



**Intent to Renew (ITR)**  
**Instruction Manual**  
2022 Renewal Applicants for  
U.S. Department of Housing and Urban Development (HUD)  
Homeless Assistance Programs  
Continuum of Care (CoC)

Chicago Continuum of Care Intent to Renew are **due March 25** at 4pm  
Submit responses (with attachments) via [this electronic form](#).

# Table of Contents

- Overview of the Chicago CoC’s Renewal Evaluation Process ..... 3**
- Who participates in the evaluation process? ..... 4**
- Intent to Renew Procedure ..... 5**
- Alchemer Instructions (and other tips) ..... 6**
- ITR Cover Page ..... 8**
- Declaration of Intent to Renew ..... 10**
- Desk Audit ..... 11**
- Certifications and Supporting Documentation ..... 14**
  - I. HUD Monitoring Section ..... 14**
  - II. Fiscal Section ..... 15**
  - III. Programmatic Section ..... 18**
  - IV. HMIS Section ..... 20**
- Appendix ..... 21**

# Overview of the Chicago CoC's Renewal Evaluation Process

The U.S. Department of Housing and Urban Development (HUD) states that one of the responsibilities of the Continuum of Care (CoC) is to develop a review process for prioritizing and ranking renewal projects for CoC funding. The Chicago CoC Board of Directors is the group of community stakeholders that sets local priorities for the CoC HUD funding. The Chicago CoC Board has designated All Chicago to act as the Collaborative Applicant. In this role, All Chicago is responsible for the local evaluation process with community input from the LEI Committee.

HUD makes final funding determinations, and information about how these determinations are made is provided each year in the annual Notice of Funding Opportunity (NOFO). For reference, a summary of rules that affect how HUD evaluates applications is in the appendix of this document.

There are two required steps in the Chicago CoC's locally developed review process for renewal projects: 1) Intent to Renew (ITR), and 2) Local Evaluation Instrument (LEI). The ITR step is designed to minimize risk to the Chicago CoC by reviewing compliance with HUD requirements and verifying whether local priorities and thresholds are being met. While this stage of the process entails review and evaluation, the intention is to emphasize proactive support that will strengthen the Chicago CoC. Agencies are to answer the questions transparently and honestly, and if a requirement or threshold is not met, there is space to receive technical assistance and room for the agency to demonstrate progress towards and capacity for future compliance. The CoC can decide not to renew a project if serious capacity issues, including performance and financial problems, insufficient participation in HMIS, unresolved monitoring issues, and other priorities of the CoC cannot be resolved by the agency through the technical assistance process. Another purpose of the ITR is for the CoC to receive notice of whether projects intend to renew and continue operating.

The LEI step is designed to quantify the performance of each project and measure the degree to which the project improves Chicago's system performance. The CoC Board establishes the ranking policies after the release of the NOFO from HUD, and the LEI score is one factor among others that are considered when determining the ranking policies. As stated above, HUD makes final funding determinations, and so renewal funding is not guaranteed upon submission of the LEI.

Steps in the 2022 renewal evaluation process (both ITR & LEI):

1. Open & close ITR – March 7 - 25
2. Open & close LEI – April 4 – May 2
3. Preliminary reports (ITR & LEI) – June 1
4. Appeal process (LEI) – month of June
5. Final reports (ITR & LEI) – July 1

# Who participates in the evaluation process?

## *Required to participate in the Intent to Renew*

All projects with HUD CoC Funding that were in operation for any length of time between 1/1/21 and 12/31/21, including system level coordination projects such as Coordinated Entry, HMIS lead, or the planning grant.

## *Required to participate in Local Evaluation Instrument*

All projects with HUD CoC Funding that meet all the criteria listed below.

- HUD program model is PSH, RRH, TH, Joint TH-RRH, SH or SSO
- The project is not a system level coordination project such as Coordinated Entry, HMIS lead, or the planning grant
- If the project began operation in 2021, the project served clients for a minimum of six months during the period between 1/1/21 and 12/31/21
- The project declared an intention to renew the grant in the Intent to Renew submission
- The project is included in the final 2022 Grant Inventory Worksheet (GIW)

# Intent to Renew Procedure

The ITR contains Yes/No checklist questions, narrative responses, and attachment uploads. Renewal applicants must complete this ITR by answering all questions and providing the requested documentation. The “desk audit” portion of the ITR is one in which topics are examined at greater depth either through narrative responses or requests for policies and procedures. Wherever possible, All Chicago will verify responses to questions through available information sources (for example, responses about APR submissions are verified in Sage). Additionally, All Chicago may ask agencies to provide documentation that supports their response to checklist questions when monitoring agencies and their projects.

