

Introduction

Annually, the U.S. Department of Housing and Urban Development (HUD) released the Continuum of Care (CoC) FY 2015 Notice of Funding Availability (NOFA) on September 17, 2015. The NOFA is available at <https://www.hudexchange.info/resource/4688/fy-2015-coc-program-nofa>. This competition brings funds into Milwaukee City & County to provide housing and supportive services to individuals and families who are experiencing homelessness. The competitive application requires each local Continuum of Care to rank, score, and select new and renewal projects. The CoC must identify and describe the process used for ranking, scoring, and selecting eligible projects. The process should be Fair & Impartial, inclusive of a Public Notification which lists the CoC's final determination on funded projects. In the FY 2015 competition, the CoC has the option to re-allocate funds from CoC renewal projects to fund new projects, and to create a new project through the Bonus competition. New funding opportunities created through re-allocation will only be available for Permanent Supportive Housing projects serving 100% chronically homeless individuals and families; Rapid Re-Housing serving homeless individuals, including unaccompanied youth, and families coming directly from the streets or emergency shelter or fleeing domestic violence; new projects for dedicated HMIS; and new Supportive Services Only (SSO) projects for centralized or coordinated assessment systems.

A ranking, scoring and selection tool has been developed to measure performance and capacity based on the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) Performance Measures. This instruction guide will detail how the WI 501- Milwaukee City and County Continuum of Care (Milwaukee CoC) projects will be evaluated.

Intent to Apply:

Annually after HUD announces the Continuum of Care registration requirements, the CoC will post an "Intent to Apply" request form on the Milwaukee Continuum of Care website, make members aware of the form by announcing at the monthly Full Body CoC meeting, posting on the CoC website at www.milwaukeeecoc.org, as well as email the Continuum's email listserv. Listserv subscription is also available via the CoC website. The intent form is intended to identify agencies who are seeking CoC funds. The form is applicable for "new" or "renewal" CoC projects. "New" projects include those made through reallocation and through Bonus project funding as made available by HUD within each NOFA. A preliminary, quantitative and qualitative review of each interested applicant is submitted to the Lead Agency, City of Milwaukee. The submission of the form will help confirm the capacity of the CoC to accommodate those agencies interested in receiving funds. The synopsis of interested applicants is communicated with the CoC's Provider Advisory Group and Full Body. Interested applicants are required to sign the form and agree to the following:

- Must meet all HUD eligibility criteria.
- Must meet all pre-application deadlines as set by the Continuum.
- Must have met all program requirements for most recent program year to be eligible for application.

- Must be a 501(c) 3, 501 (c) 4, PHA, or local government.
- Must possess legal authority to apply for and receive funds and carry out activities authorized by the CoC Program.
- Must provide the supplementary match funds required by HUD.
- Must participate fully in the Milwaukee CoC process to coordinate and integrate with other mainstream programs for which homeless populations may be eligible.
- Must assume ultimate responsibility for preparing an accurate and complete application for submission to HUD that meets all federal rules and regulations.
- Must use the 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 CoC's coordinated assessment system, provided that the victim service providers in the area use a coordinated assessment system that meets HUD's minimum requirements and the victim service provider uses that system instead
- Must be in compliance with all local, state, and federal civil rights laws and Executive Orders as well as all standards outlined in the U.S. Department of Housing and Urban Development CoC NOFA.
- All project sponsors must meet any HUD certification requirements as outlined in the 2015 CoC NOFA.
- Must submit a copy of the agency's most recent audit or IRS form 990.
- Renewal Project Sponsors must be entering data into the HMIS system, with the exception of Domestic Violence programs that are exempted by the Violence Against Women Act. Compliance with HMIS regulations will be reported by the HMIS administrator for scoring.

Ranking of Projects:

In order to best serve our community members through effective projects and maximizing funds, projects which most closely align with HUD Priorities will be prioritized for funding. The NOFA requires the ranking of each project (new/renewals) and to prioritize the eligible project into one of two funding Tiers; Tier I or Tier II. HUD requests Tier 1 is equal to 85% of the CoC's Annual Renewal Amount (ARD) amount on the final HUD-approved Grant Inventory Worksheet (GIW). Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for the bonus project. This does not include the amounts available for CoC planning and UFA costs (the latter of which does not apply to Milwaukee CoC).

