

Reading/Berks Continuum of Care CoC Program Competition Funding Policies

PA-506

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United Way of Berks County



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The Continuum of Care (CoC) Program is designed to promote community-wide commitment to the goal of ending homelessness, provide funding to quickly rehouse individuals and families experiencing homelessness while minimizing the trauma and dislocation caused by homelessness, promote access to and effect utilization of programs by homeless individuals and families, and optimize self-sufficiency those experiencing homelessness.

Each year, the Reading/Berks CoC (PA-506) applies to the U.S. Housing and Urban Development (HUD) for homeless assistance funding to address the needs of individuals and families experiencing homelessness. The availability of funding is announced through HUD's CoC Program Competition Notice of Funding Opportunity (NOFO), a national funding competition. In response to HUD's CoC NOFO, the CoC will conduct a fair, transparent funding process, that complies with CoC Regulations, specifically § 578.95 Conflicts of Interest, which covers CoC Board members, organizational conflicts and other conflicts.

Roles and Responsibilities

Collaborative Applicant

The Berks Coalition to End Homelessness (BCEH), in their role as Collaborative Applicant, is designated by the Continuum of Care to collect and submit the CoC Registration, Grant Inventory Worksheet, and CoC Consolidated Application (which includes the CoC Application and CoC Priority Listing). In addition, BCEH will apply for the CoC Planning Grant to fund the implementation of all required responsibilities throughout the fiscal year.

Funding Committee

Regulatory requirements state that funding decisions be made by representatives that do not receive CoC funding (established in 24 CFR Part 578). Therefore, the CoC has established a CoC Program Funding Committee with the composition and responsibilities described below.

The members of the Funding Committee will not be disclosed until the CoC Program Competition has ended; this is to ensure all committee members are able to provide full, honest feedback and make unbiased decisions.

Responsibilities of the Funding Committee

The Funding Committee will be responsible for a collaborative process of selecting and ranking project applications and ensuring HUD funds are used strategically. Specific responsibilities include but are not limited to:

- Finalize scoring criteria for new and renewal projects;
- Review and finalize new project solicitations and new project scoring criteria;



- Review new project applications and approve/deny funding requests, based on the CoC's priorities and available funding;
- Review and make a determination regarding appeals of new project applications not selected and/or selected for funding based on changes to the project requested by the Committee;
- Determine the ranking of renewal and new projects as required by HUD.
- Review and approve/deny appeals regarding renewal project scoring;
- Review and approve/deny appeals regarding new project scoring and selection
- Review and approve/deny appeals regarding the reallocation (full or partial) of CoC project funds;
- Make decisions on involuntary reallocation and accept voluntary reallocation

Renewal Scoring

On an annual basis, the CoC establishes scoring standards to evaluate and score HUD CoC funded renewal projects in preparation for the ranking of projects for the CoC Program Competition. In order to determine whether renewal projects are performing well or underperforming, each project's performance will be evaluated in the following areas:

- HUD policy priorities, including serving vulnerable populations and complying with Housing First approach
- Performance outcomes, including exits to permanent housing, returns to homelessness, and increases in income
- Grant management, including unit utilization, percentage of funds expended, cost effectiveness, and timely drawdowns of available funds
- CoC participation, including attendance at Coalition and Coordinated Entry monthly meetings, and CoC grantee mandated trainings
- HMIS participation, including data quality

The CoC uses a Renewal Project Scoring Tool to describe the scoring criteria to be used to evaluate and score renewal projects. This tool includes the annual criteria, as well as the data source and point structure for each criterion; this tool will be continually updated to ensure compliance with the year's HUD's NOFO requirements. Renewal projects will be scored in accordance with the Renewal Project Scoring Tool.



Renewal Scoring Process

CoC Lead Agency Staff will:

- Collect intake forms/procedures once per year from renewal applicants (to check for barriers to entry)
- Collect feedback from grantees on the Renewal Scoring Tool
- Annually review and revise the scoring tool as needed
- Provide training annually to the CoC Program Funding Committee on the ranking/scoring process for CoC funds
- Gather final GIW (when available from HUD), Renewal project's data from APR and HMIS/other comparable database data, Unit and Funding Utilization stats
- Review and compile data for scoring based on HMIS/other comparable database data
- Make necessary changes to renewal project scoring tool based on focus items identified from the NOFO
- Notify CoC membership that the project application schedule is set – which includes a deadline for all renewal and new projects to be submitted to the CoC a minimum of 30 days before the NOFO deadline.
- At the conclusion of the renewal project scoring process, each project will have a score, which will be used to inform the ranking and tiering process.
- Provide all CoC Program Funding Committee members with the ranking sheets, instructions, data documents from HMIS/comparable database (including data quality and system performance measures by project), APRs, severity of need calculations, and renewal applications for review prior to the ranking meeting.

