

Review and Ranking/Appeals/Reallocation Process

RFA Review and Ranking Policies and Procedures: Active members of the CoC are eligible to submit proposals for the HUD NOFA through the Collaborative Applicant (Doorways of NWFL) Eligible proposals will be prioritized for inclusion in the CoC's consolidated application by the **Review and Ranking Committee (RRC)**. **Applications not scoring high enough will not be placed on the Project Funding Request.**

- The CoC Governance Board recruits CoC members without a conflict of interest for the **Review and Ranking Committee**, prioritizing members who have relevant experience. The **Committee** will be comprised of representatives from across the six county catchment area and specifically, organizations or individuals that have knowledge of federal/state contracts, homeless assistance system, and grant writing.
- **Review and Ranking Committee** members must sign a statement declaring that they have no conflict of interest.
- Members must be appointed every year and their eligibility verified.
- Members must be able to dedicate time for application review and committee meetings.
- **Review and Ranking Committee** members (3-5) are trained. The **Review and Ranking Committee Training** includes:
 - Information regarding homeless activities, needs, services, definitions and other issues that are pertinent to **NWFL** CoC residents
 - Familiarization of **HEARTH** and the local process
 - The role of the **Review and Ranking Committee**. is review of the scoring tools, applications, and resources
- **Review and Ranking Committee** members receive eligible application proposals and scoring materials.
- Prior to the **Review** meeting, all **Committee** members review all applications for HUD CoC funds. Members read projects, preliminarily score them, and note any questions/comments to discuss with applicants.
- If the CoC staff have any knowledge that could lead HUD to deny granting funds to a project, they will share that information with the **Review and Ranking Committee**. Applicants will be made aware of this rule at the **Technical Assistance** meeting.
- The **Review and Ranking Committee** meets to review and discuss each application together and to individually score them. CoC staff is present at the **Committee** meeting to record decisions of the **Committee** and any comments/ recommendations they have for applicants.
 - The **Review and Ranking Committee** meeting can include a **20-minute** question and answer session with each project applicant if needed.
 - Applicants are asked to correct their applications before final submission to HUD.
 - The **Committee** discusses the merits of each proposal, scores the applications, and turns in score sheets to CoC staff.
 - Overall raw scores are calculated by the **Committee**.
 - The **Committee** considers adjustments for such issues as HUD incentives or requirements.
 - The **Committee** considers proposal changes or project budget adjustments that may be required to meet community needs.
 - The **Review Committee** determines the rank and funding levels of all projects.
 - During deliberation, CoC staff will provide technical assistance by responding to questions of the **Committee** members, correcting technical inaccuracies if they arise in conversation, and reminding the **Committee** members of their responsibilities if they step outside their purview.
- Scoring results are delivered to applicants in writing.

Northwest Florida Continuum of Care - FL-515 - FY 2019 HUD CoC NOFA

Review and Ranking/Appeals/Reallocation Processes

- Applications which do not meet the threshold requirements will not be included in the Priority List, and therefore will not be forwarded to HUD for consideration.
- If more applications are submitted than the CoC has money to fund, the lowest-scoring applications will not be included in the Priority List, and therefore will not be forwarded to HUD for consideration.

Notwithstanding, the final determination and approval by the RRC, the state or federal funding is subject to approval by the Florida Department of Children and Families (DCF) and/or the United States Department of Housing and Urban Development (USHUD). Selection through any CoC RFP funding process does not guarantee such funding through DCF and/or USHUD.

Policies for when Applicants may appeal if they can:

(1) claim of conflict of interest on the part of the RRC or (2) factual evidence that the scoring criteria provided in the RFA was not followed in the evaluation/selection process. The following instances would not be considered valid grounds for appeal; (1) failure of the applicant to meet the submission deadline; (2) failure of the applicant to submit a complete proposal with required attachments and documents; (3) failure of the applicant to adequately and completely describe the project in question.

- The application of any applicant agency which a) is unranked for submission to HUD, or b) receives decreased funding (i.e. projects receiving reallocated renewal funds) may appeal.
- Based upon committee review, applicants that do not meet the threshold requirements are ineligible for an appeal.

All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed.

