



New Project RFP - Answers to Frequently Asked Questions

Updated June 11, 2018

The NYC Coalition on the Continuum of Care (CCoC) is seeking applications for new permanent supportive housing and rapid re-housing projects to be included in our 2018 NOFA application for HUD Continuum of Care funds. Projects may be funded through both permanent housing bonus and/or any available reallocation funds. The 2018 NOFA New Project RFP is posted on our website, www.nychomeless.com. A copy is also available by clicking [here](#). (Right click on your mouse, then select “Open Hyperlink.”) All applications for new projects are due by close-of-business on [Friday, June 15, 2018](#) and should be sent to NYCCoC@dss.nyc.gov.

This document provides answers to frequently asked questions submitted to the CCoC or asked during a bidder’s conference. This document will be updated periodically and re-posted on our website along with an updated announcement to the CCoC email list. To subscribe to the NYC CCoC email list, please [click here](#) or visit us at nychomeless.com. You can also contact Jocelyn Bennett at bennettjoc@dss.nyc.gov to sign up for the mailing list.

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For more information or to submit additional questions, please contact Charlie Winkler at winklerc@dss.nyc.gov



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Application Deadline:

- 1. **Question:** What is the deadline for submission of applications?

Response: All applications for the New project RFP are due by close of business on Friday, June 15th, 2018 and should be sent to NYCCoC@dss.nyc.gov. Only emailed proposal packets will be accepted. The NYC CoC reserves the right to announce an extended deadline as needed. Applicants are encouraged to apply early and all applications submitted by the original June 15th deadline will receive bonus points as described in the “priorities” section of the RFP. Please note that the original RFP contained a typo indicating applications submitted by June 11th will receive bonus points. The correct deadline to receive bonus points is June 15th. This has been corrected in the RFP.

Coordinated Entry

- 2. **Question:** The RFP notes that funded projects will be required to accept referrals exclusively through the Coordinated Assessment and Placement System (CAPS), which is New York City’s Coordinated Entry System. CAPS has not yet been fully implemented. Does this prevent project types or projects serving particular target populations that have not yet been integrated into CAPS from applying? Will projects proposing to serve populations not yet integrated into CAPS be required to accept referrals exclusively using this system?

Response: CAPS is currently built out for Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH). Project types and projects serving particular target populations that have not yet been integrated into CAPS are eligible for funding under this RFP. All projects receiving CCoC funds are required to comply with CAPS policies and procedures, including those that may be adopted by the NYC CCoC Steering Committee in the future. As CAPS expands to include all project types funded by the CCoC, and all target populations served through CCoC funds, projects that are not currently integrated into CAPS will be required to accept referrals exclusively through CAPS.

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Budget

3. **Question:** Is there any idea of the scope/size of awards to be made?

Response: Through the 2017 CoC competition, NYC was eligible to apply for \$6.8 million for new bonus projects and approximately an additional \$3.9 million in reallocated funds. The CCoC was awarded nearly \$6.5 million for new projects in the 2017 competition, including projects funded through both reallocation and bonus dollars. HUD has not provided information regarding the amount of bonus funds for which CoCs will be eligible to apply through 2018 competition. The CCoC anticipates that it will have reallocation funds available for award during the 2018 application. The total funds available for new projects will be determined based on the final bonus amount, as determined by HUD, combined with the amount of funding that the NYC CCoC Steering Committee determines shall be reallocated from existing renewal projects.

There are no bonus points or other scoring incentives associated with submitting an application for a smaller project. Requesting funds for a large project will not negatively impact the likelihood that your project will be selected for funding. In the event that insufficient funds are available to fully fund a selected project, the CCoC will offer the selected applicant an opportunity to reduce the proposed budget.

Bonus points will be available for projects that propose annual per household costs that are below the average requested by similar new project applications. Therefore, though there is no advantage to proposing a smaller project serving fewer participants, there is an advantage to proposing a project that demonstrates cost effectiveness in terms of average annual cost per participant household.

4. **Question:** Are we allowed to request more than FMR for Rental Assistance?

Response: No. All new rental assistance projects must budget their projects at 100% of FMR. New project applications may not request budgets at either more or less than FMR.

5. **Question:** What is the recommended length of Rental Assistance in a Rapid Rehousing (RRH) project?



