**Addenda III**

**Miami-Dade County Homeless Trust**

**Request for Applications**

**Response to written questions**

For question 9 in the Renewal Project Application, should we submit policies, rosters, outcome management data, or any other information to support our responses?

You may although it is not required, a narrative response is sufficient.

Would responses to question 9 in the Renewal Project Application, that describe how the agency is working to improve or enhance these areas be considered favorable even if they are “in progress”?

Yes.

Can you please clarify the new match requirement noted on page 16 of the NOFO: “Respondents will be asked to provide the match sources for their most recent grant closeout.”? Does this mean that our proposed sources of match for the renewal must be the same sources we used in our last grant year?

The solicitation says “respondents will be asked to provide the match sources for their most recent grant close-out, in addition to the match commitment letters.” We are asking for proof of how you spent your match on the previous year so we can raise questions about match commitment letters that are drastically different to actual match sources.

Is there documentation we need to provide outside of Attachment 13 and our match commitment letters?

Yes, the documentation that supports the actual match used in the previous year.

Is it allowable to convert all of the documents for our renewal application into PDF format for submission?

Sure, except for the new project applications and the budget which are only required for new project applications.

Should we refer to the NOFO or the RFA Checklist to determine which attachments are required?

Yes. On Attachment 2 RFA Checklist, the forms that say “first time applicants” in the “Applies To” column does not apply to agencies that have renewal projects on the Grant Inventory Worksheet.

For  Attachment 14 - US HUD Required Affidavits, where are the documents these Sections refer to?

***\*****Real Property Acquisition and Relocation.*See Section III.C.5.h. of the General Section.

*\* Participation in HUD-Sponsored Program Evaluation.*See Section III.C.5.l.of the General Section.

This is a little confusing because HUD moved some of the requirements from Section III in the [2022 NOFO](https://www.hud.gov/sites/dfiles/SPM/documents/Continuum_of_Care_Competition_and_Noncompetitive_YHDP.pdf), the information you are looking for was published under IX Award Administration Information in the 2022 NOFO, and likely to remain the same for FY2023.

IX B Administrative, National and Department Policy Requirements for HUD recipients, specifies under 5, the requirements for real property acquisition and relocation with a link to: [eCFR :: 49 CFR Part 24 -- Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs](https://www.ecfr.gov/current/title-49/subtitle-A/part-24?toc=1)

And 6 specifies the requirement to participate in HUD sponsored evaluations.

There is additional information on relocation but the requirement on participating in HUD sponsored evaluations is simply that.

Given that the application is 18 months away from any possible contract/start date, if there are changes to the components of match budgeted in this application (for example, more rental assistance cash match, less medical), is that acceptable as long as all HUD rules are followed?

Yes, if awarded funds you will be given an opportunity to provide current match commitments at time of contracting.

Are MOUs for in kind service match required to be submitted with the application now or when the HUD contract is negotiated?

Yes, match MOUs are required with your response to the solicitation due at 2 p.m. on June 30th.

Is the $5,000,000 DV bonus for a one year period?  If not can it be rolled over to the second 12 months for RRH that is 24 months or will there be another CoC for $5,000,000 in the second 12 months?

The grant term we will be using is 12 months. If awarded funds, you may renew the project during the next competition. It is common for programs to lapse dollars, especially in start-up years. Monies that go unspent by projects are recaptured by HUD and used to fund bonus projects in future years. HUD has not reduced projects for lapsing funds and we exempt projects from reallocating lapse for the first two years.

Do we have to submit any documentation (police reports, court orders etc) to prove the current DV status or is the self reported data we collect at intake enough?

See HUD guidance on documenting DV here: <https://www.hud.gov/sites/documents/5382.DOCX>

For match or for the budget request, if we are doing in kind for health care can we do a % of a salary to serve x number of clients or do we have to document each procedure for each client and the estimated cost for that procedure?  Just trying to clarify the documentation process in the reimbursement phase.

Take a look at this HUD tool on documenting match: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-match/in-kind-match/documentation/>

Can we charge rent (leasing cost) for a unit in Lotus Village that will be used for Transitional Housing for this project (DV Bonus)?

Please refer to CoC Program ([**§ 578.43 – 578.57**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/)). Below are some sections I think apply to your question.

