

## COC NOFA AD HOC WORK GROUP REVIEW AND RANK PROCESS RECOMMENDATION

The Review and Rank Process that is used to review and evaluate all CoC project applications submitted in the local competition.

### GENERAL PROCESS

Prior to NOFA release:

- The CoC NOFA Ad Hoc Work Group (“NOFA Group”) meets, reviews, and revises the process and scoring materials.
- The NOFA Group makes recommendations to the CoC Committee and CoC Board for review and approval.
- The CoC Committee and CoC Board review and approve a process and scoring materials, subject to necessary changes due to the NOFA.
- The Collaborative Applicant (MAG) recruits a non-conflicted Review and Rank panel. The panel should (strongly recommended) include at least one CoC Board member (more if possible) and a non-conflicted provider (ideally a provider with experience administering federal, non-CoC grants), with a focus on having a diverse Panel and some Panel consistency from year to year. Panelists sign conflict of interest and confidentiality statements.
- A Collaborative Applicant representative attends Review and Rank panel meetings to act as a resource.

After the NOFA is released:

- Project applicants are invited to attend launch session; CoC Program requirements, process and timeline are explained. Deadlines are clearly outlined. Scoring tools and application materials are reviewed.
- Applications are prepared and submitted.
  - Applications received after the deadline will not be accepted.
  - Incomplete applications cannot be cured for Review Panel scoring, but must be corrected prior to HUD submission. The original application (not the copies) will be examined to determine if all pieces of the application have been submitted.
- Collaborative Applicant finalizes Review Panel membership and prepares final information for Review Panel.

- Review Panel members are oriented to process, trained, receive applications and review materials and then over a one- to two- week period review and score applications.
- CoC staff ensures all applications pass Threshold Review (additional detail below).
- Review Panel members meet to jointly discuss each application and conduct short interviews with applicants. The purpose of the in-person interviews is to: 1) have questions answered about projects and/or applications; 2) provide feedback to applicants on ways to strengthen their application; 3) review applicant's and committee's scoring sheets to ensure consistency.
  - Renewal projects that score less than 50% of total points will be flagged for review. The Review Panel will recommend that such projects be reallocated in favor of a new project that is aligned with HUD's priorities. (Insert HUD-eligible project language for the year).
  - The Review Panel may recommend that projects with consistently low scores, fewer than 50% of total points, should be considered for reallocation in favor of a new project aligned with HUD's priorities.
  - If a transitional housing project voluntarily reallocates its funding and submits a new project application to use those funds for permanent housing, the funds shall be awarded to that project provided that the application is at least comparable in quality to other applications of the same component type.
- Projects are given feedback from Panel on quality of application and ways to strengthen the application before submission to HUD.
- Renewal HMIS Projects undergo a threshold review and project evaluation by the Performance Standards and Data Quality (PSDQ) Group. The PSDQ Group will provide feedback to the Review and Rank panel on their evaluation of the HMIS project.
- Applications for CoC Planning funds are reviewed by the Review and Rank Panel.
- Scoring results are delivered to applicants with a reminder of the appeals process. Only projects receiving less funding than they applied for or that are placed in Tier II may appeal, and only on the basis of fact. Any projects eligible to appeal will receive a complete breakdown of scores awarded for each factor as well as a complete list of the recommended project ranks and scores. A non-conflicted work group of the CoC Board will hear appeals. To provide information and support, MAG staff and one member of the original Review Panel will attend the appeals panel to provide information but will not be members of the appeals panel or have a vote.
- Appellate hearings, if any.
- Emergency Procedure: MAG staff will do everything possible to ensure that an application is submitted to HUD for all funds possibly available to the community. Therefore, if/when all on-time applications have been submitted and it appears that the community is not requesting as much money as is available from HUD, then the

CoC staff may solicit additional applications. In addition, if, after the Review Panel has reviewed applications and made priority determinations, an applicant decides not to submit their application to HUD, MAG staff will do everything possible to submit applications for the full available amount, with projects representing HUD priorities.

- The CoC Board will consider/approve rank order of new projects and submission of renewals.
- Consolidated Application is made available to community for inspection on MAG's website.
- Consolidated Application is submitted to HUD.
- Stakeholders are advised that the application has been submitted.
- Projects have opportunity to debrief scores with CoC staff. All projects are welcome to request a debriefing and receive a complete breakdown of their scores within 30 days.
- 2015 Process Debriefing.

### APPEALS PROCESS

The Review and Rank Committee reviews all applications and ranks them for funding recommendations to HUD. That ranking decision is communicated to all applicants by email within 24 hours of the determination. All applicants are hereby directed to contact Anne Scott at (602) 254-6300 ([ascott@azmag.gov](mailto:ascott@azmag.gov)) if no email notice is received.

#### 1. Who May Appeal

An agency may appeal an "appealable ranking decision," defined in the next paragraph, made by the Review and Rank Committee concerning a project application submitted by that agency. If the project was submitted by a collaboration of agencies, only one joint appeal may be made.

