Re-housing, or Joint Transitional Housing/Rapid Re-housing
 - Projects can request funds for:
 - PSH: rental assistance, supportive services, project administration, and/or VAWA; PSH projects are eligible for funding under the CoC Bonus and are not eligible for funding under the DV Bonus.
 - RRH: Short or medium-term Tenant-based Rental Assistance⁸, supportive services, project administration, and/or VAWA. RRH projects are eligible for funding under the CoC Bonus and the DV Bonus. DV Bonus projects may also apply for HMIS funds.
 - Joint TH/RRH: TH component only: Leasing of a structure or units and operating costs, short- or medium-term tenant-based rental assistance in the rapid re-housing portion of the project; supportive services; HMIS; project administration; and/or VAWA. Joint TH/RRH projects are eligible for funding under the DV Bonus and are not eligible for funding under the CoC Bonus.
- PSH projects funded under this RFP must adhere to the requirements contained in the [CT PSH Operations Guide](#)
- RRH projects and the RRH component of Joint TH/RRH projects funded under this RFP must adhere to the requirements contained in the [CT RRH Operations Guide](#).
- All new units created through this RFP must be newly available for occupancy or newly designated to serve homeless people.
- New rental assistance units must be ready for occupancy no later than 12 months after the award of funds. Awards are anticipated to occur in approximately December 2024. 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 9/30/26. Preference will be given for projects that can begin operating sooner.
- 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.
- To ensure sufficient case management capacity, unless the project has another source of funding for services, projects must request \$9000 annually for supportive services per household to be served at a point in time. Projects may not request more than this amount. Projects that have another funding source for services are required to report that amount and source in their application. CT BOS funding for services will be adjusted accordingly so that the total amount available from all sources is \$9,000 per year per household.
- CT BOS is prioritizing funding to ensure adequate services for people already living in PSH and will set-aside funds for this purpose. The amount of that set-aside will be determined after HUD releases the NOFO. Preference will be given to proposals to enhance services for people

⁸ 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.

living in CoC funded PSH projects with no designated services funding. This [list](#) provides information about where CoC projects with no designated services are located.

- Projects that will enhance services to participants in existing PSH can only provide services in CoC funded PSH projects that:
 - do not have designated funding for services from any public source (e.g., HUD or DMHAS); or
 - have supportive services funds at an amount that is below \$5,000 per household per year
- For projects that will enhance services to participants in existing RRH, CT BOS requires that the existing project is a CoC funded RRH project that has supportive services funds at an amount that is below \$5,000 per household per year.
- Additional information regarding Project Administration and Indirect Costs⁹:
 - CT BOS has eliminated the previous maximum rate of 7% for project administrative costs. CT BOS now uses HUD's maximum rate of 10% (i.e., costs on the project administrative budget line item may not exceed 10% of the aggregated amount requested for all other budget line items. For example, a project that requests \$100,000 total annually for rental assistance and supportive services can request up to \$10,000 additional on the project administrative budget line item. Total CoC budget = \$110,000 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).
 - 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.
- Matching requirements
 - RRH and Joint TH/RRH project applicants are required to 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.
 - For PSH projects, while DMHAS will serve as the applicant for the whole project, DMHAS will provide the required match only for the portion of the project that is designated for

⁹ See the appendix for more details on administrative and indirect costs.

households meeting the DMHAS definition of disability. Applicants are required to demonstrate that they meet HUD's match requirements for the remaining portion of the project. Applicants must indicate in Zengine the number of units designated for people with a DMHAS qualified disability and DMHAS will provide the match for those units. Example: in a 20 unit project with 10 units designated for households with a DMHAS qualified disability, DMHAS would provide 50% of the total match required and the applicant would be required to demonstrate that they can meet the remaining 50% of the match requirement. Projects unable to meet this requirement will not be submitted to HUD for funding consideration. See Appendix for details.

- 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 database¹⁰.
- PSH projects must agree to also enter data into DMHAS' [DDAP](#) system.
- 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) adhere to [CAN policies](#) and accept referrals only from the Statewide by-name list.
- Projects must comply with all HUD requirements¹¹ and [CT BOS CoC Policies](#).
- 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 cited above.
 - 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. This includes for RRH a description of how

¹⁰ For more information about the DV Comparable Database contact Joanne Vitarelli jvitarelli@ctcadv.org

¹¹ See, for example: [CoC Program Interim Rule](#); [Uniform Administrative Requirements, Cost Principles, & Audit Requirements for Federal Awards](#); [HUD CoC Program Notices](#);

the project will help ensure that participants can maintain housing once rental assistance ends.

- PSH projects proposing to use the Rental Assistance Budget Line Item, must coordinate with their Local Mental Health Authority (LMHA). If the LMHA agrees to administer Rental Assistance, PSH projects are required to have [this letter](#) completed by their LMHA and submit it in Zengine. Only where the LMHA has declined to administer Rental Assistance, may a private non-profit propose to administer Rental Assistance. Where a non-profit proposes to administer Rental Assistance, they are required to: 1) demonstrate a feasible plan for doing so in accordance with CoC and DMHAS requirements 2) follow DMHAS rental assistance administration protocols 3) participate in DMHAS training on rental assistance administration protocols. For more information about rental assistance administration requirements see the [PSH Requirements and Operations Guide](#).

IMPORTANT INFORMATION ABOUT MATCH REQUIREMENTS

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 embedded in the Zengine application. Please contact ctboscoc@gmail.com by 3/6/24 with any questions about the application form or process. The CT BOS team will respond to questions submitted by that deadline and include them in an FAQ document. The team will respond to questions submitted after that date as time allows.

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.

Definition of Disabling Condition (HUD):

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).

Definition of Disabling Condition (CT DMHAS):

DMHAS limits PSH eligibility to only applicants who have a serious mental illness, chronic problems with alcohol, drugs or both, or acquired immunodeficiency syndrome (AIDS) and/or related diseases. PSH projects funded under this RFP may only serve people who meet both the HUD and DMHAS definitions of a disabling condition.

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.
- 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.
- For all 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 https://www.cga.ct.gov/current/pub/chap_830.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.

TYPES OF RENTAL ASSISTANCE

There are 3 types of rental assistance available through the CoC. Those types are described below.

Tenant-based rental assistance (TRA) Tenant-based rental assistance is rental assistance in which program participants identify housing of their choice in the community. RRH projects must use TRA. Program participants who have complied with lease terms during their residence retain the rental assistance if they move within the Continuum of Care geographic area at the completion of the lease term.

Sponsor-based rental assistance (SRA) Sponsor-based rental assistance is provided through contracts between the HUD CoC grant recipient and a sponsor organization. A sponsor may be a private non-profit organization, or a community mental health agency established as a public nonprofit organization. Program participants must reside in housing owned or leased by the sponsor.

Project-based rental assistance (PRA) Project-based rental assistance is provided through a contract with the owner of an existing structure, where the owner agrees to lease the subsidized units to program participants. Program participants will not retain rental assistance if they move.

GUIDANCE ON BUDGETING FOR RRH RENTAL ASSISTANCE

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 ($\$120,000/\$4,000 = 30$), 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 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](#).