In the Transitional Housing component you can use § 578.49 Leasing:

(1) Where the recipient or subrecipient is leasing the structure, or portions thereof, grant funds may be used to pay for 100 percent of the costs of leasing a structure or structures, or portions thereof, to provide housing or supportive services to homeless persons for up to 3 years. Leasing funds may not be used to lease units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership, where the partnership owns the structure, unless HUD authorized an exception for good cause.

(2) Any request for an exception must include the following: (i) A description of how leasing these structures is in the best interest of the program; (ii) Supporting documentation showing that the leasing charges paid with grant funds are reasonable for the market; and (iii) A copy of the written policy for resolving disputes between the landlord and tenant, including a recusal for officers, agents, and staff who work for both the landlord and tenant. (b) Requirements. (1) Leasing structures. When grants are used to pay rent for all or part of a structure or structures, the rent paid must be reasonable in relation to rents being charged in the area for comparable space. In addition, the rent paid may not exceed rents currently being charged by the same owner for comparable unassisted space. (2) Leasing individual units. When grants are used to pay rent for individual housing units, the rent paid must be reasonable in relation to rents being charged for comparable units, taking into account the location, size, type, quality, amenities, facilities, and management services. In addition, the rents may not exceed rents currently being charged for comparable units, and the rent paid may not exceed HUD-determined fair market rents. (3) Utilities. If electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds. If utilities are not provided by the landlord, these utility costs are an operating cost, except for supportive service facilities. If the structure is being used as a supportive service facility, then these utility costs are a supportive service cost.

(4) Security deposits and first and last month's rent. Recipients and subrecipients may use grant funds to pay security deposits, in an amount not to exceed 2 months of actual 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.

(5) Occupancy agreements and subleases. Occupancy agreements and subleases are required as specified in § 578.77(a).

(6) Calculation of occupancy charges and rent. Occupancy charges and rent from program participants must be calculated as provided in § 578.77.

(7) Program income. Occupancy charges and rent collected from program participants are program income and may be used as provided under § 578.97.

(8) Transition. Beginning in the first year awards are made under the Continuum of Care program, renewals of grants for leasing funds entered into under the authority of title IV, subtitle D of the Act as it existed before May 20, 2009, will be renewed either as grants for leasing or as rental assistance, depending on the characteristics of the project. Leasing funds will be renewed as rental assistance if the funds are used to pay rent on units where the lease is between the program participant and the landowner or sublessor. Projects requesting leasing funds will be renewed as leasing if the funds were used to lease a unit or structure and the lease is between the recipient or subrecipient and the landowner.

And § 578.55 Operating grant funds may be used to pay the costs of the day-to-day operation of transitional and permanent housing in a single structure or individual housing units.

Eligible costs.

(1) The maintenance and repair of housing;

(2) Property taxes and insurance;

(3) Scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost);

(4) Building security for a structure where more than 50 percent of the units or area is paid for with grant funds;

(5) Electricity, gas, and water;

(6) Furniture; and

(7) Equipment.

Ineligible costs: Program funds may not be used for rental assistance and operating costs in the same project. Program funds may not be used for the operating costs of emergency shelter- and supportive service-only facilities. Program funds may not be used for the maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease.

DV Bonus eligibility for RRH program:  Please confirm whether individuals or families who have experienced trauma related to domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions in the PAST and become homeless due to that trauma (eg. job loss due to mental illness brought on by PTSD from past incidents) or if there has to be a current situation in the household they are leaving.

•          *Any individual or family who*

•          *(i)* ***is experiencing trauma or lack of safety related to****, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual’s or family’s current housing situation,* ***including where the health and safety of children are jeopardized;***

•          *(ii) Has no other safe residence; and*

•          *(iii) Lacks the resources to obtain other safe permanent housing.*

HUD’s language is clear – the verb is active and in the present tense – to be eligible as a survivor they have to be ‘experiencing trauma or lack of safety …’ [related to domestic violence in the] ‘current housing situation’.

Trauma is insidious. It is possible for a household to be in a housing situation where they feel unsafe and that is re-traumatizing as a result of their DV history. If they can establish a lack of safety or current trauma (related to DV) in their current housing situation, then the household would be eligible.

