



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**

I. RECORD OF CHANGES

Version	Reason for Change	Date Approved by Governing Board	Signature of Board Chair or Co-Chair
Original	Approved by CoC Governing Board	08/03/2016	See Original
Original	Approved by Homeless Coalition Board	08/20/2016	See Original
1	Combined Ranking and Reallocation Procedures, added appeal process	By CoC Governing Board:	SEE ORIGINAL
1	Combined Ranking and Reallocation Procedures, added appeal process	By Ranking Committee:	SEE ORIGINAL
2	Updates to reflect changes from ranking committee to Performance, Evaluation, and Ranking Committee, a sub-committee of the CoC Governing Board, and to include project-ranking policies for all competitive funding used to address homelessness.	By Ranking Committee: 1/23/2019	1/23/2019
2	Review and approval of changes noted above.	By CoC Governing Board: 2/13/2019	2/13/2019
3	Incorporation of Appeal Polices	By CoC Governing Board:	2/17/2021

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III. 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.

Reallocation provides CoC's with the opportunity to 1) reallocate excess funding and 2) to move funding from low performing projects to new projects with the intent that the new project(s) will be higher performing. Reallocation can be either done through voluntary or involuntary reallocation based on a CoC's published reallocation process. HUD examines and considers a CoC's ratio of reallocation when scoring a CoC's Application, as it demonstrates to HUD that CoC's are consistently evaluating the effectiveness of the funding awarded to a CoC's projects and working to ensure that all HUD CoC funded projects are being used to ensure homelessness is rare, brief, and one-time.

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.

IV. 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 an existing project and wishes to create a new, eligible project, may submit a new project application to the Lee County CoC. Solicitation for voluntary reallocation made during that annual Request for Application process prior to the opening of the CoC competition. 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 Performance Evaluation and Ranking Committee (here in known as “the Committee”, a sub-committee of the CoC Governing Board, will evaluate all projects requesting funding in consultation with Collaborative Applicant staff, the most recent CoC Program Competition Notice of Funding Availability (NOFA), HUD System Performance Measures, CoC Strategic Plan, and other funder priorities to determine if any projects eligible for renewal should be reduced or eliminated to develop new projects. The Committee will forward the recommendations to the CoC Governing Board to be voted upon.

Recipients who administer a project that has been selected for involuntary reallocation will receive notification, including the reasons for the reallocation, from the Collaborative Applicant in writing, outside of *e-snaps*.

C. Reallocation Appeal Process

Recipients selected for involuntary reallocation may appeal the decision in writing to their Contract 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 Joint Component projects, which includes Transitional Housing (TH) and Rapid Re-Housing (PH-RRH) in a single project to serve individuals and families experiencing homelessness, as defined in 24 CFR §578.3.
5. 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.
6. Other eligible project types stated in the current year HUD CoC NOFA.

V. PROJECT PERFORMANCE EVALUATION AND RANKING PROCEDURE

Members of the Performance Evaluation and Ranking Committee, a sub-committee of the CoC Governing Board, (herein referred to as “the Committee”), will serve as the Ranking Committee for all CoC and DCF Homeless Funding. The Committee shall convene a minimum of one time per quarter to review project performance, make reallocation recommendations, and rank funding applications. Meetings of the 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 Committee;
- the Policies and Procedures governing the application and renewal process; and
- the scoring tools and weighting information.

A. Project Priorities

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

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

B. Threshold Requirements

The Collaborative Applicant will review all project applications to ensure that all threshold requirements have been met. The Collaborative Applicant will determine if missing threshold requirements are correctable or in-correctable deficiencies/fatal flaws. Any project application with a correctable deficiency must be reviewed and ranked. Projects applications with in-correctable deficiencies/fatal flaw will not be ranked and the project applicant will be notified prior to the Committee meeting.

C. Application Ranking Materials

Each agency seeking CoC and/or DCF funding is required to submit an Application to the Collaborative Applicant by a specified deadline, which is not less than thirty (30) days from the CoC submission deadline. The Collaborative Applicant will collect applications and schedule Committee meetings, as necessary to meet funder deadlines.

