



Local CoC Program Competition Guide

Funding Year 2022

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NOTE:

After HUD releases its FY2022 Notice of Funding Opportunity for the Continuum of Care Program, this guide will be updated to ensure compliance with all requirements.

Project applicants should review this Guide along with the CoC's Call for Projects, application materials, HUD CoC Program Competition NOFOs, and the Program Rule 24 CFR 578 for full information.

More information:

<https://www.rivervalleyescoc.org/local-competition-for-projects.html>

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Section I: HUD Guidelines for the Local Competition

The U.S. Department of Housing and Urban Development (HUD) issued Notices of Funding Opportunity (NOFOs) for the FY2022 Continuum of Care Program Competition (FR-6600-N-25) and FY2022 Supplemental to Address Unsheltered and Rural Homelessness (FR-6500-N-25S). CoC Consolidated Applications, which include a CoC Application, Project Priority Listing, and Project Applications, are due to HUD before September 30, 2022 at 8:00pm Eastern time (7:00pm Central) and October 20, 2022 at 8:00pm Eastern time (7:00pm Central), respectively.

This section describes the requirements that most directly affect project applicants. For more information, the NOFO and HUD's other CoC competition resources are available at: https://www.hud.gov/program_offices/comm_planning/coc/competition.

A. HUD Policy Priorities

The Continuum of Care (CoC) Program (24 CFR part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, states, and local governments to quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals and families; and to optimize self-sufficiency among those experiencing homelessness.

Within the CoC Program Competition, local CoCs can submit several types of project applications and CoCs have the flexibility to rank projects in any order. However, CoCs cannot receive grants for new projects (other than through reallocation) unless the CoC competitively ranks projects based on how they improve system performance and align with HUD policy priorities. HUD Policy Priorities for the two FY2022 NOFOs are:

Regular NOFO (FY2022 CoC Competition)

- Ending homelessness for all persons
- Using a Housing First approach
- Reducing unsheltered homelessness
- Partnering with housing, health, and service agencies
- Improving system performance
- Racial equity
- Improving assistance to LGBTQ+ individuals
- Including persons with lived experience
- Increasing affordable housing supply

Special NOFO (FY2022 Supplemental)

- Unsheltered homelessness
- Unsheltered homelessness and households with severe service needs in rural areas
- Providing assistance on Tribal lands
- Involving a broad array of stakeholders
- Advancing equity
- Using a Housing First approach

HUD has also identified performance-based decisions as critical to implementation of local CoC planning and competitions. Consistent with the Consolidated Appropriations Act 2021 and the Further Consolidated Appropriations Act 2020, the NOFO Section II.B. states that:

1. Requests for new project applications are not allowed, other than through reallocation unless a CoC competitively ranks projects based on how they improve system performance as outlined in the NOFO; and
2. HUD will prioritize funding for CoCs that have demonstrated the ability to reallocate resources to higher performing projects.

In 2021, HUD has provided guidance for Youth Homelessness Demonstration Program (YHDP) grants to be renewed or replaced. However, YHDP funds are not available in River Valleys CoC and will not be addressed in this Guide.

B. New Projects through Reallocation

CoCs are encouraged to evaluate community needs and project performance regularly, and to use the reallocation process to improve CoC performance. Reallocation generally moves funding from areas of lower need and/or projects with lower performance to areas of higher need and/or projects with higher performance. With reallocation, CoCs may use funds taken in whole or in part from existing grants to create new projects through reallocation. A minimum of \$44,997 of reallocated funds are available.

New projects created through reallocation may include expansions of existing high-performing projects or Transition grants to change project component type to respond to community needs. Applications for new projects through reallocation are invited from any eligible and qualified applicant, whether or not the applicant has previously received HUD CoC Program funding.

Five types of projects may be created via reallocation in FY2022 for eligible participants:

1. Permanent Housing - Permanent Supportive Housing (PH-PSH) projects
2. Permanent Housing - Rapid Rehousing (PH-RRH) projects
3. Joint Transitional/Rapid Rehousing (TH-RRH) projects
4. Support Services (SSO) for development or operation of the Coordinated Entry System.
5. Dedicated Homeless Management of Information System (HMIS) project submitted by the HMIS Lead

Not all project types that are eligible are prioritized by the local CoC. More information on new project priorities is available in the Call for New Projects and in the Reallocation section of this Competition Guide.

C. New Projects through CoC Bonus

CoCs are eligible to apply for new projects created with CoC Bonus funds as described in FR-6600-N-25. For FY2022, the Bonus amount for each CoC equals 5% of the CoC's Final Pro Rata Need, as calculated by HUD. The estimated Bonus for River Valleys CoC is \$119,657.

New projects in this category may be proposed as standalone projects or as expansions of existing CoC-funded projects seeking renewal in the current funding round. In addition, applications for new projects through the CoC Bonus are invited from any eligible and qualified applicant, whether or not the applicant has previously received HUD CoC Program funding. Eligible project types for CoC Bonus funding are the same as those eligible via reallocation (listed above).

Not all project types that are eligible are prioritized by the local CoC. More information on new project priorities is available in the Call for New Projects.

D. New Projects through DV Bonus

CoCs are eligible to apply for new projects created with DV Bonus funds as described in FR-6600-N-25. For FY2022, the Bonus amount for each CoC equals 10% of the CoC's Preliminary Pro Rata Need, as calculated by HUD. The estimated DV Bonus for River Valleys CoC is \$216,155. Projects seeking funding via the DV Bonus are dedicated to serving persons who qualify under paragraph (4) of the definition of homelessness, which includes survivors of domestic violence, dating violence, sexual assault, or stalking that are defined as homeless under 24 CFR 578.3. HUD has clarified that this definition includes persons fleeing or attempting to flee human trafficking qualify as homeless under paragraph (4).

New projects in this category may be proposed as standalone projects or as expansions of existing CoC-funded projects, including projects that do not currently and specifically target the populations to be served with these bonus funds. Applications for new projects through the DV Bonus are invited from any eligible and qualified applicant, whether or not the applicant has previously received HUD CoC Program funding. Unlike in previous years, more than one project may be submitted under the following categories. However, per HUD guidelines, new DV Bonus project applications may not request less than \$50,000.

Eligible project types for DV Bonus funding are:

1. Rapid Rehousing (RRH) projects dedicated to serving survivors of domestic violence, dating violence, or stalking that are defined as homeless under 24 CFR 578.3;
2. Joint Transitional/Rapid Rehousing (TH-RRH) projects dedicated to serving survivors of domestic violence, dating violence, or stalking that are defined as homeless under 24 CFR 578.3;
3. Support Services (SSO) Coordinated Entry System project to implement policies, procedures, and practices that equip the CoC's Coordinated Entry System to better meet the needs of survivors of domestic violence, dating violence, or stalking, ONLY with recommendation of the CoC's Coordinated Entry Committee and commitment to enter agreement with the CoC regarding SSO activities

Not all project types that are eligible are prioritized by the local CoC. In 2022, River Valleys CoC is prioritizing all eligible project types for DV Bonus, in the order listed above. More information on new project priorities is available in the Call for New Projects.

E. New Projects through Special NOFO Set-Asides

CoCs are eligible to apply for new projects created with Rural Set-Aside or Unsheltered Set-Aside funds as described in FR-6500-N-25S. For FY2022, the estimated Rural Set-Aside maximum is \$1,977,921 and the estimated Unsheltered Set-Aside maximum is \$2,161,545, as calculated by HUD.

