CoC Review, Ranking, and Selection Policies **2024**

**Introduction**

Annually, the U.S. Department of Housing and Urban Development (HUD) holds a national competition for Continuum of Care (CoC) Program funds. This competition brings funds into Winnebago, Boone, and DeKalb County to provide housing and services to individuals and families who are experiencing homelessness.

The City of Rockford (COR), the Collaborative Applicant for the Winnebago, Boone, and DeKalb County CoC, is the lead agency responsible for completing and submitting the Consolidated Application for funding on behalf of the CoC. The Consolidated Application consists of a CoC Application, Priority Listing, and Project Applications.

COR is soliciting Local Applications for new and renewal CoC projects through a funding notice; applicants are required to submit a Local Application by the deadlines determined. Renewal and new projects will be reviewed, scored, and ranked according to the process described below.

In alignment with the [FY2024 CoC Notice of Funding Opportunity (NOFO), all](https://www.hudexchange.info/news/fy-2022-coc-program-competition/) projects must be scored, rated, and ranked other than CoC Planning Grant.

For the FY2024 competition, new projects may be created through reallocation and/or bonus funding. The CoC is soliciting the following types of new projects:

- New Permanent Supportive Housing (PSH) projects with a priority for Single Adults (a diagnosed disability is required for PSH)

- New Rapid Rehousing (RRH) projects for individuals, including unaccompanied youth, and families who are living in places not meant for human habitation and in emergency shelters, and individuals and families who meet the criteria of paragraph (4) of HUD’s definition of homeless;

- New Joint Component Transitional Housing-Rapid Rehousing (Joint Component) projects for

individuals, including unaccompanied youth, who are living in places not meant for human habitation and in emergency shelters, and individuals and families who meet the criteria of paragraph (4) of HUD’s definition of homeless; and

- DV Bonus projects for survivors of domestic violence, dating violence, and stalking for Rapid Rehousing (RRH) projects and Joint Transitional Housing & Rapid Rehousing (Joint TH-RRH) projects.

To meet the basic criteria to apply, you must meet the following threshold:

Federal Threshold Criteria: Active SAM registration; Valid UEI number; Nonprofit documentation; Not disbarred and otherwise federally qualified; Financial capacity and sufficient financial management system; and Code of Conduct on file with HUD.

CoC threshold criteria: Meet the application deadline; HMIS participation; Coordinated Entry participation; Qualified Housing type; Housing first; documented minimum match; Race Equity and Anti-discrimination policy.

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| **Process for Reviewing, Ranking, and Selection** |
| The FY2024 CoC Program NOFO instructs Continuums to rank projects into two (2) tiers. HUD  conditionally selects projects in Tier 1 from the highest scoring CoC to the lowest scoring CoC, provided that project applications passed both eligibility and threshold review. HUD then awards projects in Tier 2 based on points received using a 100-point scale; points are awarded based upon the CoC Application score, CoC project ranking, project type, and commitment to policy priorities.  For the FY2024 CoC local competition, COR developed Scoring Instructions to measure project performance and capacity using objective scoring criteria, including the HEARTH Performance Measures. The CoC Board will review and approve the FY2024 CoC project review process. The Board approved the Scoring Instructions (Rating Criteria) and Review, Ranking, and Selection Policies for **September 5, 2024.** The Ranking & Scoring Committee, an independent body, is responsible for reviewing project scores and ranking projects according to the approved Scoring Instructions and Review, Ranking, and Selection Policies. The PRC will rank projects and make recommendations to the CoC Board, which has the authority to approve or reject these recommendations. |
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| **Ranking Policies** |
| These Ranking Policies are consistent with HUD’s policy priorities and aligns with local priorities and needs:  1. Policy priorities:  a) Ending homelessness for all persons  b) Use a Housing First Approach  c) Reducing Unsheltered Homelessness  d) Improving System Performance  e) Partnering with Housing, Health, and Service Agencies  f) Racial Equity  g) Improving Assistance to LGBTQ+ Individuals  h) Persons with Lived Experience  i) Increasing Affordable Housing Supply  2. HMIS and Coordinated Entry projects will be listed first in Tier 1 because they are required  elements of our CoC system.  3. Renewal projects will be ranked in Tier 1 to the extent possible, unless there are justifications for ranking the project lower, such as poor performance or a failure to meet HUD priorities or  local needs.  4. Renewal projects will be given preference over new projects, unless the ranking & Scoring Committee determines the project meets both HUD priorities and local needs by improving the CoC’s outcomes and reducing homelessness more effectively than a renewal project(s).  5. If a renewal is in its first year of operation and has at least 6 months of data,  the data can be estimated for the 12 month period. If the project has not started prior to the reporting period or has not been in operation for a minimum of 6 months, then they will ranked according to their “priority” but below those with the same priority (and the ranking in #7).  5. Re-allocations should be treated as new projects. In the event of a reallocation due to a change in recipient/sub-recipient, then the Ranking & Scoring committee can rank it as a “renewal”, if there is outcome information available. |
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6. Re-allocations should be treated as new projects. In the event of a reallocation due to a change in recipient/sub-recipient, then the Ranking & Scoring committee can rank it as a “renewal”, if there is outcome information available.

