

CA-506
2016 Continuum of Care Competition
Reviewing and Prioritizing Projects for Funding



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One of the major functions of a Continuum of Care is to prepare and oversee the applications for funds administered by HUD under the McKinney-Vento Homeless Assistance Act. Among these, the CoC Program is designed to assist individuals (including unaccompanied youth) and families experiencing homelessness and to provide the services needed to help them individuals move into transitional and permanent housing, with the goal of long-term stability. For this reason, the CoC Program funds important housing and services programs, such as permanent housing (including permanent supportive housing and rapid re-housing), transitional housing, and supportive services only programs. HUD CoC Program funds are granted annually based on a national competition following the release a Notice of Funding Availability (NOFA). It is a primary responsibility of the Continuum of Care to oversee the application for those funds.

In addition, recipients of Emergency Solutions Grant funds, another homeless assistance grant administered under the McKinney Vento Act, are required by HUD to coordinate with the Continuum of Care regarding the allocation of those funds. While HUD distributes some ESG funds directly to entitlement jurisdictions throughout the country, some funding is left to the state to administer. The California Department of Housing and Community Development (HCD) oversees the distribution of these non-entitlement funds in California. In recent years, HCD has required the CoC to prioritize applications within the Continuum and submit portions of the application.

This section outlines the LMH CoC's policies as related to designing, operating and following a collaborative process for the development of Continuum of Care Program applications and approval of submission of applications.

Collaborative Applicant

The Leadership Council designates the LMH CoC Coordinator – the Executive Officer/staff of the Coalition of Homeless Services Providers – as the annual HUD CoC NOFA Collaborative Applicant. The Collaborative Applicant is responsible for leading and supporting all aspects of the annual HUD CoC NOFA process, including submission of the Consolidated Application consisting of 1) the CoC Application (formerly Exhibit 1); 2) Project Applicants Priority List; and 3) all Project Applications (formerly Exhibits 2).

Overview of Project Review Process/NOFA Submission Timeline

Immediately after HUD's Continuum of Care NOFA is released, or as much as possible prior to release, the LMH CoC Coordinator/ Collaborative Applicant will coordinate all activities under the Project Review Process and NOFA Submission. The following is an overview of that timeline, with additional information provided below. This timeline is subject to change annually, depending on HUD/NOFA requirements.

- The Administration & Implementation Committee considers community priorities, then designs and presents scoring tools and materials to the Leadership Council for approval. The scoring system is used to prioritize renewal programs and to select new programs for inclusion in the funding application, as well as to respond to priorities set by HUD in the NOFA.
 - Community priorities are set through the LMH CoC strategic planning, needs assessment, and gaps analysis process. (Please see the “Gaps Analysis/ Needs Assessment Policy” and “Funding Priorities and Local Need,” for more information.).
- The Leadership Council considers and approves the scoring tools and materials.
- Information regarding the NOFA and the community’s process and requirements are disseminated to all LMH CoC members and other interested parties (all homeless service and housing providers in the Continuum of Care area) via the following open solicitation methods:
 - Letters/emails
 - Responses to public inquiries
 - Outreach to faith-based groups
 - Announcements at CoC meetings
 - Announcements at other meetings
 - Legal Notices published in newspapers
 - Press Releases
- Any agency interested in applying for funds is requested to contact the LMH CoC Coordinator/Collaborative Applicant and fill out/submit the provided Letter of Intent (LOI) to apply:

Coalition of Homeless Services Providers

Attn: Executive Officer

Martinez Hall

220 12th Street

Marina, CA 93933

831-883-3080

Email: chspmontry@aol.com

- Applicants attend a Bidders’ Technical Assistance Conference, and have approximately 4-6 weeks to complete and submit their applications (generally not less than 30 days prior to the NOFA deadline) to the LMH CoC Coordinator/Collaborative Applicant.
- LMH CoC Coordinator/Collaborative Applicant determines whether thresholds are met for applications.
- The Administration and Implementation confirms Rating Panel membership according to policies described below.

- The Rating Panel reviews, scores and prioritizes Project Applications according to procedures described below. Project Applicants receive their preliminary score and ranking.
- Applicants have the opportunity to appeal their score and/or rank, according to the Appeals Process below.
- The CoC Coordinator/Collaborative Applicant informs Project Applicants of their final ranking in writing, generally no less than two weeks prior to the NOFA deadline, or as the NOFA requires.
- The LMH CoC Coordinator/Collaborative Applicant collects Final Project Applications and submits them to HUD, along with the CoC Application, as part of the CoC's Consolidated Application.