New projects via the Special NOFO Set-Asides must be proposed as standalone projects with three-year terms. Applications for new projects are invited from any eligible and qualified applicant, whether or not the applicant has previously received HUD CoC Program funding.

Projects seeking funding under the Unsheltered Set-Aside must serve eligible populations under paragraphs (1) and (4) of the definition of homelessness and must be part of the CoC's plan to address unsheltered homelessness. Eligible project types for Unsheltered Set-Aside funding are:

1. Permanent Supportive Housing
2. Rapid Rehousing
3. Joint Transitional Housing/Rapid Rehousing
4. Support Services Only - Coordinated Entry
5. Support Services Only - Outreach
6. Support Services Only - Other
7. HMIS

Projects seeking funding under the Rural Set-Aside must serve eligible populations under paragraphs (1), (2), and (4) of the definition of homelessness within eligible rural-defined counties and must be part of the CoC's plan to address rural homelessness. Projects may propose to serve populations eligible under paragraph (3) of the definition of homelessness to accompany the CoC's waiver request to HUD for that population.

Eligible project types for Rural Set-Aside funding are:

1. Permanent Supportive Housing
2. Rapid Rehousing
3. Joint Transitional Housing/Rapid Rehousing
4. Support Services Only - Coordinated Entry
5. Support Services Only - Outreach
6. Support Services Only - Other
7. HMIS

Some additional service categories are eligible under the Rural Set-Aside, as described in section IV.B.3.e.(2).

Not all project types that are eligible are prioritized by the local CoC More information on new project priorities is available in the Call for New Projects.

E. Renewal Projects

In the HUD CoC Program National Competition, renewal funds are limited to the projects listed on the River Valleys CoC's List of Eligible Renewal Projects, which is developed from the HUD-approved Grant Inventory Worksheet and the results of Local Competition project reviews. Eligible project component types are those defined for each renewal project through the Grant Inventory Worksheet process. Projects seeking renewal funding may not change project component type or exceed the allowed funding levels by line item or in total, as shown on the List of Eligible Renewal Projects (which includes component types and budgets as defined on the HUD-approved Grant Inventory Worksheet). Projects may reduce budget line items, which would be considered voluntary reallocation. The CoC can also eliminate or reduce funding for these projects (involuntary reallocation) in accordance with the CoC's reallocation policy. Such changes create a reallocation fund which can be used to fund certain types of new projects described below.

F. Ranking

HUD requires CoCs to competitively rank project applications based on how they improve the CoC System Performance in order to be eligible for any new projects through Bonus funding. HUD requires that each CoC conduct a transparent and objective process to review and rank all applications for renewal of existing projects and creation of new projects. Ranking of renewal projects must incorporate regularly collected data on project performance and effectiveness.

- **For Regular NOFO Projects:** All new and renewal projects, except CoC Planning, are ranked on the Project Priority List for HUD review and funding decisions. The Bonus and DV Bonus projects must be ranked along with other project applications. Any project conditionally selected by HUD as part of the DV Bonus will be removed from the CoC's ranking list and all projects underneath it will slide up in rank. Any project that indicated it would like to be considered for the DV Bonus but was not selected as part of the DV Bonus, will retain the ranking provided by the CoC and be considered as a normal ranked project.
- **For Special NOFO Projects:** All projects are ranked on the Project Priority List for Rural Set-Aside funds or for Unsheltered Set-Aside funds in order for HUD to review and select projects.

More information on ranking is available in the Review and Scoring section and the Ranking section of this Competition Guide.

G. Tiers

To ensure that CoCs can prioritize their projects locally in the event that HUD is not able to fund all renewals, HUD may require that CoCs rank projects in two tiers. The tiers are financial thresholds.

For FY2022, Tiers do not apply to Special NOFO Set-Aside project rankings. However, Tiers do apply in the Regular NOFO project ranking.

Within the Regular NOFO project ranking:

- Tier 1 is equal to 95% of the CoC's Final Annual Renewal Demand (ARD) minus Annual Renewal Amounts (ARAs) of YHDP projects. Projects placed in Tier 1 projects will be conditionally selected by HUD provided they meet all threshold and project quality requirements described in the NOFO. In 2022, Tier 1 is calculated as \$ \$2,273,475 in River Valleys CoC.
- Tier 2 is the difference between the CoC's Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus Funds that a CoC can apply for. It excludes YHDP projects and CoC Planning projects. Tier 2 projects will be funded only if they meet HUD requirements and there are sufficient funds available nationally. Tier 2 projects are scored by HUD based on CoC overall score, project rank within the CoC, and project commitment to Housing First/Low Barrier policy priority. If all funds are applied for, Tier 2 for River Valleys CoC is estimated at \$527,263.

Note: Due to the DV Bonus ranking requirements, some projects' assigned rankings and Tiers may shift during the HUD review and selection process.

Section II: Local Competition Goals and Responsibilities

In order to participate in the HUD CoC Program National Competition, CoCs must conduct a Local Competition to select and prioritize projects to be included in the CoC's regional Collaborative Application to HUD.

In 2022, River Valleys CoC's objective for project solicitations, reviews, ranking, re-allocation, and tiering, is to advance our community's goal of ending and preventing homelessness for all people. The CoC aims to accomplish this by:

- Strategically allocating HUD funds in conjunction with other funding sources;
- Shifting investments from lower performing projects to new projects responding to documented housing and service needs, particularly for projects benefiting populations disparately impacted by homelessness;
- Preserving funding for high performing projects; and
- Complying with all HUD requirements for CoC's and projects.

Projects seeking Special NOFO funding must also be part of the CoC's Plan to Address Rural Homelessness or Plan to Address Unsheltered Homelessness.

Project priorities for the Competition are developed by the Data & Technical Assistance Committee in consultation with community representatives, then approved by the CoC membership, and incorporated into the Local Competition requirements. As described in the Governance Charter, the Executive Committee is responsible for developing CoC policy and for completing HUD CoC Program Competition applications on behalf of the CoC. Committee members are nominated and affirmed by the CoC and must abide by the CoC's Conflict of Interest statement in their development of policies and requirements for the Local CoC Competition.

Project scoring and ranking is conducted by the Project Performance & Review Committee of the CoC, as defined in the River Valleys CoC Governance Charter. Committee members are nominated and affirmed by the CoC and must abide by the CoC's Conflict of Interest statement in their scoring and ranking.

An Appeal Review Subcommittee will be formed to review any appeals submitted by applicants based on the Local CoC Program Competition scoring and ranking process. The Appeal Review Subcommittee includes one member of the Project Performance & Review Committee and two individuals not associated with any project seeking or receiving CoC funding. Subcommittee members must abide by the CoC's Conflict of Interest statement.

River Valleys CoC encourages nominations for all Committees to reflect the diversity of the CoC region, to maintain a fair and objective review and ranking process, and to utilize community expertise.

Section III: Soliciting Project Applications

All projects seeking CoC Program funding through the River Valleys CoC Local Program Competition are asked to submit intent to apply and then submit a full application if eligible. New and renewal project proposals are solicited in different ways. Support is available for both new and renewal project applicants.

A. New Projects

New projects are invited from eligible applicants that serve the CoC region, including from entities that have not previously received CoC Program funds. Priorities for new projects (through CoC Program and other sources) are finalized and approved by the CoC members early in the calendar year and distributed via the CoC listserv. New projects may include new standalone projects, expansions of existing projects, and unassigned funds projects.

As soon as possible after the NOFO release, River Valleys CoC issues a final Call for Projects to solicit new project applications from eligible and qualified applicants to propose eligible project types. The Call for Projects includes description of estimated funding available, eligible and priority project types for the Local CoC Competition, threshold requirements for applicants and projects, submission requirements and timelines, and resources for applicants.

