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# FY 2015 CoC Program Competition Overview

The FY 2015 CoC NOFA included six overarching policy priorities in line with HUD Strategic Plan goals and *Opening Doors:*

## Strategic Resource Allocation:

* Comprehensive Review of Projects
* Maximizing the Use of Mainstream Resources
* Leveraging Resources through Partnerships
* Reviewing the Efficacy of Transitional Housing

## Ending Chronic Homelessness:

* Increasing Units
* Targeting

## Ending Family Homelessness

## Ending Youth Homelessness

## Ending Veterans Homelessness:

* Prioritizing veterans and their families
* Close collaboration with local and veteran-serving organizations

## Using a Housing First Approach:

* Removing barriers to entry
* Centralized or Coordinated Assessment System
* Client-centered Service Delivery
* Prioritizing households most in need
* Inclusive decisionmaking

# Competition Summary:

HUD awarded $1.94 billion in the FY 2015 CoC Program Competition.

* HUD designated 4 Collaborative Applicants that requested Unified Funding Agency (UFA) designation.
* HUD only permitted CoCs to apply for the following new projects:

1. new Permanent Housing Bonus projects;
2. new projects created through reallocation;
3. CoC planning; and
4. UFA costs (if applicable).

* HUD required CoCs to rank all projects applying for grant funds, except CoC planning and UFA Costs.
* HUD did not require a minimum CoC Application score for CoCs to receive funding for new projects; however, CoC Applications with higher scores had a better chance of being awarded projects ranked in Tier 2.
* HUD established Tier 1 as equal to 85 percent of the CoC’s FY 2015 Annual Renewal Demand (ARD) on the final HUD-approved Grant Inventory Worksheet (GIW) and Tier 2 was the difference between Tier 1 and the CoC’s ARD plus 15 percent of Final Pro Rata Need (FPRN) that CoCs were eligible to apply for through the permanent housing bonus projects.
* HUD required project applicants to submit their application to the CoC no later than 30 days before the November 20, 2015 application deadline to allow CoCs sufficient time to review, rate, and rank the project applications.
* HUD required CoCs to prioritize their projects in the local CoC competition process and to notify project applicants that their projects were accepted or rejected 15 days prior the November 20, 2015 application deadline.. This was to allow any project applicant that believed it was denied the opportunity to participate in the local CoC planning process in a reasonable manner to submit a Solo Application in *e-snaps* directly to HUD prior to the application deadline of November 20, 2015.

# Tier 1 and Tier 2

**Tier 1–**HUD established Tier 1 at 85 percent of a CoCs ARD. CoCs could place any type of project in Tier 1 and HUD would conditionally select those projects for funding so long as the project applications passed **both** eligibility and threshold review. HUD announced Tier 1 awards on March 8, 2016.

**Tier 2–**HUD established Tier 2 as the difference between Tier 1 and the CoC’s ARD plus 15 percent of FPRN that was available for the permanent housing bonus. HUD announced Tier 2 awards on May 2, 2016. All projects in Tier 2 competed with all other Tier 2 projects in the country on a 100-point scale:

**60 points** were directly proportional to the CoC score;

**20 points** were based on where the CoC ranked the project within Tier 2; higher ranked projects received more points;

**10 points** were based on the type of project; and

**10 points** were based on the degree to which the project used housing first practices.

**Projects Straddling Tier 1 and Tier 2–**HUD first reviewed project applications that straddled Tier 1 and Tier 2 to determine if the project passed eligibility and threshold review. If the project passed eligibility and threshold review, HUD automatically considered for conditional award the portion of funding in Tier 1.

HUD scored the Tier 2 portion of the project like every other Tier 2 project. This meant that if the Tier 2 portion scored high enough to be selected, then HUD conditionally awarded the entire project. However, if HUD did not select the Tier 2 portion, then HUD only conditionally awarded the Tier 1 portion so long as the project would be feasible with only Tier 1 funding.

**Why HUD Funded Lower Rank Projects–**There were instances where HUD selected a lower ranked Tier 2 project over a higher ranked Tier 2 project, which occurred for one of two reasons:

* 1. the lower ranked project was a permanent housing project and the higher ranked project was a transitional housing or supportive services only (SSO) project, in which case, the points for the type of housing may have outweighed the points for how the projects were ranked by the CoC; or
  2. the lower ranked project and the higher ranked project were the same type (e.g., permanent housing) but the lower ranked project demonstrated a commitment to Housing First and the higher ranked project did not.