7. a) In the event that two (2) or more projects (of any type) receive the same project score, the following tie-breaking rank order will be applied to aid in the ranking of projects. The ranking shall be applied by intervention type, in order of precedence below: (Example: PSH shall be ranked highest)

i. Permanent Supportive Housing Projects (PSH)

ii. Rapid Rehousing Projects (RRH)

iii. Joint Transitional Housing - Rapid Rehousing Projects (TH-RRH)

b) In the event that the criterion in 7.a above fails to break the tie, the following tie-breaking criteria will be applied to aid in the ranking of projects when no other distinguishing data and/or information is available.

• The projects in question will be re-scored using the applicable HMIS-generated scoring criteria, but for the most recent 12-month period for which data is available.

*Example:* If the initial data examined was for the period July 1, 2020 to December 31,

2021 (per the Rating Criteria), the projects will be re-scored using the most recent 12- month period for which data is available. If today’s date is June 1, 2022, the period examined will be June 1, 2021 to May 31, 2022.

**Process for Reallocating**

HUD encourages CoCs to strategically allocate resources using cost, performance, and outcome data to improve how resources are utilized to end homelessness; this strategic allocation of resources may include the reallocation of resources whenever doing so will better help to end homelessness.

***POLICIES FOR REALLOCATION***

New projects can be created through reallocation. This allows CoC’s to reallocate part or all of a renewal project’s funding in order to create one or more new projects that meet both HUD priorities and local needs by improving the CoC’s outcomes and reducing homelessness more effectively than the reallocated renewal project.

The reallocation of funds and/or project(s) may occur in the following circumstances:

- The applicant makes the determination to not submit an application for a renewal project (includes

applicants who wish to make a change in recipient/sub-recipient)

- Due to poor performance or other justifications based on a failure to meet HUD priorities or local needs:

o The Ranking & Scoring Committee recommends that a renewal project is not submitted to HUD in the annual competition, or

o The Ranking & Scoring Committee recommends that a renewal project is submitted to HUD in the annual competition, but at a reduced funding request.

***PROCESS FOR REALLOCATION***

The Ranking & Scoring Committee, using approved Rating Criteria and Review, Ranking, and Selection Policies, reviews and ranks projects and makes recommendations for reallocation. All recommendations by the Ranking & Scoring Committee must be ratified by the CoC Board.

***NOTIFICATION TO APPLICANT OF REALLOCATED PROJECT***

The applicant of a project recommended for reallocation is notified, in writing, via email and letter.

Notification must occur within the timeframe established by HUD, and no later than fifteen (15) days before the CoC Consolidation Application submission deadline to HUD.

**Appeal Process**

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Once the CoC Board approves the Ranking & Scoring Committee recommendations, the ranking and funding decisions are deemed final for the local competition.

Per the HUD FY2024 CoC NOFO, eligible project applicants that believe they were denied the right to participate in the CoC grant process in a reasonable manner, may submit a solo project application to HUD and may be awarded a grant from HUD by following the procedure found in 24 CFR 578.35. Solo applicants must submit their solo project application in eSNAPS to HUD by 8:00 PM EDT, on October 30, 2024. See the NOFO for additional information regarding the Solo Applicant appeal process.

**Grievances**

If at any stage of the local CoC competition a potential, new, or renewal applicant or subrecipient have questions or concerns with the transparency, fairness, or compliance concerns of the process, they should submit this grievance or concern in writing to the Chair of the CoC Board, Todd Kisner-Winnebago County Health Department, or to Angie Walker at the City of Rockford. Depending on the nature and topic of the complaint, the CoC and/or the Collaborative Applicant will provide swift due diligence to respond to the grievance and act according to local or federal established procedures.