This prioritization will occur within the noted Ranking Categories and each CoC project will compete within their own project's program component. The categories are detailed below.

Ranking Categories
1. Renewal Permanent Housing projects – Rapid Re-Housing and Permanent Supportive Housing
2. New Permanent Supportive Housing created through reallocation serving 100% chronically homeless
3. New Rapid Re-Housing created through reallocation serving homeless households with children
4. Renewal Safe Havens
5. Renewal Transitional Housing
6. CoC Planning Costs (not a scored project)
7. UFA costs – Not Applicable
8. SSO projects for Coordinated Entry (not scored in its first year)
9. Renewal HMIS (not a scored project)
10. New HMIS (not a scored project)
11. All other renewal Supportive Services Only projects

In an effort to meet HUD’s highest priority funding, PSH with 100% chronic homeless units and RRH for families, will be recommended for “full” funding. This high prioritization is in line with the Federal Strategic Plan, which aims to end chronic homelessness in the year 2017, and family homelessness by 2020. Ranking categories 1 through 11 (with the exception of # 6, #7, #8, #9, & #10 – which are not scored) will be scored and ranked and subject to the determined final pro rata share for the CoC (inclusive of annual budget cut) – FY 2015.

In alignment with HUD’s Project selection process, the Milwaukee CoC will select projects in the order of HUD’s selection priorities (as established by the NOFA), and then by each project’s score. The CoC will use the project scored list and continue to the next selection priority when selecting projects for each Tier.

Tier I	Tier II
Renewal PH (RRH & PSH)	Supportive Services Only
New PSH (Re-allocation) with 100% CH	Low scoring projects
New RRH (Re-allocation) Households with Children	
Renewal Safe Haven	
Renewal Transitional Housing	
Renewal HMIS	

*PH – Permanent Housing; PSH – Permanent Supportive Housing; RRH – Rapid Re-Housing; CH – Chronically Homeless; HMIS – Homeless Management Information System

HUD is asking CoCs to make strategic decisions on which projects to cut to meet the tiering thresholds. All projects are ranked for tier determination based on APR threshold performance data.

New projects created through reallocation in the FY13/14 application that do not have performance measures will keep their ranking placement from FY13/14.

In the FY15 NOFA, the Bonus Project *is* subject to the Tier ranking and conditioned to placement in Tier 2.

Project Evaluation Process

The Milwaukee CoC evaluation workgroup developed an evaluation process and tool based on the FY15 CoC NOFA that will be used to review, score, and rank all CoC projects, as part of the FY 2015 CoC competition. The priority areas that will be reviewed are as follows:

HUD Priorities, Capacity, Community Need

- Serving HUD's target populations
- % of Chronically Homeless Clients Served
- Capacity
- % Housing Stability Measure
- Rate of Return

Project's Participant Impact

- % of Earned Income at Exit
- % of Non-Cash Benefits at Exit
- % of Other Income

Compliance

- Data Quality
- CoC Active Participation/Involvement
- % of CoC Funds Returned to HUD (Unspent)
- Timely Submission of Annual Performance Report (APR)

Data Sources:

Performance and HMIS elements are heavily weighted measures used by HUD in determining the overall CoC scores for the NOFA. Data used in the project evaluation tool comes largely from projects' most recently submitted Annual Performance Report (APR). These data elements are directly obtained from the provider themselves. Participation in HMIS and quality data entry is mandatory for those agencies seeking new and renewal CoC funds. APR performance measures provide an objective evaluation of current program performance. The APR data elements can be easily calculated to measure and provide quantitative basis for scoring the performance of renewals projects in the application process. This tool

also helps the CoC assess the system wide progress of the region in meeting established benchmarks. Information related to compliance will be shared by local HUD representative and/or CoC lead agency.

As performance is the most heavily weighted criteria used by HUD when scoring Homeless Assistance Program applications, the burden of performance falls on both the CoC and the individual projects funded by the CoC. It is therefore crucial that all projects make every attempt possible to meet or exceed their program outcomes. The CoC will assist projects that are having difficulty in meeting objectives.

Special data reports from the HMIS system are shared by the HMIS vendor/coordinator.

