Immediately after HUD’s Continuum of Care Program Notice of Funding Opportunity (NOFO) is released, the CoC Lead Agency will coordinate and carry out all of the activities needed to successfully submit an application on behalf of the CoC. The NOFO timeline published by the Lead Agency, eligibility requirements for project applications, funding priorities for the CoC, project scoring criteria and specific dates for actions described in this policy and procedure are subject to change annually, depending on HUD’s requirements as outlined in the NOFO. Scoring tools will be finalized and presented to the board of directors for review and **formal approval by vote**. The board of directors may initiate additional revisions to the scoring tools and accompanying policy and procedure as necessitated by new information about HUD priorities or process requirements contained in the NOFO.

The NOFO timeline guiding the full CoC consolidated application process will be published on the CoC’s website, Facebook, and to the CoC e-newsletter.

All applicants complete their application materials by a deadline announced by the CoC Lead Agency in the Technical Assistance special meeting and a timeline circulated within four weeks of the NOFO release. Applications for CoC projects are referred to as ***“Intents to Apply”***. The Intent to Apply forms will also be published on the CoC website, Facebook page and e-newsletter. The Lead Agency will review each project that is submitted for funding, via “Intent to Apply” form to ensure that it meets all NOFO requirements. The Lead Agency will ensure that the housing being offered will be appropriate, that the project applicant plans to serve all eligible households, CoC Program Interim Rule and FY 2021 NOFO Requirements are met and that the budget does not contain any requests for ineligible costs.

* Any late Intent to Apply form for a renewal project received by a deadline as listed on the CoC NOFA timeline will receive a 5 point penalty score reduction. Late applications for new projects received after this deadline will not be accepted.
* Incomplete renewal project applications cannot be corrected for the **CoC board’s NOFO review panel** but must be corrected before HUD submission.

**CoC Board of Director’s NOFO Review Panel**

Non-conficted CoC board of directors members are recruited and oriented to the local review and ranking process. The CoC observes conflicts of interest via written record on a Conflict of Interest form all board members are required to sign annually.

The board of directors NOFO Review Panel (hereafter known as the “panel”) must:

* Consist of 3 to 5 board members knowledgeable about homelessness and housing in the community and broadly representative of the relevant sectors, subpopulations, and geographic areas.
* Be “neutral” meaning they are not employees, volunteers, staff, Board members, receive services from or otherwise have a business or personal conflict of interest with the applicant organizations;
* Be familiar with housing and homeless needs within Milwaukee County; and
* Be willing to review projects with the best interest of homeless persons in mind

To serve on the panel, board members must:

* Have a current signed statement declaring that they have no conflict of interest
* Be able to dedicate time for application review and panel meetings scheduled by the CoC Lead Agency

The CoC Lead Agency will receive all local application and scoring materials, review each submission, score each program’s Intent to Apply, and submit all Intents to apply and scoring materials to the Panel for advanced review prior to an in-person panel meeting. The panel will meet to review and discuss Intents to Apply and project scoring sheets. Panel members will score narrative questions for new and renewal projects and an average score of panel members + Lead Agency staff scores will be the final score. Panel members will assure accuracy of scoring for renewal projects. The Lead Agency will notify applicants of the outcome of their applications by a deadline published in the NOFO timeline.

The **entire** board of directors will convene for a special NOFO meeting to discuss and vote on the CoC’s project ranking, decision to reallocate projects, and acceptance of all projects. A final ranked list for Board vote is determined through the following actions:

* A ranked list is prepared based on a compilation of competitive CoC renewal project raw scores for each application.
* The applications that do not meet threshold requirements will not be included on the ranked list, including:
  + Applicants with unresolved monitoring or HUD findings will not be accepted
  + Applicants that will not follow a Housing First approach will not be accepted
  + Applicants that do not agree to local requirements and HUD standards in question responses will not be accepted
  + Applications providing responses that are not allowable according to the CoC Program Interim Rule or the FY 2021 CoC Program Competition NOFO will not be accepted
  + Applications with missing attachments or that do not answer required questions will not be accepted
  + Applicants delinquent on Federal debt will not be accepted
  + Applications with budget calculation errors or that do not meet match requirements will not be accepted
* Newproject application(s) with scores higher than 75 will be accepted for ranking, new project applications with scores lower than 75 will be rejected and not ranked
* New projects accepted for ranking will be placed in Tier 2, below the lowest ranked renewal project, and ranked highest to lowest based on raw score. Lower scoring new projects may be rejected for ranking if funding limits for bonus and domestic violence bonus prevent the CoC from accepting all projects scoring higher than 75.