At least 5 days before the meeting, the following materials will be provided to the Ranking Committee for review:

- a summary sheet providing an overview of the requirements and priorities for funding,
- Ranking Tool, and
- Project Applications.

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

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

D. Committee Meetings

Meetings of the Committee will be conducted at least one-time per quarter, and may be more often as necessary to meet funding deadlines. The meetings will have two purposes, 1) to conduct ongoing evaluation of project performance, and 2) to rank funding applications for CoC, ESG, and DCF Homeless funding.

1. Ongoing Performance Evaluation Meetings

Committee meetings, at which project performance will be evaluated, will be moderated by the Committee chairperson. The meeting will include a review of project report cards, and general discussion regarding project performance and spending. During discussion, Committee members may ask questions of representatives from funded agencies, Collaborative Applicant Contract Managers, and/or HMIS staff regarding project performance. The Committee will use information reviewed and gathered during these meetings to make reallocation recommendations to the CoC Governing Board.

2. Project Ranking Meetings

Committee meetings, at which projects applications will be ranked, will be moderated by the Collaborative Applicant. The meeting will include general discussion regarding project priorities, performance and applications. During discussion, Committee members may ask questions regarding specific project applications, past performance of applicants, and community priorities. After the completion of discussion, public comment will be allowed in accordance with Robert's Rules of Order. After the conclusion of public comment, the Committee shall determine the final point value and ranking of the projects using the ranking tool. All scores will be read aloud and confirmed by Collaborative Applicant staff.

E. Notification of Project Score

Applicants will be notified of the score and conditional selection or rejection of project applications within five (5) business days after the Committee meeting at which projects were ranked. The notification will be sent via e-mail from the collaborative applicant.

F. Notice of Funding Availability Appeal Process

All eligible applicants have the opportunity to appeal both their preliminary ranking prior to the ranked list being finalized and approved by the CoC. An appeal can only be made by an applicant regarding the scoring of its own application. The Performance Evaluation and Ranking Committee will only review applications a second time if an applicant requests an appeal in writing within 3 business days of the notification of preliminary ranking. Applicants will receive summary scoring information with notification of preliminary ranking. Individual ranking committee member scores will not be released to applicants.

Note: Project Applicants that have been found to not meet the threshold requirements are not eligible for an appeal.

1. The Appeals Process

- Any and all appeals must be received in writing with supporting documentation within three (3) business days of the notification of ranking to projects.
- All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed.
- The notice of appeal must include a written statement specifying in detail the grounds asserted for the appeal. The appeal must include a copy of the application and all accompanying materials submitted to the Performance Evaluation and Ranking Committee. No additional information can be submitted. The appeal is limited to one single spaced page in 12-point font in the form of a letter on the applicant's agency's letterhead and must clearly state the reasons for the appeal and specify all issues being contested.
- All valid appeals will be read, reviewed, and evaluated by the Performance Evaluation and Ranking Committee.
- The Performance Evaluation and Ranking Committee will meet to deliberate the appeal.
 - The Performance Evaluation and Ranking Committee will review the preliminary rankings made by only on the basis of the submitted project application, the one page appeal, any statements made during the appeal process, and the material used by the Performance Evaluation and Ranking Committee. No new information can be submitted by the Project Applicant appealing or reviewed by the Performance Evaluation and Ranking Committee.
 - The decision of the Performance Evaluation and Ranking Committee must be supported by a simple majority vote of the CoC Governing Board.

- The appealing agency will receive a written decision of the Performance Evaluation and Ranking Committee within two (2) business days of the Performance Evaluation and Ranking Committee Meeting.
- The decision of the Performance Evaluation and Ranking Committee will be final.

G. Application Debriefing

An agency may request a debriefing of their reviewed application, whether or not the project was chosen to be funded. This must be a written request within five (5) business days of preliminary ranking notification or final appeal decision. Application debriefing will be a summary of the review committee's feedback on the project. This information is not eligible to be used for an appeal, but is intended to be informative for the agency.

H. Publication of Ranking Process

This ranking process is available on the Lee County Human and Veteran Services webpage: <https://www.leegov.com/dhs/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/coc>, within fourteen (14) business days after the Committee Meeting, at which projects were ranked.