CT BOS New Project Application for HUD CoC funds Frequently Asked Questions April 2023

Table of Contents

1. CoC Bonus (i.e., all applications that are not DV Bonus)	1
2. DV Bonus	4
3. Zengine (the database through which the application is submitted)	5

1. CoC Bonus (i.e., all applications that are not DV Bonus)

Q: The link in the Zengine application is for the 2022 HUD FMR. Can we not use the 2023?

A: The 2022 FMR link is an error. Please use the 2023 HUD FMRs at this link: https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2023_code/select_Geography.odn. The link has been updated in Zengine as of 4/11/23.

Q: Our agency is applying for PSH units with another agency as a subcontractor for services. I am uncertain how to respond to questions D and E in updating our applicant profile:

- D) Describe your organization's (and sub recipient(s), if applicable) experience in leveraging Federal, State, local and private sector funds. Include experience with leveraging all federal, state, local and private sector funds. If your organization has no experience leveraging other funds, include the phrase "No experience leveraging other federal, state, local or private sector funds
- E) Describe your organization's (and sub recipient(s), if applicable) financial management structure.

A: Responses must include D) experience in leveraging Federal, State, local and private sector funds for both your organization and the subcontractor for services, and E) the financial management structures of both your organization and the subcontractor for services.

Q: If the subrecipient is going to have another agency as subaward to provide the services, does the subrecipient need to list that organization in the RFP or can the subrecipient wait after being successfully selected for the funds?

A: Similar to the response above, applicants should include information on subrecipients in the application in all areas where sub-recipients are indicated.

Q: There was a lot of language in the RFP about creating "new units." I'm not sure exactly what that means. My org is not a developer in the sense that we don't own any real estate. We do use PSH and RRH to find housing for homeless people. Our case managers have good relationships with landlords throughout Danbury. If we place a homeless person in an affordable housing unit a private landlord, is that considered creating a new unit, or is it the creation of a new unit literally owning the building?

A: If you are using CoC Rental assistance funding to place people in affordable housing units using private landlords, then that is considered creating new units. Also, funding for this opportunity can be used to house people only in the CT

Connecticut Balance of State Continuum of Care Ending Homelessness in Connecticut | Email: ctboscoc@gmail.com | Website: www.ctbos.org

BOS geographic region which includes Hartford, Litchfield, Middlesex, New Haven, New London, Tolland, and Windham Counties. Organizations wishing to apply for projects in Fairfield County would apply via the Opening Doors Fairfield County (ODFC) CoC.

Q: We are applying for some new PSH vouchers through the 2023 RFP. On question C of the New Project Application, one of the bullets talks about how we plan to use the Critical Time Intervention (CTI) model to inform service delivery...is this even applicable to PSH as it is not a time limited program? I understand it in the context of RRH, but does not make sense to me with PSH. Is this something you think we would be ok with not addressing in our response?

A: CTI can be used in both RRH and PSH projects. CTI services are focused on: the transition to and stabilization in housing; connections to sustainable resources; establishing and maintaining a base in the community; attention to immediate needs that affect housing retention; assisting people to increase income; assessing barriers and strengths to maintaining housing; collecting info from previous workers and program participant, working the service plan to create expectations and structure and creating a resource list. While the intensive services offered through CTI when someone initially enters PSH would be time limited, in PSH you would continue to provide ongoing services at the end of the critical time period.

For more information on CTI: https://www.criticaltime.org

Q: Are there limitations to faith organizations applying for and/or receiving funding?

A: As long as your organization fits the definition of eligible recipients found in the instructions document, it is eligible to apply for and/or receive funding.

From <u>Instructions</u>: • *Eligible applicants*:

o Eligible project applicants for the CoC Program Competition are nonprofit organizations, States, local governments, instrumentalities of State and local governments, and Public Housing Authorities.

o 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.

In addition, please note that all CoC funded projects must follow federal and CT BOS requirements including:

- A prohibition on discriminating against a program participant or prospective program participant on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice
- Records must document that the recipient of CoC funds performed explicitly religious activities and offered
 such services outside of programs that are supported with federal financial assistance separately, in time or
 location, AND indicated that participation in such religiously explicit activities was voluntary for program
 participants AND did not use CoC Program funds to support or engage in explicitly religious activities AND if a
 program participant objected to the religious character of a recipient that provided services, do records
 document that the recipient undertook reasonable efforts to identify and refer the program participant to an
 alternative provider within a reasonably prompt time
- Compliance with the HUD Final Rule on Equal Access and HUD's <u>Final Rule on Equal Access in Accordance with</u> Gender Identity
- Compliance with the <u>CT BOS Policy on Ensuring a Safe, Healthy, Inclusive, Affirming and Discrimination-free</u> Environment for Persons Identifying as LGBTQIA+

Q: Are any agencies ineligible due to (renewal evaluation) scores?

A: No. There is no ineligibility due to renewal evaluation scores.

Q: Is a letter of intent required?

A: No. There is no letter of intent required.

Q: As far as a start date for the project, is it aligned to a federal fiscal year?

A: The start date does not align to the federal fiscal year. Start date will depend on a number of factors, mostly related to when new project awards are announced and the timeline in which HUD can release contracts. For projects involving capital development, project start date may depend on the development schedule of the project. From instructions: Applicants 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 2024); for new congregate PSH units as defined in the CoC Program NOFO and - anticipated to be by 9/30/25.

Q: What if you own the building? How is leasing handled or does that qualify?

A: Projects may not apply for leasing dollars to use in buildings that they own because an agency cannot lease units from itself. Where agencies own the building, PRA and SRA are allowable funding types.

From instructions:

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.

Additional information regarding PRA and SRA can be found in at these training links:

- PRA to SRA Conversion Slides
- PRA to SRA Conversion Recording

Q: All of these projects must meet the dedicated plus definition?