Response: HUD requires all RRH project applications to budget each unit at the full annual amount (i.e., at 12 months for each year). For example, a RRH project requesting 3 years of funding for 10 units with an FMR of \$1000/month would be required to budget rental assistance at $10 \times 1,000 \times 12$ per year or \$120,000 annually and \$360,000 for the full 3 year project. This does not mean that you must provide rental assistance at full FMR or for a full year for all or any project participants.

RRH projects may anticipate serving more than one household during a year in a single budgeted unit. This does not mean that households are sharing units, rather that you are using the available budget to serve as many households as possible. For the purposes of the annual project budget, even if average length of rental assistance needed by participants is anticipated to be shorter or longer than 12 months, each unit included in the budget must be budgeted at 12 months.

For example, a project anticipating average length of rental assistance at full FMR for 4 months per household, would budget each unit included in the application at the full 12 months and anticipate serving 3 households in each budgeted “unit” during the year. If in reality the households you serve need less than the full FMR or fewer than 4 months of assistance, you may serve more households than indicated in your application. You should plan to serve at least the number of households proposed in your application, but can serve as many households as possible.

Similarly, for the purposes of the annual project budget, even if average amount of rental assistance required by participants is anticipated to less than full FMR, each unit included in the budget must be budgeted at full FMR. Here’s another example: a project anticipating average length of rental assistance at 50% of FMR for 4 months per household, would budget each unit included in the application at the full 12 months and anticipate serving 6 households in each budgeted unit during the year. In this example, if FMR is \$1,000/month, each household would be anticipated to receive \$500/month in rental assistance (i.e., 50% of full FMR) for 4 months. You would budget each unit at the full 12 month FMR (i.e., $12 \times \$1,000$ or \$12,000/unit/year). But you would anticipate serving, 6 households during the year in that “unit” (i.e. each household receives \$500/month for 4 months (or \$2,000 during the year) and six households per year receive \$2,000 ($6 \times 2,000 = \$12,000$ and thus you will have fully expended the \$12,000 you budgeted for one unit for one year.) Again this does not mean,

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that households are sharing units, rather than you are using the available budget to serve as many households as possible.

In order to ensure cost effectiveness and maximize the number of participants who can be assisted, the NYC CCoC, encourages participants to design their projects in a manner that provides the least assistance necessary to prevent a return to homelessness. Some households may need a small amount of assistance for only one month. Others may need a deeper subsidy for a longer period of time. You may not provide rental assistance for longer than 24 months to any RRH participant.

6. **Question:** Are there any budget guidelines in doing a RRH program? Especially for staffing and supportive services.

Response: See Questions 4 and 5 above and the section on cost per household.

Eligible Costs

Note regarding eligible costs: The NYC CCoC considers all expenses defined as eligible by HUD in the CoC Program Interim Rule located [here](#) to be eligible under this RFP.

7. **Question:** Can household items and moving expenses be paid using Rapid Rehousing financial assistance?

Response: Projects are prohibited from providing cash and/or gift cards to participants. Consequently, projects may not give participants funds that they can use to purchase household items or secure moving services. Reasonable one-time moving costs are defined by HUD as eligible Supportive Services costs and include truck rental and hiring a moving company. As such, projects may pay for these eligible expenses directly rather than giving participants money to procure moving services.

Any cost not described as an eligible Supportive Services cost in the CoC Program Interim Rule is not an eligible cost. Household items are not described as an eligible cost in the Interim Rule and are likely to be determined by HUD to be ineligible, except in certain limited circumstances. The costs of teaching critical life management skills are eligible Supportive Services life skills training expenses. These services “must be necessary to assist the program

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participant to function independently in the community.” For example, supplies and materials, such as kitchen wares and cleaning supplies, necessary to teach skills such as household management and nutrition are eligible. In addition, the costs of activities to engage persons for the purpose of providing immediate support and intervention and identifying potential program participants are eligible Supportive Services outreach expenses, this includes addressing “urgent physical needs” such as providing blankets and toiletries. Furniture is defined in the CoC Program Interim Rule as an eligible operating expense. Projects are prohibited from combining operating and rental assistance funds, therefore, rental assistance projects, including Rapid Rehousing projects, may not apply for operating funds. They may, however, expend match funds and program income (i.e., tenant rent paid to a recipient or sub recipient) on any expense, including furniture, defined as eligible in the CoC Program Interim Rule.