Funding Priorities and Local Need

While there is a need for services and housing for homeless in many areas in the community, specific areas of greater need will be funding priorities for the CoC. Determining funding priorities is driven by the community's needs assessment and gaps analysis, and all CoC organizations participating in the gaps analysis process have a voice in this decision. Funding priorities are established through a fair and open process using objective criteria

Through the gaps analysis process, the following areas have been identified as current funding priorities (note that priorities will change annually):

- Federal priorities: Permanent Supportive Housing; targeting the chronically homeless, veterans, youth and families who have become homeless.
- Renewals of successfully operating projects if the community's need for the project continues. The LMH CoC will review each project at the time it seeks renewal funding to determine if the project is performing satisfactorily and meeting the needs of persons it proposed to serve or whether local needs have changed and other subpopulations or types of assistance should receive preference.
- To maximize the funds immediately available to the CoC and be consistent with restrictions in recent NOFAs, renewal projects may only apply for a one-year grant term, unless HUD permits multiple year renewal applications.
- Similarly, the LMH CoC Coordinator/ Collaborative Applicant will work with any potential new project applicants to ensure that new funding resources coming into the CoC are maximized. As much as feasible, there is a preference for new projects that apply for a one-year grant term unless otherwise directed by HUD requirements.
- Remaining funds (after the funding of successful one-year renewals) from the HUD designated Pro Rata amount for the CoC are available through the competitive application process.

Bidders' Technical Assistance Conference

A Bidders' Technical Assistance Conference will be conducted for agencies interested in submitting applications. The Bidders' Technical Assistance Conference will cover the following issues:

- Eligible activities
- Eligible persons to be served
- Amounts available
- Match requirements
- Advice on identifying leverage
- How to complete applications
- Submission format requirements
- Timelines and deadlines
- Local community process
- Appeal process
- Other relevant topics and issues

Procedures for Application Submissions

- Proposals and all additional requested information must be submitted per HUD directive with a PDF to the LMH CoC Coordinator/Collaborative Applicant:

Coalition of Homeless Services Providers

Attn: Executive Officer

Martinez Hall

220 12th Street

Marina, CA 93933

Email: chspmontry@aol.com

- Proposals will be due by 5:00 PM on the due date.
- Specifics regarding due dates, submission requirements, timelines and proposal format will be distributed and reviewed at the Bidder's Technical Assistance Conference.

Late and Incomplete Applications Policy

- Late Application: Late applications received within 48 hours of the due date/time will receive a 15-point score reduction. Late applications received after 48 hours will not be accepted.
- Incomplete Applications: Incomplete applications cannot be cured for Rating Panel scoring, but must be corrected prior to HUD submission. The original application (not the copies) will be examined to determine if all pieces of the application have been submitted.

Using All Available Funds

The CoC will do everything possible to ensure it applies for all funds possibly available to the community. Thus, if all on-time applications have been submitted and it appears that either 1) the community is not requesting as much money as is available from HUD, or 2) no Permanent Housing Bonus (or other special project as defined by HUD) projects have been submitted, then:

- The LMH CoC Coordinator/Collaborative Applicant will email the Leadership Council and other interested parties (all homeless service and housing providers in the continuum of care area) with specifics regarding:
 - How much money is available
 - For what type of programs
 - When the application is due
- The LMH CoC Coordinator/Collaborative Applicant will provide technical assistance and guidance, as needed, to ensure applicants understand the funding requirements.
- Any additional applications for these funds will be given as much time as possible to complete the application. However, time constraints associated with submission of the Consolidated Application to HUD may limit the time available. The LMH CoC Coordinator/ Collaborative Applicant will work to notify potential applicants about available funds as early as possible as to provide adequate time to complete a thoughtful application.

Reallocation of Funds

HUD allows CoCs to reallocate funds from non- and/or under-performing projects to higher priority community needs that also align with HUD priorities and goals. The process of reallocation is led by the Administration & Implementation Committee and LMH CoC Coordinator/Collaborative Applicant in consultation with the Leadership Council.

In addition to poorer performing projects, the LMH CoC will take into consider historical under-spending of CoC program funds when making reallocation decisions. Any program that has consistently underspent its grant in the past three years may face reallocation for the portion of the grant it has not spent. This is to ensure that this funding is kept in the community, rather than being returned to the federal treasury. The LMH CoC Coordinator/Collaborative Applicant will notify any applicants at risk of reallocation for under-spending in advance.