Detailed ITR procedure and timeline:

1. All Chicago releases the ITR desk audit topics & guidance early – February 21
2. All Chicago opens the ITR form – March 7
3. All Chicago provides ITR virtual training – March 10 - Register [here](#)
- 4. Agencies submit ITR by deadline – March 25**
5. All Chicago sends preliminary reports to agencies – June 1
6. All Chicago sends final reports to agencies – July 1

ITR technical assistance (TA) procedure:

Preliminary and final reports will identify areas where the agency needs to address compliance or adherence to thresholds and priorities. These areas will be categorized as low, medium or high concern. Technical assistance will be provided according to need, and agencies will be responsible for addressing the issues.

- a. *High concern areas:* All Chicago will ask agencies to begin addressing these areas as soon as preliminary reports are sent. To be recommended for renewal, agencies must resolve these issues or demonstrate sufficient capacity to address them, by the NOFO deadline or September 1, whichever is first.
- b. *Medium concern areas:* All Chicago will ask agencies to begin addressing these areas after final reports are sent. All Chicago will schedule check-ins quarterly until resolved or until sufficient progress is made towards resolution.
- c. *Low concern areas:* Low concern areas are those where the needs may be met through training and peer sharing without any follow-up submissions or check-ins. Agencies are responsible for following through on resolving these areas.

# Alchemer Instructions (and other tips)

The software that All Chicago uses as a tool for form completion is Alchemer. A link to the Intent to Renew Alchemer Form is located below. Each agency is required to utilize a **username and password** to login to the form because All Chicago has pre-populated certain known fields including agency name, project name(s), and HMIS ID(s). The username and password is provided in the Intent to Renew release email communication. If you need help locating your username or password, contact [CoCprograms@allchicago.org](mailto:CoCprograms@allchicago.org).

[Click here for the Intent to Renew Electronic Form](#)

This Alchemer form is designed so that each agency, including agencies that have multiple HUD CoC-Funded projects, will submit only once.

## **SAVE AND CONTINUE feature:**

You should see a black bar running across the top of the page. On the right-hand side, inside the black bar, there is text that reads, 'Save and Continue later.' Click here and enter your email to receive a unique link to your ITR form. You can use this link to reopen your form at any time before submission. You will only need to do this once and can use the same link each time.

Please be sure to keep the email that you receive containing the link. If you do not see the email, please check your junk mail folder. Sometimes you may experience a delay of a few hours in receiving the email from Alchemer. The email will be from "noreply@alchemer.com." Check your email to ensure you have received the link before navigating away from your ITR form.

Your responses will **save** whenever you navigate between pages by clicking 'Back' or 'Next.' **NOTE:** If you complete a page and close the browser page before clicking on 'Next,' your responses will not be saved.

## **Picking Up Where You Left Off:**

You will only need to use the username and password given to you by All Chicago the first time you log into the ITR form. After that, **use the Save and Continue feature to save your progress.** You will revisit the form using the link you receive. If you accidentally try to use the username and password to pick up where you left off, you will not see the work you already completed.

## **Required questions:**

All Chicago has not enacted the required question feature in Alchemer for any of the questions in this form. By doing this, it is easy for you to skip ahead and navigate backwards and forwards through the form. Even though the required question feature is not enacted, **it is still necessary for you to provide an answer to every question** that applies to your agency/project(s). Please ensure that you complete all blank fields. An N/A option has been provided if there are cases in which that is an acceptable response. Question requesting a file upload will indicate if there are any scenarios in which a project may skip without uploading a document.

**Handling different responses for multiple projects:**

When responding to the Certification Checklist questions, if the answer is 'No' for one or more of the agency's projects, select 'No' and list which project(s) the 'No' applies to. If the agency only has one HUD CoC-Funded Project, you do not have to enter the project name each time you answer 'No' since All Chicago is aware that you have only one project. However, if the agency has more than one HUD CoC-Funded Project and you select 'No,' ensure that you indicate which project(s) the 'No' response applies to. Click on 'Add Another Project' if you need to list more than one project name.

**File Naming Conventions:**

Please use the following naming convention with the files that you upload for Attachments A-C:  
Attachment Letter\_Agency Name (or acronym)\_HMIS ID(s) or Project Name(s).

For example, to upload attachment C for projects with HMIS IDs 1111 and 2222, the file would be named:

Attachment C\_Agency Name\_1111 2222.

# ITR Cover Page

## Lead Agency Information

Agency Name:

Address:

City:

State:

Zip:

Phone:

## Contact Person(s) for Questions about this ITR

Identify one or two people to act as a liaison between All Chicago staff and agency staff regarding any follow-up that occurs to resolve “technical assistance needed” designations. Alchemer allows you to complete this field more than once.

Name:

Title:

Phone:

Email:

## Executive Director

The Executive Director will receive a copy of the agency’s ITR feedback report. Please provide their name and contact information.