New Projects:

Applicants will be scored on project design, how the project addresses local priority needs, how the project aligns with local strategies and HUD's priority to end homelessness, budget appropriateness and accuracy, project match, leveraging, CoC participation, community collaborations, organizational capacity, use of Housing First, and implementation timeline. Other factors in the rating of New Projects will include community involvement. New Projects will be ranked in conjunction with HUD's Priority Listing, as noted in the FY 2015 NOFA.

Project Evaluation & Scoring:

The Milwaukee CoC NOFA evaluation workgroup will use the evaluation tool for scoring each CoC project. A list of all FY 2015 renewal projects can be found in Appendix A, and a copy of the evaluation tools used for the CoC programs can be found in Appendix B of this document. After completing the project evaluation tool, the workgroup will rank all renewals projects according to their evaluation score. New projects will also be evaluated, scored and ranked according to HUD's priority list. Projects scoring highest are ranked best; those scoring lowest are ranked at the bottom.

There also may be new projects that fail to score well enough that are held out of the NOFA submission. These projects may request that the CoC provide them with technical assistance to assist them in improving their application for future competitions. This process ensures that organizations that may lack the current capacity to receive a federal grant, can build their capacity for a future year.

Total scores for each project are determined by adding points in each section and then reducing the total by project penalties, if applicable. Projects that are unable to meet the compliance criteria will be penalized. The threshold compliance criteria are based on HUD's standards and mandatory reporting timelines and requirements. Projects which have a tie in scoring (within the same ranking category) will be evaluated on additional APR data elements. Such as: Cost Per Client Served, % of Veterans Served, Percentage of CH Clients Entry, Projects Serving Youth or Family and the following HUD priorities:

- Strategic Resource Allocation
- Ending Chronic Homelessness
- Ending Family Homelessness
- Ending Veteran Homelessness
- Using a Housing First Approach

Projects will be approved for submission to HUD based on the project funding requests that fall within the final pro rata share for the CoC, split between Tier I and Tier II, according to Section VII.A.2 of the FY 2015 HUD NOFA. The CoC's project listing will incorporate submitting all projects to total HUD's final pro rata share amount. All projects being considered will be based on evaluating HUD's recommending priority listing (renewals & new projects) as well as project performance (if applicable).

Re-Allocation:

As part of the CoC's project review process, the Funding Opportunity Workgroup will consistently evaluate projects performance and capacity throughout the funding cycle. The APR review team will submit quarterly to the Funding Opportunity Workgroup of the Provider Advisory Group score cards on how each project is performing and if a CoC project's data quality is below the HUD established threshold. As such, the CoC has established two options of re-allocation; voluntary and mandatory.

Voluntary Re-Allocation:

Voluntary Re-Allocation allows a project sponsor to re-allocate a portion or in full a project, for use towards a new CoC Project. Should a project sponsor decide to voluntarily re-allocate a project, this sponsor has the first right to use the re-allocated funds to create a "new" CoC project; one which meets HUD's requirement of either: Permanent Supportive Housing serving 100% Chronically Homeless individuals and families, Rapid Re-Housing serving homeless individuals and families who enter directly from the streets or emergency shelters, youth up to age 24, or fleeing/attempting to flee DV, new Supportive Services Only (SS) projects specifically for centralized or coordinated assessment system, or new dedicated HMIS project.

The interested project sponsor must notify the CoC Lead Agency as soon as possible, submitting a notification to the agency informing them on their intent to voluntarily re-allocate a CoC project. Should the project sponsor waive their right to first use of the re-allocated funds, the CoC will announce the re-allocation amount publicly and request an interest to apply for a new CoC project.

Mandatory Re-Allocation:

The CoC may forward low-scoring renewal projects to the HUD competition, so as not to create a service gap within the CoC. However, renewal projects that were recommended for funding, but did not meet sufficient HUD performance measurements may be placed on probation. Projects determined to be on probation will require the agency to create an action plan to address the problems identified on the evaluation tool. A project on probation will need to demonstrate considerable improvement over the

probation timeline, so as to remain in the NOFA competition in future years. The CoC will work with the project during the probation period to develop a plan to improve program performance and to monitor the progress of these efforts. The CoC may request for the project to receive technical assistance and/or implement corrective actions with established timelines.