Renewal project grantees can appeal their score. See section titled “Scoring and Project Selection Appeals” for details on the appeal process.

The CoC and the Coc Program Funding Committee will also evaluate HMIS, Coordinated Entry, and Planning grants including, but not limited to, evaluation of compliance with HUD requirements.

New Project Selection

New Project Process

As part of the annual CoC NOFO Competition, the CoC may identify funding available for new projects through bonus funds from HUD and/or through reallocation. The CoC is committed to



ensuring an open and transparent process for the selection of new projects. As such, where funding availability permits, the CoC will issue a new project Request for Proposals to be distributed widely to interested parties.

In an effort to identify potential applicants for new projects, the CoC may choose to issue a Notice of Intent (NOI) form and encourage organizations interested in applying for new CoC-funding to respond. This will allow the CoC to determine if additional outreach needs to occur in order to identify an applicant to pursue funding aligned to the CoC's funding priorities. In addition, the NOI process will allow the CoC to identify potential applicants that have not previously applied for CoC funding, as these applicants might need a higher level of technical assistance in submitting an application to the CoC.

Distribution of New Project Solicitations

Upon release of the NOFO, CoC staff will release a new project Request For Proposal (RFP) to the public which will include instructions, available funding, and the application. The CoC will work to identify multiple outlets for distribution of the solicitations, including through the CoC's website, email distribution list, and the CoC's social media. The new project solicitation will emphasize that new project applicants must incorporate data demonstrating unmet needs and their ability to meet the needs of the community and all HUD requirements. The RFP will include a due date for all proposals and instructions on submission to the CoC.

Review of New Project Proposals

The information to be included in the proposal will be detailed in the new project RFP. All proposals submitted by the deadline stated in the new project solicitation will be reviewed by the CoC Program Funding Committee using a standardized scoring tool. The CoC Program Funding Committee can request additional information from the applicants where clarification would be helpful in the decision-making process.

For each proposal submitted, the Funding Committee will make a determination as to whether or not the project should be included with the CoC's funding request through the CoC NOFO Competition. The Funding Committee also has the ability to conditionally approve a project based on the applicant making requested changes to the proposed project; this may include an increase or decrease in units, budget changes, expansion of geography etc.

All agencies submitting proposals will be notified in writing via email regarding the decision to include their proposal among ranked projects within the CoC's funding request to HUD. In addition, the CoC will publicly post a list of new project proposals received, noting which were selected for inclusion on the CoC Priority List, as well as the amount of funding approved. Upon selection, new project applicants must submit a new project application through the HUD e-snaps system in a timely manner and within the deadline established by the CoC. **New project grantees can appeal their score and the acceptance/denial of their project. See section titled "Scoring and Project Selection Appeals" for details on the appeal process.**



Scoring and Project Selection Appeals

Basis of Appeal

An appeal can only be made by an applicant regarding the scoring of their own application and regarding the acceptance of their new or renewal application.

If the applicant agency believes their renewal or new project score is incorrect, they may file an appeal in writing via email to the CoC Program Funding Committee, the Collaborative Applicant's Executive Director and/or President of the Board of Directors.

If the applicant agency does not agree with the CoC Program Funding Committee decision to accept the applicant's new or renewal project, they may file an appeal in writing to the CoC Program Funding Committee, the Collaborative Applicant's Executive Director and/or President of the Board of Directors.

Process and Timeline

BCEH will establish and publish a timeline outlining project application deadlines. Per HUD requirements, applicant organizations will be informed no less than 15 days prior to the NOFO deadline regarding whether their project application would be included as part of the CoC Consolidated Application submission.

Unless otherwise specified in written competition materials, appeals regarding a new or renewal project's score shall be due within three (3) business days after announcement and distribution of scorecards by the CoC Staff. Depending on the competition timeline, this may occur before the NOFO opens or during the competition process.

Unless otherwise specified in written competition materials, appeals regarding project acceptance shall be due within three (3) business days after announcement by the CoC Program Funding Committee of initial project selection, scoring, ranking, and tiering.

An appeal must be in the form of a letter on the applicant agency's letterhead, must clearly state the reasons for the appeal and specify all issues being contested. The letter must be emailed to the Collaborative Applicant's Executive Director and/or President of the Board of Directors. During the appeal process following a funding decision, the applicant may clarify information contained in the application and/or ranking criteria.