Name:

Phone:

Email:

## Project(s) Information

The Alchemer form will pre-populate the number of projects funded at your agency and key information that is already on file for each project, such as project name and HMIS ID. If prepopulated information is incorrect, please make the corrections in the narrative field at the end of the section. Do not delete or change the pre-populated information. Complete all the missing information.

Number of Projects:

## Complete the following information for *each* project:

1. Name of Project:
2. HMIS ID (if there are multiple IDs associated with one project, please list and explain):
3. Program Model Type (HUD): PSH, RRH, TH, Joint TH-RRH, Safe Haven, SSO, HMIS, Planning
4. Subpopulation Focus (check all that apply): Veterans, Youth (under 25), Families with Children, Domestic Violence, Substance Use, Mental Illness, HIV/AIDS, Chronic Homeless, Other, N/A – Project Serves All populations

Note: This selection should match what you have indicated in the NOFO project renewal application. If you chose a subpopulation focus on the NOFO project renewal application, you may select it here. Otherwise, do not select it.

5. Grant Number (most recent):
6. Grant Start Date:
7. Grant End Date:
8. If the project was new in 2021, provide the date it started operating:
9. If the project consolidated since January 1, 2021 (i.e., completed first year as consolidated project), provide the start and end date of this grant and the surviving HMIS provider ID:
10. Did the project amend its 2019 or 2020 grant through the expedited grant amendment process? If so, explain what changes were made.
11. Identify total project funding (for the grant year that concluded in 2021), broken down by funding source. Estimates are acceptable. The goal is to represent the total amount of funding that is connected to the project. This would include the HUD CoC funding as well as any other sources of funding that support and are attributed to the project.
  - a. CoC funding: \$
  - b. Other public funding: \$
  - c. If other public funding, please list the funding sources here:
  - d. Private funding: \$
  - e. General operating: \$
  - f. Program income: \$
  - g. In-kind: \$
  - h. One-time funding sources (such as a temporary pilot, for example): \$
  - i. Other: \$
  - j. Total project expenses (sum of the above): \$
12. Would the agency consider consolidating this project with another if the opportunity is available in the FY2022 NOFO? If so, identify: a) which projects would consolidate, b) combined grant amount, c) which project would be the surviving grant and d) what start and end dates would the combined projects go to?
13. Has the project made any major changes in the last 12 months, or expects to make changes in the next 12 months, such as grant consolidation; change in service priorities or population; or loss of funding? If yes, explain these changes.

# Declaration of Intent to Renew

Please confirm whether you intend to renew your project application(s) in the 2022 grant cycle. If you decide not to renew a project in the 2022 grant cycle, you do not have to submit responses for that project in the rest of the form. However, if you will renew at least one project, the rest of the form must be completed.

- Yes, the project(s) would like to be considered for renewal
- No, this project will not be renewed in the 2022 grant cycle. *If a project does not renew and would like to receive future funding, it will have to reapply through a competitive grant process and the project type may no longer be eligible.*

## **Name and Signature of Person who completed the Intent to Renew**

There is no requirement regarding who may sign, but it must be a person within the agency who has appropriate authority to do so. Provide the title and the date of submission.

*I certify on behalf of my agency that all information contained in this application is accurate and true, based on our current project records. I understand that falsifying or failing to provide accurate information will have a negative impact on my overall review and may result in removal from the Continuum of Care Application to HUD.*

Name:

Title:

Signature:

Date:

# Desk Audit

In this section of the Intent to Renew, narrative responses or copies of policies/procedures are requested for evaluation.

If a question is marked as *informational*, the purpose is to gather information and All Chicago will not assign any required technical assistance on the topic. If an agency does not have a current policy or practice related to an aspect of an informational question, it is acceptable to indicate this and outline what the agency intends to do in the future. After reviewing submissions, All Chicago may have questions to discuss with some agencies and may offer Technical Assistance based on information gathered through this process.

## **Topic A: Housing First**

A1. In 2021, providers that operated projects taking matches from CES were asked to confirm standard eligibility criteria or submit a contract and/or scope detailing funder required eligibility criteria. This information will be referenced this year in relation to adherences to the Housing First approach. If this information has changed, please explain. To request a copy of what your agency submitted, contact [cocprograms@allchicago.org](mailto:cocprograms@allchicago.org).

A2. Describe challenges or barriers that can prevent or delay referral participants from enrolling into the project or moving into a unit. For each challenge or barrier listed below, describe how it impacts the project and any efforts that have been made to address it. If the project does not encounter the challenge, please state that.

