

Southeastern Oklahoma Continuum of Care FY'23 NOFO Threshold Requirements

Below are the HUD and CoC Threshold Requirements. Your entity/agency/organization must be able to pass all thresholds in order to have your application scored. If you cannot pass these thresholds, your application will not be reviewed or scored. Please carefully read and consider all thresholds below prior to submitting an application.

Certain thresholds require you to send information to the CoC. They are as follows:

HUD – 1, 3, 4a&b, 11a, 16a

CoC – 1, 2, 3, 6, 9

Upon receipt of your application, you will be asked to submit information for the above thresholds to seokcoc@gmail.com and copy linda.love@kibois.org if the documentation is not contained in your application.

HUD Threshold Requirements:

1. Send proof of your active System for Award Management (SAM) registration with current information.
2. Ensure the proof of SAM registration shows your Unique Entity Identifier (UEI) Number.
3. CoC Program Eligibility - Provide evidence that your entity meets 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., non-profit documentation).
4. Financial and Management Capacity: Project applicants 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.
 - a. List the two most recent Federal grants awarded to and managed by your entity.
 - b. Briefly describe your entity's staff capacity to administer and financially manage federal funds.
5. Certifications – Ensure all required certifications specified in the NOFO are completed and submitted.
6. Population Served – Ensure the population to be served meets program eligibility requirements as described in the HEARTH Act, the CoC Rule, and the NOFO.
7. HMIS Participation - Project applicants 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 sub-recipient shall not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers use a comparable database that captures the required HMIS data in addition to meeting the needs of the local HMIS.)
8. Applicant must have no Outstanding Delinquent Federal Debts – It is HUD policy, consistent with the purposes and intent of 31 U.S.C. 3720B and 28 U.S.C. 3201(e), that

applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds unless

- a. A negotiated repayment schedule is established and the repayment schedule is not delinquent, or
 - b. Other arrangements satisfactory to HUD are made before the award of funds by HUD.
9. Applicant must have no Debarments and/or Suspensions – In accordance with 2 CFR 2424, no award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal government.
10. Pre-selection Review of Performance - If your entity has delinquent federal debt or is excluded from doing business with the Federal government, the organization may be ineligible for an award. In addition, before making a Federal award, HUD reviews information available through any OMB-designated repositories of government-wide eligibility qualification or financial integrity information, such as Federal Awardee Performance and Integrity Information System (FAPIIS), and the “Do Not Pay” website. *HUD reserves the right to:*
 - a. *Deny funding, or with a renewal or continuing award, consider suspension or termination of an award immediately for cause;*
 - b. *Require the removal of any key individual from association with management or implementation of the award; and*
 - c. *Make provisions or revisions regarding the method of payment or financial reporting requirements.*
11. Sufficiency of Financial Management System - HUD will not award or disburse funds to applicants that do not have a financial management system that meets Federal standards as described at 2 CFR 200.302. *HUD may arrange for a survey of financial management systems for applicants selected for award who have not previously received Federal financial assistance, where HUD Program officials have reason to question whether a financial management system meets Federal standards, or for applicants considered high risk based on past performance or financial management findings.*
 - a. Provide the name of your financial management system.
12. False Statements - A false statement in an application is grounds for denial or termination of an award and may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment. Recipient or applicant must confirm all statements are truthful.
13. Mandatory Disclosure Requirement - Recipients or applicants must disclose in writing to the awarding program office at HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award within ten days after learning of the violation. Recipients that have received a Federal award including the term and condition outlined in Appendix XII to 2 CFR part 200—Award Term and Condition for Recipient Integrity and Performance Matters are required to report certain civil, criminal, or administrative proceedings to SAM. *Failure to make required disclosures can result in any of the remedies described in § 200.338 Remedies*

for noncompliance, including suspension or debarment. (See also 2 CFR part 180, 31 U.S.C. 3321, and S.C. 2313.)

14. Prohibition Against Lobbying Activities - Applicants are subject to the provisions of Section 319 of Public Law 101-121, 31 U.S.C. 1352, (the Byrd Amendment), and 24 CFR part 87, which prohibit recipients of federal awards from using appropriated funds for lobbying the executive or legislative branches of the Federal government in connection with a Federal award. All applicants submit with their application the signed Certification Regarding Lobbying included in the Application download from Grants.gov. In addition, applicants disclose, using Standard Form LLL (SFLLL), "Disclosure of Lobbying Activities," any funds, other than federally appropriated funds, that will be or have been used to influence federal employees, members of Congress, or congressional staff regarding specific awards. Federally-recognized Indian tribes and tribally designated housing entities (TDHEs) established by federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage of the Byrd Amendment, but state-recognized Indian tribes and TDHEs established only under state law shall comply with this requirement. Applicants submit the SFLLL if they have used or intend to use non-federal funds for lobbying activities.
15. Equal Participation of Faith-Based Organizations in HUD Programs and Activities – Projects must ensure that all projects meet the requirements under 24 CFR 5.109. On April 4, 2016, HUD amended 24 CFR 5.109 consistent with E.O. 13559, entitled Fundamental Principles and Policymaking Criteria for Partnerships with Faith-Based and Other Neighborhood Organizations (75 Fed. Reg. 71319 (Nov. 22, 2010)). (See 81 FR 19355). These regulations apply to all HUD programs and activities, including all of HUD's Native American Programs, except as may be otherwise provided in the respective program regulations, or unless inconsistent with the respective program authorizing statute.
16. Resolution of Civil Rights Matters - Outstanding civil rights matters must be resolved before the application submission deadline. Project applicants, who after review are confirmed to have civil rights matters unresolved at the application submission deadline, will be deemed ineligible. Their applications will receive no further review, will not be rated and ranked, and will not receive funding.
 - a. Does your agency have an outstanding civil rights matter?

Continuum of Care Threshold Requirements:

1. Coordinated Entry Participation – Will your project participate in the Coordinated Entry System?
2. Housing First and/or Low Barrier Implementation – Will your project utilize a Housing First Model?
3. Documented, secured minimum match – Will you be able to provide documented, secured minimum match?
4. Project has reasonable costs per permanent housing exit, as defined locally – Review Committee will analyze this threshold.
5. Project is financially feasible – Review Committee will analyze this threshold.

6. Applicant is active CoC participant – Provide letter from CoC Lead Agency stating your entity is active in the CoC.
7. Application is complete and data are consistent – Review Committee will analyze this threshold.
8. Data quality at or above 90% - For entities currently entering in HMIS, is your data quality at or above 90% - HMIS Lead Agency will verify this threshold.
9. Acceptable organizational audit/financial review – Provide a copy of your most recently completed audit. Review Committee will analyze this threshold.