

Phase 2: FY2023 CoC Local Application Q&A

8/2/2023; Updated 8/8/23

The responses in this FY2023 CoC Local Application Q&A are based on policy priorities and eligible project types from the FY2023 HUD CoC Notice of Funding Opportunity.

Q: Can you clarify the difference between a “New” project and an “Expansion” project type?

A: To qualify as an “Expansion” project for this application, a project must be:

1. An existing project that is currently operating and funded with CoC funds, AND
2. Seeking additional CoC funds to expand or increase the number of units or persons served and/or the services provided, and/or the bring the existing facility up to state/local government health and safety standards.

Projects qualifying as an “Expansion” project would use the **Local Application for CoC New Expansion Renewal Projects** and must have also submitted a renewal project application during Phase 1.

To qualify as a “New Project” for this application, a project must be:

1. Not currently operating and not utilizing CoC funding; OR
2. Currently operating with non-CoC funding and seeking CoC funds to increase or expand the number or units or persons served and/or services provided.

Projects qualifying as a “New” project would use the **Local Application for New Projects**.

Please note that CoC funding requested in the “Expansion” project application or the “New” project application may not be used to replace state or local government funds used, or designated for use, for a comparable activity to assist homeless persons. This requirement is addressed in Question NE-9 in the “Expansion” application and Question N-26 in the “New” application. It may be possible to apply for CoC-eligible activities that were previously paid for by another funding source that is non-renewable and Applicants should seek technical assistance from the County regarding eligibility in these circumstances.

Q: Has HUD published any FAQs on the new Violence Against Women’s Act (VAWA) Budget Line Item (BLI)?

A: Yes, the following are FAQs that HUD has published to date regarding the VAWA BLI. It is also recommended that Applicants review information regarding this item on pages 6 and 7 of the Phase 2 CoC Funding Notice/Local Application.

<p>VAWA BLI. What are the eligible costs under the new CoC VAWA Budget Line Item (BLI)?</p>	<p>Section 605(a)(2) of VAWA 2022 amends section 423(a) of the McKinney-Vento Homeless Assistance Act to add the following eligible activity to the CoC program: "Facilitating and coordinating activities to ensure compliance with [the emergency transfer plan requirement in 34 U.S.C. 12491(e)] and monitoring compliance with the confidentiality protections in 34 U.S.C. 12491(c)(4)."</p> <p>Funding can be requested for this activity in new project applications. Funds may also be added to this BLI in eligible renewal projects through expansion or by shifting up to 10 percent of funds from other eligible BLIs to the VAWA BLI.</p> <p>(a) Examples of eligible costs for emergency transfer facilitation include the costs of assessing, coordinating, approving, denying, and implementing a survivor's emergency transfer which includes:</p>
	<p>(i) Assistance with moving costs. Reasonable moving costs to move survivors for an emergency transfer. (Note that the general requirement that moving costs be one-time does not apply for emergency transfer moves under this BLI.)</p> <p>(ii) Assistance with travel costs. Reasonable travel costs for survivors and their families to travel for an emergency transfer.</p> <p>(iii) Security Deposits. Grant funds can be used to pay for security deposits of the safe units the survivor is transferring to via an emergency transfer.</p> <p>(iv) Utilities. Grant funds can be used to pay for costs of establishing utility assistance in the safe unit the survivor is transferring to.</p> <p>(v) Housing Fees. Fees associated with getting survivor into a safe unit via emergency transfer, includes but not limited to application fees, broker fees, holding fees, trash fees, pet fees where the person believes they need their pet to be safe, etc.</p> <p>(vi) Case management. Grant funds can be used to pay staff time necessary to assess, coordinate and implement emergency transfers.</p> <p>(vii) Housing navigation. Grant funds can be used to pay staff time necessary to identify safe units and facilitate moves into housing for survivors through emergency transfers.</p> <p>(viii) Technology to make an available unit safe. Grant funds can be used to pay for technology that the individual believes is needed to make the unit safe, including but not limited to doorbell cameras, security systems, phone, and internet service when necessary to support security systems for the unit, etc.</p> <p>(b) Examples of eligible costs for monitoring compliance with the VAWA confidentiality requirements include the costs of ensuring compliance with the VAWA confidentiality requirements which includes:</p> <p>(i) Monitoring and evaluating compliance with VAWA confidentiality requirements.</p> <p>(ii) Developing and implementing strategies for corrective actions and remedies.</p> <p>(iii) Program evaluation of confidentiality policies, practices and procedures.</p> <p>(iv) Training on compliance with VAWA confidentiality requirements.</p> <p>(v) Reporting to Collaborative Applicant, HUD and other interested parties on compliance with VAWA confidentiality requirements</p> <p>(vi) Costs for establishing methodology to protect survivor information.</p> <p>(vii) Staff time associated with maintaining adherence to confidentiality requirements.</p>
<p>VAWA BLI. What is the difference between case management costs under a "VAWA BLI" request on the VAWA budget screen in e-</p>	<p>Case Management costs under the VAWA budget are used to pay for staff time specifically necessary to assess, coordinate, and implement VAWA emergency transfers. Case Management under the Supportive Services budget is to pay for the staff time needed for assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s).</p>
<p><i>snaps</i> and case management costs in the Supportive Services budget screen?</p>	
<p>VAWA BLI. How do I know if my project qualifies for VAWA costs?</p>	<p>All Renewal, New, YHDP Renewal and YHDP Replacement projects are eligible to include a VAWA BLI. Planning and UFA Costs projects do not include a VAWA BLI.</p>
<p>VAWA BLI. Are match requirements for a VAWA budget the same as other CoC BLIs?</p>	<p>Yes. A VAWA BLI follows the same 25 percent match requirements as other BLIs in the CoC Program, except for the Leasing BLI, which has no match requirement.</p>

<p>VAWA BLI. Why does my project have a VAWA BLI added automatically to its summary budget, and why can I not remove it?</p>	<p>As stated in HUD’s final rule implementing VAWA 2013, “The requirements set forth in 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), implementing the requirements of VAWA apply to all permanent housing and transitional housing for which CoC program funds are used for acquisition, rehabilitation, new construction, leasing, rental assistance, or operating costs.” While projects can choose to use other funds to meet these requirements, we recognize that the costs associated with emergency transfers cannot be fully predicted and planned in advance.</p>
	<p>To allow for the flexibility to meet VAWA emergency transfer requirements and provide effectively for the safety of project participants experiencing domestic violence, dating violence, sexual assault, and/or stalking, all projects are required to have a VAWA BLI in case of the need for an emergency transfer request.</p>

<p>VAWA BLI. How is the CoC VAWA budget funded, for new project applications, specifically in Renewal projects that have set budgets already?</p>	<p>For New project applications you can add funding requests for a new CoC VAWA Budget Line Item (BLI) the same as any other BLI request in <i>e-snaps</i>.</p> <p>For Renewal projects, including YHDP Renewal and YHDP Replacement projects, HUD will not be adding new money to projects to fund the CoC VAWA BLI; however, CoC funding for the VAWA BLI in renewal projects must come from shifting funds from existing BLIs or by applying for an expansion project with your VAWA BLI request.</p>
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Q: Is it possible to submit a Local Application for CoC New Expansion Renewal Projects that only requests additional funds for the VAWA costs?

A: Yes.