- a) Providing or locating project-based or scattered-site units that meet the **needs and preferences of participants** (current or working towards enrollment or move-in).
  - i. Describe the challenge/barrier:
  - ii. Describe any successes or efforts to address:
- b) Internal agency or program policies and procedures, such as agency-specific document requirements.
  - i. Describe the challenge/barrier:
  - ii. Describe any successes or efforts to address:
- c) Requirements from other funding sources (please specify what other funding is used and what requirements it has that impact the project's ability to implement housing first).
  - i. Describe the challenge/barrier:
  - ii. Describe any successes or efforts to address:
- d) Any other barriers participants may experience in the process of being approved for project enrollment or approved for a unit.
  - i. Describe the challenge/barrier:
  - ii. Describe any successes or efforts to address:

A3: Describe the project's efforts to **support** referral participants with project enrollment or movement into housing. This can include the ways a project tries to locate and stay in contact with participants and

how the project supports participants in obtaining documentation or meeting any other program requirements. For scattered-site projects, it may include a description of the ways a project advocates on behalf of participants in overcoming challenges to being approved by landlords related to lack of income documentation, instances of interaction with the criminal system, or others.

A4 (informational): Describe the interactions that take place between the project and the referral participant when the match is rejected for any reason. For example, describe how they are notified, what information they receive from the project, and whether this includes due process or the ability to appeal the decision.

### Criteria

All Chicago will refer to the criteria listed below when evaluating responses to this desk audit question.

- A1-3: The responses should demonstrate how the project follows the Housing First approach. [From USICH](#), the Housing First approach follows the belief that people experiencing homelessness can achieve stability through permanent housing and appropriate support; it values client choice; and holds the following:
  - that access to housing should not be contingent on sobriety, minimum income, lack of criminal record, completion of treatment, participation in services, or other necessary conditions
  - projects should do everything possible not to reject or terminate participants
  - people with disabilities are offered clear opportunities to request reasonable accommodations
- A1: The project's policies and procedures align with the housing first approach
- A2: The project demonstrates that it exercises opportunities to extend the level of choice offered to participants when that is feasible
- A2: The project demonstrates effort to meet participant's needs and preferences before the participant requests another match
- A2: The project has assessed its internal policies and practices for potential barriers participants may experience to being approved for a program or unit, and the project has detailed a plan to overcome these barriers.
- A3: The project demonstrates an effort to avoid rejecting referrals unless eligibility criteria is not met
- A3: The project demonstrates effort to avoid rejecting referrals due to inability to obtain documentation, or gain landlord approval
- A3: Project demonstrates that it incorporates Coordinated Entry List and Housing Provider Contact Protocols
- A4: This is informational, and no criteria will be used to assess this response.

**Topic B: Diversity, Equity, and Inclusion (Informational)**

B1 (informational). Describe the agency/project's efforts to advance diversity, equity, and inclusion within the program and/or agency.

B2 (informational). Describe any steps the agency is taking to understand the extent to which the project's participants reflect the broad population of those experiencing homelessness in the Chicago CoC\*.

B3 (informational). Describe any steps the agency is taking to understand the extent to which the agency's board of directors and its executive leadership reflect the diversity of its participants.

B4 (informational). Describe any steps the agency is taking to review internal policies/procedures with an equity lens.

\* demographic information about the Chicago CoC participant population can be found here:

<https://allchicago.org/how-we-are-ending-homelessness/data-analytics/hmis/chicagos-dashboard-to-end-homelessness/>

# Certifications and Supporting Documentation

## I. HUD Monitoring Section

This section relates to all HUD monitoring of both fiscal and programmatic requirements. All Chicago requests information about “concerns” in addition to “findings” for the purpose of developing training in the areas of greatest need.

1. Are there any open/unresolved findings that were issued prior to calendar year 2021? Yes/No
  - a. If yes, explain in a narrative why the finding(s) remain unresolved.
2. Were any of the agency’s projects monitored by HUD in calendar year 2021 or 2022? Yes/No
  - a. If no, skip the following questions in this section.
3. Name the projects that were monitored in 2021 or 2022.
4. Number of concerns:
5. List the concerns:
6. Number of findings:
7. List the findings:
8. Have all the HUD findings from 2021 or 2022 been resolved? Yes/No/N/A
  - a. If no, explain in a narrative why the finding(s) remain unresolved

All Chicago will evaluate whether the following criteria has been met:

- The program has documentation of HUD monitoring and has evidence of steps taken to work towards or complete the resolution of any findings in a timely manner. An agency will receive a “Technical Assistance Needed” designation if there are unresolved HUD Monitoring findings and sufficient progress has not been made towards resolving the findings with HUD.

### ***Attachment A: HUD Monitoring Documentation (if applicable)***

A project that has been monitored by HUD in calendar year 2021 or 2022 will submit the attachments listed below.