When the project's probation timeline expires and the project continues to reflect poor performance, the Funding Opportunity Workgroup/Provider Advisory Group will make a recommendation to the CoC Executive Board for mandatory re-allocation. The Executive Board may recommend ranking poor performance projects below projects of another ranking category. However, if indicated, the Executive Board may also choose to re-allocate a project should improvements (via technical assistance or corrective action) not be made by the established deadline.

The Executive Board may also have the right to recommend a mandatory re-allocation of a CoC project if it is determined to be a ranking category that is classified by HUD as non-priority; to have continual poor data quality efforts are identified; projects without prioritized placement for Chronically Homeless individuals and/or to serve the Special Targeted Population; and historical projects who return an excessive amount of CoC funds to HUD.

Rejected CoC Projects:

If a CoC project has been rejected or re-allocated (via mandatory re-allocation), the project applicant will be notified no later than 15 days before the NOFA application deadline. The written notification will be mailed to the project applicant, include an explanation for the decision. In addition, all CoC projects for the FY2015 competition (accepted & rejected) will be listed on the CoC's website and shared at the next scheduled Full Body CoC meeting.

Appeals Process:

If an applicant chooses to appeal the CoC decision regarding the ranking, rejection, or funding of their project, a written notification should be submitted to the CoC Lead Agency within 5 business days of the Public Notification of ranked/scored projects for the FY 2015 CoC NOFA. The Lead Agency/NOFA review team will review all appeals, notify the Executive Board on the appeal and provide a response to the applicant.

APPENDIX A:

Milwaukee CoC FY 2015 – List of “Eligible” Renewal CoC Projects

Grantee Name	Project Name	Program Type
Renewal Projects		
The City of Milwaukee	CoC Planning	Planning
Center for Veterans Issues	Permanent Supportive Housing/Milwaukee	PSH
Center for Veterans Issues	Veterans Opportunity Integration Development (VOID)	TH
Community Advocates	Autumn West Permanent Supporting Housing Project	PSH
Community Advocates	Autumn West Safe Haven	SH
Friends of Housing	PH Renewal 2014	PSH
Friends of Housing	Project Restore Permanent Supportive Housing Project	PSH
Guest House of Milwaukee	Homelinc I	TH
Guest House of Milwaukee	Homelinc III	PSH
Guest House of Milwaukee	Homelinc 4	PSH
Guest House of Milwaukee	Homelinc 5	PSH
Heartland Housing	Capuchin Apartments	PSH
Hope House of Milwaukee	Hope House Rapid Rehousing for Families	RRH
Institute for Community Alliances	Milwaukee CoC HMIS Coordination Project	HMIS
Mercy Housing Lakefront	Johnston Center	PSH
St. Catherine Residences (Mercy Housing Lakefront)	St. Catherine Residence	PSH
Meta House	Meta House Transitional Housing – Phase I (Bremen)	TH
Meta House	Meta House Transitional Housing – Phase II (Locust)	TH
Meta House	Meta House Permanent Housing – Phase III (1 st Street)	PSH
Milwaukee County	Heartland Housing	PSH
Milwaukee County	Mercy Housing SPC – Milwaukee South	PSH
Milwaukee County	Milwaukee County Shelter + Care/TRA (My Home Housing Program)	PSH
Milwaukee County	Milwaukee County – Safe Haven	SH
My Home Your Home	Lissy’s Place	TH
The Salvation Army	Roots	PSH

WI 501 –Milwaukee City & County Continuum of Care Project Ranking, Scoring, Cut Process

2015

The Salvation Army	Winterstar	TH
Walker’s Point Youth and Family	Transitional Living Program for Homeless Youth	TH
New Projects		
Outreach Community Health Centers	Rapid Rehousing for Families	RRH - Reallocation
Impact 211	Community Based Coordinated Entry	SSO- Reallocation
Institute for Community Alliance (ICA)	Milwaukee HMIS Expansion	HMIS- Reallocation
Milwaukee County	Housing First – TBRA for Chronically Homeless	PSH – Bonus

APPENDIX B:

FY 2015 Evaluation Tool

PSH/SH Projects - Renewals

Evaluation Categories – PSH/SH Programs	Goal	Max Points	Project Performance	Score
<i>I. HUD Priorities, Capacity, Community Needs – Maximum Points Available = 75 Points</i>				
Serving HUD’s Target Population <ul style="list-style-type: none"> Example: Veterans > 10% = Max 5 pts, Family & Youth = Max 5 pts 	Yes	10 pts		
% of Chronically Homeless Clients Served	100%	35 pts		
<ul style="list-style-type: none"> Project Serves 100% CH 		35		
<ul style="list-style-type: none"> Project Serves 75% -99.9% CH 		15		
<ul style="list-style-type: none"> Project Serves 40% - 74.9% CH 		5		
<ul style="list-style-type: none"> Project Serves less than 39.9% CH 		0		
Capacity	>95%	10 pts		
<ul style="list-style-type: none"> 95% - 100% 		10		
<ul style="list-style-type: none"> 80% - 94.9% 		8		
<ul style="list-style-type: none"> 65% - 79.9% 		5		
<ul style="list-style-type: none"> Less than 65% 		0		
% Housing Stability Measure	>/= 90%	14 pts		
<ul style="list-style-type: none"> 90% - 100% 		14		
<ul style="list-style-type: none"> 80% - 89.9% 		13		
<ul style="list-style-type: none"> 75% - 79.9% 		10		
<ul style="list-style-type: none"> 70% - 74.9.9% 		7		
<ul style="list-style-type: none"> 65%-69% 		4		
<ul style="list-style-type: none"> Less than 65% 		0		
Rate of Return to Shelter	< 12%	6 pts		
<ul style="list-style-type: none"> Less than 12% 		6		
<ul style="list-style-type: none"> 12% - 25% 		4		
<ul style="list-style-type: none"> 25.1% - 39.9% 		2		
<ul style="list-style-type: none"> More than 40% 		0		
<i>I. HUD Priorities, Capacity, Community Needs</i>			<i>Sub-Total</i>	

WI 501 – Milwaukee City & County Continuum of Care
Project Ranking, Scoring, Cut Process

2015

Evaluation Categories – PSH/SH Programs	Goal	Max Points	Project Performance	Score
<i>II. Projects Participant Impact – Maximum Points Available = 25 Points</i>				
% of Earned Income at Exit	>/= 35%	10 pts		
• More or Equal to 35%		10		
• 19% – 34.9%		6		
• 6% - 18.9%		4		
• Less than 6%		0		
% of Non-Cash Benefits at Exit	>/= 90%	10 pts		
• More or Equal to 90%		10		
• 75% – 89.9%		6		
• 30% - 74.9%		4		
• Less than 29.9%		0		
% of Other Income	>/= 70%	5 pts		
• More or Equal to 70%		5		
• 35% – 69.9%		2		
• Less than 35%		0		
<i>II. Projects Participant Impact</i>			<i>Sub-Total</i>	
<i>III. Compliance – Maximum Point Reduction = -40 Points</i>				
% of HUD Funds Returned	None	0 pts		
• 1% - 20%		-6		
• >/= 20%		-15		
Active CoC Participation	All Meetings	0 pts		
• 3 or More Absences		-5		
• 2 Absences		-3		
HMIS Quality Data Entry	No	0 pts		
• Data Entry Errors Above 10%		-10		
Timely Submission of APR	Yes	0 pts		
• Did Not Submit APR by Deadline		-5		
• Amendment After Timely Submission		-3		
<i>III. Compliance</i>			<i>Sub-Total</i>	
PSH/SH Total Project Score				

Project's Ranking Number:

APPENDIX B:

FY 2015 Evaluation Tool

TH Projects - Renewals

Evaluation Categories – TH Program	Goal	Max Points	Project Performance	Score
<i>I. HUD Priorities, Capacity, Community Needs – Maximum Points Available = 60 Points</i>				
Serving HUD’s Target Population • Example: Vets > 10% = Max 5 pts, Family & Youth = Max 5 pts	Yes	10 pts		
% of Chronically Homeless Clients Served	100%	10 pts		
• Project Serves More than 25% CH		10		
• Project Serves 10% -24.9% CH		7		
• Project Serves 5% -9.9% CH		5		
• Project Serves less than 5% CH		0		
Capacity	>95%	10 pts		
• 95% - 100%		10		
• 80% - 94.9%		8		
• 65% - 79.9%		5		
• Less than 65%		0		
Rate of Return to Shelter	<= 12%	5 pts		
• Less than 12%		5		
• 12% - 25%		3		
• 25.1% - 39.9%		1		
• More than 40%		0		
% Housing Stability Measure	>/= 85%	25 pts		
• 85% - 100%		25		
• 60% - 84.9%		15		
• 30% – 59.9%		5		
• Less than 30%		0		
<i>I. HUD Priorities, Capacity, Community Needs</i>			<i>Sub-Total</i>	

