

IV. Preparing an Application

REVIEWING AND PRIORITIZING PROJECTS FOR FUNDING

One of the major functions of a Continuum of Care is to prepare and oversee the applications for funds administered by HUD under the McKinney-Vento Homeless Assistance Act. Among these, the CoC Program is designed to assist individuals and families experiencing homelessness and to provide the services needed to help them move into housing, with the goal of long-term stability. For this reason, the CoC Program funds important housing and services programs, such as permanent housing (including permanent supportive housing and rapid re-housing), transitional housing, and supportive services only programs. HUD CoC Program funds are granted annually based on a national competition following the release a Notice of Funding Availability (NOFA).

In addition, recipients of Emergency Solutions Grant funds, another homeless assistance grant administered under the McKinney Vento Act, are required by HUD to coordinate with the Continuum of Care regarding the allocation of those funds. The California Department of Housing and Community Development (HCD) oversees the distribution of non-entitlement funds, for which Napa CoC is qualified to apply, in California. In recent years, HCD has required the CoC to prioritize applications within the Continuum and submit portions of the application. The Napa CoC's policy to address that requirement is established in the ESG Review and Rank Process and ESG Scoring Tool, which are subject to change based on HCD's requirements.

This section outlines the Napa CoC's policies as related to designing, operating, and following a collaborative process for the development and submission of the Continuum of Care Program application.

Collaborative Applicant

The Napa CoCB designates Napa Health and Human Service Agency (HHSA) as the annual HUD CoC NOFA Collaborative Applicant. The Collaborative Applicant (or its designee) is responsible for leading and supporting all aspects of the annual HUD CoC NOFA application process, including submission of the Consolidated Application consisting of 1) the CoC Application (formerly Exhibit 1); 2) Project Applicant's Priority List; and 3) all Project Applications (formerly Exhibits 2).

Overview of Project Review Process/NOFA Submission Timeline

Immediately after HUD's Continuum of Care Program NOFA is released, the Collaborative Applicant (or its designee) will coordinate and carry out all of activities needed to successfully submit an application on behalf of the Napa CoC. The following is an overview of the timeline of tasks for NOFA submission. The timeline is subject to change annually, depending on HUD/NOFA requirements.

- Prior to the NOFA release, the Collaborative Applicant will design scoring tools and any corresponding local application materials to assist in the review and ranking of all

renewal and new project applicants. These materials will take into consideration both local and HUD priorities.

- The scoring tools will be finalized and presented to the CoCB for review and approval.
- Upon publication of the NOFA, the Collaborative Applicant will schedule and announce a time and date for a Technical Assistance Workshop. These details will be distributed to the entire CoC.
- All applicants/potential applicants participate in the NOFA Overview Technical Assistance Workshop. At the workshop, the Collaborative Applicant will present an overview of the HUD CoC NOFA, including details about available funding and any major changes in the application from previous years. Applicants will also be oriented to the process for reviewing and ranking applications, which will cover any supplemental local application materials and the scoring tool and applicable dates. Applicants will also have a chance to ask any questions about both the local and HUD application processes.
- Applicants complete local application materials by a date announced at the Technical Assistance Workshop, typically within four (4) to six (6) weeks of the NOFA release (and generally not less than thirty (30) days prior to the NOFA submission deadline).
 - Any late application received within forty-eight (48) hours of the due date/time will receive a fifteen (15) point score reduction. Late applications received after forty-eight (48) hours will not be accepted.
 - Incomplete applications cannot be cured for the Review and Rank Panel scoring process but must be corrected prior to HUD submission.
- Qualified, non-conflicted Review and Rank Panel members are recruited and oriented to the local review and ranking process. (See below for more detail.)
- The Review and Rank Panel members receive all local application and scoring materials and review and score each program's application.
- The Review and Rank Panel meets to jointly discuss each application, interview applicants, and to comment on ways to improve individual applications. Panel members individually score applications based on the scoring tools. The ranked list is created by the following procedures:
 - One ranked list is prepared based on a compilation of Review and Rank Panel raw scores for each application.
 - Those applications that do not meet certain threshold requirements (as detailed on the scoring tool) will not be included on the ranked list.
 - The highest scoring and eligible new permanent housing project will be selected to apply for any "Permanent Housing Bonus" funding available through the NOFA.
 - In order to promote system performance by preventing returns to homelessness and promoting housing stability and retention, the CoCB has determined that renewal Permanent Supportive Housing projects with a strong track record of performance as demonstrated through their APRs and other data, may be prioritized above any new projects that have not demonstrated their ability to better enhance system performance. Performance requirements for this purpose are projects that 1) meet HUD guidelines for Housing First; 2) maintain at least an 80% occupancy rate (unless they do not yet have performance data for a full year

of operation, in which case occupancy rate may not yet have achieved 80%) and 3) participate in Homeless Management Information System.

