

REVIEW, RANK and REALLOCATION PROCESS

CoC Board Approved 6/24/2019

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

GENERAL PROCESS

A. Phase I – Scoring Materials, Policies and Rank and Review Subcommittee

- The Collaborative Applicant (MAG) may receive input from HUD Grantees on the scoring tool (see attachment “Program Performance Report”). The Collaborative Applicant will finalize the scoring tool and review and rank process. The scorecard is based on objective criteria as reported in the project’s Annual Performance Report submitted to HUD. Criteria include points for: serving clients with multiple conditions and those that enter with no income; projects whose clients increase housing stability and income; effective use of federal funding; and, projects with reliable data measured by data quality measures. In addition, the CoC awards points for participation in Coordinated Entry and the Continuum of Care; cost effectiveness; alignment with Housing First principles; and, resolution of HUD monitoring findings.
- The CoC Board will review scoring materials and approve a process subject to necessary changes due to the NOFA.
- The Collaborative Applicant will recruit a non-conflicted Review and Rank Subcommittee (Subcommittee). The Subcommittee may 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, that addresses racial inequity, geographic balance, and under-represented groups. In addition, the Collaborative Applicant will seek Subcommittee consistency from year to year. CoC Board members are prohibited from serving on the Subcommittee. Members sign conflict of interest and confidentiality statements.
- The Collaborative Applicant initiates the first phase of the performance evaluation, communicates expectations and deadlines to project applicants, and collects required materials. The Collaborative Applicant will coordinate the collection of all reports and materials needed for the scoring tool and coordinate the scoring process for renewal projects.
 - HMIS, Coordinated Entry, and renewal housing projects without an APR due to HUD by May 31, 2019 will be held harmless and need not submit any reports or materials for scoring.

- Projects operated by Victim Service Providers or that do not use HMIS because they serve survivors of domestic violence, human trafficking, or sexual assault will submit data reports from the project's comparable database.

B. Phase II – Application Review

- The CoC Board will review data sources for community needs and gaps in the CoC program portfolio to make a data-informed decision on funding priorities while considering NOFA limitations and HUD priorities.
- Following release of the CoC Program NOFA, the Collaborative Applicant may collect additional information that is necessary to submit a more competitive Consolidated Application.
- The Collaborative Applicant will finalize Subcommittee membership.
- Following release of the CoC Program NOFA, all renewal project applicants and new agencies interested in applying will be invited to attend a NOFA launch session. Public notice will be sent to all agencies with renewal applications, the CoC general distribution list, local governments in the region, and posted on the MAG website. The public notice will seek renewal and new applications. New and expansion project application requirements, process and timeline will be explained.
- Applicants will prepare and submit project applications.
 - Late applications received after the deadline or incomplete applications will not be accepted.
- The Collaborative applicant will compile new and renewal project application packets for Subcommittee review.
- Review and Rank Subcommittee members will be oriented to the process, trained, and receive applications. They will review new and renewal project application materials over a one- to two- week period. They will review and score new and renewal project applications using the discretionary points embedded in the scorecard based on the narrative sections provided by applicants in the scorecard (additional details below in attachment "Discretionary Points and Explanatory Narratives").
- Collaborative Applicant staff will ensure all new and renewal project applications pass Threshold Review (details below). The Collaborative Applicant will complete a technical review of HUD e-snaps project applications for completeness and technical errors. Applicants will be notified if technical corrections are needed and must complete technical corrections as directed.
- Subcommittee members will meet to jointly discuss each new and renewal project application and conduct short, mandatory interviews with applicants in person. Teleconference or videoconference accommodations may be requested, if applicant is

unable to attend in person. The purpose of the in-person interview is to ask standardized and potentially clarifying questions about projects and/or applications. Projects may receive additional points based on their responses.

- A Collaborative Applicant representative attends Subcommittee meetings to staff the meetings and act as a resource.
- 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.
- Expansion projects will be evaluated using the same scorecard as new projects. If an expansion project receives a score higher than the renewal project it is expanding, the expansion project will be ranked immediately below the renewal project.
- HMIS, Coordinated Entry, and renewal housing projects without an APR due to HUD by May 31, 2019 will be held harmless and ranked at the top of Tier I.
- The Review and Rank Subcommittee will develop three ranked list options for presentation to the CoC Board in a public meeting and will articulate the potential pros, cons, and impact of each recommendation. These ranked lists will include only renewal projects.
 - Option One: A ranked list based on raw scorecard scores.
 - Option Two: A ranked list based on scores as adjusted by the Subcommittee using the discretionary points embedded in the scorecard.
 - Option Three: A ranked list reflecting the Subcommittee's consideration of qualitative factors, as described above and incorporated into standardized interview questions.
- The Subcommittee will review the three options with the CoC Board to allow for explanation, questions, and meaningful dialogue between the members of the Subcommittee and the CoC Board.
- The CoC Board will consider the three options presented and approve a rank order of new, expansion, and renewal projects. CoC Board members that have an application for funding must recuse themselves from the vote and will be asked to follow the same process as other project applicants.
- The CoC Board will review the CoC Planning Grant funding application.
- The Board will approve ranking of the Continuum of Care Project applications in a public meeting.
- The CoC Board's ranking decision is 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, as described in the "Appeals Process" below. 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.