Application Eligibility Threshold Review

Before Project Applications are submitted to the Rating Panel, they must pass a threshold review. The LMH CoC Coordinator/Collaborative Applicant will complete the threshold review to verify the eligibility of:

- Applicant
- Project
- Activity
- Completeness of application

This review will take place prior to the application's submission to the Rating Panel for reading and scoring. Proposals that fail to completely meet threshold review criteria will not be forwarded to the Rating Panel for further consideration. These programs will be notified of this decision within 24 hours of the threshold review.

Proposals that completely meet eligibility threshold review criteria will be submitted to the Rating Panel and will be scored according to the scoring criteria.

Rating Panel

Eligible Project Applicant proposals will be prioritized for inclusion in the LMH CoC's Consolidated Application by the Rating Panel based on their score.

- On an annual basis, the Administration & Implementation Committee creates separate scoring tools for renewal and new projects. The Leadership Council approves these tools prior to use. Using these scoring tools, the Rating Panel may review, but is not limited to, the following objective rating measures to assess the performance of projects seeking funding:
 - CoC monitoring findings
 - HUD monitoring findings
 - Independent audits
 - HUD APRs for performance results
 - Unexecuted grants
 - Site visits
 - Surveys of program clients
 - Reallocation recommendation(s) from the Administration & Implementation Committee and LMH CoC Coordinator/Collaborative Applicant
 - Project readiness
 - Expenditure of grant funds (fast or slow)
 - De-obligated funds status from previous awards
 - Cost effectiveness of the project
 - Provider organization experience
 - Provider organization capacity
 - Project presentation
 - CoC membership involvement
 - HMIS participation involvement
 - Match funds committed to project
 - Leverage letters committed to project

Rating Panel Membership

The Administration & Implementation Committee recruits between 5 and 7 Rating Panel members who are:

- knowledgeable about homelessness and housing in the community and who are broadly representative of the relevant sectors, subpopulations, and geographic areas
- “neutral,” meaning that they are not employees, staff or otherwise have a business or personal conflict of interest with the applicant organizations;
- familiar with housing and homeless needs within the LMH Continuum of Care; and
- willing to review projects with the best interest of homeless persons in mind

Rating Panel Responsibilities

To serve on the Rating Panel, members must:

- sign a statement declaring that they have no conflict of interest and a confidentiality agreement
- be appointed every year and have their eligibility verified and approved by the Leadership Council
- be able to dedicate time for application review and committee meetings as directed by the Leadership Council or their designee, typically the LMH CoC Coordinator/Collaborative Applicant.

Prior to each application review and rank process, the LMH CoC Coordinator/Collaborative Applicant and Administration and Implementation Committee will train Rating Panel members. This training includes the following:

- Information regarding homeless activities, needs, services, definitions and other issues that are pertinent to the LMH CoC
- A background of McKinney Vento and the local process
- The role of the Rating Panel
- Review of the scoring tools, applications, and resources

Rating Panel Project Review Process

- Rating Panel members receive eligible applications and scoring materials prepared by the LMH CoC Coordinator/Collaborative Applicant.
- All Rating Panel members review all relevant information from applications over a one-week period.
- The Rating Panel meets to review and discuss each application together and to individually score them. As a designee of the Leadership Council, the LMH CoC Coordinator/ Collaborative Applicant staff is present at the Rating Panel meeting to record decisions of the Panel and any comments/ recommendations they have for applicants.
 - The Rating Panel discusses the merits of each proposal, scores the applications, and turns in score sheets to staff.
 - Overall raw scores are calculated by LMH CoC Coordinator/Collaborative Applicant staff.
 - The Rating Panel considers adjustments for HUD incentives or requirements.
 - The Rating Panel considers proposal changes or project budget adjustments that may be required to meet community needs.
 - The Rating Panel determines the rank and funding levels of all projects considering all available information.
 - Project Applicants may be asked to attend Rating Panel deliberation(s) to provide a brief overview of their respective proposals, and be available for a question and answer session with Panel members.
 - During deliberation(s), the LHM CoC Coordinator/Collaborative Applicant will provide technical assistance by responding to questions of the Rating Panel members, correcting technical inaccuracies if they arise in conversation, and reminding the members of their responsibilities.