📄 HUD Monitoring Letter (indicating findings or lack thereof)

📄 If there were findings, submit a copy of the correspondence the agency sent to HUD to attempt to resolve the finding(s) as well as any additional response(s) from HUD

📄 If a finding(s) has been closed, submit a copy of the HUD close out letter

## II. Fiscal Section

9. Will your agency be able to meet the match requirement for all renewal projects? Yes/No
10. What is your agency's fiscal year? Provide the start and end date of the agency's fiscal year.
11. For the most recently completed audit year, was the organization required to undergo a single (Uniform Guidance) audit? Yes/No
- In general, agencies with \$750,000 in federal expenditures in a fiscal year are required to undergo a single (Uniform Guidance) audit.
- If yes: Attachment B is the Annual Financial Statement Audit and Attachment C is the Single Audit Report or Management Letter. Most auditors will include the single audit report with the financial statement audit. If the single audit is included in Attachment B, then no additional attachments are needed. If the single audit was not included in Attachment B, then Attachment C is a copy of the most recent single audit (which should be for the same fiscal year as the attached financial statement audit).
  - If no: The agency is not required to have a single audit. Attachment B is the Annual Financial Statement Audit. For Attachment C, include the following letter from your auditor: **Auditor's Communication with Those Charged with Governance – AU 260**. Additionally, if either of the letters listed below were issued by your auditor, please include a copy of these letters with Attachment C:
    - Auditor's management letter
    - Communicating Internal Control Related Matters Identified in an Audit – AU 265If you have any questions regarding these letters, contact your auditor for clarification.

### ***Attachment B: Annual Financial Statement Audit***

Attach:

📎 Most recently completed audited financial statement (complete package)

As an example, if the agency's most recent year end is 6/30/21, you will likely be able to attach the audit for 6/30/21. If not, attach the audit for 6/30/20. As another example, if the agency's most recent year end is 12/31/21, you will likely attach the audit for the year that ended 12/31/20 because the audit for the year that ended 12/31/21 likely will not have been completed yet.

### ***Attachment C: Single Audit Report or Management Letter***

If the organization underwent a Single (Uniform Guidance) Audit, attach:

📎 Single audit report (complete package). It is not necessary to resubmit if this was already included in Attachment B.

If the organization did NOT undergo a Single (Uniform Guidance Audit), attach:

📎 Auditor's Communication With Those Charged With Governance," referred to as an AU 260 letter (this communication is required to be issued in connection with an audit)

📎 Auditor's management letter (if issued by your auditor)

📄 “Communicating Internal Control Related Matters Identified in an Audit,” referred to as an AU 265 letter (if issued by your auditor)

### **Financial Risk Assessment**

All Chicago uses a Financial Risk Assessment process to evaluate the financial statements, single audits and in cases in which a single audit is not required, certain communications issued by the auditors of CoC funded agencies. The risk assessment methodology was developed in collaboration with the CoC CFO workgroup. Through this process, a financial risk score is calculated for each agency. All agencies will receive the detail of their risk score calculation and can appeal any component of the score to the CoC Finance Committee, through All Chicago. Appeals can include mitigating circumstances that led to risk points being assessed. For example, an audit may have been completed after nine months due to issues with the auditor.

This risk score will determine whether an agency requires technical assistance prior to approval of its project renewal applications and will determine whether an agency will be selected for financial monitoring. If the financial risk assessment completed by All Chicago results in a “High Risk requiring technical assistance” designation, the agency must receive technical assistance prior to approval of its project renewals and demonstrate the capacity to address any issues which can result in questioned or disallowed costs. If after technical assistance the agency cannot demonstrate the capacity to address the identified issues, then the agency’s grant(s) may not be recommended for renewal. Agencies classified as High Risk may be selected for financial monitoring and technical assistance after project renewal. Agencies classified as Medium Risk may also be selected for focused technical assistance and/or monitoring.

When reviewing the annual financial statement audit, All Chicago evaluates whether:

- An audit is completed within the prescribed time period for federal clearinghouse submission, if applicable. Generally, this time period is 9 months after the agency’s year end, but the deadline has been extended to 15 months for fiscal year ends from 6/30/20 to 6/30/22.
- The audit opinion indicates that the organization’s financial statements are fairly presented in accordance with generally accepted accounting procedures (GAAP).
- The audit opinion does not include any substantial doubt about the organization’s ability to continue as a going concern.