- The CoC Board will meet to consider the ranked list generated by the appeals process (details below) and to approve a final rank order for submission to HUD.

C. Phase III – Emergency Procedure

- 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 may solicit and submit further applications for the full available amount, with projects representing HUD priorities.
- CoC staff ensure all project applications submitted under the emergency procedure pass Threshold Review.

Threshold Review

In addition to the scoring criteria, all new and 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 new and renewal projects must meet the following thresholds. If threshold criteria are not met, the Review and Rank Subcommittee will be notified to determine severity of non-compliance with threshold criteria:

- Project must participate or agree to participate in the Coordinated Entry system to the capacity the Coordinated Entry system is built out in the community.
- Project must meet applicable HUD match requirements (25% for all grant funds except leasing).
- All proposed program participants will be eligible for the program component type selected.
- The information provided in the project application and proposed activities are eligible and consistent with program requirements in 24 CFR part 578.
- Each project narrative is fully responsive to the question being asked and meets all criteria for that questions as required by the NOFA.
- Data provided in the application are consistent.
- Required attachments correspond to the list of attachments in e-snaps that must contain accurate and complete information that are dated between May 1,

2019 and September 18, 2019.

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 may consider:

1. Unspent funds and the ability to cut grants without cutting service/housing levels
 - Subcommittee 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)
2. Projects with consistently low scores
 - Scrutiny will be given to projects that scored in the bottom 10% in the past three years
3. Alternative funding sources available to support either new or renewal project(s) at-risk of not being funding
4. Impact on the community in light of community needs
5. Non-compliance issues identified during the Review and Rank process

The impact of this policy is that both high-scoring and low-scoring projects may be reallocated if these considerations warrant that decision.

APPEALS PROCESS

The Review and Rank Subcommittee reviews all applications and ranks them for funding recommendations for approval by the CoC Board to be forwarded to HUD for funding. The CoC Board's funding recommendation decision is communicated to all applicants by email within 24 hours of the determination. All applicants are hereby directed to contact Julie Montoya at (602) 900-4811 (jmontoya@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. Scope of an Appeal

The main questions for the Appeals Panel are:

- a. Was the review process followed consistently?
- b. Were all applicants evaluated in a similar manner?
- c. Did the Ranking Panel or the Continuum of Care make an error?

Disagreement with discretionary point allocations are not grounds for appeal. The Rank and Review Subcommittee will insure that discretionary points are applied consistently across projects.

If an error was made by the Rank and Review Subcommittee, the Board, or applications were not reviewed according to the same process, then an appeal may have merit and an appeal hearing may be granted.

An appeal does not have merit if the agency interprets the information differently or if they provide additional information after the application deadline and/or CoC Board decision.

If the appeal hearing is not granted, the project remains on the project listing as approved by the Board.

If the hearing and appeal are granted, and project scoring and/or listing changes, the project listing will be revised accordingly. This would impact other projects and therefore, the Continuum of Care Board will need to establish quorum, meet, and take action on the final project listing. The decision of the CoC Board will be final.

4. Timing

The ranking decision is communicated to all applicants within 24 hours of Board funding decision. The Board funding decision will take place at least 20 days prior to the NOFA due date. Applicants have 48 hours after the CoC Board funding decision to submit their appeal and should contact Julie Montoya at (602) 900-4811 (jmontoya@azmag.gov). Applicants who are eligible and decide to appeal should submit a formal written appeal (no longer than 2 pages) to Julie Montoya (jmontoya@azmag.gov). 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.

5. Initiating the Formal Appeal

The Formal Appeal must be submitted within 48 hours of the CoC Board funding decision (time countdown begins on the time listed on the agenda when the Board meeting ends). The appeal document must consist of a short, written (no longer than 2 pages) statement

of the agency's appeal of the CoC Board'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 Julie Montoya (jmontoya@azmag.gov).

6. Members of the Appeal Panel

A three-member non-conflicted Appeal Panel will be selected from the CoC Board. 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 MAG staff will participate in the Appeal Panel to inform discussion.

7. The Appeal Process, Including Involvement of Other Affected Agencies

The Appeal Panel will review the written appeal for merit. If the Appeal Panel believes there is merit to the appeal on the basis of facts, then an appeals meeting will be conducted either in person or by telephone with a representative(s) of the agency who filed the appeal. The Panel then will deliberate and inform appealing agencies of its decision.

If an appeals meeting is held, the CoC Board will approve the final project list for submission. If an appeals meeting is not held, the original project list will be upheld. The decision of the CoC Board will be final. Final decisions for projects being rejected or reduced and the reason(s) for the rejection or reduction will be communicated in writing and outside of e-snaps no later than 15 days prior to the FY 2019 NOFA application deadline.

CONSOLIDATED APPLICATION

- The Consolidated Application will be made available to community for inspection on MAG's website at least two days prior to the FY 2019 NOFA application deadline.
- MAG will submit the Consolidated Application to HUD.
- Stakeholders will be advised that the application has been submitted.
- Projects will 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.