



2019 CoC NOFA Competition Policies

CONTINUUM OF CARE PROGRAM GRANT (PAGE 44)

CoC Project Ranking and Funding Decision Process

SARAH staff, with assistance from its Board of Directors, will recruit participants for an Independent Review Team (IRT), whose primary purpose will be to carry out the project ranking and funding decisions for the Continuum of Care Program local competition. The IRT also may serve in other prioritization and funding allocation capacities as determined by SARAH staff.

The Board of Directors will appoint the Chair of the IRT and make an annual call for nominations for members. The Board of Directors will elect up to seven (7) IRT members from the slate of nominees.

Independent Review Team

IRT members (including members of their immediate families) may not be employees, contractors, or serve in any representative capacity of an applicant or a subrecipient agency party to a funding application.

CoC Program Ranking Policy

SARAH will hold a training, open to the public, to train the IRT to perform the project ranking and prioritization process. The IRT training will follow HUD guidance and the prioritization and ranking rules within the CoC Program Notice of Funding Availability (NOFA) and SARAH policies.

The IRT will conduct two private meetings, which will include SARAH staff, as part of the project review and selection process. The first meeting will review and confirm receipt of all CoC Program Application Materials. SARAH staff, in coordination with the IRT Chair, will provide final instructions to the committee on the review process. The second meeting will center on the final review, prioritization, and funding decisions. Additional meetings may be scheduled, depending on the timing of the NOFA, to complete reviews for renewal applications, new applications, and to update the ranking policy if necessary due to new HUD requirements or policy changes.

Project Placement: Tier 1

HMIS and Coordinated Entry Renewal Grants will be placed in Tier 1 as they are core operations for the Continuum of Care.

HMIS and the Coordinated Entry Expansion and/or Consolidated Grant ranking positions will be recommended by the Independent Review Team.

Project Placement: Tier 2

Project score determines tier 2 placement, with special consideration for projects that serve a high priority population or many clients.

Both new and renewal projects are ranked solely by score, with renewal projects having an advantage of a being scored on 150-points scale, compared to new projects being scored on a 100-points scale.



Renewal Projects

Renewal Projects are evaluated using the CoC-Approved Renewal Scoring Tool, which is primarily focused on project performance based on the HUD System Performance Measures. Additional points are given for the following:

- Demonstration of eLOCCS drawdowns and utilization of grant funds
- Housing First orientation and fidelity
- Integrity of Equal Access Policies
- Serving as a Coordinated Entry Hub or completing Coordinated Entry assessments in the field
- Meeting PIT Team Lead requirements as outlined in executed TX-500 Continuum of Care Project Agreement MOU between SARAH and the grantee
- Assessment of cost per client in facilitating the project

Consolidated grant performance will be averaged from previous grants and consolidated into one score for ranking. Projects focusing on serving survivors of Domestic Violence (DV) will be evaluated with a specialized DV Performance Scorecard which measures outcomes specific to the population.

New Projects

New Projects are evaluated based on the experience of the requesting grantee, project descriptions, proposed Housing First orientation and policy, and the priority of the proposed population to serve. Renewal projects that reallocate to new projects based on funding priorities and gaps identified by the Board of Directors will receive extra points. Funding priorities will be posted to the SARAH website.

Additional Ranking Policies

- Projects with equal scores are ranked by project component type.
- Projects with equal scores and the same component type will be ranked based on cost per client.

SARAH will prepare the project priority list and funding decision as instructed by the IRT. The IRT Chair will present the list and the Chair's report at the next Board of Directors meeting. The Board of Directors will vote to accept the decisions of the IRT. The Board of Directors is the final decision-making body for the determination of project priorities and funding levels.

The Board of Directors may also direct SARAH to make minor budgetary corrections, as needed, consistent with HUD application rules and funds allocated to the CoC. SARAH will be charged with communicating budget adjustments to individual applicants and instructing them to make changes before submitting the final CoC application to HUD.

