



Lee County
Continuum of Care

Project Ranking and Reallocation Policies and Procedures

**Original Approved by the Lee County
CoC Governing Board on August 3, 2016**

**Original Approved by the Lee County Homeless
Coalition Board on August 20, 2016**

I. Background

The U.S. Department of Housing and Urban Development (HUD) requires the Continuum of Care (CoC) to develop a reallocation process for projects funded with CoC funds. Reallocating funds is an important tool used by CoCs to make strategic improvements to their homelessness system. Through reallocation, the CoC can create new, evidence-informed projects by eliminating projects that are underperforming, or are more appropriately funded from other sources. Reallocation is particularly important when new resources are not available.

The CoC will make all funding decisions based on alignment with HUD guidelines, performance measures, and unspent project funds. Reallocated projects will be encouraged to seek funders that will continue to support the contributions these projects make to the CoC.

II. Reallocation Policy

A. Voluntary Reallocation

A recipient, as defined in 24 CFR §578.3, may voluntarily reallocate its existing project by reducing its project's annual renewal amount in whole or in part, as defined in 24 CFR §578. A recipient that voluntarily reallocates its existing project awards and wishes to create a new, eligible project, may submit a new project application to the Lee County CoC. Solicitation for voluntary reallocation will be sent via email to the currently funded recipients prior to the opening of the CoC competition each year. If necessary, individual meetings will be scheduled with each recipient to discuss project performance, HUD CoC priorities, and other factors that may affect future funding for each project.

B. Involuntary Reallocation

The CoC will make reasonable efforts to ensure that projects are meeting performance standards and fulfilling the requirements of CoC guidelines prior to enforcing involuntary reallocation. If, after reasonable correction efforts have been made, there continues to be deficiencies in project performance, then the CoC Governing Board may recommend the project for involuntary reallocation.

A determination for involuntary reallocation will be made based on the following criteria:

- a. Project performance, which takes into consideration the type of project, its performance relative to that type, community needs, and timely expenditure of funds;
- b. Utilization and effectiveness, which factors bed/unit operating capacity and cost effectiveness relative to project type and population served;
- c. Extent of participation in HMIS, including, but not limited to, bed coverage, data quality, participation in Coordinated Entry; and

- d. CoC funding priorities as detailed in the most recent CoC Notice of Funding Availability (NOFA) and/or other HUD published priority listings, such as CoC Competition Focus.

The CoC Governing Board will evaluate all projects requesting funding using the most recent CoC Program Competition Notice of Funding Availability (NOFA) and determine if any projects eligible for renewal should be reduced or eliminated to develop new projects. The CoC Governing Board will forward the recommendations to the Ranking Committee to be voted upon.

Recipients who administer a project that has been selected for involuntary reallocation through CoC Governing Board recommendation, and Ranking Committee vote, will receive notification, including the reasons for the reallocation, from Human and Veteran Services in writing, outside of *e-snaps*.

C. Appeal Process

Recipients selected for involuntary reallocation may appeal the decision in writing to the Human and Veteran Services Contracts Manager within seven (7) business days after notification of selection for involuntary reallocation. The written notification should provide documentation supporting continued need for the project in question, and an action plan detailing how the project will meet HUD funding priorities and maintain compliance with all applicable laws and regulations.

The Contracts Program Manager will review all appeals and provide a final recommendation within fourteen (14) business days of receipt of the appeal.

D. Reallocated Funds

CoC Program funds made available through involuntary reallocation may be used to develop one or more new projects. Should no viable, new project be identified, CoC Program funds made available through involuntary reallocation may be available for the expansion of other eligible renewal project(s), subject to current CoC funding priorities and HUD NOFA requirements.

E. Eligible Projects

The CoC may use reallocated funds to create the following projects:

1. New permanent supportive housing projects where all beds will be dedicated for use by chronically homeless individuals and families as defined in 24 CFR §578.3;
2. New rapid re-housing projects for homeless individuals and families who enter directly from the streets or emergency shelters, youth up to age 24, and persons who meet the criteria of paragraph (4) of the definition of homeless in 24 CFR §578.3;

3. New Supportive Services Only (SSO) project specifically for a centralized or coordinated assessment system; and
4. New dedicated Homeless Management Information System (HMIS) project for the costs at 24 CFR §578.37 that must be carried out by the HMIS Lead Agency.
5. Other eligible project types stated in the current year HUD CoC NOFA.