- In order to promote system performance by promoting housing stability and retention and enabling newly funded PSH projects to quickly house and retain individuals in housing, the CoCB has determined that newly funded projects without a full year of data will be scored as renewal PSH projects and eligible to be prioritized above new projects as outlined above; and in the outcome measures of Section 2 of the Renewal Scoring Tool, points will be awarded based on pro-rated occupancy and capacity measures.
- Second-time or older renewal projects that do not have performance data for a full year of operation will be required to submit an explanation as to why they have not started spending out project funds and provide a plan for doing so within the HUD-mandated period. In extreme cases where community funding is at risk, panelists may exercise scoring discretion, including removing prioritization over new projects, recommending reallocation or placement into Tier 2.
- The Review and Rank Panel determines if any renewal project should be considered for a decrease in funding due to substandard performance. Any funding captured from an existing project will be made available for reallocation to a new project that meets the requirements in the NOFA application.
- Scoring results are sent to applicants with a reminder of the appeals process at least 15 days before CoC Application deadline. (See below for more details on the appeals process.) In addition, projects are given feedback from the Review and Rank Panel on the quality of their application and ways they can improve their final submission to HUD.
- Appeals, if any, are considered.
- A final ranked project list is submitted to the CoCB for review and approval.
- The Collaborative Applicant collects all final Project Applications and submits them to HUD, along with the CoC Application, as part of the CoC's Consolidated Application.

Review and Rank Panel Membership

The Collaborative Applicant recruits between three (3) and five (5) Review and Rank Panel members who are:

- Knowledgeable about homelessness and housing in the community and who are broadly representative of the relevant sectors, subpopulations, and geographic areas
- "Neutral," meaning that they are not employees, staff, or otherwise have a business or personal conflict of interest with the applicant organizations;
- Familiar with housing and homeless needs within the Napa CoC; and
- Willing to review projects with the best interest of homeless persons in mind.

To serve on the Review and Rank Panel, members must:

- Sign a statement declaring that they have no conflict of interest and a confidentiality agreement; and

- Be able to dedicate time for application review and Review and Rank Panel meetings as scheduled by the Collaborative Applicant.

Reallocation of Funds

HUD allows CoCs to reallocate funds from non- and/or under-performing projects to higher priority community needs that also align with HUD priorities and goals. The Review and Rank Panel facilitates the reallocation discussion and process, in consultation with the CoC and CoCB. All final decisions about reallocation must be approved by the CoCB.

Using All Available Funds

The Napa CoC will do everything possible to ensure it applies for all funds available to the community. Thus, if all on-time applications have been submitted and it appears that either: 1) the community is not requesting as much money as is available from HUD, 2) no Permanent Housing Bonus (or other special project as defined by HUD) projects have been submitted, or 3) there are reallocated funds available, then:

- The Collaborative Applicant will email the CoCB and other interested parties (all homeless service and housing providers in the CoC area) with specifics regarding how much money is available and or which type of programs.
- The Collaborative Applicant will provide technical assistance and guidance, as needed, to ensure applicants understand the funding requirements.
- Any additional applications for these funds will be due as soon as possible after this email is distributed, as determined by NOFA submission deadline.

Appeals Process

All eligible applicants have the opportunity to appeal both their score and preliminary ranking prior to the ranked list being finalized and approved by the CoCB. The Appeals Committee will only be established if an applicant requests an appeal.

The Appeals Committee

The Appeals Committee will be comprised of three (3) impartial members of the CoCB. These three voting members will not have participated in the original Review and Rank Panel. No member of the Appeals Committee may have a conflict of interest with any of the agencies applying for CoC Program funding. All members of the Appeals Committee must sign conflict of interest and confidentiality statements. If there are insufficient CoCB members who qualify for the appeals committee, a member of the CoC may participate in the Appeals Committee.

The role of the Appeals Committee is to read and review only those parts of the application that are being appealed. If deemed necessary, the Appeals Committee may request that one member of the Review and Rank Panel attend the meeting in a non-voting, advisory capacity.

Eligible Appeals

- The application of any Project Applicant agency that receives less funding than applied for may be appealed.

- The application of any Project Applicant agency that is ranked in a Tier 2 (if tiers are required by HUD) may be appealed.
- The application of any Project Applicant agency that is ranked in the bottom third of Tier 1 (if tiers are required by HUD) may be appealed.

Note: Project Applicants that have been found to not meet the threshold requirements are not eligible for an appeal.

Applicants may appeal if they can prove their score is not reflective of the application information provided, or if they can describe bias or unfairness in the process that warrants the appeal.

The Appeals Process

- Any and all appeals must be received in writing with supporting documentation within three (3) business days of the notification of ranking to projects.
- All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed.
- The notice of appeal must include a written statement specifying in detail the grounds asserted for the appeal. The appeal must include a copy of the application and all accompanying materials submitted to the Review and Rank Committee. No additional information can be submitted. The appeal is limited to one single spaced page in 12-point font.
- All valid appeals will be read, reviewed, and evaluated by the Appeals Committee.
- The Appeals Committee will meet to deliberate the appeal.
 - The Appeals Committee will review the rankings made by the Review and Rank Committee only on the basis of the submitted project application, the one page appeal, any statements made during the appeal process, and the material used by the Review and Rank Panel. No new information can be submitted by the Project Applicant appealing or reviewed by the Appeals Committee.
 - The decision of the Appeals Committee must be supported by a simple majority vote.
- The appealing agency will receive a written decision of the Appeals Committee within two (2) business days of the Appeals Committee Meeting.
- The decision of the Appeals Committee will be final.

Final Prioritized List of Applications

The CoCB must approve the final ranked list of all Project Applicant proposals. Any CoCB members with a conflict of interest must recuse himself/herself from all related discussions and abstain from the vote approving the priority list. The Collaborative Applicant will then submit this prioritized list to HUD by the NOFA deadline as part of the CoC Consolidated Application. Conditional award funding is typically based upon the prioritized list of Project Applicants that are submitted; however, actual awards/award amounts are determined by HUD.