The items that factor in the risk assessment score are as follows:

- In the case of the single audit, the following items will factor into the financial risk score.
  - Whether the reports were issued within the prescribed time period for federal clearinghouse submission.
  - Any modification of the financial statement opinion
  - Any qualification of opinion with respect to a federal program.
  - Any material weaknesses with regards to financial statements or federal awards
  - Any significant deficiencies with regards to financial statements or federal awards
  - Whether the organization is determined to be a low-risk auditee

- If no single audit is required:
  - Was the agency required to undergo an audit in accordance with Government Audit Standards.
  - Any issues with management with respect to the audit.
  - Any material weaknesses or significant deficiencies noted in the audit report of auditor letters to management

<b>Q. #</b>	<b>Risk Evaluation Item</b>	<b>Risk Points</b>	
1	<b>Single Audit Required?</b>	1	if No
2	<b>If no single audit, was a Yellow Book audit performed?</b>	1	if No
3	<b>Audit completed within the prescribed time for federal clearinghouse submission</b>	3	if No
4	<b>Financial Statements Auditor's Report</b>	3	if modified
5	<b>Single Audit Report</b>	3	if modified
6	<b>Internal control # of material weaknesses</b>	2	per weakness
7	<b>Internal control # of significant deficiencies</b>	1	per weakness
8	<b>Internal control # of instances of material noncompliance</b>	2	per instance
9	<b>Fed awards # of material weaknesses</b>	2	per weakness
10	<b>Fed awards # of significant deficiencies</b>	1	per weakness
11	<b>Low Risk Auditee? (Yes or No)</b>	1	if No

Under this scoring methodology, a perfect risk score is 0.

Agencies will be classified as follows:

- Low Risk: 0 -1 points
- Medium Risk: 2 -3 points
- High Risk: 4 points or more
- High Risk requiring technical assistance: 4 or more points and the agency receives risk points for questions 2, 3 or 4 (modified/qualified opinion on the single audit or financial statement audit report).

### III. Programmatic Section

12. Do all of the agency's projects participate in Coordinated Entry? Yes/No  
Answer "Yes" if all the agency's projects do at least **one** of the bulleted items listed below.
- Refers people for a Coordinated Entry housing assessment
  - Ensures all participants have access to the Coordinated Entry System
  - Has a skilled assessor on staff to conduct assessments
  - Requests matches for all vacancies through the Coordinated Entry System, including the DV Coordinated Entry System if applicable
  - Utilizes Coordinated Entry transfer requests for all transfers
  - The CoC is aware that the project uses the CHA's vacancy matching process
  - Fulfills matching requests
  - Coordinates outreach efforts
  - Coordinates or participates in System Integration Team meetings
  - Oversees the Coordinated Entry System
  - Performs housing system navigation
13. If the agency has a project that is PSH, RRH, TH, Joint TH-RRH or Safe Haven and does NOT do both (d) and (e) from the list above, please explain the reason. For example, a project that has a HUD model of TH and does not request matches through Coordinated Entry should identify that here. Also, a project that uses CHA's vacancy matching process should identify that here.
14. Was the last APR submitted on time for each project? Yes/No/N/A  
The APR must have been submitted to HUD in Sage. All Chicago will use Sage to verify that the status of the APR is "Submitted," "Accepted," or "Awaiting Director Review." If the APR was submitted on time and it has not been accepted due to a delay by HUD, it still qualifies as "submitted on time." Please explain if your response is "No" or "N/A."
15. Has the last APR been rejected by HUD for any project? Yes/No/N/A
- If yes or N/A, please explain.
16. The agency agrees to maintain the confidentiality of non-HMIS records pertaining to any individual or family who receives family violence prevention or treatment services with HUD CoC funding.  
Yes/No
17. The agency takes measures to ensure that the address or location of any family violence shelter project in the Chicago CoC, which is assisted with HUD CoC funds, will not be made public, except with written authorization of the person responsible for the operation of such project. Yes/No
18. Does the agency currently have on its board of directors or other equivalent policymaking entity a participant who has experienced homelessness as defined by HUD? Yes/No  
If yes, answer the following:
- Has the person experienced homelessness or been a resident of an agency project *in the last 10 years?* (not a HUD requirement) Yes/No
  - Is the person currently experiencing homelessness or a current program participant? (not a HUD requirement) Yes/No
  - Please provide the name (first name, initial of last name) or HMIS ID of the person who has lived experience of homelessness.