#### 2. What May Be Appealed

"An appealable ranking decision" is a decision by the Review and Rank Committee that (a) reduces the budget to a lower amount than applied for, (b) ranks the project in Tier 2, or (c) recommends the project for reallocation.

#### 3. Timing

The ranking decision is communicated to all applicants within 15 days of the NOFA due date. Applicants have until 12:00 p.m. on the day after the CoC Board funding decision to decide if they are going to appeal and contact Anne Scott at (602) 254-6300 ([ascott@azmag.gov](mailto:ascott@azmag.gov)) for more information, with a formal written appeal (no longer than 2 pages). If an appeal will be filed, other agencies whose rank may be affected will be notified

as a courtesy. Such agencies will not be able to file an appeal after the appeals process is complete. They may file an appeal within the original appeals timeline.

#### 4. Initiating the Formal Appeal

The Formal Appeal must be submitted by 12:00 p.m. the day after the CoC Board funding decision. The appeal document must consist of a short, written (no longer than 2 pages) statement of the agency's appeal of the Review and Rank Committee's decision. The statement can be in the form of a letter, a memo, or an email transmittal.

The appeal must be transmitted by email to Anne Scott ([ascott@azmag.gov](mailto:ascott@azmag.gov)).

#### 5. Members of the Appeal Panel

A three-member Appeals Panel will be selected from the CoC Board or its designees. These individuals have no conflict of interest in serving, as defined by the existing Review and Rank Committee conflict of interest rules. Voting members of the Appeal Panel shall not serve simultaneously on the Review and Rank; however, a Review and Rank Panel member and a MAG staff person will participate in the Appeals Panel to inform discussion.

6. The Appeal Process, Including Involvement of Other Affected Agencies  
The Appeal Panel will conduct an in person or telephone meeting with a representative(s) of the agency/collaborative who filed the appeal to discuss it, if needed. The Panel then will deliberate. The Appeal Panel will inform appealing agencies of its decision.

The CoC Board or its designee will approve the final project list for submission. The decision of the CoC Board will be final.

#### **Reallocation**

It is possible that funds will be reallocated from projects that will not receive renewal funding, or who's funding will be reduced. This is a recommendation made by the Review and Rank Panel, and approved by the Board, and will be based on HUD priorities and CoC Board funding priorities. When considering reallocation, the Review and Rank Panel will:

- Consider unspent funds and the ability to cut grants without cutting service/housing levels
  - Panel members will receive guidance about the limitations related to spending CoC funds.
  - For projects receiving leasing or rental assistance, information about unspent funds will be presented together with information about agency capacity (serving the number of people the project is designed to serve).
- Consider history of reductions (e.g., if grant reduced one year, will not be apparent in spending the following year)
- Consider alternative funding sources available to support either new or renewal project(s) at-risk of not being funding
- Consider renewal HUD "covenant" concerns

- Consider impact on consolidated application's score
- Consider impact on the community in light of community needs
- Consider non-compliance issues identified during the Review and Rank process or project monitoring
- Consider projects with consistently low scores

The impact of this policy is that high scoring projects may be reallocated if these considerations warrant that decision. In addition, if a project receives less than 50% of total points, then the Panel should strongly consider reallocation of funding.

### Threshold

In addition to the scoring criteria, all renewal projects must meet a number of threshold criteria. A threshold review will take place prior to the review and rank process to ensure baseline requirements are met. All renewal projects must meet the following thresholds. If threshold criteria is not met, the Review and Rank Panel and the CoC Board will be notified to determine severity of non-compliance with threshold criteria and action needed:

- Project must have full and active HMIS participation, indicated by every HMIS user of the project completing training and/or passing the annual HMIS recertification exam (implemented in April 2015), unless the project is a victim services agency.
- Project must participate (or agree to participate) in Coordinated Entry (to the capacity the Coordinated Entry system is built out in the community)
  - *Per HUD contracts, contractors are required:  
To use the centralized or coordinated assessment system established by the Continuum of Care as set forth in §578.7 (a) (8). A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system, provided that victim service providers in the area use a centralized or coordinated assessment system that meets HUD's minimum requirements and the victim service provider uses that system.*
- Project must meet applicable HUD match requirements (25% for all grant funds except leasing).
- Project must report point in time bed or unit utilization rate during the operating year (percent reported in the APR – average of four point-in-times in the APR). Low utilization must have a valid explanation as well as the plan to increase the utilization rate.
- Project must be responsive to outstanding or pending HUD program monitoring findings. If there are currently unresolved monitoring issues, the program must fully describe and explain the agency's plan to resolve them.
- Project must be able to meet the HUD threshold requirements for renewal projects including that there are none of the following:
  - 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;
- History of other major capacity issues that have significantly impacted the operation of the project and its performance;
- History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly;
- History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established time frames.
- History of non-compliance with HUD CoC Program funding requirements, defined in the HEARTH Act and/or NOFA.
- Program components and project types must meet HUD funding contracts and program regulations, refer to HUD's HEARTH Act and/or HUD's SHP Desk Guide for guidance on project regulations.