8. **Question:** On Page 35 of the RFP - Clarify what constitutes Operating Costs. What can be included there? The Operating Costs seem to lend itself to PSH rather than RRH – how would the grid be used for RRH? Also, can the numbers in the chart on page 35 then be added up and placed in the “Operating Costs” section on page 36?

Response: As noted on page 8 of the RFP, HUD prohibits combining rental assistance and operating funds. Since RRH projects involve rental assistance, they may not request an operating budget.

9. **Question:** Are broker’s fees allowed in rental assistance costs?

Response: Housing search is an eligible supportive services cost. HUD has determined that “Staff time spent locating, obtaining, and retaining suitable housing...is an eligible cost. Since this activity is an eligible cost, the cost to hire a broker to locate, obtain, and retain suitable housing or the cost of paying a broker fee when the recipient wants to lease a unit that has a broker's fee attached is also an eligible cost. Keep in mind, a recipient should exercise judgment when determining whether a broker is necessary to carry out this project activity and whether the costs for broker services are reasonable. If the recipient selects to hire a broker to conduct housing search on behalf of its program participants, it should follow the procurement rules in the applicable OMB Circulars.”



10. **Question:** Are security deposits allowed in Rental Assistance costs?

Response: CoC Rental Assistance funds may be used to pay for security deposits in an amount not to exceed 2 months rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of the first month's rent.

Domestic Violence Rapid Rehousing RFP

11. **Question:** Is there a separate RFP yet to be released specifically for survivors of domestic violence or should we be utilizing this current RFP?

Response: \$50 million will be available nationally to fund rapid re-housing that is set-aside for people fleeing/attempting to flee domestic violence (DV RRH). The NYC CCoC will convene a separate competition for the DV RRH funds when more information becomes available from HUD. No details regarding the timeline, award process, eligible expenses, etc. for the set-aside DV RRH funds are currently available. As such, the NYC CCoC encourages applicants who wish to create new RRH for survivors of domestic violence to take advantage of and apply for funds under this RFP.

Participant Eligibility

12. **Question:** Are youth who are leaving/aging out of foster care and youth leaving juvenile justice facilities qualified for a rapid rehousing (RRH) program?

Response: Pending release of any additional information by HUD, the NYC CCoC anticipates participant eligibility for RRH programs to remain as defined in the 2017 CoC Program NOFA and included in the 2018 RFP for new project funds, i.e.,:

RRH projects may serve individuals and families, including unaccompanied youth, who meet the following criteria:

- 1) residing in a place not meant for human habitation (i.e., unsheltered and living, for example on the streets, in a park, or on public transportation);
- 2) residing in an emergency shelter;



- 3) persons who qualify under the domestic violence criteria in paragraph (4) of the HUD definition of homelessness, including persons fleeing or attempting to flee human trafficking (see Appendix);
- 4) residing in a transitional housing project that was eliminated in the FY2017 or 2018 CoC Competition;
- 5) residing in transitional housing funded by a Joint TH-RRH component project; or
- 6) receiving services through a VA-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

For all project types, individuals coming from an institution where they have resided for 90 days **or** less AND have entered the institution from the streets, emergency shelter, **or** safe haven, maintain their homeless status during that time.

As such, youth who are leaving/aging out of foster care and youth leaving juvenile justice facilities would be eligible to receive RRH assistance funded through this RFP only to the extent that they also meet the criteria listed above. The NYC CCoC will notify applicants of any changes to participant eligibility criteria, if new information becomes available from HUD.

Matching Requirements

13. Question: Please provide additional detail on the required 25% match for a new RRH project. More specifically, can IN KIND staffing be used to meet the match requirement, and can you elaborate on how an agency would be required to document this match? Also if the match comes in the way of administrative work (typically included in the application budget) would we be able to propose out agency federally approved indirect rate? If so, would the documentation for this match differ from other IN KIND matches? What kind of record keeping is required for match documentation in general?

Response: Agencies providing the required match using volunteer time should indicate this as in-kind match. Agencies providing the match using paid staff time should indicate this as cash match and list the source of the funds used to pay for those staff salaries. Match is only in-kind if it is a donation of services, goods, materials, or equipment. Donations are typically



from a third party. In-kind match from a third-party requires an MOU with the entity providing the match. An agency cannot sign an MOU with itself.

