

Homeless Continuum of Care of Stark County

Board of Directors Meeting

Tuesday, May 10, 2016

9:30 am at the Sisters of Charity Foundation

MEMBERS PRESENT

John Aller
Lynne Dragomier
Amanda Fletcher
Cathy Jennings
Kimberly Kroh
Beverly Lewis
Beth Pearson
Kelly Perry
Crystal Sandor
Shirene Starn-Tapyrik

Jean Van Ness

EXCUSED

Mike Cody
Kellie Johnson

ABSENT

Maria Heege
Beverly Jordan
Bruce Lawver
Lisa Miller

Nedra Petro

CoC PLANNER

Natalie McCleskey

SOCF STAFF

Shannon McMahon Williams

GUESTS

Matt Hudas
Jennifer Keaton

I. Welcome/Conflict of Interest Reminder/Approval of April Minutes

At 9:36 a.m., Jean called the meeting to order, welcomed everyone, and reminded everyone of the Conflict of Interest policy.

Motion: Jean requested a motion to approve the April meeting minutes, which had been distributed to the Board via email prior to the meeting. Lynne moved to approve the minutes. Cathy seconded the motion and it passed unanimously.

II. Results of 2015 Continuum of Care Grant Competition

Beverly L. and Beth arrived at the meeting.

Natalie distributed a document to the Board entitled "OH-508 Canton, Massillon, Alliance/Stark County – CoC Awards FY2015," which lists all of the CoC funding received by HCCSC in the FY2015 grant competition. Notably, HCCSC received bonus funding while many other CoCs lost funding in this highly competitive process. In fact, we heard, unofficially, that HCCSC was the highest scoring CoC in Ohio in the 2015 competition. Natalie congratulated the Board for its work and shared that HUD will offer a debriefing soon to explain HCCSC's score.

The Board discussed the results, commenting that this outcome helps to demonstrate that HCCSC can remain strong without merging with the Balance of State CoC. Many other small continuums did not fare well, and HUD seems to be encouraging the merger of smaller CoCs that are struggling to meet the requirements.

Regarding the FY2016 CoC grant competition, Natalie has completed the registration and will finalize the Grant Inventory Worksheet next. Based on the timing of these steps, she suspects that the Notice of Funding Availability (NOFA) may be released earlier than it was last year.

III. Approval of Recommendations to City of Canton for 2016 Emergency Solutions Grants (ESG)

Natalie distributed a document entitled “Emergency Solutions Grant, City of Canton” (see Appendix A), which outlines (1) the amount of funding that was available this year, (2) the steps that the City and Stark County Regional Planning Commission (“Regional Planning”) took to advertise the funding availability, (3) the number of applications that were received and met threshold criteria, and (4) the Recipient Approval and Evaluation Committee’s recommendations to the City for the use of the funding. Natalie reminded the Board that Regional Planning administers ESG funding for the City of Canton in collaboration with HCCSC. Specifically, HCCSC’s Recipient Approval and Evaluation Committee reviews all applications and makes recommendations to the HCCSC Board regarding funding. The Board then reviews the Committee’s recommendations and either approves or amends them, and then forwards the approved or amended recommendations to the City of Canton so that it can finalize a decision. \$196,470 was available this year for eligible projects.

As explained in Appendix A, the Committee is recommending that all applicants for 2016 ESG funding receive the amount they requested. Only three agencies applied, and the total amount requested leaves a surplus of \$17,586. The Committee is recommending that this balance be awarded to CommQuest’s homelessness prevention program.

The Board discussed whether or not HMIS could make use of the surplus funding, given the challenges with data entry and reporting what it has faced with the software conversion. Ultimately, however, there appeared to be consensus that there was no reason to believe that awarding HMIS additional funds would mitigate the remaining challenges resulting from the conversion.

Motion: Beth moved to approve the Recipient Approval and Evaluation Committee’s recommendations for the use of ESG funding for FY2016 as written in Appendix A. Amanda seconded the motion, and it was approved by all except John, who abstained.

IV. Review and Approval of New Procedures for Conducting Local CoC Competition

Prior to the meeting, the Board received the document “Procedures for Inviting and Reviewing Applications for CoC Funding” via email (see Appendix B). Jean noted that this is the third iteration of these procedures in the last three years. This year, the procedures were revised to be more transparent and inclusive in an effort to meet clearer expectations for conducting local competitions that HUD articulated in the FY2015 CoC application. The document in its current form was approved by the Recipient Approval and Evaluation Committee. It was also distributed for comment via email to the entire HCCSC membership; no concerns were raised from members in that process.

Jean reviewed the CoC application process in detail with the Board members and noted the following changes to the “Procedures”:

- Applications for all funding, including renewals, reallocations, and bonus funding, will be accepted at the same time. Previously, applications for renewals were taken first.
- The section on reallocation is fairly new; it is written mostly to allow HCCSC to reallocate funding to high performing projects if possible, in response to HUD’s guidance indicating that reallocation should be used for that purpose.