Grievance and Appeals Process

Provisions at 24 CFR 578.9 require CoCs to design, operate and follow a collaborative process for the development of an application in response to a NOFA issued by HUD. As part of this collaborative process, CoCs must implement internal competition deadlines to ensure transparency and fairness at



the local level.

Any project applicant that submits a project that the CoC rejected in the local competition must have been notified in writing by the CoC, outside of e-snaps, with an explanation for the decision to reject the project(s).

The Appeals Process outlined below is a statement to eligible organizations. SARAH is committed to fairness and openness in the HUD CoC funding process.

Except for the amount of the HUD CoC allocation available to SARAH and cost eligibility, the CoC Board is the primary decision-maker in the review process.

- The Independent Review Team will review all applications and make project ranking recommendations to the SARAH Board.
- SARAH will make the final rankings and notify all project applicants no later than 15 days before the application deadline regarding whether their project applications would be included as part of the CoC Consolidated Application submission and the approved community ranking.
- If the application was rejected, or if the applicant objects to their ranking position, applicants have three (3) calendar days from the ranking announcement to make a formal appeal. If they wish to do so, they must notify the SARAH Executive Director, in writing, of the appeal with specific reasons why the applicant believes the project was unfairly rejected or ranked.
- The SARAH Executive Director will notify the Board of the appeal and a conference call will be held to discuss if the appeal has merit based on the criteria in 24 CFR 578.35. At least two (2) Board members must participate in the call.
- If it is determined that the appeal does not have merit, the applicant will be notified in writing. The CoC Board President and an additional board member selected by the President will hear the appeal within three (3) days and make a final determination. The applicant will be notified in writing within three (3) days of the appeal decision.
- Project applicants whose project was rejected may appeal the local CoC competition decision to HUD, if the project applicant believes it was denied the opportunity to participate in the local CoC planning process in a reasonable manner, by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline.

Grant Reallocation Policy

Voluntary Reallocation

Existing CoC project grantees of any project type may, in part or in whole, voluntarily reallocate their grants. Grants may be reallocated to a project type which meets the Funding Priorities established for the competition. SARAH staff offer technical support and approval letters for grantees reallocating to meet HUD and community priorities.

Existing CoC grantees of any project type may also voluntarily reallocate their funds to the pool of new project dollars for community members to apply for.

Additional points will be awarded to projects voluntarily reallocating to a project type listed in the Funding Priorities established for the competition.



Involuntary Reallocation

SARAH and the NOFA Independent Review Team (IRT) will review each renewal project annually to determine the applicant's performance and rate of expenditure. If significant deficiencies are found with a project during the review process, the project may be placed on a CoC Project Quality Improvement Plan (QIP).

The QIP will be customized based on the specific issues of the project with deficiencies. The plan will be drafted by SARAH staff (with recommendations from the Independent Review Team after the annual review) and approved by the Board of Directors. The renewal applicant will have seven (7) calendar days to appeal the participation in the performance improvement plan by writing an appeal letter to the Board. The Board will make the final determination.

SARAH's Board of Directors will review the project's progress six (6) months after the close of the Notice of Funding Availability (NOFA). If the project has not shown progress toward the targets outlined in their QIP at a level satisfactory to the Board of Directors, the project will be involuntarily reallocated for the next funding cycle.

Significant De-obligated Funds

All projects are expected to expend 100% percent of their project funds. Any project that de-obligates more than 10% of its funds or \$25,000 in any HUD contract year is considered to have incurred a de-obligation deficiency. Grantees with an unexpended balance that meets or exceeds the threshold specified above will be subjected to a reduction in renewal grant amount with the unspent funds being added to the pool of funds available for reallocation.

Projects with a de-obligation deficiency will be required to submit a spending plan to SARAH. The Board of Directors will require a quarterly update on the progress of meeting the spending plan. If at the end of the grant, a project incurs a second de-obligation deficiency, the project will be reduced to the amount expended at the end of the 12 or 24-month review. An exception to this policy may be made for new projects that could not expend funds due to implementation barriers. The Board of Directors reserves the right to place a project on a spending plan at any time if funds are not being drawn down during routine financial monitoring.