To ensure project quality, the CoC reserves the right to restrict applications from current CoC grantees in certain circumstances. In 2022, new project applications are not allowed if either of the following statements are true:

1. The new project proposed is an expansion or transition of a project that is in its first year of operating or was first awarded funds in the previous funding round. In this case, the project has little or no data to demonstrate strong performance, capacity to expand, or reason to transition. The CoC recommends that the project applicant focus on developing the recently funded project before proposing expansion or change.
2. The project applicant has a project in the bottom 25% of renewal projects (by total Review Points) as shown on the list of eligible renewal projects and the applicant has chosen not to voluntarily reallocate or propose a viable path to improvement. In this case, the CoC recommends that the applicant focus on improving performance for its existing project(s) rather than participating in a new project, either as grantee or subrecipient.

The Call for Projects is posted on the CoC website and distributed via the CoC email listserv, which includes CoC members and partners across the region. (Throughout the year, anyone interested in CoC planning or activity can sign up for the listserv on the CoC website.) In addition, the CoC sends the Call for Projects to county-level Homeless Response Team leads and other relevant association listservs to invite new projects. Other listservs may include: Minnesota Social Services Association, Minnesota Chapter of the National Association of Housing and Redevelopment Organizations, regional Human Services Directors groups,

Violence Free Minnesota (formerly Minnesota Coalition for Battered Women), Southern Minnesota Regional Legal Services, Minnesota Tribal Collaborative, Rainbow Health (formerly MN AIDS Project), and others as identified. CoC listserv members also encouraged to share the announcement with their networks.

For the 2022 Local CoC Competition, the Call for Projects will be posted on the CoC website and distributed via the CoC listserv at least 30 days before the New Project Applicant deadline. Other listservs will distribute to their members per their own distribution schedules. Public announcement regarding the Final Call for Projects will occur at the first Full CoC Network meeting after the Call for Projects is posted.

Application materials will be due by 4:00 on the date listed on the Call for Projects and in the method proscribed by the CoC. No extensions for additional documentation are expected in 2022.

Special note for Special NOFO projects: In the case that project applications are not received to fulfill the CoC's Plan to Address Unsheltered Homelessness or Plan to Address Rural Homelessness, the CoC reserves the right to solicit additional project applications in a second round of projects.

B. Renewal Projects

All renewal projects listed on the Grant Inventory Worksheet for the competition year are invited to declare intent to apply for renewal funds. The invitation is extended through announcement at a full CoC meeting and via CoC listserv. In the event that the Grant Inventory Worksheet is not available, the CoC will proceed with project reviews based on funding award announcements by HUD in the previous funding round(s) and will update the list and post the list when available.

Submission of performance data and documentation for preliminary review by the CoC is considered the housing project's notification of intent to apply. The specific data and documentation required is distributed by email to project contacts, included in the draft Call for Projects, and posted on the CoC website at <https://www.rivervalleyscoc.org/local-competition-for-projects.html>. Project data and documentation received by the published deadline and in accordance with the prescribed method are reviewed. Housing projects that do not submit notification on time or in accordance with the prescribed method will be penalized or rejected.

Renewal projects that are reviewed and accepted in the preliminary review/intent to apply stage are notified by email of their review score, acceptance/rejection for the 2022 CoC Local Competition, and any reallocation applied to the project as a result of the preliminary review. After reviews are complete, a list of Eligible Renewal Projects for the 2022 CoC Program Competition is posted to the CoC website, with notification to the CoC listserv. Accepted projects are invited to apply in *e-snaps*, HUD's online application system for the CoC Program at such time that *e-snaps* is opened for the National Competition. Projects are also advised of any additional CoC Local Competition documentation that may be required.

For the 2022 competition, the renewal project invitation will be posted on the CoC website and distributed via the CoC listserv at least 30 days before the Renewal Project Applicant deadline. Performance data and documentation is due by 4:00 on the date listed on the Call for Projects and in the method proscribed by the CoC. No extensions for additional documentation are expected in 2022.

C. Resources and Support for Project Applicants

Resources are available to assist project applicants with both Local CoC Program Competition and national competition processes. Technical assistance (TA) for the Local CoC Program Competition will be prioritized for new applicants, new projects proposals, and project applicants with new staff, but all applicants are encouraged to seek TA if needed.

These resources for River Valleys CoC Project Applicants may include:

- Local Competition guidance and materials, along with HUD and *e-snaps* guides, are posted on the CoC website at <https://www.rivervalleyscoc.org/>. General notifications are distributed via the CoC listserv as well.
- CoC staff webinars for new and renewal project applicants. Slides from the webinars and Q&A summaries are posted on the CoC website. Details will follow and be posted on the CoC website.
- Applicant lab time with CoC staff will be scheduled prior to CoC competition deadlines for applications in *e-snaps* (online system for national competition). Details will follow and be posted on the CoC website.
- 1:1 Technical Assistance provided via phone/web conference by CoC staff, by appointment only.

Details on these resources, together with information on support available through the national HUD CoC Program Competition are included in the Call for Projects.

Section IV: Receiving Project Applications

A. Notification of Intent to Apply

Notification of intent to apply is required for renewal and new project applicants in the Local CoC Program Competition. For all applicants, notifications of intent to apply must be submitted before the CoC-established deadline and in accordance with the method or format defined by the CoC.

New projects notice of intent to apply is due by 4:00pm on the date set in the Call for Projects. Notification includes basic information about the applicant and proposed subgrantees, project type, project location, and target population. New projects include expansions of renewal projects and unassigned funds applications as well as new stand-alone projects. New project applicants are strongly encouraged to communicate with the CoC Coordinator before submitting Intent to Apply to ensure compliance and receive technical assistance if needed. New project notification of intent to apply will be collected via electronic form, with the link included in the Call for Projects.

All new projects will be preliminarily accepted and will not be reviewed for acceptance or rejection or scored during the intent to apply stage. However, projects that do not submit notification on time or in accordance with the prescribed method will not be reviewed and will not be considered for funding.

New projects will be scored during the Application stage to select the List of Eligible Projects to be included in the CoC Local Program Competition and determine the amount of project funds reallocated for use by new projects.

Renewal Non-housing projects, i.e. HMIS and SSO-CE performance data and documentation submitted for annual review is considered the project's notification of intent to apply. See Call for Projects for detailed list of submittals required for renewal projects.

Renewal project review submissions are due by 4:00pm on the date set in the Call for Projects. All documents are submitted via a shared Google Drive folder.

Renewal housing projects performance data and documentation submitted for annual review is considered the project's notification of intent to apply. Project data and documentation includes all information needed for the Project Performance & Review Committee to evaluate performance, prioritization of participants with high needs, alignment with HUD and CoC policy priorities, participation in CoC activities, and effective management of program funds. See Call for Projects for detailed list of submittals required for renewal projects.

Renewal housing project review submissions are due by 4:00pm on the date set in the Call for Projects. All documents are submitted via a shared Google Drive folder.

Timeliness: Renewal projects that do not submit notification on time or in accordance with the prescribed method will be penalized as follows:

- Project notifications received between 4:01pm on the due date set in the Call for Projects through 4:00pm on due date +1 day will be assessed a 10% penalty on the project's weighted score.
- Project notifications received between 4:01pm on due date +1 day and 4:00pm on due date +2 days will be assessed a 20% penalty on the project's weighted score.
- Project notifications received after 4:00pm on due date +2 days will not be reviewed and will not be considered for funding.