**CoC Planning and UFA Costs**–HUD conditionally selected these projects if they passed eligibility and threshold review. HUD did not rank them in Tier 1 or Tier 2.

# Establishing CoC’s ARD

## HUD established the CoC’s ARD using the GIW and based on 24 CFR 578.17(b)(2). HUD allowed for a 10-day grace period after NOFA publication for CoCs to make final changes.

If CoCs failed to include eligible projects on the GIW they submitted for final HUD approval, HUD still allowed the CoCs to submit the projects during the Competition; however, HUD did not increase the CoC’s ARD.

If CoCs included projects on the GIW that were not eligible for renewal in in the FY 2015 CoC Program Competition, HUD deleted those projects from the GIW and reduced the CoC’s ARD by the amount of the ineligible project.

# Project and CoC Applications

HUD redesigned the FY 2015 CoC Application to place more emphasis on system level performance and CoC-wide progress on national goals set in *Opening Doors*.

**Consolidated Application–**The CoC Consolidated Application was a two-part submission–(1) CoC Application and (2) Project Priority Listing, which included the locally approved and ranked project applications. If a CoC failed to submit either part, HUD considered the application to be incomplete. This meant that HUD could not consider any project for funding during the FY 2015 CoC Program Competition. A number of CoCs failed to submit complete applications which resulted in not only loss of funding, but also made the CoC ineligible to receive bonus funding or planning funding. **Project Applications–**HUD required project applicants to complete the following based on project type:

**Renewal–**verify basic project and budget information, answer housing first and barrier to entry questions, select the grant term, and certify the budget request for renewal.

**New–**complete the project application in its entirety.

**CoC Planning–**answer questions concerning governance and collaboration in addition to budget and planning activity details.

**UFA Costs–**complete budget information only–most of the UFA information was captured during FY 2015 CoC Program Registration.

**Housing First–**HUD made the final selection about whether a project used housing first practices based on the answers provided to both the Housing First and low-barrier questions in the project application.

**Award Amount Changes–**HUD may have reduced an award amount for a project because the project applicant requested an amount that exceeded the amount available.

**New project created through reallocation–**HUD reduced the award amount when a project applicant requested more funding than was available from reallocation–for example, if a CoC reallocated $10,000 but applied for a new reallocated project for $15,000, HUD only awarded $10,000.

**New project created through the permanent housing bonus–**HUD reduced the award amount if the CoC applied for more than the maximum amount available to the CoC for the permanent housing.

**Renewal projects–**HUD reduced the award amount to fit within the ARA–for example a renewal project may have exceeded the ARA or a rental assistance project incorrectly changed the unit configuration or number of units approved on the final HUD-approved GIW.

* HUD awarded 3 bonus points to CoCs that submitted both the CoC Application and the CoC Priority Listing by 7:59:59 on November 19, 2015.

**High Performing Community**–HUD did not approve any CoC to serve persons defined as homeless under paragraph (3) of the definition of homeless in 24 CFR 583.5. Therefore, all projects funded during the FY 2015 CoC Program Competition are prohibited from serving this population with FY 2015 CoC Program funds.

# Permanent Housing Bonus

CoCs could have created the following new projects through the permanent housing bonus for up to 15 percent of the CoC’s FPRN:

**Permanent Supportive Housing projects** that serve 100 percent chronically homeless individuals, families, and unaccompanied youth; and

**Rapid Re-housing projects** that serve homeless individuals, families, and unaccompanied youth coming directly from the streets or emergency shelters or persons fleeing domestic violence (category 4 of the definition of homelessness).

# Budgets and Unit Configuration

HUD adjusted budgets and unit configurations if while reviewing the application, the numbers did not match those on the final HUD-Approved GIW.

**Project Budgets–**If a project application budget exceeded the ARA on the final HUD-approved GIW, HUD reduced the amounts to match the amount on the GIW.

**Unit Configuration–**If a project application requested a unit configuration different than the final HUD-approved GIW, HUD changed the unit configuration to match the unit configuration on the final HUD-approved GIW.