19. In any project, does the agency serve at least one household that consists of one parent and one or more children 18 and under? Yes/No  
 If yes, answer the following:
- a. Does the agency and applicable project(s) accept all families with children 18 and under without regard to the age or gender of any child? Yes/No
  - b. Does the agency and applicable project(s) ensure that a staff person has designated responsibility for providing guidance and support around enrolling children in pre-school or school, ensuring that children are enrolled in school, connecting eligible families to the CPS Students in Temporary Living Situations (STLS) program, and connecting children to appropriate services in the community? Yes/No
  - c. Are the agency and applicable project(s)' policies and practices consistent with the laws related to providing education services to individuals and families? Yes/No
20. Does the agency adhere to Environmental Review requirements before committing funds or making choice-limiting actions such as signing a lease? Yes/No
21. Does the agency have Standard Operating Procedures (SOP) for their CoC-funded projects? Yes/No
22. Does the agency adhere to the lead-based paint regulations, including disclosure requirements and completing the Lead Requirements Screening Worksheet? Yes/No
23. Does the agency have a CoC grant agreement that includes funding for leasing? Yes/No
- a. If yes, does the agency ensure lease agreements are in place between the recipient/subrecipient and property owner? Yes/No
24. Does the agency have a CoC grant agreement that includes funding for rental assistance? Yes/No
- a. If yes, did the agency ensure that the program participants enter into a lease agreement with the property owner? Yes/No
25. Has the agency used any of the waivers of regulatory requirements that HUD made available to prevent the spread of COVID-19 and to mitigate against the economic impact caused by COVID-19 for eligible households? Yes/No  
 If yes:
- a. Did the agency provide notification in writing to HUD? Yes/No
  - b. Has the agency created an Emergency Recordkeeping Policies and Procedures (i.e., recipient level documentation)? Yes/No
  - c. Has the agency documented the constraints/barriers/limitations that make it necessary to use the waivers (i.e., recipient level documentation)? Yes/No
  - d. Has the agency made notations in files of affected participants outlining application of the waiver and demonstrating that it falls within the timeframe (i.e., client level documentation)? Yes/No

## IV. HMIS Section

The Continuum of Care (CoC) Program Interim Rule (24 CFR 578) places a high emphasis on having a functioning and comprehensive Homeless Management Information System (HMIS) in the CoC jurisdiction. HMIS is critical to gathering unduplicated, aggregated data on homelessness in the community both for the CoC and Emergency Solutions Grant (ESG) Programs. HMIS data is crucial in identifying and housing individuals through the Coordinated Entry System (CES), and assessing system strengths and needs in addressing and ending homelessness.

26. Some projects serving survivors of domestic violence are exempt from the requirement to participate in HMIS. Does this apply to any of the agency's projects? Yes/No

If yes:

a. Name the project:

b. Does the project use a comparable database? Yes/No

i. If yes, name the database:

27. Do all of the agency's projects (not including any exempt projects listed in response to question 26) have an HMIS ID created in ServicePoint? Yes/No/N/A

# Appendix

This section contains supporting references to regulations and requirements, as well as tips on where to find technical assistance.

**Q9 Match.** See 24 CFR 578.73. Match must equal 25 percent of the total grant request including admin costs but excluding leasing costs (i.e., any funds identified for Leased Units and Leased Structures). Match contributions can be cash, in-kind, or a combination of the two; and, match must be used for an eligible cost as set forth in Subpart D of CoC Program interim rule. For an in-kind match, the recipient may use the value of property, equipment, goods, or services contributed to the project, provided that, if the recipient or sub recipient had to pay for such items with grant funds, the costs would have been eligible. If third party services are to be used as match, the third-party service provider that will deliver the services must enter into a memorandum of understanding (MOU) before the grant is executed documenting that the third part will provide such services and value towards the project.

**Q16-17. Confidentiality of records.** Hearth Act section 416(c)(5) - Each recipient shall certify to the Secretary that “it will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under this subtitle and that the address or location of any family violence shelter project assisted under this subtitle will, except with written authorization of the person or persons responsible for the operation of such shelter, not be made public.”

**Q18. Person of lived experience on the Board of Directors.** The CoC Interim Rule, 24 CFR 578.75(g)(1), requires that, “Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.”

**Q19. Family projects.**

- a) Hearth Act Section 404 “Preventing Involuntary Family Separation” - If a project serves families with children under 18, entry cannot be denied based on the particular age or gender of a child in the family. For example, a project could not deny a family on the basis that there is a teenager.
- b) Hearth Act Section 426(b)(4)(d), 24 CFR 578.23(c)(4)(iv) - Appropriate services may include early childhood programs such as Head Start, specialized services for children with disabilities, and McKinney-Vento services for students experiencing homelessness if eligible (i.e., fee waivers, transportation, etc.)
- c) Hearth Act Section 426(b)(4)(c), 24 CFR 578.23(c)(7) - Policies do not restrict rights under McKinney-Vento and projects should take the educational needs of children into account when placing families in housing to place families as close as possible to the school of origin.

**Q20. Environmental review.** See 24 CFR 578.31 for regulatory requirement. Responsibilities of the recipient include determining the appropriate level of review, completing documentation within the

required timeframe, and maintaining records of compliance. A training is available in the [All Chicago Learning Management System](#) under the category of “Program Administration -> Compliance and Regulatory.”

**Q21. Standard Operating Procedures.** See 24 CFR 578.103(a). “The recipient and its subrecipients must establish and maintain standard operating procedures for ensuring that Continuum of Care program funds are used in accordance with the requirements of this part and must establish and maintain sufficient records to enable HUD to determine whether the recipient and its subrecipients are meeting the requirements of this part.” The SOP is a document that is frequently requested for review by HUD auditors. All Chicago has a technical assistance resource available.

