

## REVIEW AND RANK PROCESS

CoC Board Approved 5/22/2017

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

### GENERAL PROCESS

Prior to NOFA release:

- The CoC Board in consultation with the CoC Committee will conduct a formal needs assessment by reviewing all available data sources to determine community needs and gaps in resource portfolios.
- The CoC Board meets, reviews, and revises the process and scoring materials.
- The CoC Board reviews and approves a process and scoring materials, subject to necessary changes due to the NOFA.
- The Collaborative Applicant (MAG) recruits a non-conflicted Review and Rank Subcommittee (Subcommittee). The process for recruitment and selection will be transparent to the members of the CoC. The Subcommittee should include at least one non-conflicted provider (ideally a provider with experience administering federal, non-CoC grants), with a focus on having a diverse Subcommittee and some Subcommittee consistency from year to year. CoC Board members are prohibited from serving on the Subcommittee. Members sign conflict of interest and confidentiality statements.
- A Collaborative Applicant representative attends Subcommittee meetings to act as a resource.

After the NOFA is released:

- The Collaborative Applicant will convene an emergency ad hoc group of CoC Committee members to seek input into how to utilize the 25 points on the score card to reflect HUD's priorities in the NOFA.
- 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 corrected for Subcommittee 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.

## MARICOPA REGIONAL CONTINUUM OF CARE

- Collaborative Applicant finalizes Subcommittee membership and prepares final information for the Subcommittee.
- Subcommittee 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).
- Subcommittee members meet to jointly discuss each application and conduct short, voluntary interviews with applicants either in person, by phone, or video conference. 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 in the bottom 10% of total points will be flagged for review. The Subcommittee may recommend that such projects be reallocated in favor of a new project that is aligned with HUD and Board priorities.
  - The Subcommittee may recommend that projects with consistently low scores, consistently in the bottom 10% of total points, should be considered for reallocation in favor of a new project aligned with HUD's priorities.
- Projects are given feedback from the Subcommittee 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 Data Subcommittee. The Data Subcommittee will provide feedback to the Review and Rank Subcommittee on their evaluation of the HMIS project.
- Applications for CoC Planning funds are reviewed by the Review and Rank Subcommittee.
- 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 Review and Rank Subcommittee will attend the Appeal Panel to provide information but will not be members of the Appeal 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 Subcommittee

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.

- In addition to the numeric scores, the Subcommittee will consider qualitative factors such as subpopulation needs, improvement plans, project performance, and potential impact to the community's system of care when generating recommendations for the CoC Board.
- The Review Subcommittee may present multiple options to the CoC Board in a public meeting and will articulate the potential pros, cons, and impact of each recommendation. The meeting will be scheduled to allow for explanation, questions, and meaningful dialogue between the members of the Subcommittee and the CoC Board.
- 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.

### 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 Subcommittee 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 Subcommittee 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 Subcommittee'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 Appeal Panel will be selected from the CoC Board or its designees. These individuals will have no conflict of interest in serving, as defined by the existing Review and Rank Subcommittee conflict of interest rules. Voting members of the Appeal Panel shall not serve simultaneously on the Review and Rank Subcommittee; however, a Review and Rank Subcommittee member and a MAG staff person will participate in the Appeal 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 PLAN

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

- a. Consider unspent funds and the ability to cut grants without cutting service/housing levels
  - i. Subcommittee members will receive guidance about the limitations related to spending CoC funds.
  - ii. 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).
- b. Consider history of reductions (e.g., if grant reduced one year, will not be apparent in spending the following year)
- c. Consider alternative funding sources available to support either new or renewal project(s) at-risk of not being funding
- d. Consider renewal HUD “covenant” concerns (use restrictions, etc.)
- e. Consider impact on consolidated application’s score
- f. Consider impact on the community in light of community needs
- g. Consider non-compliance issues identified during the Review and Rank process or project monitoring
- h. 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 scores in the bottom 10% of community ranked projects, then the Subcommittee may 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 Subcommittee and the CoC Board will be notified to determine severity of non-compliance with threshold criteria and action needed:

- i. Project must participate (or agree to participate) in Coordinated Entry (to the capacity the Coordinated Entry system is built out in the community)
  - i. *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.*
- j. Project must meet applicable HUD match requirements (25% for all grant funds except leasing).
- k. 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.
- l. 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.
- m. Project must be able to meet the HUD threshold requirements for renewal projects including that there are none of the following:
  - i. Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
  - ii. Audit finding(s) for which a response is overdue or unsatisfactory;
    - o History of inadequate financial management accounting practices;
    - o Evidence of untimely expenditures on prior award;
  - iii. History of other major capacity issues that have significantly impacted the operation of the project and its performance;
  - iv. History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly;
  - v. History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established time frames.
  - vi. History of non-compliance with HUD CoC Program funding requirements, defined in the HEARTH Act and/or NOFA.
  - vii. 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.