Applicants with extenuating circumstances must communicate with the CoC Coordinator as early as possible before the deadline to request an extension. No extension will be allowed beyond three days. No grace period is allowed if an extension is granted.

All renewal project applicants, including any projects on the Grant Inventory Worksheet that do not submit performance data and documentation for review, will be notified by email of the results of the project review. The notification will include total review points awarded, reviewer comments, project acceptance or rejection by the CoC as an eligible renewal project (to submit a full application for the National Competition), and project funding allowed, including any amount reallocated for new projects. If projects are rejected or have funding reduced via reallocation, reasons will be provided as allowed in the CoC's Reallocation Policy.

Exception for FY2021 New Projects Seeking First Renewal: New housing projects awarded during the federal FY2021 funding cycle provided documentation as new applicants in 2021 and have not yet started their projects. Therefore, these projects will be exempt from submitting performance data for the purpose of River Valleys CoC scoring and ranking. Threshold and/or progress documentation may still be required to ensure minimum eligibility standards have been maintained and the applicant is effectively preparing or implementing the new project. FY2021 housing projects will be automatically ranked as the last housing projects fully within Tier 1 (just above renewal HMIS and Coordinated Entry projects), in the order they were initially ranked in the Project Priority List submitted to HUD in 2021. Certifications and other documentation required by HUD for the *e-snaps* application system are still required. (No new projects were funded in 2020, so no exceptions are anticipated for projects with less than one year of grant performance.)

B. Project Application

New projects: By 4:00PM on the date set in the Call for Projects, applicants must submit a complete and correct Project Application in *e-snaps* **AND** documentation required for the CoC Local Competition or for use in the regional CoC-wide application, which includes all selected project applications.

Project applicants must submit Local Competition application documents for review by Google drive folder. The CoC Coordinator will create and share a Google Drive folder with the project's designated Application Contact(s) submitted in the Intent to Apply Form. All documents uploaded to the shared folder by 4:00pm on the deadline set in the Call for Projects (or allowed extension) will be retrieved for CoC Local Competition review.

Documentation added after the deadline is considered late and will result in penalty scoring or application rejection. Before the application deadline, applicants must finalize project documents in the folder for CoC Local Competition review.

All projects: Project applications with all attachments must also be submitted electronically in *e-snaps* by 4:00pm on the deadline set in the Call for Projects for consideration for the FY2022 CoC Program national competition (after the system is opened for project applicants and after projects are approved in the CoC Local Competition).

Applicants are advised to print a copy of the Submission Summary form in *e-snaps* from the CoC Project Application before closing their internet browser after the CoC Project Application has been submitted in *e-snaps*. This is the Applicant's receipt of submission and proof of compliance with the application deadline. The CoC will not give funding consideration to any applicant whose application is determined to be late and that is unable to provide the CoC with a record of submission that verifies the Project Application was submitted prior to the application deadline date and time.

Along with the project application in *e-snaps*, additional documents may be required to complete the project's submission for the Local CoC Program Competition. These elements are described in the Final Call for Projects (released after HUD releases the Notice of Funding Opportunity).

New projects will be scored during the Application stage to select the List of Eligible Projects to be included in the CoC Local Program Competition.

Timeliness: New projects that do not submit full application materials on time or in accordance with the prescribed method will be penalized as follows (dates revised to reflect extension period):

- Project applications received between 4:01pm on the due date set in the Call for Projects through 4:00pm on due date +1 day will be assessed a 10 point penalty on the project's weighted score.
- Project applications received between 4:01pm on due date +1 day and 4:00pm on due date +2 days will be assessed a 20 point penalty on the project's weighted score.
- Project applications received after 4:00pm on due date +2 days will not be reviewed and will not be considered for funding.

Renewal projects have a hard deadline of 4:00pm on the due date set in the Call for Projects to submit a complete *e-snaps* application. Funding previously approved during the Preliminary Review stage for renewal projects that do not meet the *e-snaps* deadline will be subject to reallocation.

C. Unassigned Funds Application

In the case that new and renewal projects submitted and deemed eligible and necessary during the review process do not fully claim the maximum funding allowed for a given

category of funds, the CoC reserves the right to solicit a final round of expansion proposals from the highest ranked renewal projects already submitted and reviewed for the CoC Local Competition and which submitted notice of intent to apply (for unassigned funds) before the new project intent to apply deadline. The highest ranked projects are allowed to apply in the unassigned funds final round because threshold and project quality reviews will have already been completed on the projects.

If unassigned funds from reallocation or CoC Bonus are identified during new project application reviews, project applicants will be invited by the Project Performance & Review Committee via the CoC Coordinator to submit a new expansion project application or revise a new project application submitted by the same applicant in *e-snaps* by the deadline set in the Call for Projects.

If the highest ranked project applicant declines or cannot submit a proposal within the timeframe, the expansion opportunity will be offered to the next highest ranked project on the List, and so on. If the project that accepts the opportunity has already proposed an expansion (new project), the unassigned funds expansion will be a revision to the existing and approved new project application, not a separate expansion application. If the project does not have an existing approved expansion grant on the List, the new expansion grant will be placed at the bottom of Tier 2.

Section V: Reviewing & Scoring Project Applications

A. Review and Scoring Process

All project applications received in accordance with the guidelines for Receiving Project Applications will be reviewed and scored by the Project Performance & Review Committee. CoC staff will collect all application materials as described above and deliver them to the Committee.

The Committee members read all project applications and documentation submitted for completeness and consistency. Threshold requirements will be checked first for all project applicants. Projects that do not meet thresholds will not be scored or ranked.

The Committee may, but is not required to, request clarifications or additional information from applicants if information is not clear enough to score the project. However, the committee must apply the same standard to all applications in seeking clarification. The Committee will record and submit questions to the CoC Coordinator, who will seek input from the applicant on behalf of the Committee.

At least two reviewers from the Committee will read each applicant's materials to score individual elements. The Committee will use an objective review and rating tool that meets HUD requirements and aligns with CoC objectives for the funding round to calculate a total score for each project. A rating tool that incorporates DV-specific criteria will be employed for all DV projects. The Rating Tools address the HUD and River Valleys CoC scoring criteria defined in this Guide and in the HUD Continuum of Care Program Competition NOFO, thus ensuring that projects are scored based on their ability to improve the CoC's System Performance and meet CoC objectives.

The Committee may place conditions on applications regarding corrections or clarifications to be made before final submittal in *e-snaps*. Conditions identified during scoring will be shared with applicants in writing when the project scores are released. Conditions identified during ranking will be shared with applicants in writing when the ranking is released to the CoC for review and comment.

After reviews are complete, the Committee will finalize preliminary voluntary and involuntary reallocation amounts per the process described in the Reallocation section of this Guide.

All projects are assessed a score for each element on the Rating Tool, according to the scale described on the tool and using the data sources named in the tool. The score for each element is then added together to create a raw score. Because total points possible for each project type are not equal, all scores are then weighted to a common 100-point scale as follows: $(\text{Raw score} / \text{Points possible for project type}) \times 100$. The resulting weighted score constitutes the project's Review Points, which are used in the ranking process.

A score report is generated for each project application. The Score Report includes:

- Notification of whether the project is accepted or rejected for the Local CoC Competition, with reason for any rejections
- Notification of whether the project is subject to reallocation, with reason for any reallocation
- Score calculations for each element
- Total raw score
- Weighted score
- Reviewer notes, including any conditions placed on the application in preparing the e-snaps application

A List of Eligible Projects for Renewal will also be generated, including all project Review Scores, allowed maximum funding request, any funds reallocated, and budget detail from the Grant Inventory Worksheet. This List is distributed to project applicants and posted to the CoC website (with notification of posting to the CoC email listserv).