Appeals Committee

The CoC Program Funding Committee, in conjunction with the CoC Governing Board (President, Vice President, and Secretary) and Executive Director shall make up the Appeals Committee. This committee will review all appeals and make the final decision on funding allocations and priority listing.



Staff from BCEH as the Collaborative Applicant will be designated as the chair of the Appeals Committee and will document the process, but will not make determinations on the appeal. In the event BCEH is the appealing applicant, the Committee Chair will be moved to the President. A date to review relevant information and an appeals meeting will be scheduled and posted as soon as is practical after the CoC's funding recommendations are announced.

Process to be Followed

Prior to the hearing, a package of related information will be compiled by BCEH and distributed to the Appeals Committee and appellant. This package shall include the original written appeal request, original funding application/ranking criteria, and all written information that all parties including the appellant believe to be helpful to those hearing the appeal. The written material submitted will be the primary basis for the appeal decision.

Review

The appeals review date and time shall be set by the Chair of the Appeals Committee, making every attempt to find a mutually agreeable time. Although any staff, board members, clients or other interested parties may assist with compiling information included in the written appeal packet, the appellant shall be limited to one spokesperson to articulate its appeal at the review meeting.

The Appeals Committee will then meet to review the facts presented. Though the ensuing discussion is limited to the Appeals Committee members, appellant and CoC participants may be asked to remain available and may be asked additional questions of clarification during the deliberation process.

The Appeals Committee shall provide all parties with a written explanation of their decision, though it is expected that a decision will be made during the appeals meeting and conveyed verbally at that time. Any changes shall then be forwarded to all Continuum of Care funding applicants. The decision of the Appeals Committee shall be considered final.

Appeal to HUD

If the grantee or project applicant is not satisfied with the outcome of their appeal, the HUD CoC NOFO provides project applicants an opportunity to appeal to HUD. Agencies interested in appealing to HUD should carefully review the eligibility criteria and appeal process established by HUD and described in the annual CoC NOFO. In past CoC Competition NOFA/Os, this appeal has been limited to “eligible project applicants that attempted to participate in their CoC planning process and believe they were denied the right to participate in a reasonable manner.”



The agency may appeal the CoC's decision to HUD if the applicant agency 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 NOFO deadline.

In order to ensure that all project applicants have the opportunity to participate in the CoC's planning process and to provide input in the CoC's funding process, the CoC has/will provide the following opportunities:

- Circulation of the prior year's Renewal Scoring Tool with an opportunity to provide feedback and input on scoring criteria.
- The CoC's ranking criteria will be distributed prior to project scoring.
- Project applicants will have the ability to review the data to be used for project evaluation and scoring and ask clarifying questions.
- The CoC will provide a new project application and scoring criteria in order to score all new project applications in a consistent and transparent method.
- Updates will be provided by the CoC during Coalition meetings and via written and/or electronic communications.

To submit an appeal to HUD, follow the instructions as indicated in the HUD CoC NOFO, which is/will be available at <https://www.hudexchange.info/programs/coc/>.

Reallocation

The HUD reallocation process allows the CoC to fund new projects by transferring all or part of funds from any existing CoC grant to create a new project. The CoC will annually review the option of reallocation of the CoC program funding resources. The reallocation process will be communicated throughout the CoC via email distribution list and CoC Lead Agency website posting

Reallocation shall have the intent to achieve one or more of the following objectives:

1. To meet the housing needs for persons as identified in the Coordinated Entry process and HMIS data.
2. To make homelessness in PA-506 rare, brief, and non-recurring.
3. To enhance CoC system performance by providing high quality, effective housing projects.
4. To align funded programming to be consistent with the HEARTH Act, HUD guidance, and HUD policy priorities.
5. To contribute to the HUD competitive consolidated application process.



6. To strengthen collaboration within the homeless services system.

Process

Reallocation may be voluntarily initiated by a funded agency, or initiated by the CoC Leadership and the CoC Program Funding Committee. Decisions related to CoC-initiated reallocations will be made in accordance with the CoC interim rule, which holds each CoC responsible for the performance, fiduciary accountability and strategic value of each CoC program project included in the annual Collaborative Application. The reallocation process will be transparent, equitable, and data-driven with an emphasis on local needs.

The CoC may use funds taken in whole or in part from existing projects to create new projects and expand renewing projects. HUD determines how new projects can be reallocated and this is described annually in the Notice of Funding Opportunity for CoC Funding.