Safety in housing is what is paramount here – if they are experiencing a lack of safety (related to DV) in their housing and that is causing trauma, then they could and should be served.

What admin costs are allowable under this grant?

10% (with a 50% split going to the Homeless Trust) unless you have a federally approved indirect cost rate.

Are related finance and data management/reporting/compliance considered admin or program costs?

Under the Project Administration program component, CoC recipients and subrecipients may use these funds to support:

1. General management, oversight, and coordination ([**§ 578.59(a)(1)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
2. Training on CoC requirements and attending HUD-sponsored CoC trainings ([**§ 578.59(a)(2)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
3. Carrying out environmental reviews ([**§ 578.59(a)(3)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))

Ineligible project administration costs include staff and overhead costs directly related to carrying out other eligible activities under the CoC Program ([**§ 578.43 – 578.57**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/)) (e.g., Leasing, Rental Assistance, Supportive Services) should be charged to those budget line items.

Please confirm that for the DV Bonus TH:RRH we can provide RRH to both households in our emergency and transitional housing programs?

TH:RRH program participants can circumvent TH and receive RRH directly.

For the **transitional** housing option, there is no budget category for the actual housing costs.  Is this per diem or would it have to be broken down by utilities, insurance, maintenance, etc.? (Assuming we do a set aside in our building).

All of the CoC eligible costs/activities are permitted in TH projects:

Leasing

Rental Assistance

Supportive Services

Operating Costs

HMIS

Project Administration

For more information on each category visit: [CoC Eligible Activities - List of CoC Eligible Activities - HUD Exchange](https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/coc-eligible-activities-overview/list-of-coc-eligible-activities/#:~:text=CoC%20eligible%20costs%2Factivities%20are%3A%201%20Acquisition%202%20Rehabilitation,Services%207%20Operating%20Costs%208%20HMIS%20More%20items)

Are clients required to pay 30% of their income in the DV Bonus RRH for housing and utilities or can assistance be 100%?

Respondents will be required to comply with CoC RRH Standards of Care found here: <https://www.homelesstrust.org/resources-homeless/library/providers/standards-of-care/rapid-rehousing.pdf>. Our standards use a model whereby tenants with income slowly assume increasing responsibility towards rent; it also emphasizes utilizing case management/supportive employment to get tenants sufficient income sources to assume the rent.

Can we use Food & Beverage contract expenditures as match for eligible budget items in this grant?

All costs paid for with matching funds must be for activities that are eligible under the CoC Program.

Can we use admin costs as match?  eg. liability insurance, finance staff, audit, accounting, etc.

Match is all cash or in-kind resources contributed to the grant.

All grant funds must be matched with an amount no less than 25 percent of the awarded grant amount (excluding the amount awarded to the leasing budget line item). Match resources may be from public (not statutorily prohibited by the funding agency from being used as a match) or private resources.

Examples A and B are calculations of match with and without a leasing budget line item.

EXAMPLE A

Total amount requested from HUD (without leasing)

Rental Assistance funding = $95,000

Project Administration funding = $5,000

Total amount requested = $100,000

Total amount requested from HUD x .25 = Minimum Match Requirement

$100,000 x .25 = $25,000

EXAMPLE B

Total amount requested from HUD (with leasing)

Leasing funding = $40,000

Supportive Services funding = $55,000

Project Administration funding = $5,000

Total amount requested = $100,000

Total amount requested from HUD, excluding amount requested for leasing

$100,000 (Total Amount Requested) - $40,000 (Leasing Funding) = $60,000

Total amount requested from HUD x .25 = Minimum Match Requirement

$60,000 x .25 = $15,000

If we provide RRH to clients currently at our shelter, can supportive services (service assessment, housing search/counseling, employment services etc.) be budgeted from this grant and if so, for what period?  Eg. Services provided for 5 months prior to RRH placement if it took that long to reduce all barriers to housing and locate the housing?

Yes, the project can enter the client into HMIS (or alternative software) and start providing services and requesting reimbursement for screening, Housing Navigation/counseling, employment services, obtaining documents… Once the client moves into an apartment, the provider simply reflects the Move-In Date in HMIS (or alternative software), and continues providing services. If providers do not use HMIS they must have an equivalent database that utilizes the same universal data elements as HMIS, for example, CAHSD uses OSNIUM and that MIS has a homeless module that can produce the same Annual Progress Report produced by HMIS.