B. Scoring Criteria

The Project Rating Tool for New Projects, for Renewal Projects, and for Projects serving Survivors addresses the following applicant and project eligibility and project quality thresholds established by HUD, as well as River Valleys CoC criteria. Please review the FY2022 NOFOs and the CoC Project Rating Tools for details. This section includes a general review of criteria and standards.

1. Criteria for New Projects

All New Project Applications must meet the following requirements:

- Projects must submit application materials for the Local CoC Competition within published timelines for the competition and via the methods prescribed
- Project applicants and subrecipients must provide evidence of eligibility under the CoC program
- Project applicants and subrecipients must demonstrate the financial and management capacity to carry out the project as proposed and administer federal funds
- Project applicants must submit the required certifications as specified in the NOFO
- Projects applications must establish eligibility of project applicants and propose to serve eligible populations applicable to the project type, per 2 CFR §578.3 and any guidance in the NOFO
- Projects must be cost effective compared to the norm in the community/region
- Project must meet an identified need in the region and provide evidence of ability to advance system performance measures
- Projects providing housing must agree to participate in the local Homeless Management Information System. Victim service providers must use a comparable database that meets HUD and local CoC requirements, including ability to generate and deliver data for HUD and CoC reporting/planning

- Projects providing housing must agree to accept and prioritize client referrals through the CoC Coordinated Entry System, using the process approved by the CoC
- Projects must commit to policy and model alignment with CoC expectations for:
 - Housing First/Low Barrier approach
 - Equal Access Rules
 - Ensuring education services for children and youth
 - Coordinated Entry for program participants
 - Participant self-sufficiency supports, including Moving On
 - Advancing advance equity for populations disparately impacted by homelessness
- Projects must maximize leveraging and identify non-HUD funding for the project, including the use of mainstream resources
- Projects must request less than 10% in administrative funding

HUD will review all projects to determine that projects meet the quality threshold. The criteria and scoring for the HUD project quality threshold review are included in the FY2022 NOFO, Section V.C.3.c.

2. Criteria for Renewal Projects

Renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards identified in the FY2022 NOFO. HUD will review information in eLOCCS, APRs, HUD CPD Field Office monitoring reports, and performance standards to evaluate:

- Whether the project's performance met the plans and goals established in the application
- Whether the project applicant demonstrated all timeliness standards for grants being renewed, including full expenditure of grant funds
- The project applicant's performance in assisting program participants to achieve and maintain independent living and records of success, except dedicated HMIS projects that are not required to meet this standard
- Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site

The CoC will also review how the project advances CoC-wide system performance for people experiencing homelessness in the areas of:

- Advancing equity for disparately impacted populations through program design and implementation
- Ensuring staff and volunteer training on best practices and CoC expectations
- Leadership or participation in CoC-wide strategies

3. Performance Criteria for all Housing Projects

The performance measures will be based on measures and policy priorities established by HUD and supported by River Valleys CoC. (Exceptions and alternatives for DV Bonus and other projects targeted specifically for survivors are noted in #4 below.) Performance measures for all housing projects are:

- Percent of project participants who either remain in permanent housing or exit to permanent housing
- Percent of those exiting permanent housing who do not return to homelessness within 12 months
- Percent of participant households maintain or increase earned income and unearned income between program entry and exit or annual assessment
- Utilization rate of beds/units in the project
- Speed at which program moves households into housing after referral
- Commitment to serving high-need and/or priority populations
- Effective program management – use of funds, bed utilization, data quality
- Commitment to and documented implementation of
 - Housing First/Low Barrier approach
 - Equal Access Rules
 - Requirements to ensure education services for children and youth
 - Coordinated Entry for program participants
 - Participant self-sufficiency supports, including Moving On
 - Efforts to advance equity for populations disparately impacted by homelessness
- Extent to which the applicant participates in and invests in improving CoC system performance
- Cost-effectiveness of HUD CoC funds compared to other similar projects

4. Criteria for Housing Projects serving Survivors

Projects serving survivors of serving survivors of domestic violence, dating violence, sexual assault, trafficking, or stalking that are defined as homeless under 24 CFR 578.3 must meet general new or renewal project criteria listed in the HUD Notice of Funding Opportunity and in this section of the Guide. The performance measures are based on measures and policy priorities established by HUD or the U.S. Interagency Council on Homelessness and supported by River Valleys CoC.

Additional and alternative performance measures for housing projects targeted for survivors, including project seeking DV Bonus status, are:

- Percent of participants who report a lower perceived risk of violence upon exit from the program
- Percent of participants who exit and report being stably housed 6 months after exit
- Average time to connect participants to permanent housing
- Commitment to services and programs specific to the needs of survivors in the program

- Commitment to use of alternate, equivalent database to produce required aggregate outcome reports for CoC and HUD reporting

5. Criteria for Housing Projects from “Youth-serving Providers”

Projects from “youth-serving providers” as defined by HUD meet general new or renewal project criteria listed in the HUD Notice of Funding Opportunity and in this section of the Guide. The performance measures are based on measures and policy priorities established by HUD or the U.S. Interagency Council on Homelessness and supported by River Valleys CoC.

Additional performance measures for housing projects targeted for survivors, including project seeking DV Bonus status, are:

- Percent of participants who report/demonstrate increased permanent connections to community and relevant persons in their lives; and
- Percent of participants who exit and report being stably housed 6 months after exit.

C. Alternative Performance Measures

River Valleys CoC recognizes that scoring criteria may not accurately reflect the strength of certain subpopulation-specific programs. As a result, for the 2022 CoC program competition, programs that 1) offer culturally-specific programming or 2) target exclusively youth, victims of domestic violence or sexual assault, or persons seeking sober living/recovery may offer alternative program data measures to review. All measures submitted must be accompanied by data generated directly from a program database, published industry performance standards (or performance standards from another funder) that support the proposed measure, and definitions of data fields used in the measure.

D. Criteria for Reducing or Rejecting a Project Funding Request

The CoC reserves the right to reduce or reject a funding request from a project applicant for any or the following reasons:

- Failure to meet any threshold criteria for grantees of the HUD CoC Program
- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon
- Audit finding(s) for which a response is overdue or unsatisfactory
- History of inadequate financial management accounting practices
- Evidence of untimely expenditures on prior awards
- Evidence of noncompliance with HUD and/or CoC policies, including coordinated entry and written standards for assistance
- History of other capacity issues that have significantly impacted the operation of the project and its performance
- Timeliness in reimbursing sub recipients for eligible costs. HUD will consider a project applicant as meeting this standard if it has drawn down grant funds at least once per month

- History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes
- Failure to consistently meet the CoC performance measures; Projects that are in the bottom 25% of scores over 2 or more years and projects that receive fewer than 60 of 100 possible Review Points may be rejected
- Failure to provide documentation required by the CoC Local Competition for a project application or project review in the time or manner required,
- Applicant choice to voluntarily reallocate all or a part of its award, or
- Funding limits set within the applicable NOFO.

Any criteria applied by the CoC for reducing or rejecting funding requests will be applied equitably to similar projects within the same priority/ranking list, based on project type, performance level, or other standard criteria. Funds claimed by renewal projects that are reduced or rejected will be available to new projects through reallocation.

Section VI: Ranking Projects for the Priority List

River Valleys CoC ranks project applications based on how they improve the CoC System Performance, as required by HUD guidelines for the CoC Program Competition. Ranking based on performance is required in order for projects applications in the CoC to be eligible for Bonus Project funding.