Competitive Reallocation

The CoC Program Funding Committee reserves the right to reallocate renewal funding and make it available for new projects through a competitive process to maximize services, effectively compete, and/or to address underperforming projects. The Funding Committee may reallocate funding from any CoC project to ensure the CoC Consolidated Application best aligns with HUD priorities and contributes to a competitive application, and to collaboratively secure funding to meet community needs. Decisions will be made during the process of preparing an application for funds. All reallocation decisions must be approved by CoC Leadership and the Funding Committee through a vote.

Once it has been determined that reallocation of funding is in the best interest of the CoC, a representative of the CoC will communicate with the agency whose project is being fully or partially reallocated to discuss how and when the reallocation will occur.

It is the CoC's responsibility to strategically determine how to best use the resources available to end homelessness within the community, and the CoC may reallocate funds from projects which are seen as underperforming. Underperforming projects are defined as those which are found during the annual performance review process, during monitoring, or are otherwise known to not meet the following CoC funding objectives:

- Compliance with Housing First: Underperforming projects do not comply with Housing First standards, repeatedly deny Coordinated Entry referrals, remove clients from the program for reasons against Housing First, and continue to have policies that do not follow Housing First principles.
- Compliance with Local and Federal Project Review and Certification Standards: Underperforming projects may include those with a history of serving ineligible persons, expending funds on ineligible costs, lack compliance with Fair Housing standards, or fail



to fully cooperate in the coordinated entry process.

- Project Capacity: Underperforming projects may include those which fail to make effective use of project capacity and have underutilized beds/units. This may be seen through unspent funds, untimely expenditures, or other issues which significantly impact project operations and performance.
- Financial Management: Underperforming projects may include agencies or projects with audit findings for which a response is overdue or unsatisfactory, have underspent funds, show a misuse of funds, or untimely drawdown of funds.
- Performance Outcomes: Underperforming projects may show poor data quality within HMIS, unmet performance outcomes within their most recent APR, or rank low in the Project Review/Ranking.
- Local Need: Project may be slated for reallocation when a local need is better met through another project.
- Loss of External Supporting Program Funds: Projects which are unable to fully meet CoC objectives due to loss of ancillary service or support funding that results in unmet performance outcomes or unspent funds may be slated for reallocation.

Voluntary Reallocation Process

CoC grantees may self-nominate to voluntarily reallocate CoC renewal funds. Projects that voluntarily reallocate funds may choose to apply for a new project using the reallocated funds or they may choose not to apply. A grantee seeking to reallocate funding through the Voluntary Reallocation Process must do so in accordance with the timeline set by the CoC Lead Agency in that year's application process and (if desired) complete a new project application by the deadline set by the CoC Lead Agency in order to be eligible and considered for a new project.

Providers who are in good standing with the CoC (e.g. those with strong performance, history of efficient grant management, etc.) and interested in reallocation into a new project should contact the CoC as soon as possible. Providers seeking to transition their project should apply via the New Project RFP and submit it to the CoC by the new project deadline. The Funding Committee may look favorably upon providers seeking to voluntarily reallocate projects to repurpose the same level of project funding, and in some cases maintain the rank position where the renewal project would otherwise be ranked. The decision to allow a project conversion is at the discretion of the Funding Committee. If the proposed new project is not accepted by the CoC Ranking Committee, the committee may choose to allow the renewal project to remain in place, or release the funds to the community in a competitive process.

If a grantee reallocates funding through the Voluntary Reallocation Process, but does not elect to apply for a new project or is not selected for new project funding by the Funding Committee, the reallocated funds are eligible to be applied for by any organization interested in working in the



CoC. This information will be shared through the CoC's distribution list, as well as the CoC Lead Agency's website and social media, and new applications must still conform to the deadlines set for the application process.

Recusal

The CoC Lead Agency will not participate in any discussion or deliberation about reallocation that may impact their CoC funding.

Reallocation Appeals

Any project applicant subject to full or partial reallocation may appeal this decision. All appeals must be submitted within 1 business day of receiving a reallocation notification. The CoC may allow additional time for appeal if the CoC Competition timeline allows. Timelines will be outlined in the letter from the CoC outlining the reallocation decision. An appeal must be in the form of a letter on the applicant agency's letterhead, must clearly state the reasons for the appeal and specify all issues being contested, and must be signed. The letter can be mailed to BCEH or scanned and sent via email.

Any applicant appealing a reallocation decision will appeal to the Appeals Committee. The CoC Program Funding Committee, in conjunction with BCEH's Governing Board (President, Vice President, and Secretary) and Executive Director shall make up the Appeals Committee. This committee will review all appeals and make the final decision on funding allocations and priority listing.