Match, whether cash or in-kind, can only be used on eligible CoC Program costs, i.e., any cost that is defined as eligible in the CoC Program Interim Rule – this is not limited to approved budget line items for the particular project. For example, case management is an eligible CoC Program cost. You can use DOHMH funds that support case management services for project participants as cash match for a project, regardless of whether or not the project has requested CoC funds for supportive services.

Below are some examples of cash and in-kind match:

- CASH MATCH: Recipient or sub-recipient agency staff provide case management funded through a DOHMH contract
- CASH MATCH: Building utilities not covered by the CoC grant are paid by the recipient agency and funded through private sources
- CASH MATCH: Mental health services are provided to participants by a sub-recipient and funded through SAMSHA.
- In-Kind: Board member provides legal services at no cost
- In-Kind: FQHC operated by a community partner provides outpatient health services to participants
- In-kind: Value of the copy machine used by project case managers and owned by the recipient or sub recipient agency.

The recipient may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that, if the recipient had to pay for them with grant funds, the costs would have been eligible. Any such value previously used as match, may not be used again (i.e., cannot be claimed by more than one project or by the same project in another year).

To avoid delays in grant execution, the NYC CCoC encourages applicants to submit match documentation with their project applications in ESNAPS. This step will occur later, if your grant is selected by the CoC to be included in the final application to HUD.

When the match source is cash, recipients/sub recipients must provide HUD with match documentation prior to grant agreement execution. Documentation can be attached to the



project application in eSnaps or, if it is not available at application submission and HUD conditionally awards the project, submission of the documentation will be a condition for grant execution.

Written documentation of cash match must be provided on the source agency's letterhead, (e.g., if you are using case management services funded by DOHMH as cash match, the letter must come from DOHMH and be on their letterhead), the letter be signed and dated by an authorized representative of the source agency, and, at a minimum, must include the following: amount of cash to be provided to the recipient for the project, specific date the cash will be made available, the project name and fiscal year to which the cash match will be contributed, the time period during which funding will be available, and allowable activities to be funded by the cash match (e.g., case management or rental assistance for project participants). If awarded the grant by HUD, to document cash match, agencies must show that the funds were recorded on the agency's books and expended on eligible expenses during the grant operating year.

If using in-kind match, the applicant should submit with the project application in ESNAPS an MOU with the donor entity. If the MOU is not available at application submission and HUD conditionally awards the project, submission of the MOU will be a condition for grant execution.

If awarded the grant by HUD, to document in-kind match of donated services the recipient and/or sub-recipient must keep and make available, for inspection by HUD and/or the CoC, records documenting that the service hours were actually provided. They must also keep the MOU with the donor entity on file. Requirements for the MOU, include: establish the unconditional commitment of the services being donated, provide the name of the project and operating year to which the match is being contributed, describe the specific service to be provided (must be a CoC program eligible activity), indicate total point-in-time number of clients receiving the service and total clients receiving the service over the grant term, state profession and qualifications of the persons providing the service, state hourly cost of the service to be provided, indicate that the services are valued at rates consistent with those ordinarily paid for comparable services in that locality.

If awarded the grant by HUD, to document in-kind match of donated goods, property or equipment, the recipient and/or sub-recipient must keep and make available for inspection by



HUD and/or the CoC: documentation of the value of the commitment (must be documented on source agency letterhead, signed & dated) and indicate that the value is consistent with the cost ordinarily paid for similar goods in the local market. The letter must indicate the date on which the in-kind donation will be available, the project and operating year to which the match is being contributed, the time period during which the goods will be available, and the CoC Program allowable activities to be provided by the donation (e.g., donation of food for meals for project participants, or donation of tenant rights and responsibilities booklets to provide tenant counseling services). The recipient and/or sub-recipient must also keep and make available records documenting that the donation was actually received.

Since the documentation requirements for in-kind match are significantly more onerous than for cash match, the NYC CCoC encourages agencies to use cash match sources whenever possible.

Since it is not permissible to use CoC funds as match, you may not, as your question suggests, use staff time for administrative work that is already included in your project budget. Since eligible project administrative costs are capped by HUD at 10% of the grant awarded, if your application includes project administrative costs of less than 10% of the grant awarded, you may use, as cash match, funds that support staff time for eligible project administrative costs up to the difference between the allowable and the requested level of project administrative costs. You may not use, as match, funds that support staff time for project administrative costs that exceed the cap established by HUD. Please note the restrictions on eligible project administrative costs and the difference between project administrative and indirect costs described in the RFP.

