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Procedures for Inviting and Reviewing Applications for CoC Funding

I. Development of CoC Priorities and Local Timeline, Application, and Scoring Forms

Each year in preparation for HUD's release of the Notice of Funding Availability (NOFA) for Continuum of Care (CoC) grants, the Homeless Continuum of Care of Stark County (HCCSC) will take the following steps to prepare for a local application process designed to identify projects that the HCCSC will recommend for CoC grants:

- A. Identification of Funding Priorities. The HCCSC's System Performance Committee will review available data and data trends, identify gaps in the homeless system, and develop for the HCCSC Board's approval recommendations about CoC funding priorities for the year.
- B. Preparation of Timeline and Application Forms. The HCCSC's Recipient Approval and Evaluation Committee will establish a timeline for the local CoC grant competition that will determine which project applications are included in the Collaborative Application that the HCCSC will submit to HUD. In addition, the committee will prepare for Board approval one or more application forms to be used in the local competition and completed by all applicants for CoC funding, including any bonus funding that HUD may make available. Among other things, those forms will:
 1. Identify any criteria that an organization must satisfy to be considered for CoC funds if it has not been a previous recipient of CoC funds; and
 2. Include notice that a project's eligibility to apply for CoC funds may have to be reassessed following the release of the CoC NOFA if the NOFA announces any unanticipated changes in HUD's funding criteria or priorities or if relevant circumstances change significantly before the HCCSC submits its Collaborative Application to HUD.
- C. Preparation of Scoring Form. The Recipient Approval and Evaluation Committee will also prepare for Board approval one or more forms to be used in scoring and ranking projects that apply for CoC funds. As much as possible, those forms should base a project's scores and ranking on objective criteria, including the following:
 1. The project's success in satisfying performance measures adopted or recommended by HUD;
 2. The project's success in meeting system-wide and project-specific performance standards or targets;
 3. The extent to which a project satisfies priorities established by HUD or the HCCSC;
 4. The comparative stability of a project and its sponsoring organization and their capacity to administer the requested CoC grant;
 5. The ability of the project to obtain other sources of support to match and leverage its CoC funding;

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6. The extent to which the project and its sponsoring organization understand and effectively collaborate with the HCCSC by, among other things, participating in relevant committees and workgroups and providing timely notice of proposed additions to or changes in their policies, procedures, or services;
 7. The adherence of the project to its own and system-wide rules governing access to and eligibility for the project, including Housing First, Fair Housing, and Equal Access policies; and
 8. The extent to which project staff attend required professional development sessions and pursue other professional development opportunities.
- D. Solicitation of Feedback from HCCSC Members. The System Performance Committee and the Recipient Approval and Evaluation Committee will review their findings and preliminary recommendations with members and consider feedback received from the members before finalizing their recommendations to the Board on CoC funding priorities and CoC application and scoring forms.

II. The Application Workshop

Each year, the Collaborative Applicant and the CoC Planner will hold a workshop for prospective CoC grant applicants. In preparing for and conducting this workshop, the Collaborative Applicant and CoC Planner will observe the following guidelines:

- A. Notice of Workshop. At least two weeks before the annual pre-application workshop, the Collaborative Applicant will:
 1. Place a boxed advertisement about the workshop in the three newspapers of general circulation in Stark County; and
 2. E-mail a notice of the workshop to all individuals on the HCCSC listserv.
- B. Workshop Agenda. At the workshop, the Collaborative Applicant and the CoC Planner will:
 1. Review with attendees the application form that all applicants must complete in order to receive HCCSC endorsement to submit an application for CoC funding to HUD;
 2. Discuss the procedures and timelines for submitting applications for the local competition;
 3. Discuss any special rules applying to organizations that have not received CoC funding previously;
 4. Discuss HCCSC priorities as approved by the HCCSC Board; and
 5. Review the form(s) that will be used to score applications.

III. The Local Application Process

- A. Publication of Application Deadline and Relevant Forms. Following Board approval of the application and scoring forms to be used in the local CoC competition and at least four weeks before applications to that competition are due, the Collaborative Applicant will publish a boxed ad in each of the three newspapers of general circulation in Stark County. This ad, which may be the same ad described above that announces the application workshop (see section II.A. above), will describe the type(s) of new project(s) the HCCSC Board will be considering for funding. It will also announce the deadline for submitting applications and indicate where interested persons can find copies of the application and scoring forms.

The Collaborative Applicant will also:

1. Post a notice of the application deadline along with relevant application and scoring forms on the HCCSC's website; and
 2. Send an e-mail to all individuals on the HCCSC's listserv notifying them of the due date for applications and directing them to the HCCSC website for more information.
- B. Eligibility of Applications for Consideration. To be considered for CoC funding, applications to the local competition must be completed in their entirety and submitted along with any required attachments by the published due date.
- C. Application Scoring Process. The Recipient Approval and Evaluation Committee will review and score applications using the scoring form(s) approved by the HCCSC Board. In the reviewing and scoring process, the following guidelines will apply:
1. The Recipient Approval and Evaluation Committee may take into consideration, not only information submitted in or with the application, but also information derived from other sources, including but not limited to:
 - a. Recent Annual Performance Reports (APRs) and status reports submitted by the applicant;
 - b. Recent financial statements and audits;
 - c. Recent project audits and monitoring reports and any responses to those audits or reports;
 - d. Recent on-site reviews of the applicant conducted by the CoC Planner; and
 - e. HUD monitoring reviews and recipient responses.
 2. The Recipient Approval and Evaluation Committee may schedule a meeting with representatives of the applicant organization to solicit information beyond that submitted in

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the application and take that additional information into consideration when scoring the application.