Staff from BCEH as the Collaborative Applicant will be designated as the chair of the Appeals Committee and will document the process, but will not make determinations on the appeal. In the event BCEH is the appealing applicant, the Committee Chair will be moved to the President. A date to review relevant information and an appeals meeting will be scheduled and posted as soon as is practical after the CoC's funding recommendations are announced.

The appeals review date and time shall be set by the Chair of the Appeals Committee, making every attempt to find a mutually agreeable time. Although any staff, board members, clients or other interested parties may assist with compiling information included in the written appeal packet, the appellant shall be limited to one spokesperson to articulate its appeal at the review meeting.

The Appeals Committee will then meet to review the facts presented. Though the ensuing discussion is limited to the Appeals Committee members, appellant and CoC participants may be asked to remain available and may be asked additional questions of clarification during the deliberation process.

The Appeals Committee shall provide all parties with a written explanation of their decision, though it is expected that a decision will be made during the appeals meeting and conveyed



verbally at that time. Any changes shall then be forwarded to all Continuum of Care funding applicants. The decision of the Appeals Committee shall be considered final.

Ranking Process

The CoC expects that the CoC NOFO will require the CoC to rank projects included on the Priority List. As part of this process, projects will be sorted into either Tier 1 or Tier 2; the funding amounts for Tier 1 are set by HUD for each CoC. In past CoC Competitions, projects placed into Tier 2 have been individually scored by HUD in order to determine if they will receive funding.

The CoC's ranking "rules" over the last several years have included the following principles:

- The ranking process will begin by ranking all renewal projects in their descending score, as determined through the renewal scoring process and the Renewal Scoring Tool.
- Renewal projects that have not operated throughout the entire "look back" period (the year-long period of time the data is collected for scoring) will not be competitively ranked; instead these projects will be ranked at the bottom of Tier 1.
- Projects and any expansions that support CoC infrastructure and operations will be ranked at the top of Tier 1 as they are necessary for CoC operation. This includes HMIS and Coordinated Entry funding; planning grants are not ranked.
- The Funding Committee may opt to review performance data across multiple years for renewal projects ranked in Tier 2. Projects with a history of poor performance may be ranked lower than projects with one year of poor performance, even if the renewal score is higher than a project that has not had performance issues in recent years.
- New projects will be scored and included in the list with the renewal projects based on the CoC priorities and unmet needs and the quality of new project applicants. The CoC Program Funding Committee will collectively determine how to incorporate the new projects into the overall ranking. The Funding Committee reserves the right to rank new projects in Tier 1 and/or Tier 2.

As there are appeal opportunities built in for renewal process scoring, new project scoring/selection, and reallocation, there is no appeal opportunity for the final ranking.

At the Review and Ranking Meeting

CoC Funding Committee Members will:

- Discuss budgets, drawdowns, barriers, housing first, items from the review of each project's application, organization's project policies and procedures, APR, HMIS/comparable database data, performance measures, and GIW.



- Discuss pros and cons of each project, community needs, and current funding levels and Tier rules/amounts from the NOFO.
- Rank the projects and determine funding levels for each, and ensure that Tier 1 and Tier 2 budget amounts are correct.
- **The CoC Funding Committee reserves the right to rank projects outside of score order; score is only one factor considered by the Ranking Committee for priority ranking and selection of projects.**

After the Review and Ranking Meeting

- The CoC Funding Committee notifies the CoC Lead Agency (Berks Coalition to End Homelessness) of the review and ranking, as well as proposed funding amounts.
- Lead Agency staff contacts each project individually to discuss ranking, score, and tier placement.
- This ranking, scoring, and tiering are shared with the Coalition (CoC) mailing list and posted publicly on the BCEH website.
- Lead Agency staff notifies the applicants via email of their final approved funding amount for revision of their applications as needed along with a due date for application completion in e-snaps.
- The CoC application in full, including the Priority Listing, is shared with CoC membership prior to the NOFO deadline and submission to HUD, with an opportunity to provide feedback.

Applicant Notification & Public Posting

All applicants will be notified of the results of the ranking process according to the deadline established in the CoC Competition NOFO. Applicants will be notified regarding the project's final budget submitted, rank order on the Priority List, project placement into Tier 1 or Tier 2, or the rejection of their project for inclusion on the Priority List. The CoC will provide notification in writing via email. The CoC will also publicly post information on ranking and tiering of projects and the list of projects accepted or rejected for inclusion on the Priority List on the CoC's website.