Similarly, since eligible indirect costs are also capped by HUD, if your application includes indirect costs that are less than the applicable cap, you may use, as cash match, funds that support staff time for eligible indirect costs up to the difference between the allowable and the requested level of indirect costs. You may not use, as match, funds that support staff time for indirect costs that exceed the cap established by HUD. Agencies claiming indirect costs at higher than the 10% de minimis indirect cost rate must have an indirect cost rate proposal that is in accordance with federal OMB requirements, and allowable indirect costs are capped at the proposed/approved rate.



For more information see:

<https://www.hudexchange.info/resource/3113/importance-of-documenting-match-under-the-coc-program/>

Expansion Projects

14. Question: On page 15 of RFP: Existing Point-in-Time project capacity: what if you don't have any currently funded HUD funded projects? What is the best way to answer this question/fill out this chart? Do you use numbers for your non-HUD funded projects? What point-in-time is being referred to? Do you want to see persons served, which will be larger, than persons placed in to housing, which will be smaller?

Response: This section of the application is filled out only for projects proposing to expand an existing project. Whether the project you are proposing to expand is a CoC funded project or a project funded through other sources, you should fill out the column labeled "PIT Capacity – Existing Project" to reflect the PIT capacity of the particular project you are proposing to expand. Point-in-time capacity is the number of units/beds/households your project serves at any given point-in-time rather than the number you may serve over the course of an entire year, this includes both people in housing and people who are still searching for housing.

Other (Non-CoC) Funding

15. Question: Page 18 of RFP, what is the purpose of this question/chart?

Response: The NYC CCoC will use this information to ensure that the project meets the HUD cost effectiveness criteria, i.e., costs may not deviate substantially from the norm in the proposed project locale for the type of project proposed. To do this, we need to understand all of the funding that a project receives, not just the proposed CoC funds. In addition, bonus points will be available for projects that propose annual per household costs that are below the average requested in similar new project applications. Costs will be calculated based on all funding used to support the project, not just CoC funds. In addition, this information will help the NYC CCoC to have a full picture of the project you are proposing, and to ensure the project



is viable, will be able to start promptly, and is compliant with HUD requirements such as the prohibition against combining funds described on page 8 of the RFP.

16. **Question:** Are there limits to other funding sources you can have in place, as part of your new project application?

Response: The purpose of the new project RFP is not to supplement funding you already have in an existing project that is open, occupied, and serving homeless people. If the project was expanding to include additional units, or the project is under development and not yet fully funded, then you can apply for HUD funding for those new units. Projects must be cost effective, i.e., costs may not deviate substantially from the norm in the proposed project locale for the type of project proposed. Projects also may not “double dip” i.e., they are prohibited from combining the following types of assistance in a single structure or housing unit: Leasing and acquisition, rehabilitation, or new construction, Tenant-based rental assistance and acquisition, rehabilitation, or new construction, Short or medium-term rental assistance and acquisition, rehabilitation, or new construction, Rental assistance and leasing, Rental assistance and operating. In addition, bonus points will be available for projects that propose annual per household costs that are below the average requested in similar new project applications – see also #17 and #18 below.

Cost per Household:

17. **Question:** Is there a preferred range for cost per program participant?

Response: There is no preferred range for cost per program participant for any of the eligible project types (i.e., Permanent Supportive Housing, Rapid Rehousing, or joint Transitional Housing and Rapid Rehousing). Bonus points will be available for projects that propose annual per household costs that are below the average requested in similar new project applications.

18. **Question:** Page 20 of RFP, can the chart for Q.15 be completed for total HH instead of the more detailed HH composition as it currently reads? Why was it changed to the more granular version this year compared to prior years?



Response: The NYC CoC Steering Committee adopted the following motion for the 2018 competition for new CoC project funds: Bonus points will be available to all projects with proposed costs that are below the average. Average annual costs per household will be calculated for supportive services and combined operating/leasing/rental assistance, including all CoC and non-CoC funds. Each project’s proposed costs will be compared to the average costs requested by all similar new project applications. Average costs will be calculated separately for each model type (i.e., PSH, RRH, and Joint TH/RRH and each household type (i.e., families with children, single adults, projects 100% dedicated to serving single youth under 25 and projects 100% dedicated to serving households with children headed by a single youth under 25).

The information provided on Page 20, Q.15 of the RFP will enable consideration of your project for these bonus points. If you do not provide sufficient information to enable calculation of your project’s costs in relation to similar proposed projects, you will not be eligible to receive these bonus points.