A: No. Only the PSH project participants must meet the Dedicated Plus definition.

Q: Is PSH project funded through the CT Department of Mental Health and Addiction Services (DMHAS) or the US Department of Housing and Urban Development (HUD)?

A: For new PSH projects funded through this opportunity, DMHAS will be the project recipient, also known as the grantee. The funds will come from HUD to DMHAS. DMHAS will contract with and pass along the HUD funds to the subrecipient agency.

Q: If an agency was just recently awarded funding through BOS, are they still eligible to apply again?

A: Yes

Q: If an agency is applying for expansion of existing PSH, does that mean another agency in the same Coordinated Access Network (CAN) cannot apply for new PSH?

A: No

Q: Is there a cap on what can be requested for service dollars per PSH participant?

A: There is a cap of \$9,000 annually for supportive services per household for PSH projects.

Q: Who is the applicant for RRH?

A: CT Department of Housing (DOH) will be the applicant for RRH projects.

Q: If LMHA is applying for PSH is the contact and agency the LMHA or DMHAS?

A: If the LMHA is applying for a PSH project, in Zengine input the contact and agency as the LMHA.

Q: Are there any signatory forms that must be completed and then uploaded?

A: No, there aren't any signatory forms.

Q: The language around the bonus points for H2H from Zengine is "New PSH project that has services funds from the DMHAS H2H initiative and will apply for CoC rental assistance only, but from the slides that were voted on for the meeting just say Rental assistance (which could be PSH or RRH). We would like to clarify if only PSH is eligible for bonus points or if it could be RRH too?

A: RRH is eligible for H2H bonus points as well. See the question under Zengine for additional H2H information.

Q: Is applying for more rental assistance for an existing project to expand number of households served an allowable application if we are not requesting additional supportive services dollars?

A: Yes, although it is a requirement that new projects have \$9,000 in supportive services funding per household. That funding does not have to be CoC funding.

Q: Page seven of the CT BOS 2023 Continuum of Care New Project Application Instructions states, "CT BOS has established a maximum rate of 7% for project administrative costs". HUD allows up to 10% for project administrative costs. What is the reasoning behind CT BOS establishing 7% as the maximum rate?

A: The maximum rate of 7% for project administrative costs was established by the CT BOS Steering Committee. Only certain activities are defined by HUD as eligible project administration expenses. Expenditures on project administration activities must be documented as a direct expense, which can be challenging for agencies to do. Agencies can also opt to claim indirect costs. The intent of the limitation is to: reduce recapture risk related to ineligible activities and improper documentation of project administration costs; and to ensure that as much CoC funding as possible is available to house and serve people experiencing homelessness. Questions regarding the rationale can also be brought to the Steering Committee for discussion.

2. DV Bonus

Q: If you are applying for DV Joint TH/RRH and don't currently receive HUD funds for that nor have that type of program, can you apply for a new DV Joint TH/RRH?

A: Yes

Q: Would a Sexual Assault project answer the DV Specific Questions?

Connecticut Balance of State Continuum of Care Ending Homelessness in Connecticut | Email: ctboscoc@gmail.com | Website: www.ctbos.org

A: If a project is applying for an RRH or Joint TH/RRH project from the DV Bonus in which project participants will meet HUD's definition of Category 4 Homeless (see definition below), then they would respond to the DV Specific Questions. If you are applying for a DV Bonus project and enter the New DV Project application, you will be asked those questions.

From Instructions: 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.

Q: Within the Joint Transitional Housing/Rapid Rehousing model, we would be requesting funds for on-site Transitional Housing and scattered site (by victims choice of units in the community) RRH. All participants who meet HUD Category 4 definition of homelessness would be eligible. We would serve any gender and families with children and households with only adults. Is this model eligible?

A: Yes, that Joint TH/RRH model is eligible under DV Bonus

3. Zengine (the database through which the application is submitted)

Q: What is the link for Zengine?

A: Here are the 2 instruction documents for Zengine. The links for the 2 applications are within.

- New CoC PH Bonus and Reallocation Funds
- New DV Bonus Funds

Q: We have experienced staff turnover and the person who created the RFP profile for our agency has left the agency. How do we go about accessing the agency profile that was created in the past?

A: In order to access the previously created agency profile you must use the credentials previously used to enter the profile, which is usually the creator's email address and a password that they created. You can then access and update the profile with the new staff's information. If this is not possible and/or to change the email address with which the agency logs in, contact Housing Innovations at shannon@housinginnovations.us. If your agency creates a completely new RFP profile, the user will not have access to anything that was previously submitted. Contacting Housing Innovations is recommended to provide a smoother submission experience for agencies.

Q: The application form in Zengine between 2C and 2D asks applicants to "Indicate the type of project for which you are applying from the list below (indicate one lettered option from dropdown list below)" with one option being D) New PSH project that has services funds from the DMHAS H2H initiative and will apply for CoC rental assistance only. However, slide 28 from the CT Balance of State (CT BOS) Continuum of Care (CoC) Semi-Annual Meeting March 24, 2023 states that Bonus Points for rental assistance (RA) projects that received CT DMHAS H2H services funding (both lead agencies and sub-recipients (but cannot have RA twice on same units). How should we answer this question in Zengine if a project that received CT DMHAS H2H services funding intends to apply for RRH?

A: If you intend to use H2H funding in an RRH project, for 2.D) select E) New RRH project that will create new units to serve participants who are literally homeless. Projects will use CoC rental assistance and service funds. Even though you will not use CoC services funds, E is the most appropriate option for the type of project you describe. Please be sure, in

2.O. under Project Description, to state your intention to use CT DMHAS H2H funds for services, including the total amount you will have for supportive services from that source, and what that amounts to per household in the proposed project.