- 1) Appeals shall be filed in writing within 3 business days of notification of the CoC Review and Ranking Committee (RRC) decision.
- 2) The RRC, shall within 2 business days review the appeal and uphold or deny the appeal in writing.
- 3) If the appeal is denied, the applicant may file the written appeal within 2 business day with the CoC Governance Board.
- 4) The Governance Board shall within 3 business days review the appeal and make a final decision on the appeal in writing

The purpose of the Review and Ranking Committee is to review and select project applicants for CoC funding and other funding opportunities, evaluate project performance, decide scoring and prioritization criteria, the CoC application and other funding, and rank and tier projects for the CoC application. The CoC Review and Ranking Committee will consider partial or full reallocation of projects on at least an annual basis as part of the CoC application process. In addition, the committee shall determine when projects should be reallocated outside the CoC application process such as when new projects are required due to performance issues. The reallocation of lower performing projects, those that do not meet community needs, serve priority population, and those that do not have a significant impact on improving system-wide performance and do not play a critical role in crisis response. Decisions regarding full or partial reallocation will be made based on:

- Project performance including the project's role in system performance
- Compliance issues (CoC and HUD), including whether the project is actually operating as housing first, low-barrier, and using coordinated entry
- Priorities of the CoC including the goal of ending and maintaining an end to veteran, chronic, family and youth homelessness
- Cost-effectiveness
- Historical spending balances in the past grant terms.

Reallocation may be voluntary, involuntary, partial, or full. The different types of reallocation are summarized below.

Review and Ranking/Appeals/Reallocation Process

Reallocation Policy

Voluntary Reallocation:

A recipient defined in 24 CFR 578.3, may voluntarily reallocate its existing project by reducing its projects annual renewal amount, as defined in 24 CFR 578.3, in whole or in part. If a project funded in the prior year does not submit an application by the deadline or chooses to no longer participate in the CoC program either as an agency or program type it will be considered a voluntary reallocation.

If a recipient chooses to voluntarily reallocate all or part of its renewal project the recipient should notify the CoC Collaborative Applicant 60 days prior to the end of the current grant term, if the annual Request for Proposals is posted the recipient should notify the Collaborative Applicant in writing within 15 business days of the release of the RFP. Involuntary Reallocation:

Each year, the CoC will review each renewal applicant's performance against the priorities of the CoC and HUD. The CoC **Review and Ranking** will evaluate all projects requesting funding under the CoC Program Competition and determine if any projects eligible for renewal should be reduced or eliminated to develop projects outlined in the annual Request for Applications. A determination for involuntary reallocation will be based on evaluation of performance which is summarized below:

- Project performance, which takes into consideration the type of project and its performance relative to that type;
- Utilization and effectiveness, which factors bed/unit operating capacity and cost effectiveness relative to project type and population served; and
- Extent of participation in HMIS, including but not limited to, bed coverage and data quality

CoC Program funds made available through involuntary reallocation may be used to develop one or more eligible new projects.

Full reallocation if projects do not meet threshold review

A threshold review will determine whether a project is subject to full reallocation in order to improve system-wide performance. The threshold review will include:

- Meets or threshold levels for outcome performance
- Supports system performance
- Operates as housing first, low-barrier
- Uses Coordinated Entry
- Complies with HUD and CoC Standards
- Meets threshold standards for cost effectiveness and utilization

Projects not meeting the above requirements will be subject to full reallocation

Partial Reallocation is warranted when

Projects may be recommended for partial reallocation based on review regarding:

1. Cost-effectiveness in ending homelessness or maintaining permanent supportive housing is poorer than other projects serving clients presenting a similar degree of challenges, even though the project meets threshold standards
2. Utilization rate is poorer than other projects, even though the project meets threshold standards.

Should no applicant request CoC Program funds to develop an eligible project, CoC funds made available through voluntary or involuntary reallocation will be available to the CoC Collaborative Applicant. The Collaborative Applicant will apply to HUD as the project applicant. If this occurs under involuntary reallocation the Collaborative Applicant will subcontract CoC program funds to the affected applicant(s) provided that the affected applicant make changes necessary to address project performance, improve utilization and/or effectiveness, and/or enhance participation in HMIS. If changes are not addressed and project performance does not improve the Collaborative Applicant will notify the subrecipient in writing that their contract is being terminated. The Collaborative Applicant will then have the responsibility to carry out the project or subcontract the funds to another agency