3. The Recipient Approval and Evaluation Committee may assign responsibility for reviewing and evaluating discrete portions of an application to particular committee members and rely on those evaluations in scoring the project on related criteria.
4. For each criterion listed on the scoring form, applications will receive a score based on a consensus reached by the members of the Recipient Approval and Evaluation Committee.
5. A project's final score on the application will be the total points earned by the project as a percentage of the total points available to the project. Points will be considered "available to a project" only if the scoring criterion on which those points are based can be applied to the project.

IV. Notice and Appeal of Committee Decisions on Applications

- A. Notice of Review Outcomes. Following the Recipient Approval and Evaluation Committee's review and scoring of each timely and complete project application, the CoC Planner will send a copy of the project's scoring form to the applicant organization. In addition, the CoC Planner will send a letter to the applicant organization indicating whether, based on its score, the Recipient Approval and Evaluation Committee will be recommending that the HCCSC Board approve the project for inclusion in the Priority Listing that the HCCSC will submit to HUD as part of its next Collaborative Application. In cases in which the committee decides against recommending a project for inclusion on the listing, the letter will explain the reasons why that recommendation was withheld, and, where appropriate, what the organization can do to improve its chances of receiving CoC funding in the future.
- B. Requests for Reconsideration of Score or Endorsement. Within 5 working days following its receipt of a project scoring form and the accompanying letter announcing the Recipient Approval and Evaluation Committee's decision to recommend or not recommend the project for inclusion on the Priority Listing, the applicant organization may submit a letter to the CoC Planner requesting reconsideration, submitting supporting documentation where relevant, and outlining all the reasons why the committee should reconsider the project's scores and its omission from the Priority Listing.
- C. Response to Requests for Reconsideration. The Recipient Approval and Evaluation Committee will review all requests for reconsideration and respond to them through the CoC Planner.

V. Development of Conditional and Final Priority Listings

- A. Approval of a Conditional Priority Listing by HCCSC Board. After the application appeals process has concluded, the Recipient Approval and Evaluation Committee will recommend to the HCCSC Board projects to be included in the Priority Listing that will be submitted to HUD as part of the HCCSC's next Collaborative Application. Barring unforeseen changes in funding criteria or priorities which HUD announces in the CoC Notice of Funding Availability (NOFA) for the year or

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significant changes in other relevant circumstances the conditional Priority Listing, if approved by the Board, will determine the projects included on the final Priority Listing.

- B. Notice of the Board's Decision. All applicants will receive notice in writing of the Board's decision regarding the projects to be included in the conditional Priority Listing within 5 working days after that decision is made.
- C. Review of NOFA for Possible Impact on Conditional Priority Listing. Within 5 working days after HUD has issued its annual NOFA, the Collaborative Applicant will determine whether projects included on the conditional Priority Listing are eligible for funding and continue to meet HUD funding priorities as reflected in the NOFA. It will also determine whether enough eligible projects have applied to take advantage of all available CoC funds. In determining whether enough eligible projects have applied, the Collaborative Applicant will consider applications submitted for projects that were not approved for the conditional Priority Listing as well as applications for projects that were not recommended for full funding.
- D. Publication of Notice of HUD's NOFA. Within 7 working days after HUD has issued its annual NOFA, the Collaborative Applicant will publish a public notice that will include:
 - 1. Information about the local application process;
 - 2. The conditional Priority Listing of projects chosen for funding through the most recent application process; and
 - 3. A request for additional proposals in the event that the most recent local competition yielded an insufficient number of eligible projects to take advantage of available CoC funding.
- E. Second Round of Applications. Following the solicitation of additional applications in accordance with Section D.3, the steps outlined in Section III will be repeated to review and score a second round of applications. In that event, the Collaborative Applicant, in consultation with the Recipient Approval and Evaluation Committee, will exercise its discretion to modify schedules and procedures as necessary to meet the deadline for submission of the final CoC Grant applications.

VI. Preparation of Final Applications, Priority Listings, and Rankings for Submission to HUD

- A. Deadlines and Instructions for Submitting Final Applications.
 - 1. Unless the NOFA or other changes in circumstances provide any reason to conclude that a project conditionally approved for inclusion on the Priority Listing should not be included in the final listing, the Collaborative Applicant will notify the project applicant within 5 days of the NOFA's release to begin completing its application in *e-snaps*.
 - 2. All applicants notified within this 5-day period must complete their applications in *e-snaps* in accordance with any instructions given by the Collaborative Applicant.

