



August 14, 2014

SNAPS In Focus: Lessons Learned in FY 2013

Welcome to the next message in our new “SNAPS In Focus” series. This week, I’m going to focus on the results of the FY 2013 portion of the FY 2013 - FY 2014 CoC Program Competition now that the final award announcement has been made. This was a unique competition and while a full debriefing will be made available in the next few weeks, I wanted to take a few minutes to highlight what generally went well and where communities could make improvements in the future.

I’d like to start on a positive note by saying that we at HUD were incredibly encouraged to see in the competition (and hear about anecdotally through our partners) that communities took on the challenge of strategic resource allocation. You read our Weekly Focus messages and carefully considered the policy priorities which resulted to important conversations about how the homeless services system should work and perform at the local level. We saw more projects being created through reallocation than ever before, with 229 CoCs that reallocated existing projects to create new permanent supportive housing for people experiencing chronic homelessness or rapid re-housing for families with children coming from the streets or emergency shelter.

We also were encouraged to see how communities embraced the new concepts such as prioritization for persons experiencing chronic homelessness and housing first. In the last few weeks we have released additional information and guidance on these topics, including the [Notice on Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status](#) and a brief on [Housing First in Permanent Supportive Housing](#). These are intended to provide CoCs and recipients with guidance on how to implement these policies, and we will continue to put out guidance and tools to assist communities in these efforts.

This was also the first year that the national Annual Renewal Demand (ARD) exceeded the total amount available for the FY 2013 CoC Program Competition. This made the room for error even less than any other year, yet it was evident upon review of the project applications that many CoCs are not reviewing project applications in a meaningful way and therefore failed to catch errors that resulted in projects either being rejected by HUD or not being awarded due to insufficient funding. I cannot stress enough how important it is for CoCs to thoroughly review each project application that is submitted for consideration—both new and renewal. Mistakes at the project application level can cost a CoC greatly. Reviewing project applications is also an opportunity for the CoC to identify potential capacity issues so that they can work with the recipients to resolve them sooner, hopefully avoiding monitoring findings or possible denial of funding by HUD.

Below, I want to highlight some of the areas that had the biggest impact to hopefully help CoCs and project applicants from making similar mistakes in the future:

- Each project application must pass the eligibility and quality threshold requirements as laid out in the NOFA in order to be funded, regardless of how it is ranked or prioritized by the CoC. CoCs are expected to take the time and carefully review EACH application that is ranked and included on the CoCs Priority Listing to make sure all applications are as strong and competitive as possible.



- Tier 1 and Tier 2 are financial thresholds to help CoCs plan and prioritize projects when the total amount of funding available is less than the national Annual Renewal Demand, as was the case in FY 2013. The Tier 1 funding line was firm and projects had to either fall entirely within Tier 1 or they were automatically pushed into Tier 2. CoCs must carefully review each budget to ensure that funding requests are accurate and precise.
- Project applicants should closely review the NOFA to ensure that the population they propose to serve is an eligible population for the type of project being requested. Applicants should answer each question thoroughly and provide the best information possible to describe what is being proposed and ensure that information is consistent throughout.
- A new reallocated project is a *new* project—not the continuation of an existing project. Even where the applicant and some aspects of the new project may be the same, the new reallocated project must meet all of the characteristics as required by the NOFA for the project type being requested. This means, for example, that when a transitional housing project is being reallocated to create a new permanent housing project, the participants in the transitional housing project were not eligible to be served by the new permanent housing project.

In the next couple of weeks, HUD will release a debriefing broadcast and will send out debriefing summaries to all CoCs to provide more detail about what we saw during the review of the FY 2013/FY 2014 CoC Applications and Project Applications. CoCs, recipients, and project applicants that were denied funding are all encouraged to view the broadcast when it becomes available.

I want to close this message by simply saying thank you. We recognize the extraordinary challenges that you are up against and the importance of the work that you do. As a former provider, I know how difficult the decisions we are asking you to make can be. We are working hard in SNAPS to identify areas where we can provide CoCs with more flexibility and provide better guidance so that CoCs and recipients are able to make informed decisions. We are all on the same mission together—to end homelessness for all persons.

As always, thank you for your service to people who are homeless and at-risk of homelessness.

Ann Marie Oliva
Deputy Assistant Secretary for Special Needs
Acting Director, Office of Special Needs Assistance Programs