

Rank and Review Procedures & Reallocation Policies

FL-505 developed, adopted, and implemented the following in June 2017 at a membership meeting:

Rank and Review Procedures are found in Section 1-4 of this document.

Reallocation Procedures are found in Section 5- 8 of this document.

Scoring Processes are described in detail in a separate document, Scoring Processes for FL-505, and change annually depending upon the NOFO and requirements contained within the NOFO.

These processes, policies, and procedures were developed and implemented based on the United States Department of Housing and Urban Development's Notice of Funding Opportunity for the CoC Program, input from Stakeholders, and 24 CFR 578. This document was voted on and approved by the CoC. Minor changes may occur in formatting, dates specific to the funding year, and additional requirements may be added if the NOFO requires it. Changes to the procedures do not change without Stakeholder approval.

Section 1. Eligibility

Active members of the CoC are eligible to submit proposals for the HUD NOFA through the Collaborative Applicant (Homelessness & Housing Alliance). Active membership is described in Governance Charter, Annual Membership Campaign, and Written Standards.

Only eligible proposals will be ranked for inclusion in the CoC's consolidated application by the Grant Review Committee. Applications that do not meet the scoring threshold will not be reviewed. Low scoring proposals not scoring high enough will not be ranked on the Priority Listing. Eligibility is determined in federal regulation and the annual Notice of Funding Opportunity (NOFO) released by the United States Department of Housing and Urban Development.

All items regarding eligibility for applicants, including being an active member of the CoC will be included in the local Request for Proposals (RFP) that is publicly noticed, according to the timeline and requirements of the NOFO.

Section 2. Grant Review Committee (GRC)

The CoC Board of Directors recruits between 3 and 5 members, without a conflict of interest for the Grant Review Committee, prioritizing members who have served as GRC members in the past or who have other relevant experience. The Committee will be composed of representatives from a cross-section of groups that have knowledge of federal/state contracts, homeless assistance system, and grant writing.

- Grant Review 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.
- Grant Review Committee members (3-5) are trained. The Grant Review Committee Training includes:
 - Information regarding homeless activities, needs, services, definitions and other issues that are pertinent to Okaloosa and Walton County residents
 - A background of HEARTH and the local process
 - The role of the Grant Review Committee Review of the scoring tools, applications, and resources

Section 3. Process for Rank and Review

Grant Review Committee members receive eligible application proposals and scoring materials.

Prior to the Review meeting, all Committee members review all applications over a one-week period 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 Committee. Applicants will be made aware of this rule at the Technical Assistance meeting.

The Review 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. ****This year the meeting may take place via Zoom.***

The Review and Rank Committee meeting can include a 15-minute question and answer session with each project applicant if needed.

Each applicant may receive the opportunity to make technical edits.

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 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 with a reminder about the process.
- 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 be ranked the lowest and rejected in the Priority List, and therefore will not be forwarded to HUD for consideration.

Section 4. Policies for Appeals

Reasons for appeals:

- Applicants may appeal through the process below if they can:
- Prove their score is not reflective of the application information provided; or
- Describe bias or unfairness in the process, which warrants the appeal
- 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 if justified.
- 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 2 business days of notification of the CoC Grant Review Committee (GRC) decision.
2. The GRC shall within 1 business day 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 1 business day with the Coe Board of Directors Executive Committee.
4. The Executive Committee shall within 1 business day review the appeal and uphold or deny the appeal in writing.
5. If the appeal is again denied, the applicant may file the written appeal within 1 business day with the Board of Directors.
6. The Board of Directors shall within 1 business day review the appeal and make a final decision on the appeal in writing

Section 5. Reallocation Policy

The purpose of the Grant Committee is to review and rank 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 Co application.

The CoC Grant 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 role in system performance such as successful exits to housing and housing retention, etc.
- 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
- Utilization Rate
- Project Performance Data
- Historical spending balances in the past grant terms

Reallocation may be voluntary, involuntary, partial, or full. The different types of reallocation are summarized in the next section.

Section 6. Voluntary/Involuntary 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 Coe 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.

Section 7. Involuntary Reallocation

Each year, the CoC will review each renewal applicant's performance against the priorities of the CoC and HUD. The CoC Grant Committee 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.
- Project role in system performance such as successful exits to housing and housing retention, etc.
- 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
- Utilization Rate
- Project Performance Data
- Historical spending balances in the past grant terms

Section 8. Voluntary Reallocation:

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
- 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
- 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 sub recipient 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 ta another agency.

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Rank and Review Procedures
Approved June 2017 by the Okaloosa Walton Continuum of Care