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3. In the following circumstances, the Collaborative Applicant will notify the project applicant to begin completing its application in *e-snaps* as soon as possible and will adjust the deadline for that application as necessary to meet HUD's deadline for submission of the Collaborative Application:
 - a. Changed circumstances or new information in the NOFA have given rise to questions that must be resolved about whether a project on the conditional Priority Listing should remain on the final listing; and
 - b. The Recipient Approval and Evaluation Committee did not endorse a project for funding until after the NOFA was issued.
- B. Final Review of Applications by Collaborative Applicant and CoC Planner. As applications are submitted in *e-snaps*, the Collaborative Applicant will review the applications to ensure that they conform to the applications approved by the Recipient Approval and Evaluation Committee and that they are complete and, at least on their face, accurate and consistent. If an applicant is required to make any changes, the CoC Planner will return the application via *e-snaps* with an email explaining needed changes and the deadline for making those changes.
- C. Preparation of Final Priority Listing. It is the responsibility of the Recipient Approval and Evaluation Committee to develop for HCCSC Board approval:
 1. A final list of the projects to be included on the Priority Listing submitted with the Collaborative Application; and
 2. Any other list of recommended projects that HUD requires Continuums to prepare as part of a competition for bonus funds available through the CoC Grant program.
- D. Ranking of Projects. It is also the responsibility of the Recipient Approval and Evaluation Committee to rank those projects, using a method developed by the Committee, reviewed by HCCSC members, and approved by the HCCSC Board each year following release of the CoC NOFA.
- E. HCCSC Approval of the Collaborative Application. Before submitting the Collaborative Application to HUD, the Collaborative Applicant will solicit HCCSC Board approval for the application as a whole and for its ranking of individual applications. In requesting this approval, the Collaborative Applicant will:
 1. Explain to the Board any instances in which the ranking of individual applications was based on factors other than application scores; and
 2. Provide an opportunity for the Board to ask questions, and, based on a majority vote, change the ranking.

VII. Reallocations

- A. Responsibility for Proposing Reallocations. The Collaborative Applicant and Recipient Approval and Evaluation Committee should consider the possibility of recommending that all or part of the CoC funding currently received by a project be reallocated for any good cause, including the following:
1. The project has consistently failed to meet performance standards established by HUD or the HCCSC;
 2. The Collaborative Applicant and HMIS have been obliged to spend a disproportionate amount of time overseeing the project due to its repeated failures to:
 - a. Submit timely and accurate data and reports required by HUD or the HCCSC;
 - b. Follow other policies and procedures prescribed by HUD or the HCCSC; or
 - c. Cooperate with the efforts of the HCCSC to improve the performance of the project or the homeless system as a whole.
 3. The project has repeatedly underspent its CoC funding or otherwise mismanaged its CoC grant;
 4. HUD priorities or policies have changed, putting the project at risk of being defunded;
 5. HCCSC priorities or policies have changed with the result that the project no longer plays the role it previously did in promoting the HCCSC's strategies for ending homelessness;
 6. The project is unusually expensive compared with other projects of its type; or
 7. Some or all the funds received by the project can be put to higher and better uses to achieve the HCCSC's goals for ending homelessness.
- B. Process for Effecting Reallocations.
1. Notice to Current Recipient. In the event that the Collaborative Applicant and Recipient Approval and Evaluation Committee agree that the HCCSC should consider reallocating CoC funds from a current recipient, the Collaborative Applicant will provide prompt notice to the project. That notice should include:
 - a. The reasons for recommending that reallocation be considered; and
 - b. The amount recommended for possible reallocation.
 2. Timing of Notice.

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- a. General Rule. Generally, notice to the current recipient should be provided before the local application process begins so that the ad announcing the start of the local competition (see section III. A. above) can include information about the amount of funding that may be available through reallocation.
 - b. Unusual Circumstances. Under unusual circumstance, the notice to the current recipient may be given after the start of the local competition. “Unusual circumstances” may include:
 - i. Information received from HUD after the start of the local competition that suggests that funding for the project may be in jeopardy; and
 - ii. The discovery of new facts and circumstances about the project or its sponsoring organization that call into serious question the ability of the project to fulfill its current commitments to HUD or to the HCCSC or manage additional CoC grants.
3. Reallocation Decisions. The Recipient Approval and Evaluation Committee will develop a final recommendation regarding proposed reallocations during the course of its review of all local applications for CoC funding. In developing this recommendation, the committee must take into consideration:
- a. The current recipient’s application or applications for continuing CoC funding, including, if it chooses to submit them after receiving notice of possible reallocation, its application for the entire amount of funding it has been receiving and its application for a sum reduced by the amount the Recipient Approval and Evaluation Committee has proposed to reallocate; and
 - b. All applications from new projects requesting all or part of the reallocated funds.
4. Appeal and Finalization of Reallocation Decisions. The process for appeal and finalization of reallocation decisions will be the same process outlined in section IV through VI for all other applications.