**Q22. Lead-based paint.** See 24 CFR 578.75(b) for regulatory requirement. All Chicago has a technical assistance resource available explaining the visual assessment, information and disclosure, and lead screening worksheet requirements. For housing rehabilitated with funds under this part, the lead-based paint requirements in 24 CFR part 35, subparts A, B, J, and R apply. For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. For residential property for which funds under this part are used for acquisition, leasing, services, or operating costs, 24 CFR part 35, subparts A, B, K, and R apply.

**Q23. Funds for leasing.** See 24 CFR 578.49(b)(5); 24 CFR 578.103(a)(17). “Where grant funds were expended for leasing structures or units to provide housing to homeless persons, did the recipient or its subrecipients meet the requirement to ensure lease agreements were in place between the recipient/subrecipient and property owner that supports the costs charged to the grant for leasing costs?” Also see page 6 of [HUD’s CoC Program Leasing Slides](#) for a visual that illustrates the structure of leasing agreements executed with leasing funds. See slides 9-11 of [HUD’s CoC Leasing v Rental Assistance slides](#).

**Q24 Funds for rental assistance.** See 24 CFR 578.51 (l). “For project-based, sponsor-based or tenant-based rental assistance, program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause.” See slides 12-15 of [HUD’s CoC Leasing v Rental Assistance slides](#).

**Q25 HUD waivers.** For the list of waivers, go [here](#). For the April 14, 2020 HUD webinar on COVID-19 webinars, go [here](#). A training is available in the [All Chicago Learning Management System](#) under the category of “Program Administration -> Compliance and Regulatory.”

**Rules that affect how HUD evaluates applications (from FY21 CoC Competition NOFO, pg. 43).**

1. Past Performance

In evaluating project applications for funding, HUD will consider a project applicant’s past performance in managing funds. Items HUD will consider include, but are not limited to:

- the ability to account for funds in compliance with applicable reporting and recordkeeping requirements;
- timely use of funds received from HUD;
- timely submission and quality of reports submitted to HUD;
- meeting program requirements;
- meeting performance targets as established in the grant agreement;
- the project applicant’s organizational capacity, including staffing structures and capabilities;
- timely completion of activities and receipt and expenditure of promised matching funds;
- the number of persons served or targeted for assistance;

- promoting self-sufficiency and economic independence;
- producing positive outcomes and results; and
- Encouraging participation with faith-based entities.

HUD may reduce scores based on the past performance review. Wherever possible, HUD will obtain past performance information and if this review results in an adverse funding related to integrity of performance, HUD reserves the right to take any of the remedies necessary.

## 2. Statutory and Regulatory Requirements.

To be eligible for funding under the FY 2021 CoC Program Competition NOFO, project applicants must meet all statutory and regulatory requirements in the Act and the Rule. The FY 2021 YHDP noncompetitive renewals and replacements is administered under the Consolidated Appropriations Act, 2021 which permits YHDP projects to renew or replace non-competitively through the CoC Program (see Section II.B.7 of this NOFO). Project applicants can obtain a copy of the Act and the Rule on [HUD's website](#) or by contacting the NOFO Information Center at 1-800-483-8929.

## 3. Threshold Requirements

*a. Ineligible Applicants.* HUD will not consider a project application from an ineligible project applicant, including an application submitted for CoC planning funds or UFA Costs from a project applicant other than the Collaborative Applicant.

*b. Project Eligibility Threshold.* HUD will review all projects to determine if they meet the following project eligibility threshold requirements on a pass/fail standard. If HUD determines the applicable standards are not met for a project, the project will be rejected. Any project requesting renewal funding will be considered as having met these requirements through its previously approved grant application unless information to the contrary is received (e.g., monitoring findings, results from investigations by HUD's Office of Inspector General, the recipient routinely does not draw down funds from eLOCCS at least once per quarter, consistently late Annual Performance Report (APR) submissions). Approval of new and renewal projects is not a determination by HUD that a recipient is compliant with applicable fair housing and civil rights requirements.

(1) Project applicants and potential subrecipients must meet the eligibility requirements of the CoC Program as described in the Act and the Rule and provide evidence of eligibility required in the application (e.g., nonprofit documentation).

(2) Project applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds. Demonstrating capacity may include a description of the applicant and subrecipient experience with similar projects and with successful administration of SHP, S+C, or CoC Program funds or other federal funds.

(3) Project applicants must submit the required certifications specified in this NOFO.

(4) The population to be served must meet program eligibility requirements as described in the Act, the Rule, and Section II.B.11.f of this NOFO.

(5) Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that meets the needs of the local HMIS.