Motion: Lynne moved to approve the “Procedures for Inviting and Reviewing Applications for CoC Funding” (see Appendix B). Beverly L. seconded the motion and it passed unanimously.

V. Report on HMIS Progress in Resolving Issues with New Software

Jennifer Keaton and Matt Hudas joined the meeting in order to report on recent progress made in resolving the issues associated with the HMIS software conversion. They shared the following information:

- Overall, good progress has been made, and the software glitches are being fixed. The next task will be working on improving data quality.
- All issues related to generating federal reports, including APRs, have been resolved. HMIS staff will need to build all state-required reports, as those were not built into the system, and will fix any issues related to Ohio Development Services Agency (ODSA)-required reports.
- HMIS staff is now focusing on working with each Participating Agency individually in order to diagnose any issues that remain. They believe that, in some cases, issues may be related to poor internet connections or incorrect computer specifications, which can be resolved.

Following up on the earlier conversation about the potential benefit of additional funding for HMIS to resolve the remaining issues, Jennifer indicated that HMIS could not make a good use of extra funding for that purpose.

Jean then requested feedback from the providers on the Board. Cathy and Amanda stated that meetings within their agencies and with HMIS staff have helped solve most of their software issues, and they are improving. Shirene shared that Alliance for Children and Families (ACF) has a significant data backlog to enter and requested assistance. Jennifer recommended that Shirene communicate with her about her needs and priorities and offered to train all ACF staff (some of whom are new) on the software. Jean noted that she would follow up with Shirene to ensure that this can be resolved quickly.

VI. Report on Housing Inventory Count and PIT Count

Documents entitled “Stark County Continuum of Care” and “Point in Time Count – Data Comparison” were distributed to the Board. The first shows the final Point-in-Time (PIT) Count data from 2009 to 2016, and the second shows sheltered and unsheltered PIT data from 2013 to 2016 broken down by subpopulation.

Jennifer reviewed the data with the Board, noting the following points:

- The street count is the lowest it has ever been, and, for the first time, no minor children were found on the street, whether part of a family or unaccompanied.
- The emergency shelter count is high, as it included both households in shelters and households staying in motels paid for by local organizations.
- The transitional housing (TH) count is lower because units are being converted to other project types.
- The permanent housing count is higher even though HAP beds were lost on the bed inventory. The increase in beds is due to the VASH vouchers for veterans and new rapid re-housing (RRH).
- The number of households at imminent risk of homelessness (being asked to leave their residence within 14 days) continues to grow, which reflects the national trend.
- The count of chronically homeless households was very low this year, largely due to the change in the term's definition, which makes it more restrictive.
- Increases were seen in numbers of homeless households with children and persons in those households.
- Decreases were seen in numbers of homeless veterans, households without children, and youth. The decrease in homeless veteran households shows that prioritizing them is effective.

Beth left the meeting at this point.

Following Jennifer's report, the Board requested more data on the households at imminent risk of homelessness in Stark County, specifically whether they have their own leases or are doubled-up, and what other risk factors they may have, including mental health issues, that prevent them from achieving stability.

The Board then discussed the increase in permanent supportive housing (PSH) units and reviewed the document "New PSH Units in the Works" (distributed at the meeting), which outlines (1) projects created through reallocation in the FY2015 CoC competition, (2) projects created through bonus award in FY2015 CoC competition, and (3) projects not awarded bonus funding in FY2015 CoC competition. The two projects not awarded bonus funding, Alliance for Children and Families' (ACF) BFIRST and Coleman's Changing Destinies, are both receiving the Ohio Housing Finance Agency capital funding and are pursuing project-based vouchers from SMHA for ongoing operating support. Creating new PSH has been one of HCCSC's primary focuses over the last year, and efforts are still ongoing. ICAN's Basic Accommodations is converting from a safe haven to PSH, and ACF may convert its state-funded TH to PSH in the upcoming funding cycle.

With this report finished, Matt left the meeting.

VII. Review and Discussion of Monthly Management Report

Jennifer reviewed and the Board discussed several items on the most recent Monthly Management Report, which was distributed via email to the Board prior to the meeting, including the following:

- The number of calls to the Hotline increased, largely due to repeat calls from clients and calls from service providers.

- The length of time from intake to referral to a shelter increased from three to 13 days. The overflow women’s shelter is now closed with the end of the cold weather months, which may account for this.
- RRH is facing a few challenges. Exits from RRH are low due to data entry challenges, and no one has been newly housed in March or April because the case managers have run into several environmental and inspection issues with units.
- Only one new family with children has been referred to PSH since January.
- Stark Social Workers Network staff, whose work is accounted for in the “Status Confirmed or Not” section, have made great improvements in their recordkeeping and document gathering efforts. By and large, they are finding that very few clients who self-report as chronically homeless can be documented as such.
- The total numbers of households on the prioritization list is not necessarily straightforward, as several are inactive because they cannot be contacted or no longer need the assistance once they are contacted. One HMIS staff member calls households on the list weekly.