To be eligible for ranking, all applicants and projects (new and renewal) must meet all HUD eligibility criteria, as outlined in the NOFO and must comply with Local CoC Competition requirements as described in this Guide, the Call for Proposals, and project application forms. Projects that meet the eligibility criteria are scored by the Project Performance & Review Committee based on quality, performance capacity, and cost effectiveness. The Committee uses a CoC approved rating tool as the basis for ranking projects for each respective project priority list required by HUD.

A. Ranking Special NOFO Unsheltered Set-Aside Projects (FR-6500-N-25S)

In order to ensure system support for new direct service projects funded in the Special NOFO, all system support projects (HMIS, SSO-CE, and CoC Planning) that are part of the CoC Plan to Address Unsheltered Homelessness will be ranked at the top of the project list, based on their weighted review scores. If system support projects exceed 15% of the total amount of project dollars requested in the Unsheltered Set-Aside, the lowest ranked system support project may be placed below housing projects described in the next paragraph.

All housing projects that are part of the CoC Plan to Address Unsheltered Homelessness are ranked on the CoC Project Ranking Form immediately following system support projects, based on their weighted Review Scores. Projects are ranked in descending order, with highest review scores at top and lowest at bottom.

B. Ranking Special NOFO Rural Set-Aside Projects (FR-6500-N-25S)

In order to ensure system support for new direct service projects funded in the Special NOFO, all system support projects (HMIS and SSO-CE) that are part of the CoC Plan to Address Rural Homelessness will be ranked at the top of the project list, based on their weighted review scores. If system support projects exceed 15% of the total amount of project dollars requested in the Rural Set-Aside, the lowest ranked system support project may be placed below housing projects described in the next paragraph.

All housing projects that are part of the CoC Plan to Address Rural Homelessness are ranked on the CoC Project Ranking Form, based on their weighted Review Scores. Projects are ranked in descending order, with highest review scores at top and lowest at bottom.

C. Ranking Regular NOFO Projects (Special NOFO FR-6600-N-25)

Ranking applies to all project applications, except CoC Planning, which HUD does not require CoCs to rank with other projects. All projects ranked fall into one of two Tiers as described in the HUD Requirements section of this Guide.

1. Housing Projects

All housing projects are ranked on the CoC Project Ranking Form, based on their weighted Review Scores. Projects are ranked in descending order, with highest review scores at top and lowest at bottom. The highest ranked projects whose grant amounts total the Tier 1 ARD minus the HMIS renewal(s), SSO-Coordinated Entry renewal, and newly funded projects will be placed in Tier 1.

If there is a tie between two or more projects, a tiebreaker will be used. The score will be based on cost effectiveness (cost to CoC program funds per positive housing outcome), and will be calculated as follows, with the APR used for project reviews:

- For PSH: $(\# \text{ Stayers} + \# \text{ Leavers to Permanent Housing}) / \text{Total HUD CoC Program funds requested}$
- For RRH and Joint TH/RRH: $\# \text{ Leavers to Permanent Housing} / \text{Total HUD CoC Program funds requested}$

The project with the lower cost per positive housing outcome will be placed one rank higher than the other(s) in order.

If there is still a tie between two or more projects after the cost effectiveness tiebreaker has been applied, a second tiebreaker will be applied based on the percentage of performance points awarded on the Rating Tool. The project that received the highest percentage of performance points will be placed highest of the tied projects, followed by the next highest, and following.

Exceptions to ranking for housing projects that apply in 2022:

- Renewal projects must receive at least 60 Review Points to be accepted and ranked.
- New housing projects awarded in the previous funding round and submitting for a first-time renewal are not scored because the project has not started and has no additional data to provide. First time renewals from FY2021 were fully reviewed and ranked as new applicants in 2021. With verification that threshold criteria for funding are still being met by the project applicants, those projects will be automatically ranked as the last housing projects fully in Tier 1 (just above the HMIS and SSO-Coordinated Entry renewals), in the order they were initially ranked in the Priority Ranking submitted to HUD.
- New projects must receive at least 75% of points possible in the “Capacity to Enhance System Performance” section for the project type and 75% of points possible in the “Serve High Need Populations” section to be placed in Tier 1. New projects that do not meet this threshold will be placed in Tier 2 in the order of points received. (Adjustments to project ranking may still apply per section D below.)

2. Non-Housing Projects

After housing projects are ranked, projects for HMIS and SSO-Coordinated Entry are placed in the ranking as follows, based on CoC policy objectives to ensure a functioning Coordinated Entry System and a Homeless Management Information System (HMIS) as required by HUD. The projects are reviewed annually and affirmed as necessary and

effective by the CoC Coordinated Entry Committee or by the HMIS Governing Board, as applicable.

Assuming that eligible applications are received, HMIS projects totaling a minimum of 2.5% of Annual Renewal Demand (ARD) and Coordinated Entry projects totaling a minimum of 5% of ARD will be ranked in Tier 1 immediately below new housing projects from the previous funding round. Together, HMIS and SSO-Coordinated Entry projects will not exceed 15% of the value of ARD. Amounts in excess of those levels may be placed into Tier 2 or reallocated.

D. Tiers

Once the rank order of projects has been determined, the projects at the top of the list will be in Tier 1 and projects at the bottom of the list may fall into Tier 2.

- Tier 1 is equal to 95% of the CoC's Final Annual Renewal Demand (ARD) minus Annual Renewal Amounts (ARAs) of YHDP projects. In 2022, Tier 1 is calculated as \$2,273,475 in River Valleys CoC.
- Tier 2 is the difference between the CoC's Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus Funds that a CoC can apply for. If all funds are applied for, Tier 2 for River Valleys CoC is estimated at \$527,263.

The CoC reserves the right to re-order the project list or request applicants increase/decrease their budget to best position the River Valleys CoC to receive the maximum overall amount of funding and improve the CoC's homeless response system performance. These adjustments are described in the next section.

E. Adjustments within Project Ranking

After reviewing the full ranking and breakdown by funding tier (if applicable), the Committee may recommend adjustments to the ranking or increase/decrease individual funding requests as described in this guide. The Committee may also make recommendations about which projects should be designated as bonus projects and which should receive reallocated funds (if applicable). Rationale for any adjustment made will be included in the Committee report on ranking, the individual project ranking form (in notification to applicants), and in the Project Priority List posted for public review. In addition, any adjustment applied by the Committee will be applied uniformly across applicable projects.

Reordering for individual projects during ranking may be proposed when:

- A project straddling Tier 1 and Tier 2 would not likely be feasible if only the Tier 1 portion were funded. Reordering in this case cannot reduce the rank for another housing project that would have been ranked fully in Tier 1 if reordering had not occurred.
- Analysis of likely project scores in HUD's review of projects within Tier 2 (as described in the NOFO) indicates that a revised order would result in higher overall scores for projects in Tier 2.
- Comment (with verification) received during the posting period for the proposed project priority list indicates the project was ranked incorrectly.

Reductions in funding requests for individual projects during ranking may be proposed when:

- A project application falls fully or partially below the funding line (below Tier 2 in Regular NOFO ranking), exceeds the HUD-approved Allowed Renewal Amount for the project, or exceeds the total available bonus or reallocated funds according to HUD and CoC rules.
- An HMIS or SSO-Coordinated Entry project exceeds the limits for those project types in Tier 1 and funds are needed for another CoC priority.
- A project in Tier 1 meets any of the thresholds for reduction or rejection AND a second project is straddling Tiers or falling partially below Tier 2. Renewal projects with a history of recaptured funds or low bed utilization will be prioritized for reductions. Reduction of this kind will only be applied during the ranking process if 1) the reduced project can reasonably be expected to continue to operate the project as proposed in the project application, and 2) the amount of the reduction does not exceed the amount of funds necessary to prevent a project from straddling Tiers or falling below Tier 2.
- A new project proposes a significantly higher cost per expected positive housing outcome than other similar projects.
- A new project overlaps with another project of similar target population, geographic service area, and project component type.