III. Ranking Committee

Members of the Human Services Council will serve as the Ranking Committee. The Committee shall convene a minimum of one time per year to fulfill their purpose of ranking CoC applications. Meetings of the Ranking Committee will be open to the public, and will allow time for public comment.

The Collaborative Applicant will ensure that the committee members are provided, and familiar with, all relevant information related to:

- the HEARTH Act;
- the Continuum of Care;
- the role of the Ranking Committee;
- the Policies and Procedures governing the renewal process; and
- the scoring tools and weighting information.

A. Ranking and Review Priorities

The Ranking Committee will rank renewal and expansion project applications according to the following priorities:

1. Project Performance Measures
(Renewal/Expansion Project Rating Tool)
 - a. Exits to Permanent Housing
 - b. Returns to Homelessness
 - c. New or Increased Income
2. Project Effectiveness
(Renewal/Expansion Project Rating Tool)
 - a. High Need Populations Focus
 - b. Cost Reasonableness
 - c. Coordinated Entry Participation
 - d. Housing First and Low Barrier Implementation
3. CoC Standards
(Renewal Application Narratives)

- a. Project Conforms to CoC Written Standards
- b. Project Participates in Coordinated Entry and Adheres to Coordinated Entry Policies and Procedures
- c. Applicant is actively engaged in the CoC
4. Monitoring Criteria
(Renewal Application Narratives)
 - a. Number of Findings/Concerns
 - b. Completion of Corrective Action Plans

The Ranking Committee will rank new project applications according to the following priorities:

1. Experience
(Application Narratives)
 - a. Providing services similar to that proposed in the application.
 - b. Serving the population proposed in the application.
 - c. Using a housing first approach.
 - d. Using federal funds, including timely drawdowns, satisfactory performance, and submission of required reporting.
2. Design of Housing & Supportive Services
(Application Narratives)
 - a. Demonstration of the need for type, scale, and location of housing, and understand of the needs of the population to be served.
 - b. Clear and specific plan to assist clients to secure and maintain permanent housing.
 - c. Clear and specific plan to assist clients to increase income.
3. Timeliness and Financial Capacity
(Application Narratives)
 - a. Clear and specific plan for program implementation.
 - b. Cost per person served is reasonable.
 - c. Organizations most recent audit indicated no findings.
 - d. Sufficient match documentation.
 - e. Budgeted costs are reasonable, allocable, and allowable.
4. Project Effectiveness
(Application Narratives)
 - a. High Need Populations Focus
 - b. Coordinated Entry Participation
 - c. Housing First and Low Barrier Implementation

B. HUD and CoC Threshold Requirements

The Collaborative Applicant will review all project applications to ensure that all HUD and CoC threshold requirements have been met. The Collaborative Applicant will determine if missing threshold requirements are correctable or in-correctable deficiencies. Any project

application with a correctable deficiency must be reviewed and ranked. Projects applications with in-correctable deficiencies will not be ranked and the project applicant will be notified prior to the Ranking Committee Meeting.

C. Renewal Application Ranking Materials

Each agency seeking CoC funding is required to submit a Renewal Application to the Collaborative Applicant not less than thirty (30) days from the CoC submission deadline. The Collaborative Applicant shall collect applications and schedule a meeting with the Ranking Committee.

At least one week before the meeting, the following materials will be provided to the Ranking Committee for review:

- NOFA summary sheet,
- Ranking Tool, and
- Project Applications.

Correspondence and ranking materials will be distributed by email from the Collaborative Applicant unless otherwise requested by the Ranking Committee.

Unless there is an unforeseen delay, the Ranking Committee shall have no less than seven (7) days to review all project materials. During this time, each member of the Ranking Committee shall complete an individual rating tool, determining point levels for each application. Each member shall bring the rating tool to the Ranking Committee Meeting for discussion and final project ranking.

D. Ranking Committee Meeting

The Ranking Committee Meeting will be moderated by the Collaborative Applicant. Initial point averages will be determined, after which time general discussion on the Summary Sheets and average will occur. The Ranking Committee shall determine the final point value and ranking of the projects.

E. Publication of Ranking Process

This ranking process is available on the Lee County Human and Veteran Services webpage: <https://www.leegov.com/dhs/funding/coc>.

The final ranking results and project applications will be made available on the Lee County Human and Veteran Services' webpage: <https://www.leegov.com/dhs/funding/coc>, within seven (7) business days after the final Ranking Committee Meeting.