- The Rating Panel's recommendations for Project Application priority ranking (i.e. Priority List) are forwarded to the Leadership Council for final approval.
- Scoring results and a preliminary rank are delivered in writing to all Project Applicants a minimum of two weeks prior to the NOFA deadline (or as dictated by HUD in the NOFA) with a reminder about the appeals process.
 - Project Applications which do not meet the threshold requirements will not be included in the Priority List in the CoC Application/Consolidated Application, and therefore will not be forwarded to HUD for consideration.
 - If more new applications are submitted than available through the Permanent Housing Bonus and/or reallocated funding, only the highest-scoring new applications will be included in the CoC's Consolidated Application to HUD.

Appeals Process

All eligible applicants have the opportunity to appeal both their score and preliminary ranking prior to the Priority List being finalized and approved by the Leadership Council.

The Appeals Committee

The Appeals Committee will be comprised of four (4) impartial members of the LMH Leadership Council: 3 members will be Appeals Committee voting members and one will be a non-voting member.

- The three voting members will not have participated on the original Rating Panel.
- The non-voting member must be a member of the original Rating Panel.
- No member of the Appeals Committee may have a conflict of interest with any of the agencies applying for McKinney funding. All members of the Appeals Committee must sign conflict of interest and confidentiality statements.
- The role of the Appeals Committee is to read and review only those areas of the application that are being appealed.

Eligible Appeals

- A Project Applicant may appeal an application if a) the application received less funding than applied for, or b) if the agency can show, with evidence, that the process was unfair.
- Project Applicants that have been found not to meet the threshold requirements are not eligible for an appeal.
- Appeals cannot be based upon the judgment of the Rating Panel.

Applicants may appeal in writing, with back up documentation, if they can prove their score is not reflective of the application information provided, or if they can describe bias or unfairness in the process which warrants the appeal.

The Appeals Process

- Any and all appeals must be received in writing within three (3) business days of the notification of ranking to projects.

- 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.
- All notices of appeal (one original and four copies) must be submitted to:

Coalition of Homeless Services Providers/CoC Coordinator
Martinez Hall
2201 12th Street, Marina CA 93933
831-883-3080
Email: chspmontry@aol.com

- The notice of appeal must include a written statement specifying in detail the grounds asserted for the appeal. The appeal must be signed by an individual authorized to represent the sponsor agency (i.e., Executive Director)/Project Applicant. The notice of appeal is limited to one single spaced page in 12-point font.
- The appeal must include a copy of the application and all accompanying materials submitted to the Rating Panel. No additional information can be submitted.
- All valid appeals will be read, reviewed, and evaluated by the Appeals Committee.
- The Appeals Committee will meet to deliberate the appeal.
 - All Project Applicants appealing the Rating Panel-recommended decision will be timely notified in writing and invited to attend any appeal. They may make a 10-minute statement regarding the appeal.
 - The Appeals Committee will review the rankings made by the Rating Panel only on the basis of the submitted project application, the one page appeal, any statements made during the appeal process, and the material used by the Rating Panel. No new information can be submitted by the Project Applicant appealing or reviewed by the Appeals Committee.
 - The decision of the Appeals Committee must be supported by a simple majority vote.
- The appealing agency will receive a written decision of the Appeals Committee within two (2) business days of the Appeals Committee Meeting.
- The decision of the Appeals Committee will be final.

Grantee Withdrawal

All applicants are encouraged to notify the LMH CoC Coordinator/Collaborative Applicant as soon as possible, and in writing, if they choose to not apply for funding. If a Project Applicant decides not to submit their application to HUD, the LMH CoC will do everything possible to find a qualified program to apply for those funds so that they are not lost to the community.

- The LMH CoC Coordinator/Collaborative Applicant will email all LMH CoC members and other interested parties (all homeless service and housing providers in the continuum of care area) with specifics regarding:
 - How much money is available
 - For what type of programs

- When the application is due.
- Any additional applications for these funds will be given as much time as possible to complete the application. However, time constraints associated with submission of the Consolidated Application to HUD may limit the time available. The LMH CoC Coordinator/ Collaborative Applicant will work to notify potential applicants about available funds as early as possible as to provide adequate time to complete a thoughtful application.
- The Rating Panel will review applications that are submitted and will meet, either in-person or via conference call, to score and rank these applications.

Final Prioritized List of Applications

The final prioritized list of all Project Applicant proposals must be approved by the Leadership Council. Any Leadership Council members with a conflict of interest must recuse him/herself from all related discussions and abstain from the vote approving the priority list. This prioritized list will then be forwarded to HUD by the LMH CoC Coordinator/Collaborative Applicant by the NOFA deadline as part of the Consolidated Application. Conditional award funding is typically based upon the prioritized list of Project Applicants that are submitted, however, actual awards/award amounts are determined by HUD.

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