Along with the project-specific reorder and reduction considerations listed above, the Committee may also consider the following in adjusting the order (rank) or funding level for the final Project Priority List:

1. Geographic diversity and geographic need. To provide access to CoC-funded housing and services across the CoC region, the Committee will review the project list in terms of potential impact on geographic regions and communities that have greater numbers of homeless households, especially from populations disparately impacted by homelessness. Projects may be reordered or reduced to align greater potential funding with high-need areas.
2. Target population diversity and equity. To advance the CoC goal of ending homelessness for all people, the Committee may review the project list in terms of potential disparate impacts on persons who have a disability or who identify as LBGTQIA+, Hispanic/Latinx, or as Black, Indigenous, or other Persons of Color.
3. Funding diversity
 - a. Grant amounts may be reduced for any single grantee that is proposed to receive more than 30% of funds allocated for the CoC. System-level projects (HMIS and SSO Coordinated Entry) are excluded from calculations.
 - b. Grant amounts may be reduced and projects may be reordered if the overall mix of funding requests represented on the Project Priority List does not move the CoC closer to its optimal mix of program types based on need in the table below or as described in the applicable CoC Plan (Special NOFO projects).

Project Component Type	FY2021		FY2022	
	Current	Optimal	Min T1	Max T1
Permanent Supportive Housing	62.3%	55.0%		
Rapid Rehousing	10.9%	22.0%		
Joint Transitional/ Rapid Rehousing	7.9%	10.0%		
HMIS	2.5%	3.0%	2.0%	15.0%
Coordinated Entry	11.6%	10.0%	5.0%	
Total	100.0%	100.0%		

When adjustments are completed and all rationale is recorded on the project form and the list, the Committee will vote to approve the Project Priority List and present it to the CoC for comment. The proposed Project Priority List must be posted to the CoC website in accordance with HUD's timelines and requirements. Project applicants, COC members, and the general public will be given not less than 48 hours to provide comment. If comments provide verified information that affects project score, the Project Performance & Review Committee may choose to adjust that project's score or rank.

Decisions of the Appeal Review Subcommittee will also be incorporated into the final ranking. All adjustments based on input and appeals will be documented in the Rationale section of the ranking form.

Upon approval by the CoC, the final project priority list, together with a final draft of the Collaborative Application will be posted for CoC review at least two business days before the Collaborative Application is submitted to HUD, or an earlier date if required by HUD in the Notice of Funding Opportunity.

Section VII: Reallocation

Through the reallocation process, the CoC ensures that projects submitted with the CoC Collaborative Application best align with the HUD CoC funding priorities and contribute to a competitive application that secures HUD CoC dollars to address and end homelessness in River Valleys CoC. The CoC will make decisions based on alignment with HUD guidelines, performance measures, and unspent project funds.

A. Criteria for reallocation

The CoC may reduce or reject a funding request from a project applicant. For renewal projects, this is considered reallocation. Reallocation may be required for any of the following reasons:

- Failure to meet any threshold criteria for grantees of the HUD CoC Program;
- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
- Audit finding(s) for which a response is overdue or unsatisfactory;
- History of inadequate financial management accounting practices;
- Evidence of untimely expenditures on prior award;
- Evidence of noncompliance with HUD and/or CoC policies, including coordinated entry and written standards for assistance;
- History of other major capacity issues that have significantly impacted the operation of the project and its performance;
- Timeliness in reimbursing sub recipients for eligible costs. HUD will consider a project applicant as meeting this standard if it has drawn down grant funds at least once per month;
- History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes;
- Failing to consistently meet the CoC performance measures, e.g. low score in the evaluation process;
- Failing to provide documentation required by the CoC Local Competition for a project application or project review in the time or manner required;
- Applicant choice to voluntarily reallocate all or a part of its award; or
- Any reason named in Section VI.D. above.

B. Involuntary Reallocation

Involuntary Reallocations may be initiated by the Project Performance & Review Committee based on any of the criteria above, during the scoring phase or during the ranking phase of project reviews. Whenever possible, reallocation decisions will be made during the scoring phase. The Committee will evaluate and determine if programs will have a full or partial reallocation of funding, based on the extent of compliance or noncompliance with the criteria above. Any reallocation strategy the Committee chooses will be applied for all

projects with the same violation, and rationale will be recorded for inclusion with the Project Priority List.

All funds freed through involuntary reallocations may be made available for one or more new projects.

Project applicants that are subject to partial involuntary reallocation must develop a plan to continue with their renewal project at the reduced level of funding. This includes HUD contract compliance for numbers of persons served and the types of services provided. It may be possible to seek a contract amendment from HUD for some changes; applicants should contact their HUD representative to discuss any options for amendment. If the reduction in funding will result in loss of assistance for persons currently served by the program, the applicant must work with the CoC Coordinated Entry Specialist to develop a transition plan for these persons.

C. Voluntary reallocation

For projects not subject to involuntary reallocation, an applicant may choose to reallocate funds from an existing renewal project.

If the same applicant wishes to apply for a new project using those same funds, the following parameters apply:

- The applicant may choose to reallocate all or a portion of its renewal funds to create the new project.
- The applicant who reallocates renewal funds will have “first rights” to the funds IF the existing (reduced or ended) project scored at or above average for project type in the previous year, and IF the new project proposed is eligible if the NOFO, and IF the new project will meet a high priority project type for the project location (identified in the priorities for reallocation). First rights does not confer any preference in scoring. As a new project, it will be scored and ranked like other similar new projects.
- The applicant may also choose to compete for a portion or all of the funds available to the CoC through involuntary reallocation of other projects or bonus funds, if available.

Project applicants that voluntarily reallocate must submit a plan to continue with the renewal project at the reduced level of funding. This includes HUD contract compliance for numbers of persons served and the types of services provided. It may be possible to seek a contract amendment from HUD for some changes; applicants should contact their HUD representative to discuss any options for amendment. If the reduction in funding will result in loss of assistance for persons currently served by the program, the applicant must work with the CoC Coordinated Entry Specialist to develop a transition plan for these persons.

D. Priorities for use of reallocated and bonus funds

The River Valleys CoC Executive Committee updated the CoC's Reallocation Policy and Priorities, which were approved by the CoC. This policy establishes the CoC's approach to grant reallocation for the 2022 HUD CoC application. Refer to the section above for details on voluntary vs. involuntary reallocation processes.

The following types of projects will be prioritized for reallocated and Bonus funding in FY2022. These are listed below in order of priority:

- a. **New Rapid Rehousing or Joint Transitional Housing/Rapid Rehousing projects**
for identified target populations (youth or older adults) in priority geographies. See detail in Call for New Projects. Preference will be given to projects that leverage other housing subsidies and healthcare resources.
- b. **New Permanent Supportive Housing projects**
for target population (single adults) in priority geographies. See detail in Call for New Projects. Preference will be given to projects that leverage other housing subsidies and healthcare resources.
- c. **New DV Bonus Rapid Rehousing or Joint Transitional Housing/Rapid Rehousing projects**
for areas not already served by DV-focused housing projects. Preference will be given to projects that leverage other housing subsidies and healthcare resources.
- d. **Other eligible projects**
that demonstrate ability to improve system performance measures.

