



***What is the Continuum of Care Competition?***

The Continuum of Care (CoC) Program is a HUD program and funding source designed to promote a community-wide commitment to the goal of ending homelessness. The CoC Program was created through the McKinney-Vento Homeless Assistance Act (1987) as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. The CoC Program Interim Rule (24 CFR Part 578) became effective in 2012.

The CoC Program is designed to promote community-wide planning and strategic use of resources to address homelessness; improve coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improve data collection and performance measurement; and allow each community to tailor its programs to the particular strengths and challenges in assisting homeless individuals and families within that community

***What is a NOFO?***

The Notice of Funding Opportunity (NOFO) establishes funding criteria for HUD's programs, including the CoC Program. HUD is making available approximately \$2.6 billion in Fiscal Year 2021 for the CoC Program nationwide. The FY 2021 CoC NOFA was released by HUD on August 18, 2021.

***Where can I read official documents and stay up-to-date on program information?***

HUD posts official releases related to the FY 2021 CoC Program Competition at [https://www.hud.gov/program\\_offices/comm\\_planning/coc/competition](https://www.hud.gov/program_offices/comm_planning/coc/competition). CAFTH will post Memphis-specific program information at <http://www.cafth.org/2021-coc-notice-of-funding-opportunity/>.

CoC Program Laws, Regulations, and Notices are posted at [www.hudexchange.info/coc/coc-program-law-regulations-and-notices/](http://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/).

***Why do I not submit my application to HUD directly?***

Since 1994, HUD has required each community to come together to submit a single comprehensive Continuum of Care (CoC) application rather than allowing applications from individual providers in a community. HUD's intent in creating this structured application process was to stimulate community-wide planning and coordination of programs for individuals and families who are homeless.

The Memphis and Shelby County Homeless Consortium serves as the TN-501: Memphis/Shelby County Continuum of Care (CoC), designated by HUD as the group organized to carry out the responsibilities prescribed in the HEARTH Act for a defined geographic area. The Consortium has designated Community Alliance for the Homeless (CAFTH) as the Lead Agency and Collaborative Applicant for the CoC Program Competition.

***Who is eligible to apply for a project application?***

Eligible project applicants for the CoC Program Competition include nonprofit organizations, states, and local governments. For-profit entities and individuals are ineligible.

All applicants for financial assistance must have an active DUNS number and an active registration in the System for Award Management (SAM) before submitting an application. *NOTE FOR NEW APPLICANTS: Getting a DUNS number and completing SAM registration can take up to four weeks; therefore, applicants should start this process or check their status early.*

***What type of new projects can be funded under the CoC Program?***

New project applications can be for Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), or Joint TH and RRH (TH-RRH). New projects are ranked alongside all current renewal projects for available funding, which is very limited and competitive.

New projects specifically applying for the DV Bonus can be for Rapid Rehousing (RRH) or Joint TH and RRH (TH-RRH) projects serving survivors of domestic violence, dating violence, or stalking.

***What is e-snaps?***

E-snaps is the electronic grants management system used by HUD's Office of Special Needs Assistance Programs (SNAPS) where agencies must submit project applications. E-snaps can be accessed at <https://esnaps.hud.gov/grantium/>. CAFTH will host optional lab times for any applicants who would like assistance completing application requirements in the e-snaps online portal. You must check the CAFTH NOFA webpage to register in advance.

***Why is there not more notice before applications are due?***

Unfortunately, HUD does not provide us with any advance notice regarding when they will be releasing the NOFA each year. HUD released the FY 2021 NOFA on August 18, 2021, and requires each CoC to establish a deadline for local project applications that is no later than 30 days before the FY 2021 CoC Program Competition application submission date of November 16, 2021. Project applications for Memphis/Shelby County are due by **October 6, 2021**.

***How are funding decisions made?***

Project applications are reviewed by the Rank & Review Committee, which is composed of the Consortium's Governing Council (except those who are submitting an application for funding) and three additional community members elected at the Consortium's Annual Meeting.

The Rank & Review Committee meets for multiple days to rank projects based on three factors: Performance Evaluation, Strategic Resource Allocation, and Community Impact. Although CAFTH staff is available to answer questions about the CoC Program, CAFTH does not have a vote or say on how the Committee ranks projects. The Committee ranks and sorts projects into two tiers; HUD establishes each CoC's Tier 1 and Tier 2 amounts based on the total amount of funds requested by eligible renewal project applications. The Ranking process is extremely competitive, with all new and renewal projects competing for the same limited amount of funding available.

CAFTH submits the Priority Listing (Ranking), CoC Collaborative Application, and Project Applications to HUD. HUD first selects new and renewal project applications to fund in Tier 1 before scoring project applications in Tier 2, incorporating the CoC Collaborative Application score and an individual project application score to determine which Tier 2 projects will be funded. HUD scores and makes *all final funding decisions* for the CoC Program.

***Can we receive an advancement of funds from HUD to pay our bills?***

For service providers that have limited capital, under some circumstances, cash advances are permitted in lieu of reimbursements under the ESG and CoC programs. For recipients and subrecipients that are able to meet the requirements in 2 CFR 200.305, it is not necessary for all costs to be incurred prior to receiving advanced funds.

Cash advances to a subrecipient must be limited to the minimum amounts needed and in accordance with the actual, immediate cash requirements of the organization in carrying out the approved activities of the project. Cash advances cannot be a portion of the contracted award amount each month.

If the recipient or subrecipient does not meet the requirements of 2 CFR 200.305, then cost reimbursement is the preferred method of payment for subrecipients.

([https://ecfr.federalregister.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.305#p-200.305\(a\)](https://ecfr.federalregister.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.305#p-200.305(a)))

The Office of Inspector General provides some ground rules and examples of how to set up and maintain these internal controls in the article: Implementing the Five Key Internal Controls: <https://www.hudexchange.info/resource/5065/hud-integrity-bulletins/>

Additional information is in the CoC Financial Management Virtual

Binder: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-financial-management/eloccs/>