***Voluntary Reallocation of Projects***

The annual CoC Program Competition Notice of Funding Opportunity (NOFO) dictates what types of projects may be created through reallocation in a given competition. Generally, HUD will direct CoCs in the NOFO or in other preceding releases of technical assistance documents that they will no longer continue to fund certain project types. In instances when it is apparent projects will lose CoC funding in the next year’s competition on the basis of their project type alone, the NOFO committee should be the venue for planning strategic voluntary reallocation of funding to best meet current needs of the CoC, while being mindful of the need to prevent displacement and returns to homelessness from clients served by these existing projects. The CoC Lead Agency will formally notify affected recipients that their project type is anticipated to no longer be eligible for renewal funding. The CoC Lead Agency will also indicate that the project type is ineligible for renewal funding in Intent to Apply forms following confirmation from the NOFO that a given project type is no longer eligible for funding.

Under the circumstances listed in which an agency would not apply for their own voluntarily reallocated funds , the Lead Agency will open a competitive application process for funding available due to voluntary reallocation. The planning for voluntary reallocation of projects not likely to be funded by HUD will be a collaborative effort between the agencies operating these project types and the NOFO committee membership, alongside the preparation of system capacity and gaps analysis in 2022. The CoC Leadership committee comprised of CoC-, ESG-, HOME-, CDBG-, and HOPWA-funded agencies will be debriefed regarding why agencies are being requested to voluntarily reallocate funds a certain way. In the event a NOFO year necessitates a competitive application process for funds from reallocation, CoC Leadership committee members will be invited to provide input into the best use of these funds available and discuss the CoC’s proactive measures to protect the well-being of clients served by projects that must reallocate their funding.

The Lead Agency will invite all CoC recipients to communicate that they want to voluntarily reallocate funding by a deadline. Should a CoC recipient wish to reallocate their own funding voluntarily, the funding available will be included in the Intent to Apply.

In 2021, no recipients voluntarily reallocated.

***Required Reallocation of Projects***

CoC decisions to reallocate a project, and what type of project the reallocated funds should be prioritized for are based on CoC needs and an objective to allocate CoC funding for the highest performing projects. The CoC will reference program outcome history and inability to improve over time in response to direction from the CoC Lead Agency and/or board of directors as grounds for a required reallocation. Mandatory reallocation is justified when corrective action or formal recommendations from the CoC for performance improvement in the first year of poor performance do not yield significant improvement in the following year for a renewal applicant. The board of directors will have oversight over the fulfillment of corrective action plans administered for the poorest performing project(s). The CoC lead agency will have oversight over quarterly program evaluations covering performance expectations of all CoC-funded projects (focus areas include CoC participation, CoC compliance, data-driven performance evaluation criteria, unit utilization, and program administration including financial management and fidelity to the housing first model).

The CoC Lead Agency acknowledges that during 2020 while data was generated for CoC NOFO review in the FY 2021 competition, CoC recipients faced significant challenges outside of their control such as limited rental housing inventory to place clients in, challenges with the job market, and greater difficulty accessing treatment providers which affects program outcomes. The CoC will not reallocate projects based on performance in the FY 2021 CoC Program Competition due to the context of the year being evaluated. The CoC will address reallocation based on performance in the FY 2022 CoC Competition

The CoC is engaged in strategic planning and a funding mapping planning project will be conducted in 2022. It is expected that future cost studies, renewal project performance, and analysis of housing needs by subpopulation will support future analysis of over-saturation of CoC funds which could alter mandatory reallocation policies in future years.