Section VIII: Selections and Award Notifications

All project applicants will be notified of their project status following the process below. In addition, as required by HUD guidance, the CoC membership will be notified regarding specific aspects of project applications submitted in the Local CoC Program Competition.

A. River Valleys CoC Local Competition

New projects: The River Valleys CoC Performance Review and Rating Committee (or a non-conflicted subset of the Committee) will review new project applications using the CoC Project Rating Tools. By the date posted in the Call for Projects, the CoC Committee (via the CoC Coordinator) will provide all new project applicants final notice of project acceptance/rejection, any funding changes, score, rank, Tier 1/Tier 2 status, and source of funds expected for the project (i.e., reallocated funds, CoC Bonus, or DV Bonus). The notification will also include any required changes applicants must make in *e-snaps* to meet project quality thresholds described in the NOFO. All corrections in *e-snaps* must be made and the *e-snaps* project application resubmitted by 4:00pm on the date set in the Call for Projects to be ranked and included in the project list submitted for review in the national CoC Program Competition.

Renewal projects: The River Valleys CoC Performance Review and Rating Committee (or a non-conflicted subset of the Committee) will review renewal project performance data and documentation using the CoC Project Rating Tool and provide scoring and approval to submit renewal project applications.

On or before the date posted in the Call for Projects, accepted renewal projects will be notified in writing of the acceptance and any conditions applied to the project proposal, and those applicants are expected to submit full applications as required in *e-snaps* when the system is opened for project applications. Rejected renewal projects (subject to involuntary reallocation) will receive written notification of that status and are not advised to submit application in *e-snaps*. Renewal projects subject to voluntary or involuntary reallocation (partial or complete) as a result of preliminary reviews will also receive written notification of the amount reallocated and the amount still available to the project, along with any conditions applied to the project proposal.

The List of Eligible Renewal Projects will be published on the CoC website, attached to this Call for Projects notice, and distributed to CoC members and partners via listserv. This notice will also include the minimum amount of reallocated funds available for new projects.

By the date posted in the Call for Projects, the Committee (via the CoC Coordinator) will provide all renewal project applicants final notice of project acceptance/rejection, any funding changes, score, rank, Tier 1/Tier 2 status, and source of funds expected for the project (i.e. reallocated funds, CoC Bonus, or DV Bonus). The notification will also include any required changes applicants must make in *e-snaps* to meet project quality thresholds described in section D.2. All corrections in *e-snaps* must be made and the *e-snaps* project

application resubmitted by 4:00pm on the date set in the Call for Projects to be ranked and included in the project list submitted for review in the national CoC Program Competition.

B. HUD CoC Program Competition

HUD will conduct a threshold review of ranked projects for all CoCs that submit the CoC Consolidated Application by the application deadline. Projects and applicants that do not meet threshold eligibility and capacity requirements set forth in the applicable NOFO will be rejected. HUD may also place conditions on a grant award that must be satisfied before HUD will execute a grant agreement with the applicant for the project.

HUD may issue up to two conditional funding announcements, which have generally occurred between January and March following the CoC Collaborative Application deadline. HUD will score the FY2022 CoC Application portion of the CoC Collaborative Application in accordance with the criteria set forth in the applicable NOFO.

HUD may employ rating panels to review and rate all or part of the CoC Applications according to the rating criteria identified in the applicable NOFO.

Projects with rental assistance, leasing, or operations may be adjusted by HUD during the review process to reflect changes in Fair Market Rents (FMRs) for the project area.

Following the evaluation process, HUD will notify successful applicants of their selection for funding. Notification of project awards will be posted on the HUD website and distributed via the HUD Homeless Assistance Listserv. HUD will notify all other applicants, whose applications were received by the deadline, that have not been chosen for award by email. Award information will be sent by mail to the authorized representative(s) named in form SF424, lines 8 and 21.

Administrative and reporting requirements for successful applicants is outlined in the applicable NOFO.

Section IX: Appeals

Project applicant may submit appeals to the decisions of the Project Performance & Review Committee in certain circumstances where the applicant believes the project application was harmed by a miscalculation on the part of the Committee, a violation of established CoC or HUD policy, or a violation of CoC Program Competition guidelines as defined in this document. Disagreement with the results of a decision that followed appropriate process will be deemed an invalid appeal.

Appeals will be limited to:

1. Verified Conflict of Interest
2. Violation of CoC-established voting policies or procedures
3. Violation of regulations established by HUD
4. Technical error such as mathematical miscalculation by the scoring Committee.
(Errors in data submitted by the applicant do not qualify.)

Projects wishing to appeal related to scoring must submit the appeal in writing using the Appeals form attached by the deadlines set forth in the Call for Projects. All agencies filing an appeal must be prepared to rapidly respond to requests from the committee.

The Appeal Review Subcommittee will assess claims within three business days and communicate decisions on that day via the CoC Coordinator. Decisions of the Appeal Review Subcommittee are final for the purposes of the Local CoC Program Competition. Applicants may review the applicable NOFO for guidelines regarding appeals in the National Competition.

Appendices

Appendix A: Appeal Form (Local Competition)

Agency: _____

Project: _____

For each item appealed, identify the eligible category of appeal, describe the issue, and attach evidence to support your claim.

Eligible Appeal Category	Description of issue	Evidence attached (list)
<input type="checkbox"/> Verified Conflict of Interest <input type="checkbox"/> Violation of CoC-established voting policies or procedures <input type="checkbox"/> Violation of regulations established by HUD <input type="checkbox"/> Technical error such as mathematical miscalculation <u>by the scoring Committee.</u>		
<input type="checkbox"/> Verified Conflict of Interest <input type="checkbox"/> Violation of CoC-established voting policies or procedures <input type="checkbox"/> Violation of regulations established by HUD <input type="checkbox"/> Technical error such as mathematical miscalculation <u>by the scoring Committee.</u>		
<input type="checkbox"/> Verified Conflict of Interest <input type="checkbox"/> Violation of CoC-established voting policies or procedures <input type="checkbox"/> Violation of regulations established by HUD <input type="checkbox"/> Technical error such as mathematical miscalculation <u>by the scoring Committee.</u>		

Certification: I certify that all of the information provided in this appeal request (or any accompanying documents) is correct, accurate and complete to the best of my knowledge. I understand that the decisions of the Appeal Review Committee are final.

Signature

Printed Name

Date

B. Template for List of Eligible Renewal Projects for the 2022 Local CoC Program Competition

**List of Renewal Projects Eligible for
2022 Continuum of Care Program Competition Grants**

Applicant Name	Project Name	Grant Number	Expiration Year	Project Component	Max budget line items						FMR or Actual Rent	Units with RA	Max Grant Amount	Project Review Points*
					Leasing	Rental Assistance	Supportive Services	Operating Costs	HMIS	Admin				

*Project Review Points will be used as the basis for ranking projects per HUD guidelines for the national CoC Program Competition. NA = Project scoring not applicable. Projects recently funded (with no current data to review) and projects for required systems are reviewed and approved separate of housing project scoring.

**List of Renewal Projects NOT Eligible for
2022 Continuum of Care Program Competition Grants**

Applicant Name	Project Name	Grant Number	Expiration Year	Project Component	Leasing	Rental Assistance	Supportive Services	Operating Costs	HMIS	Admin	FMR or Actual Rent	Units with RA	Total Grant Amount	Project Review Points

Total renewal funding approved for existing renewals \$_____