New HMIS standards adopted by HUD will create two types of RRH HMIS projects beginning 10/1/23, RRH with Rental Assistance, and RRH without Rental Assistance.

What kind of “food” costs can be covered in RRH?

Four of the CoC eligible costs/activities are permitted in RRH projects:

Rental Assistance

Supportive Services

HMIS

Project Administration

Eligible supportive services are:

* Annual Assessment of Services ([**§ 578.53(e)(1)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Moving costs ([**§ 578.53(e)(2)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Case management ([**§ 578.53(e)(3))**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/)
* Childcare ([**§ 578.53(e)(4)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Education services ([**§ 578.53(e)(5)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Employment assistance and job training ([**§ 578.53(e)(6)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* **Food** ([**§ 578.53(e)(7)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Housing search and counseling services ([**§ 578.53(e)(8)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Legal services ([**§ 578.53(e)(9)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Life skills training ([**§ 578.53(e)(10)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Mental health services ([**§ 578.53(e)(11)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Outpatient health services ([**§ 578.53(e)(12)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Outreach services ([**§ 578.53(e)(13)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Substance abuse treatment services ([**§ 578.53(e)(14)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Transportation ([**§ 578.53(e)(15)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))
* Utility deposits ([**§ 578.53(e)(16)**](https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/))

For more information on each category visit: [CoC Eligible Activities - List of CoC Eligible Activities - HUD Exchange](https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/coc-eligible-activities-overview/list-of-coc-eligible-activities/#:~:text=CoC%20eligible%20costs%2Factivities%20are%3A%201%20Acquisition%202%20Rehabilitation,Services%207%20Operating%20Costs%208%20HMIS%20More%20items)

Will points be lost if our TH:RRH proposal is not serving 'unsheltered' homeless individuals?

Yes, rating factor B.4. on the rating sheet: <https://www.miamidade.gov/resources-homeless/library/nofa-2023/attachment-20-new-hud-project-scoring-criteria.doc> provides 10 points to proposal that describe how healthcare and housing resources are being coordinated and leveraged, **and ideally suited to reduce unsheltered homelessness**.

If your presently operating a project and is receiving NOFA funding, do we need a New or Renewal application?

Projects listed in the Grant Inventory Worksheet that are renewing their interest to continue receiving CoC funds must submit a response to this solicitation. Please refer to attachment 2 to ensure you are submitting all the required Renewal Application forms along with your response.

Can we place 2 adults in the same room? I want to say HUD guidance says yes and even allows two people to stay in the living room under certain conditions, but I want to provide an official response quoting the HUD rules.

HUD has general guidelines with respect to occupancy limits in housing. Generally speaking, HUD’s preference is for two persons to share each sleeping room. Unrelated persons of different genders are not expected to share a sleeping room and adolescent children are not expected to share a sleeping room with siblings of the opposite sex. HUD requires that PHAs set reasonable occupancy limits and encourages CoCs to follow the practices set by the local PHA. In HUD’s public housing occupancy handbook, it states that ‘HUD does not specify the number of persons who may live in public housing units of various sizes.’  It, however, does go on to state: “In assigning families to public housing, **a PHA may allow families to occupy units of sufficient size so that persons of opposite sex (other than spouses), persons of different generations, and unrelated adults may have separate bedrooms**.” [https://www.hud.gov/sites/documents/74651C5PIHH.PDF]

HUD would allow two, unrelated adults to share a room but it would also allow them to have separate sleeping rooms. For permanent housing, I’m not certain you’d want to have unrelated adults sharing a sleeping room. It can be done. But people generally want more privacy than that and, as adults, might occasionally want to spend the night with a person of their choice. There are great potential benefits from shared housing but roommate conflict is a limiting factor and a shared bedroom is likely to escalate that conflict.

Is there any scenario where someone doing leasing in shared housing, can charge tenants less than 30% of their income?

24 CFR 578.77 Calculating Occupancy Charges and Rent: “(b) Calculation of occupancy charges. Recipients and subrecipients are not required to impose occupancy charges on program participants as a condition of residing in the housing. However, if occupancy charges are imposed, they may not exceed the highest of:” the regulation then goes on to 30% of adjusted income, 10% of gross, etc.