19. Question: How do you determine the average cost per unit or household?

Response: See response to #18 above.

Eligible Project Types

20. Question: For a PH CR-SRO project that is ramping up right now (so not fully populated at the moment, but could be fully occupied by NOFA due date), would the beds in this project be eligible to apply for PSH support services dollars? By HUD standards it’s not an existing project. For the Provider, it’s a new OMH licensed project, serving Pop A, CH, some Youth. The current project is not receiving HUD funds, but could the new beds receive HUD funds? i.e. could it be considered an expansion project? It would be new beds to the CoC and new beds to HUD, but they would be pre-populated – clients already in them. And if a client moves in today, would they continue to have their CH status at the time HUD awards them the money?



Response: No, this project would not be eligible to apply for funding through this RFP. Permanent Supportive Housing projects funded through this RFP must create new bed capacity for people who are chronically homeless at the time they enter the project. Existing projects are eligible to apply only to the extent that they are proposing to increase the number of units designated for chronically homeless people in the project or allow the recipient to serve additional chronically homeless persons. People already housed in a CR-SRO project are housed and not chronically homeless under the HUD definition. Rapid Rehousing (RRH) projects funded through this RFP must be used to serve only eligible participants as described in the RFP. People already housed in a CR-SRO would also not be eligible for RRH assistance.

21. **Question:** If a project is currently receiving NY15/15 for scatter site, can it apply as a new project to obtain HUD funds for psych services and property management? These would be new, additional services.

Response: See answers to Q.20 above and Q.23 below.

22. **Question:** Are Youth projects and DV projects eligible to apply for PSH?

Response: Yes, but they must ensure that their intended target population will meet the definition of chronic homelessness (CH) included in the RFP. PSH projects must dedicate 100% of their units to CH. Projects proposing to serve a target population that will not meet the HUD definition of chronic homelessness, should consider applying instead for RRH or Joint TH/RRH.

23. **Question:** If a building has 100 units and 40 of them are set aside for PSH and the other 60 are part affordable housing, can the 40 units be part of a new project application?

Response: Permanent Supportive Housing projects funded through this RFP must create new bed capacity for people who are chronically homeless at the time they enter the project. Existing projects are eligible to apply only to the extent that they are proposing to increase the number of units designated for chronically homeless people in the project or allow the recipient to serve additional chronically homeless persons.



Miscellaneous

24. **Question:** If an organization submits more than one project, does it compete against itself?

Response: It depends. In some years, the NYC CCoC has not received sufficient applications to expend all funds available to support new project applications. In recent years, the NYC CCoC had to extend the application deadline to obtain a sufficient number of viable applications. Depending on the applications submitted in 2018, all eligible applications submitted by the deadline and proposing a viable project could be funded. The NYC CCoC encourages agencies to submit more than one project application. It's also possible that the NYC CCoC will receive more applications than available funds can support. In that case, all projects will be scored and compete against each other for funding.

25. **Question:** Can you clarify whether youth doubled up in a project both have to sign leases?

Response: For permanent housing projects (i.e., PSH and RRH), participants must sign an initial 12-month lease. Everyone residing in the unit should be on the lease. HUD requires that, for projects using CoC rental assistance funds, leases are between the CoC program participant (i.e., the homeless/formerly homeless person) and the property owner. Agencies may not use CoC rental assistance funds for master leasing. HUD requires that projects using CoC leasing funds maintain leases between the recipient or sub-recipient of the CoC funds and the property owner. In leasing projects, the recipient or sub-recipient would sublease to the participant(s).

If two or more people who are eligible for the CoC assistance (see the RFP for details on eligible participants), would like to share a unit, each may want to have a separate lease with the owner or recipient/sub-recipient of the CoC funds. In this case, each person would receive a separate subsidy and have their income reviewed and their rent calculated separately.

HUD requires that CoC funded projects are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status, and that "Any group of people that present together for assistance and identify themselves as a family... are considered to be a family and must be served together as such." Therefore, two or more



people who identify as family can rent an apartment together, as long as one of them qualifies for the CoC assistance. The eligible participant would receive the subsidy, the other family members would be on the lease, all occupants would be required to report income, and the rent would be calculated based on the family's total income.

For more information or to submit additional questions, please contact Charlie Winkler at winklerc@dss.nyc.gov