

HUD CoC Grant Competition and Evaluation:

- a. CoC Collaborative Applicant: The CoC Lead Agency serves as the CoC's Collaborative Applicant for the annual HUD CoC grant competition. As Collaborative Applicant, the CoC Lead coordinates the local CoC grant competition including:
 - i. Completing the annual CoC Program Registration to HUD
 - ii. Creating a competition timeline - reviewed and approved by the CoC Board prior to posting and sharing publicly
 - iii. Recruiting and training the CoC Performance Committee members.
 - iv. Collecting CoC Project Applications, doing a technical review to ensure applicants meet HUD project thresholds, and leading the Rank & Review process with the CoC Performance Committee.
 - v. Writing the CoC Consolidated Application with assistance from CoC members.
 - vi. Submitting a draft of the full CoC Consolidated Application and Priority Listings to the CoC Board for approval. The CoC Board approves the full CoC Consolidated Application and Priority Listings prior to them being posted on the Collaborative Applicant's website. The Collaborative Applicant posts the full Consolidated Application and Priority Listings on their website and notifies the full CoC membership prior to final submission in accordance with HUD instructions.
- b. CoC Performance Committee: Committee members evaluate project applications, review project performance, and submits rank order priority listing and final funding requests in the Consolidated Application for CoC funding, consistent with current HUD guidelines. The Committee must include at least 3 members, at least 1 member with lived experience of homelessness. Responsibilities include:
 - i. Reviews and updates the Rank & Review scoring tool and local application each year to align with HUD priorities described in the current year's Notice of Funding Opportunity and local priorities identified in the most recent CoC Needs Assessment.
 - ii. Scores and ranks project applications and submits them to Collaborative Applicant to submit as the CoC Priority Listing.
 - iii. Note: the HMIS Lead Agency's HMIS renewal application will be ranked in Tier 1 as this is an ongoing CoC need. Any request for HMIS expansion will be ranked with other projects and scored based on local CoC priorities.
 - iv. CoC Board conducts a CoC Needs Assessment at least every 2 years.
- c. Applicant Notification: CoC Project applicants are notified of their ranking by timeframe defined by the NOFO. If an applicant wants to appeal this decision, they submit a written appeal to the CoC Board and the CoC Board makes a final decision on the appeal and any change to the Priority Listing prior to submission.
- d. Reallocation: Reallocation refers to shifting Continuum of Care funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's Annual Renewal Demand. New Projects created through reallocation must meet, at a minimum, the requirements set forth in the annual CoC Notice of Funding Opportunity (NOFO) and project eligibility and project quality thresholds established by HUD. Each CoC funded project will be evaluated annually using specific information to include but not be limited to: data entered into HMIS (or comparable database), HUD Annual Performance Report (APR), Point in Time (PIT) Count, Housing Inventory Count (HIC), the CoC project application, cost

reasonableness, HUD CoC system performance measurements, other HUD recommended data tools, and local needs assessments. Reallocation may be self-initiated by a CoC-funded agency (voluntary) or initiated by CoC Leadership (involuntary). CoC funded projects may reallocate all or part of their funding. The reallocation process will be transparent, equitable, and data-driven with an emphasis on local needs.

- i. **Voluntary Reallocation:** A CoC renewal project grantee may choose to voluntarily reallocate all or a portion of their renewal grant amount if (1) the grantee is no longer interested in continuing the project or part of the project or (2) the grantee no longer needs the CoC funding as other funding is available for the project or part of the project.
Procedures:
 1. The grantee will notify the CoC Lead Agency as soon as possible. This should be documented in a letter signed by the grantee's Executive Director and submitted to the CoC Lead Agency before the annual HUD CoC grant competition or at the beginning of the competition in the grantee's Letter of Intent.
 2. The CoC Lead Agency will notify the CoC Board. The CoC Board will discuss the reallocation request and take formal Board action. As confirmed by the CoC Board, the CoC Lead Agency will notify the full CoC of the reallocated grant amount and the ability to accept new and expansion project requests up to the full Annual Renewal Demand.
- ii. **Involuntary Reallocation:** The CoC Board may determine that involuntary reallocation is necessary if a CoC-funded project shows a pattern of poor performance for more than one funding cycle. Underperforming projects are defined as those which are found during the annual performance review process, or otherwise known to not meet the following CoC funding objectives:
 - **Project Capacity** – Underperforming projects may include those which fail to make effective use of project capacity. This may be seen through unspent funds, untimely expenditures, or other issues which significantly impact project operations and performance.
 - **Financial Management** – Underperforming projects may include agencies or projects with audit findings for which a response is overdue or unsatisfactory, have outstanding funds, show a misuse of funds, or untimely drawdown of funds.
 - **Performance Outcomes** – Underperforming projects may show poor data quality within HMIS, unmet performance outcomes within their most recent Annual Performance and Housing First Evaluation (see below).

Procedures for Involuntary Reallocation:

1. If a CoC Project is still underperforming during the Annual Performance Evaluation after a Performance Improvement Plan, the CoC Lead Agency will notify the CoC Board to determine the need for an involuntary reallocation. If the CoC Board decides to partially or fully reallocate a CoC project's grant, the CoC Project will be notified before the beginning of the CoC funding cycle unless reallocation is deemed necessary during the funding cycle because of a substantial change in HUD priorities documented in the Notice of Funding Opportunity. During the CoC funding cycle, new and expansion project applications will be accepted.