WI 501 – Milwaukee City & County Continuum of Care
Project Ranking, Scoring, Cut Process

2015

Evaluation Categories –TH Program	Goal	Max Points	Project Performance	Score
<i>II. Projects Participant Impact – Maximum Points Available = 40 Points</i>				
% of Earned Income at Exit	>/= 35%	15 pts		
• More or Equal to 35%		15		
• 19% – 34.9%		8		
• 6% - 18.9%		5		
• Less than 6%		0		
% of Non-Cash Benefits at Exit	>/= 90%	20 pts		
• More or Equal to 90%		20		
• 75% – 89.9%		17		
• 60% - 74.9%		8		
• Less than 60%		0		
% of Other Income	>/= 70%	5 pts		
• More or Equal to 70%		5		
• 35% – 69.9%		2		
• Less than 35%		0		
<i>II. Projects Participant Impact</i>			<i>Sub-Total</i>	
<i>III. Compliance – Maximum Point Reduction = -40 Points</i>				
% of HUD Funds Returned	None	0 pts		
• 1% - 10%		-6		
• >/= 20%		-15		
Active CoC Participation	All Meetings	0 pts		
• 3 or More Absences		-5		
• 2 Absences		-3		
HMIS Quality Data Entry	No	0 pts		
• Data Entry Errors Above 10%		-10		
Timely Submission of APR	Yes	0 pts		
• Did Not Submit APR by Deadline		-5		
• Amendment After Timely Submission		-3		
<i>III. Compliance</i>			<i>Sub-Total</i>	
TH Total Project Score				

Project’s Ranking Number:

APPENDIX B:

FY 2015 Evaluation Tool

NEW Projects (PSH – Serving Chronically Homeless; Rapid Re-Housing – Serving Families; SSO – Coordinated Entry; HMIS)

New Project Evaluation Tool (PSH-CH, RRH-Families, SSO-CE, HMIS)	Max Points	Project Score
<p><u>Program Design</u></p> <ul style="list-style-type: none"> • Target Population • Reasonable HUD Projected Outcomes • Projected Outcomes Address Homeless Needs/Issues • Project Coordinates with other CoC Sources/Partners • Project will increase # of people experiencing homelessness being served • Project Location – an existing facility or is it new; one site or multiple sites • Design incorporates multiple methods of outreach • Project incorporates working with special population (Veterans, Persons w/ AIDS, Youth, Families, Physical and/or Mentally Ill, etc.) 	40	
<p><u>Project Budget</u></p> <ul style="list-style-type: none"> • Budget Line Items are HUD Eligible • Administration Budget is <=10.0% • Budget Line Items are reasonable • Match funds are noted • Leverage funds are noted • Other funding sources are being used in project 	30	

New Project Evaluation Tool (PSH-CH, RRH-Families, SSO-CE, HMIS)	Max Points	Project Score
<p><u>Home – Based Services Offered</u></p> <ul style="list-style-type: none"> • Services are eligible as defined by CoC rules (24 CFR part 578.53) • Do the services align with agency’s mission, capacity and previous community experience • Are any of the services contracted to sub-recipient, partner or non-partner to achieve HUD Outcomes? 	10	
<p><u>Agency Capacity</u></p> <ul style="list-style-type: none"> • Solid & demonstrated management structure • Previous Community Experience in providing housing and homeless services • Demonstrated sound financial accounting system • Experience with HUD funded homeless assistance grants • Sufficient Staffing Levels to accommodate new project (Team Leader, Case Manager, Housing Specialists) • Levels of Staff Retention for current homeless operations 	10	
<p><u>Agency Community/Stakeholder Experience</u></p> <ul style="list-style-type: none"> • History of implementing homeless projects successfully • Active CoC member/Community Stakeholder –advocating for ending homelessness • Current/Previous experience with HUD homeless funding; if yes did it involve returning funds within last 12 months to HUD due to lack of expenditures • Unresolved monitoring/audit findings within last 12 months with HUD on grant funded items or local participating jurisdiction 	10	
Total Available Points	100	

Project Ranking Number: