

2024

RANK, REVIEW, & REALLOCATION PROCESS

POLICIES & PROCEDURES

ADOPTED BY THE BOARD 09/29/2015

UPDATED BY THE BOARD 07/29/2024

THESE POLICIES AND PROCEDURES SUPERSEDE ALL PREVIOUSLY ADOPTED RANK, REVIEW, AND REALLOCATION POLICIES AND PROCEDURES AS WELL AS ANY RANK, REVIEW, AND REALLOCATION-RELATED PROVISIONS IN OTHER PREVIOUSLY ADOPTED POLICIES AND PROCEDURES



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OVERVIEW

The Rank and Review Process is used to review and evaluate all eligible CoC project applications submitted in the local competition, then rank them for submission of the annual Notice of Funding Opportunity (NOFO). This document outlines the Rank and Review Collaborative (RRC) process, as well as the process for the reallocation of project funds and the appeal protocol should this occur.

General Process

Phase I – Scoring Materials, Rank and Review Collaborative (RRC), Collaborative Applicant Role

Scorecard

The Collaborative Applicant (MAG) annually updates a scoring tool, often referred to as the “scorecard,” used to aid the Rank and Review Collaborative (RRC) when reviewing projects for the annual Notice of Funding Opportunity (NOFO). 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. Collaborative Applicant staff may annually request input from HUD Grantees on the scoring tool, which can be found on the [Collaborative Applicant website](#). The Collaborative Applicant finalizes the scoring tool prior to the RRC convening. Once finalized, the CoC Board will review scoring materials and approve a process subject to necessary changes due to the timing or details of that year’s NOFO release.

Rank and Review Collaborative

The Collaborative Applicant will recruit a non-conflicted RRC. The RRC 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 panel, that addresses racial inequity, geographic balance, and under-represented groups. CoC Board members are prohibited from serving on the RRC. In addition, the Collaborative Applicant will seek panel consistency from year to year. Members sign conflict of interest and confidentiality statements.

Collaborative Applicant

The Collaborative Applicant initiates the first phase of the application process, 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 scorecard and coordinate the scoring process for renewal projects.

- HMIS, Coordinated Entry, and renewal housing projects without an APR due to HUD by May 1 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.

Phase II – Application Review

The following steps and processes will take place following the release of the annual NOFO.

- 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 NOFO limitations and HUD priorities.
- All renewal project applicants and new agencies interested in applying will be invited to attend a NOFO 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 Collaborative Applicant website. The public notice will seek renewal and new applications. Renewal, new, and expansion project application requirements, process, and timeline will be explained through email communication, training sessions, and one-on-one assistance by the Collaborative Applicant as needed.
- Applicants will prepare and submit project applications.
- Late applications received after the deadline or incomplete applications will not be accepted.

The following steps and processes will take place following agency application submission to the Collaborative Applicant.

- The Collaborative Applicant will finalize RRC membership.
- The Collaborative Applicant will compile all new and renewal project application packets for RRC review.

- 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.
- The Collaborative Applicant will train RRC members and provide them with the applications to review.
- RRC members will review new and renewal project application materials over a 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 responses provided by applicants in the scorecard.

The following steps and processes will take place during the convening of the RRC meetings.

- After reviewing applications individually, the RRC members will meet to jointly discuss each new and renewal project application. This process includes conducting short, mandatory interviews with each applicant in person or virtually. Teleconference or videoconference accommodations may be requested if applicant is unable to attend in person. The purpose of the interview is to ask standardized and potentially clarifying questions about projects and/or applications. Projects may receive additional points based on their responses.
- At least one Collaborative Applicant representative attends the RRC meetings to staff the meetings, take notes, and act as a resource.
- In addition to the numeric scores, the RRC 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.
- Projects that have been approved for consolidation in the previous year's NOFO will complete separate applications, be scored separately, then have scores averaged for the ranking of the consolidated project (the "surviving" grant). This

process finalizes the consolidation, and only the consolidated project will be scored in subsequent NOFOs.

- Projects without an annual APR will be held harmless and ranked at the top of Tier I. Examples of these projects include:
 - HMIS
 - Coordinated Entry
 - Renewal housing projects without an APR due to HUD by May 1
 - Projects that have transferred to another agency without a full year of operation under the new agency
- The RRC will develop a minimum of three and a maximum of seven 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.
 - Option One: A ranked list based on raw scorecard scores.
 - Option Two: A ranked list based on scores as adjusted by the RRC using the discretionary points embedded in the scorecard.
 - Option Three – Seven: A ranked list reflecting the RRC’s consideration of qualitative factors directed by the Board, as described above, and incorporated into standardized interview questions. The RRC can create up to five lists for the Board to consider, but does not have to create more than one.
- The RRC will review the options with the CoC Board to allow for explanation, questions, and meaningful dialogue between the members of the RRC and the CoC Board and recommend one for approval.
- The CoC Board will consider the 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 Collaborative Applicant delivers the CoC Board’s ranking decision 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, the Collaborative Applicant and at least one member of

the RRC 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.

Threshold Review

In addition to the scoring criteria, all projects must meet several threshold criteria. A threshold review will take place prior to the rank and review process to ensure baseline requirements are met. All new and renewal projects must meet the following thresholds. If threshold criteria are not met, the RRC will be notified to determine severity of non-compliance with threshold criteria.

- A 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 question, as required by the NOFO.
- 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.

Phase III – Emergency Procedure

Collaborative Applicant 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 Collaborative Applicant staff may solicit additional applications. In addition, if, after the RRC has reviewed applications and made priority determinations, an applicant decides not to submit their

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

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 RRC and approved by the Board, based on HUD priorities and CoC Board priorities. When considering reallocation, the panel may consider:

1. Unspent funds and the ability to cut grants without cutting service/housing levels.
 - RRC 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 10% or more under the median project score.
3. Alternative funding sources available to support either new or renewal project(s) at-risk of not being funding.
4. Impact on the community considering community needs.
5. Non-compliance issues identified during the rank and review 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 RRC 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 Collaborative Applicant staff if no email notice is received.

Who May Appeal:

An agency may appeal an "appealable ranking decision," defined in the next paragraph, made by the Rank and Review panel 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.

What May be Appealed:

"An appealable ranking decision" is a decision by the RRC that:

- Reduces the budget to a lower amount than applied for;
- Ranks the project in Tier 2, or;
- Recommends the project for reallocation.

Scope of Appeal:

The main questions for the Appeals Panel are:

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

Disagreement with discretionary point allocations are not grounds for appeal. The RRC will ensure that discretionary points are applied consistently across projects. If an error was made by the RRC or 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.

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 statement (no longer than 2 pages) 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 Collaborative Applicant staff.

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.

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

If the appeal hearing is granted, 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 RRC conflict of interest rules. Voting members of the Appeal Panel shall not serve simultaneously on the RRC; however, a RRC member and Collaborative Applicant staff will participate in the Appeal Panel to inform discussion. 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 virtually with the representative(s) of the agency who filed the appeal. The panel then will deliberate and inform appealing agencies of its decision.

If the hearing and appeal are granted, 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 NOFO application deadline.

Consolidated Application

The following steps and processes will take place once the Collaborative Applicant has finalized the Consolidated Application.

- The Consolidated Application will be made available to community for inspection on the Collaborative Applicant's website at least two days prior to the NOFO application deadline.
- The CoC Board will meet to approve the Consolidated Application prior to submittal.
- Collaborative Applicant staff will submit the Consolidated Application to HUD.
- Stakeholders will be advised that the application has been submitted.
- Project applicants will have opportunity to debrief scores with Collaborative Applicant staff. All projects are welcome to request a debriefing and receive a complete breakdown of their scores within 30 days of submission of the Consolidated Application.