# Reallocation

All CoCs could create new projects by reallocating funds in whole or part from existing eligible renewal projects without decreasing the CoC’s ARD. HUD did not guarantee funding for such new projects created through reallocation, rather HUD required that such projects meet the requirements set forth in the FY 2015 CoC Program NOFA and pass project eligibility and threshold review. CoCs could reallocate to create the following new projects:

1. **Permanent supportive housing** for chronically homeless individuals, families, and unaccompanied youth;
2. **Rapid re-housing** to serve homeless individuals, families and unaccompanied youth coming directly from the streets or emergency shelters or persons that met the criteria of category 4 of the definition of homeless, which means they were fleeing domestic violence;
3. **Dedicated Homeless Management Information System** (HMIS); and
4. **Supportive Services Only** (SSO) for a coordinated entry process.

**Projects Automatically Rejected**–HUD rejected any new project application submitted by a CoC that was not a Permanent Housing Bonus projects or a project created through reallocation.

**Renewal Projects Not Funded in FY 2015 Competition–**For eligible renewal projects that were reallocated in whole–meaning all of the eligible renewal funding for a project was reallocated to create a new project–when the operating year ends in FY 2015, the project will no longer receive HUD funding and therefore, must retain other sources of funding to continue operations or find other suitable projects to transfer program participants.

**New projects created through reallocation–**Are not continuations of reallocated renewal project and therefore, will not have the same start date as the reallocated renewal project. Such projects usually cannot serve the same participants that currently reside in the reallocated renewal project.

**New Permanent Supportive Housing projects** serving chronically homeless participants may only serve those who come directly from the streets or other places not meant for human habitation, emergency shelters, or safe havens. Participants who come from transitional housing projects are ineligible.

**New Rapid Re-housing projects** may only serve those who come directly from the streets or emergency shelters or who are fleeing domestic violence.

**Participants fleeing domestic violence**, dating violence, sexual assault, stalking, or other dangerous or life threatening conditions that relate to violence against the individual or family member that makes them afraid to return to their primary nighttime residence (including victims of human trafficking) are eligible for both types of new permanent housing projects so long as meet the criteria established in paragraph (4) of the definition of homeless.

# FY 2015 Point Structure

For the FY 2015 CoC Program Competition, HUD awarded up to 200 total points for all scoring categories: CoC Coordination and Engagement; Project Ranking, Review, and Capacity; Homeless Management Information System; Point-In-Time Count; System Performance; and Performance and Strategic Planning. A detailed explanation of each category is provided below to assist your CoC in its self-evaluation.

## Part I: CoC Coordination and Engagement–49 possible points

HUD required CoCs to demonstrate the existence of a coordinated, inclusive, and outcome-oriented community process, which included demonstrating a fair and impartial project review and selection process.

**Coordination–**CoCs were to describe:

1. Coordination with Federal, state, local, private and other entities;
2. Participation with Consolidated Plan Jurisdictions;
3. How they work with Emergency Solutions Grant (ESG) recipients;
4. How they coordinate services for victims of domestic violence;
5. Coordination with Public Housing Agencies; and
6. Strategies to ensure homelessness is not criminalized.

**Important Points to Consider**

* + - CoCs generally scored well on their responses to describing how they work with ESG recipients to determine the local ESG funding decisions and assist with the development of performance standards and evaluate outcome for ESG-funded activities.
    - Many CoCs lost points because they did not have a strong partnership with their PHAs. Many CoCs would have improved their scores if their PHAs were accepting more people experiencing homelessness into housing programs and if their PHAs had homelessness preferences.

**Engagement–**CoCs were to describe how they:

1. Solicited and considered a full range of opinions and were open to new proposals;
2. Coordinated with Consolidated Plan jurisdictions and Emergency Solutions Grant funded programs;
3. Coordinated discharge planning;
4. Utilized their Centralized or Coordinated Entry process;
5. Reviewed, ranked and selected projects in a manner that was transparent, impartial, and addressed the needs of the community; and
6. Monitored the performance of CoC Program recipients.

**Important Point to Consider**

* CoCs scored well on providing a detailed description of how they solicit a full range of opinions from individuals and organizations with knowledge of homelessness or have an interest in preventing and ending homelessness.

## Part II: Project Ranking, Review, and Capacity–26 possible points

HUD required CoCs to demonstrate the existence of a coordinated, inclusive, outcome-oriented community process for soliciting and objectively reviewing, ranking, and selecting project applications and to demonstrate their ability to monitor the project performance of grants and the capacity of recipients.

**Project Ranking, Review and Selection–**Applicants were required to

1. Submit the number of renewal project applications and indicate how many Annual Performance Reports they reviewed;
2. Describe how project applications were reviewed, ranked, and selected;
3. Attach written, dated evidence that clearly showed that information about the process was made available through public postings;
4. Describe how the severity of needs and vulnerabilities were considered in determining the project application priority;
5. Indicate if the CoC used the reallocation process and if so, attach written documentation that this process was publicly posted;
6. Indicate if project applications were rejected, and if so, attach written documentation that the rejected applicants were notified and the rejections were publicly posted; and
7. Identify if the Annual Renewal Demand (ARD) was equal to or less than the final ARD on the final HUD-approved GIW.

**Important Points to Consider**

**Public Availability–**The majority of CoCs scored well on making the local competition review, ranking, and selection criteria publicly available and identifying the mediums they used.

**Severity of Need–**CoCs scored in the moderate to low range when addressing the severity of needs and vulnerabilities. When considering the severity of needs, over half of the responses did not specifically identify the needs and vulnerabilities of populations the CoCs take into account, or did not indicate that projects that serve these populations receive additional consideration in the review, ranking, and selection process. Lower scores were the result of failing to do the following:

1. provide detailed examples of how the CoC factored a project population into the review, ranking, and selection process;
2. specifically identifying the needs and vulnerabilities of the populations the CoCs take into account; or
3. indicating projects that served these populations received additional consideration in the review, ranking and selection process.

## Public Posting of CoC Consolidated Application– HUD required CoCs to provide evidence that they publicly posted all parts of the CoC Consolidated Application–this included the final project application ranking and notification to the full CoC membership. The majority of CoCs scored poorly on this question because they did not provide all documentation that HUD required or the information was not provided within the HUD-established deadline.

## Monitoring Performance–The majority of CoCs scored in the mid-range for monitoring performance of CoC program recipients. This included providing the process and criteria for monitoring project performance as well as how they assess the capacity of the project to implement program requirements.

## Part III: Homeless Management Information System–18 possible points

HUD required CoCs to demonstrate that they have a functioning HMIS that facilitates the collection of information on homeless individuals and families using residential and other homeless services and stores the date electronically. Domestic violence and legal services organizations are prohibited from entering data into HMIS but are required to have a comparable database that supplies aggregated, non-personally identifiable information to their CoC. This section included HMIS implementation, funding sources, bed coverage, and data quality including:

1. Providing the governance charter that outlines the roles and responsibilities of the CoC and HMIS Lead, or other document that provided this information;
2. Indicating if the CoC has an HMIS Policies and Procedures Manual, and attaching a copy to the application;
3. Identifying if the CoC has agreements in place that outline the roles and responsibilities between the HMIS Lead and the Contributing HMIS Organizations (CHOs);
4. Providing information for a number of questions about the bed coverage rate, including:
   * bed coverage information from the FY 2015 Housing Inventory Count (HIC) and for each project type with a bed coverage rate below 85 percent, provide the specific steps they planned to take to increase the percentage over the next 12 months,
   * information regarding the submission of the 2015 HIC into HDX, and information about beds from the HIC for each project type; and
   * how often the CoC reviews or assesses bed coverage.
5. Identifying the reports the HMIS generates;
6. Identifying how frequently the CoC reviews data quality; and
7. Identifying the Federal partner programs that use the CoC’s HMIS.

**Important Points to Consider**

* CoCs scored well on providing their governance charter and identification of its location in the application.
* For the questions regarding bed coverage rates, those who had bed coverage rates below 85 percent scored high by providing detailed plans with specific steps they are taking in the next 12 months to increase rates.
* CoCs scored well on their ability to generate HMIS reports from the list provided in the application.

## IV: Point-In-Time Count–9 possible points

HUD required CoCs to provide the following information about the Point-In-Time (PIT) count including the methods they used, the decisions behind the selection of the methodology, changes in methodology, and data quality.

* Sheltered PIT count, count methods, and data quality, and
* Unsheltered PIT count, count methods, and data quality.

Overall CoCs scored in the well to moderate range in all areas for reporting PIT information. Questions were completed with the required information. CoCs provided descriptions of their PIT count methodology and why this methodology was selected.

Over one half of the CoCs did not change their methodology from 2014 to 2015.

CoCs scored lower on questions regarding changes to PIT count methodologies. The questions asked for a detailed description of the change. Many did not clearly describe their new methodologies, or failed to focus on a methodology changes.

## Part V: System Performance–38 possible points

HUD reviewed CoC Applications based on the CoC’s plan for and progress to reduce homelessness in its geographic area and decreasing the number of recurrences of homelessness. Questions focused on chronic homelessness, particularly those with the longest experience of homelessness.

HUD evaluated CoCs on the extent to which their work furthers the achievement of HUD’s goals, as articulated in HUD’s Strategic Plan and *Opening Doors,* through planning and performance.

HUD required that CoCs provide information on the following performance measures:

1. Point-In-Time Count
2. First Time Homelessness
3. Length of Time Homeless
4. Successful Permanent Housing Placement or Retention
5. Returns to Homelessness
6. Job and Income Growth
7. Thoroughness of Outreach

CoCs scored well for providing complete, detailed information in their responses for the performance measures above.

HUD also outlines three performance and strategic planning objectives.

Ending Chronic Homelessness

Ending Homelessness Among Households with Children

Ending Youth Homelessness

Ending Veteran Homelessness

For the three performance and strategic planning objectives, HUD required CoCs to provide:

* Data and details of why there were increases, decreases, or no change for a number of populations, including people experiencing chronic homelessness, families with children, youth, and veterans;
* An update from the FY 2013/2014 CoC Program Competition Application of the strategies and actions that were accomplished;
* Factors for prioritization of households with children;
* Strategies to address the needs of people experiencing chronic homelessness, families with children, youth, and veterans.

CoCs scored well on providing detailed information on accomplishing strategies and actions from their FY 2013/FY 2014 application.

The majority of CoCs scored in the mid-range for describing their plan to rapidly rehouse every family that became homeless within 30 days of becoming homeless.

CoCs scored well for providing information on how they ensure veterans that are eligible for VA services were identified, assessed and referred to the appropriate resources.

For questions regarding veterans who are not eligible for assistance through the U.S. Department of Veterans Affairs, and how the CoC prioritizes resources to serve this population. CoCs scored lower, and narratives often did not fully address both parts of the question.

# Other Important Points to Consider

1. It is important that CoCs have a full accounting of **all** CoC-funded projects within their geographies. This includes knowing the total number of CoC-funded projects, the types, and the expiration dates. It is important that all eligible renewal grants are indicated on the final HUD-approved Grant Inventory Worksheet.
2. Only those renewal projects with an operating end date in Calendar Year 2016 (CY) (the period between January 1, 2016 and December 31, 2016) were eligible for renewal. In accordance with the FY 2015 CoC Program NOFA, HUD reduced CoCs’ ARD amounts by the amounts of any ineligible renewal projects.
3. HUD provided detailed instructions, instructional guides, and answers to frequently asked questions in order to assist CoC and project applicants to ensure all application questions are fully addressed. Additionally, the HUD Exchange Ask A Question (AAQ) is also available during the competition to assist applicants in locating the proper guidance. All of these resources were available on the HUD Exchange.
4. If project applicants requested less funding or units than what they were eligible to request, HUD awarded the lesser amount. This means that the CoC will be limited to that amount in future CoC Program Competitions.
5. HUD required project applicants to provide a description of the project, which should have described the entire scope of the proposed project and fully answered the question as outlined by the Project Application Detailed Instructions.
6. Project applicants frequently listed ineligible costs or failed to provide sufficient detail in the Quantity and Detail column of the supportive services, operating, and HMIS budgets for HUD to make an affirmative determination that awarded funds will be spent appropriately. This resulted in numerous conditions placed on projects and, occasionally, the removal of project funds.
7. Project applications that indicated they would serve persons defined as homeless under paragraph (3) of the definition of homeless in 24 CFR 583.5 were conditioned and required to confirm that the project(s) will only serve persons who are eligible.
8. New permanent housing (PSH or RRH) projects must agree that all participants will come from eligible locations:

**PSH participants** may only come from the streets, other places not meant for human habitation, emergency shelters, or safe havens.

**RRH participants** may only come from the streets, emergency shelters, or fleeing domestic violence, including victims of human trafficking.

1. HUD required project applicants to either maintain or increase the number of beds dedicated to serving persons experiencing chronic homelessness. HUD conditioned projects if the number included in the application was less than the number dedicated in the FY 2014 application or if the number was less than the total number of beds for those projects required to only serve persons experiencing chronic homelessness.