Having concluded her reports, Jennifer left the meeting.

VIII. Review and Approval of FY2016 CoC Application and Scoring Forms

Before the meeting, the Board received the draft documents “2016 Continuum of Care Application” (the local project pre-application) and “FY2016 HCCSC Scoring Criteria and Score Sheet” via email. Natalie and Jean reviewed the changes made to these documents since the FY2015 CoC competition, noting that most revisions were made (1) to streamline the pre-application process by creating one form for all projects (including new and renewals), (2) to align the scoring sheet with the application more closely, and (3) to follow up on information requested by HUD in the FY2015 application. Additional changes will be made with recommendations from the Recipient Approval and Evaluation Committee.

The revised application contains a new section on threshold criteria, which will help to inform all projects (especially new projects) of the CoC NOFA’s baseline expectations. In addition, a section has been added for projects to report on their participation in HCCSC. Natalie reviewed with the Board the different sections that must be completed by new and renewal projects exclusively.

The pre-application deadline is currently set for June 29, 2016. Several providers requested that this deadline be moved due to the proximity of the deadline for ODSA applications. The Board discussed this request briefly but reached no consensus.

Kelly left the meeting.

Motion: Beverly L. moved to approve an email vote of the forthcoming amended drafts of the local “2016 Continuum of Care Application” and “FY2016 HCCSC Scoring Criteria and Score Sheet.” Kim seconded the motion and it was approved by all except Shirene, Amanda, and Cathy, who abstained.

IX. Questions about Board Updates/CoC Planner Activities

A. Outreach to Local Political Leaders

Jean reported that she and Joni Close would be meeting with Commissioner Creighton in the afternoon following the Board meeting.

B. ODSA Workshop and HCCSC's Priorities for ODSA's Homeless Crisis Response Program (HCRP) Funding

Natalie attended the ODSA workshop in early May, at which ODSA clearly stated that CoC entitlement communities (of which Stark County is one) should use their HCRP funding solely for RRH. Currently, HCRP is funding both RRH and homelessness prevention in Stark County. Regional Planning, which administers the funds locally, is scheduled to release the RFP soon, and the CoC Board could provide a recommendation regarding the use of HCRP funding. The Board discussed the issue and decided that the System Performance Committee should examine it more closely at its meeting on May 17 and form a recommendation that could then be sent to the Board.

Motion: Lynne moved to approve an email vote on the forthcoming recommendation from the System Performance Committee regarding priorities for ODSA funding. Beverly L. seconded the motion and it was approved by all except Amanda and Shirene, who abstained.

X. Old Business

A. National Housing Trust Fund

Ohio received over \$3 million from the National Housing Trust Fund.

XI. New Business

The Board had no new business to discuss.

XII. Adjournment

There being no further business, the meeting was adjourned at 11:36 a.m.

Emergency Solutions Grant

City of Canton

- FY2016 Total Allocation - \$212,400
- Minus \$15,930 (7.5%) for Admin = \$196,470 for eligible projects
- Ad was posted in the Repository, applications were posted on HCCSC, City of Canton and SCRPC websites, notice was emailed to past recipients and HCCSC members, application workshop was conducted on April 1st.
- Three applications were received.
- All three applications met threshold criteria.

Recipient Approval & Evaluation Committee Recommendations

Project	Agency	Amount Requested	Amount Committee Recommends Approval
HMIS	StarkMHAR	\$28,351	\$28,351
Shelter - Operations and Essential Services	Domestic Violence Project Inc.	\$68,695	\$68,695
Homelessness Prevention	CommQuest (Doing Business As - Community Services of Stark County)	\$81,838	\$81,838 – with remaining surplus funds being added to this project (*see comment below for additional details on this recommendation)
	TOTAL REQUEST	\$178,884	
	TOTAL FUNDS REMAINING	\$17,586 (* See comment below for details of Committee recommendation on remaining funds)	

*** Committee recommendation for remaining funds:**

With a remaining balance of \$17,586, due to insufficient number of applications received, the Recipient Approval & Evaluation Committee recommends these funds be added to Homelessness Prevention. While the HCCSC Board-approved ESG funding priorities included rapid re-housing, no rapid rehousing projects applied for funding and the Committee felt that this was an insufficient amount of funds to warrant solicitation of an additional RFP as well as insufficient funds to create a new Rapid Re-Housing project with.

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 which 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;
 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 their 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 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 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 or to the Recipient Approval and Evaluation Committee 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 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 significant changes in other relevant circumstances, 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.
 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 has been 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 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.
 - a. General Rule. Generally, notice to the current recipient should be provided before the 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 circumstance 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 application 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.