***Project Rating***

Renewal projects will be assessed on performance outcomes related to permanent housing stability, income growth, compliance with HUD requirements, financial performance, CoC participation, Housing First, serving vulnerable populations COVID-19 response, unit utilization, and data quality. Renewal projects are evaluated holistically through a renewal project scoring tool, subject to revision each year based on the content of the NOFO and observed changes in performance of all projects calling for changes in scoring thresholds. New projects will be assessed based on vulnerability factors of population served, experience serving the subpopulation, experience with the activity, project budget, housing first approach, financial management, improving safety of project participants, improving housing stability of project participants, CoC participation, and Housing First. Scoring summaries and this policy will be made available to public for understanding of rating.

***Program Compliance and HUD Monitoring***

Renewal projects with unresolved monitoring findings or that are in non-compliance with the CoC Program Regulations (including participant eligibility), Coordinated Entry participation, HMIS participation, and other applicable regulations and laws may have funds reallocated on a mandatory basis, as decided by the board of directors. Monitoring findings are obtained through the local HUD field office.

***Appeals Process***

Applicants have the opportunity to appeal their score and preliminary ranking prior to the CoC project ranking being finalized and approved by the board of directors. The appeals process will be overseen by a separate NOFO Appeals panel of 3 board members who are not conflicted, meaning they are not employed by/serve on the board of directors for/volunteer for/receive services from the agency filing the appeal. Members of the NOFO Appeals panel should be different than those serving on the NOFO review panel. Applicants may be eligible to appeal the decision of the panel if their project application is rejected from inclusion as part of the CoC’s consolidated application submission process, is reallocated entirely, or receives decreased funding through reallocation.

To appeal, the applicant must demonstrate that their application result is not reflective of the Intent to Apply information/scoring tool information provided, or there was a bias or unfairness in the process to warrant the appeal. All appeals must be based on information submitted by the applicant agency by a deadline established by the CoC Lead Agency. No new or late information will be considered. The omission of information from a project application is not grounds for an appeal.

The NOFO Appeals panel will meet to deliberate appeals. The project applicants appealing will be invited for a portion of the meeting and each applicant may make a statement regarding the appeal.

The panel will review the rankings made by the board of directors only on the basis of the submitted project application, the appeal form and supporting documents, any statements made to the panel during the appeals process, and the materials used by the NOFO committee. No new information can be submitted by the applicant or reviewed by the panel.

The decision of the NOFO Appeals panel must be supported by a simple majority vote of its members communicated to the appealing agency same day.

The decision of the panel will be final for both the validity of an applicant’s appeal and CoC project ranking.

**Competitive and Non-Competitive Ranking of CoC Projects**

For the FY2021 NOFO ranking, all housing projects accepted for ranking are ranked by scalable measurements for performance. Projects will be ranked in order based on their total score out of 100 points maximum, so the highest scoring project will be ranked first, and the lowest scoring project will be ranked last. Renewal projects to be consolidated with the FY 2021 NOFO will be ranked as separate projects following their scores.

For the FY2021 NOFO ranking, new bonus permanent housing projects and new DV bonus permanent housing projects will be subject to acceptance given threshold criteria and scoring 75 points or higher. A new bonus project or new DV bonus project that meets threshold criteria will be ranked below all renewal projects.

Mercy Housing-Saint Catherine’s will not be scored due to transferring their grant. IMPACT Inc.’s Supportive Services Only-Coordinated Entry grant and the Institute for Community Alliances Milwaukee CoC HMIS Coordination Project are not scored. The CoC Planning grant is not ranked as required by HUD.

**Board of Directors Recusal**

The board of directors is responsible for ultimately determining, by vote, the evaluation criteria, ranking, corrective action plan compliance, and governance for the CoC. Board members who are conflicted, meaning they are employed by/serve on the board of directors for/volunteer for/receive services from a CoC funded agency will recuse themselves (not participate in or influence) CoC project ranking or reallocation discussions due to their participation or influence constituting a conflict of interest – see 24 CFR § 578.95. CoC board of directors’ recusal also calls for board members whose agencies receive CoC funding to abstain from voting on ranking and reallocation of CoC projects. However, board members responsible for projects that are subject to reallocation will be invited by the Board Chair to provide the board with their own insight into their performance and input into the determination of partial versus full CoC grant reallocations.