

Special Unsheltered NOFO Frequently Asked Questions – 9/2/2022

1. Is one person (street homeless, unsheltered) a household?

Yes

2. SSO – Coordinated Entry: if we are providing health care services to the primary target populations via a coordination of care strategy, are those staff persons expected to utilize the coordinated entry process and system? Or are they facilitating an individual’s access to other CoC partners that are implementing the coordinated entry process? “SSO- Coordinated Entry – Coordinated entry process, will it cover the CoC’s entire geographic area?” If we are proposing to provide SSO in 3 boroughs but will collaborate with program partners across all boroughs on the coordinated entry process for those we are working with directly, can we say “yes” to covering the CoC’s entire geographic area?

The question referenced here applies only to SSO-CE projects, meaning projects whose work will involve *building, maintaining, or improving* a Coordinated Entry system. New SSO projects would not be expected to receive client referrals through Coordinated Entry, but rather expected to facilitate client access to Coordinated Entry as a means of accessing permanent housing options.

3. SSO: assistance with moving costs – can this be from a safe haven to PSH or other permanent housing?

Yes. One-time moving costs are an eligible expense and include truck rental and hiring a moving company. Assuming the client meets homeless eligibility requirements, there are no restrictions on previous housing location as it relates to moving costs.

4. SSO - LIMITATIONS: “The recipient may only assist program participants for whom the recipient or subrecipient of the funds is not providing housing or housing assistance.” If we are a Safe Haven site operator, is this considered housing and if so, we cannot provide supportive services to those in this facility? Or is it considered transitional housing and a form of shelter, as defined by “literally homeless”, so we can provide SSO?

HUD considers NYC DHS Safe Havens a form of emergency shelter. Therefore, operating a Safe Haven and serving clients from that program through a Special Unsheltered NOFO-funded SSO project would be allowable.

For more information about how HUD sees the differences between SSO projects and housing projects (RRH/PSH/TH-RRH), see this tool:

<https://www.hudexchange.info/resource/3875/coc-program-sso-housing-component-decision-tool/>

5. If safe havens are transitional housing, is this considered a Housing First Approach tactic, getting street homeless stabilized, assessed for RRH or PSH?

The Housing First model speaks to the transition from unhoused circumstances to one of permanent housing. HUD considers NYC DHS Safe Havens a form of emergency shelter. If the project removes barriers/preconditions to program enrollment and works to minimize the likelihood of program discharge (see more details below), it is considered Housing First. For more information on Housing First, see this USICH Housing First checklist:

https://www.usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf

The Special Unsheltered NOFO New Project Application asks the following question regarding Housing First, which is copied from the E-snaps application required for submission to HUD:

Will your project use a Housing First approach? (Yes/No)

If yes, explain how your project will do the following:

- *Eliminate barriers to program enrollment*
- *Prevent program termination/discharge*
- *Eliminate barriers to obtaining permanent housing*

6. SSO - LIMITATIONS: “Services can only continue for six months after a client is placed in permanent housing.” If a client is placed in PSH, we can provide care coordination to them only for 6 months? Or is it other forms of permanent housing, not PSH?

Correct—services through an SSO project can only continue for six months following a client’s placement into permanent housing (PSH, RRH, or other types). Supportive services must be “necessary to assist program participants in obtaining and maintaining housing” and would at that point be intended to assist in a client’s adjustment to their new living situation.

7. BUDGET: If selected, the grant is for 3 years but same amount each year? Will there be any accommodation in years 2 & 3 for COLA increases for staff positions?

The initial grant term of three years assumes the same annual budget for the first three years. If a project requires an expanded budget in future years, a provider must apply for a project expansion through during the renewal process of the annual CoC Program NOFO. This expansion, however, would be to add units or expand services offered in a CoC project.

HUD does NOT increase supportive services budgets each year to account for cost-of-living adjustments. With that in mind, providers ought to consider long-term sustainability as they design their budgets, recognizing that they will not be given money each year to increase salaries via the HUD grant.

8. SSO (Non-CE): Allowed expenses – is office space/rent an allowable expense for SSO (Non-CE) project staff?

Yes. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service. Such costs should be included under the “Operating Costs” line in the Supportive Services Budget section of the application.

9. How is the CoC going to turn the individual applications into a collaborative application that is competitive and that maximizes the City's global budget award?

Through extensive stakeholder meetings and comprehensive application review by the CoC Steering Committee, persons with lived experience of homelessness, and other subject matter experts, we are working to create a unified and competitive application for funding that will be submitted to HUD. The New Project Review Committee will review project applications with an eye towards quality and innovation to ensure that we are maximizing the available funds through this competition to improve and expand housing/services available to individuals and families experiencing homelessness in NYC.

10. Is there a maximum amount we can request, or any guidance on the funding range we should consider as reasonable for this one? Will there be requests to increase/decrease the individual project budgets submitted?

No, there is no maximum request amount that has been set by the CoC. Project applicants are encouraged to apply for a budget that will allow them to successfully implement their proposed project. The NYC CoC is only eligible to apply for \$20million annually, so all projects that are sent to HUD cannot cumulatively exceed this amount. The CoC reserves the right to request budget changes (increases or decreases) to ensure that our project list does not exceed total available funds in this NOFO.

11. How will the CoC determine which projects are accepted in the local competition? Will the CoC simply choose projects based on their score until the money runs out?

The CoC will first conduct a threshold review of all applications received in the local competition to ensure that they meet minimum standards as established by HUD. All projects that pass minimum threshold will then be sent to the New Project Review Committee for review. The Review Committee will determine ranking and inclusion of projects in the NOFO, driven primarily by application score. As mandated by HUD, the ranking tool and decisions made will be posted publicly on the CoC website following the completion of the review process. If needed, the Review Committee can consult the CoC Co-Chairs and Steering Committee for guidance in determining ranking and project inclusion. For more information on project scoring, please see [Appendix B: Application Scoring Matrix](#).

12. If the applicant agency has an existing federally negotiated/approved indirect rate can that be used in this application since this is federal funding?

Yes. If your agency has an existing federally negotiated or approved indirect cost rate, that can be used in this application for funding. If the rate is a federally negotiated indirect cost rate, the project application must include the corresponding negotiated indirect cost rate agreement signed by the cognizant agency. If your agency does not have an existing negotiated indirect cost rate, we expect that you will use the *de minimis* rate of 10%.

13. If we do not have a federally approved indirect cost rate, do we need to use 10% and does this have to be itemized? Generally overhead is not itemized because it's spread across all grants.

Yes, applicants that do not have a federally approved indirect cost rate should use the *de minimis* rate of 10%. The 10% *de minimis* rate must only be used to pay for overhead costs that are not directly charged to federal awards. If all costs are charged directly to the federal award (e.g., space costs, utility, and administrative costs), then the recipient should not also charge the 10% *de minimis* rate. See below for language from the Notice of Funding Opportunity on indirect cost rates. For more information, see this [Indirect Cost Toolkit for CoC and Emergency Solutions Grant Programs](#).

“For each applicant or intended subrecipient that meets the conditions for the *de minimis* rate under [2 CFR 200.414\(f\)](#) and will use that rate to charge indirect costs, the project application must clearly state the intended use of the *de minimis* rate of 10 percent of Modified Total Direct Costs (MTDC). As described in 2 CFR 200.403, costs must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both. Once an organization elects to use the *de minimis* rate, the organization must apply this methodology consistently for all Federal awards until the organization chooses to negotiate for a rate, which the organization may apply to do at any time. Documentation of the decision to use the *de minimis* rate must be retained on file for audit.”

14. Would the CoC award a contract to an organization under investigation?

The New Project Review Committee is responsible for determining which project applications are accepted and submitted to HUD for funding consideration. Should the NYC CoC receive an application from an organization currently under an investigation of any kind, the New Project Review Committee will take this information into account in their review. CoC Leadership, including the Co-Chairs and Steering Committee, will be consulted for guidance in such instances.

While the NYC CoC selects which projects will be submitted to HUD for consideration, HUD ultimately decides which projects will receive funding.

15. Can this funding be used to fund the construction of a new building?

No. New Construction or rehabilitation costs are not eligible under the Unsheltered Set Aside, only the Rural Set Aside in this NOFO.

16. If we receive city funds for current transitional housing & related services, can we apply for an RRH or SSO project through the Special NOFO to supplement services for that existing program? Or must they be kept separate?

Special NOFO funding cannot be used to replace existing funds from local or state government. If you are interested in applying for funding to enhance services for an existing project, you should review this [HUD Housing Component Decision Tool](#) to help you decide which project type is most appropriate.

17. Is there a ceiling for how much HMIS funding you can request within the SSO category?

No. There is not a ceiling for how much HMIS funding you can request as a part of your SSO project budget.

18. Should applicants include letters of support/commitment from project partners to be responsive to the partnerships scoring criteria?

Yes, applicants are encouraged to include letters of support/commitment from project partners with their new project applications. Partnerships with healthcare organizations and leveraging of local housing resources have both been recognized by HUD and the CoC as policy priorities in this NOFO. For more information on these partnerships, please see the following resources:

- National Alliance to End Homelessness – [Partnerships Fact Sheet](#)
- [Special Unsheltered Notice of Funding Opportunity](#) (Housing- page 46, Healthcare - page 48)

19. How do we know if our current data system is HMIS Compliant? Do you have a list of HMIS compliant vendors?

The HMIS Data Standards outline data elements that are required in an HMIS to meet participation and reporting requirements established by HUD and other federal partners at VA and HHS. These standards are updated on an annual basis. For the most up to date version, please visit: [FY 2022 HMIS Data Standards - HUD Exchange](#)

Commonly used HMIS-compliant vendors include, but are not limited to:

- Adsystem – Adaptive Enterprise Case Management
- All Things Homeless – HITS
- Bell Data Systems – Client Services Network
- Bitfocus – Clarity Human Services HMIS
- CaseWorthy – HMIS
- Coelho Consulting – CARES
- Digital Gnomes – MAACLink
- Eccovia Solutions – ClientTrack

- Foothold Technology – AWARDS
- Simon Solutions – Charity Tracker
- Social Solutions – Efforts to Outcomes (ETO); Apricot
- WellSky (Mediware) – ServicePoint

20. May we use this funding for our general operating budget?

Funding requested through the Special Unsheltered NOFO must be used to create a new housing project or new services that will serve individuals and families experiencing homelessness or fleeing domestic violence. Organizations cannot apply for funds with the sole purpose of increasing their general agency operating budget. Depending on the project type, applicants may be eligible to apply for operating funds, but they must be related to the specific project that will be created with the funding, not used generally throughout the organization. Additionally, applicants may elect to use an indirect cost rate in their project applications to pay for general overhead costs that are not directly charged to federal awards (e.g.: space costs, utility, administrative costs). For more information on eligible costs, please view [Appendix A: Project Type Detailed Descriptions](#) and the [CoC Interim Rule \(24 CFR 578 37-63\)](#).

21. What activities are eligible as supportive services? Where can I find the full list?

The full list of supportive services as defined by HUD is included in [Appendix A: Project Description Details](#) under SSO eligible costs. Full regulatory language on supportive services under the CoC program can be found in the [CoC Interim Rule](#) (section 578.53).

22. Can services be provided only to people who are currently homeless or within six months of moving into permanent housing after being homeless?

Participant eligibility is described on pg. 9 of the [Notice of Funding Opportunity](#).

Projects funded through this NOFO must have the following eligibility criteria for program participants:

a. Projects funded through the Unsheltered Homelessness Set Aside must have the following eligibility criteria for program participants:

1. meet the criteria of paragraph (1) of the definition of homeless at 578.3, except that persons coming from transitional housing must have originally come from places not meant for human habitation, emergency shelters, safe havens, or institutions where they resided for 90 days or less and originally came from places not meant for human habitation, safe havens, or emergency shelters; or

2. meet the criteria of paragraph (4) of the definition of homeless at 578.3.

In the event that a client of an SSO program funded through the Special Unsheltered NOFO becomes permanently housed, that client would be eligible to continue receiving supportive services for up to six months after permanent housing placement.