



## FY2019 CoC-funding Process and Policies

### Eastern PA CoC

Each year, the Eastern PA Continuum of Care (CoC) applies to the U.S. Housing and Urban Development (HUD) for homeless assistance funding to address the needs of individuals and families experiencing homelessness throughout its 33-county region. The availability of funding is announced through HUD's CoC Notice of Funding Availability (NOFA), a national funding competition.

In response to HUD's CoC NOFA, the Eastern PA CoC will conduct a fair, transparent funding process, that complies with CoC Regulations, specifically § 578.95 Conflicts of interest, which covers CoC Board members, organizational conflicts and other conflicts.

### Vision, Mission and Guiding Principles

#### Vision:

- Homelessness will be rare, brief and a one-time experience in our community
- Our system will meet people where they are and support them in obtaining and retaining housing
- Our system will be sustainable, with enough resources to provide housing and services to those experiencing homelessness according to their individual needs
- Our system will work with mainstream systems to maximize resources for those we serve

Mission: The mission of the CoC is to end homelessness throughout its 33-county geographic region.

#### Guiding Principles:

- Ending homelessness is possible
- Homelessness should not define those who experience it
- Housing is essential to ending homelessness
- "The whole is greater than the sum of its parts"
  - We must work together as a cohesive system in order to reach our goal
  - We must engage with the wider community
  - We must be strategic in how we use our resources

### Funding Allocations, per Eastern PA CoC Governance Charter

In 2013, when the Eastern PA CoC was established through the merger of the Central-Harrisburg and Northeast regional CoCs, the 33-county geography was divided into five regions. At that time, an "Annual Renewal Demand" or ARD was established to represent the amount of CoC funding allocated to each region. The purpose of the regional ARD was to set a baseline for monitoring the movement of CoC funding across the different regions in order to preserve the geographic diversity of funding. Per

the CoC's Governance Charter, the regional ARD is to inform all funding decisions, including in specific situations such as: funding reduction of a specific project, funding reduction of all CoC-funded projects; or an increase in the funding allocation. From the Governance Charter:

#### Reduction of a Specific Grant

In the event that an individual grant no longer exists or for which funding must be reduced or reallocated, any remaining grant funds shall be reallocated first to the county in which this grant is located. If there are no qualified applications in the county, these funds will be made available to the RHAB of the affected grantee. If there are no qualified applications in the affected RHAB, the remaining grant funds shall be returned to the full Eastern PA CoC and the Board of Directors shall solicit funding applications from all remaining RHABs. The Funding Committee will recommend the redistribution of funds between RHABs, as needed in order to ensure all available funding is allocated. The Board agrees to adopt the recommendations of the Funding Committee in such cases. If the remaining grant funds are ultimately reallocated to a different RHAB, then the ARD Percentage shall be adjusted to reflect the new funding distribution.

#### Across the Board Funding Reductions

In the event that the Board of Directors determines that there is insufficient funding to service all existing grants, the Board would accept recommendations from the Funding Committee to determine how funding reductions would be made. The Funding Committee will attempt to apply any required reductions equitably among all RHABs in accordance with the percentage cut required, HUD mandated policies and funding priorities.

#### Increase in Funding Allocations

In the event that HUD increases the total amount of available funding to the CoC, through a "bonus," increase in annual pro-rata allocation, or any other method, any such funding increase shall be distributed according to HUD mandated policies and funding priorities at the discretion of the Funding Committee. The Funding Committee will determine if these funds should be distributed to each RHAB based on the most current ARD percentage, or if the funds will be strategically allocated to communities based on unmet needs or other priorities of the CoC.

If the Funding Committee determines that the increased funding shall be proportionately distributed to each RHAB based on the established pro-rata, and any RHAB is unable to utilize any amount of the increased funding allocation, these excess funds will be returned to the full CoC and the Funding Committee shall solicit funding applications from all remaining RHABs. Under these circumstances, the Governing Board will adopt the recommendations of the Funding Committee to ensure that all available funds are requested through the CoC's application to HUD. If the remaining grant funds are ultimately redistributed to a different RHAB, then the ARD Percentage shall be adjusted to reflect the new funding distribution.

RHAB	2013 - \$	2018 - \$	Δ - \$	2013 - %	2018 - %	Δ - %
Central Valley	\$1,946,248	\$1,312,607	- \$633,641	18.20%	13.01%	-5.19%
Lehigh Valley	\$2,716,368	\$3,083,804	+ \$367,436	25.40%	30.56%	5.16%
Northern Tier	\$787,866	\$557,124	- \$230,742	7.37%	5.52%	-1.85%
Pocono	\$1,722,499	\$1,919,290	+ \$196,791	16.10%	19.02%	2.92%
South Central	\$3,522,545	\$3,218,091	- \$304,454	32.93%	31.89%	-1.04%

## Roles and Responsibilities

As detailed below, the annual funding process is shared across many different entities within the CoC.

### Eastern PA CoC Governing Board

The Eastern PA CoC Governing Board is charged with fulfilling the mission of the CoC, as well as functioning as the designated primary decision-making entity to meet the duties and responsibilities of the CoC.

Responsibilities of the Governing Board, as they pertain to CoC funding:

- Design, operate, and follow a collaborative process for selecting and ranking project applications, in conjunction with the Funding Committee;
- Adopt the recommendations of the Funding Committee; and
- Provide input for the CoC Planning Grant funds to the Collaborative Applicant. (The CoC Planning Grant funds are used to provide ongoing support to the CoC and fulfill HUD requirements such as the point-in-time count and the CoC application.)

### Non-Conflicted Members of the Eastern PA CoC Governing Board

Non-conflicted members of the Eastern PA CoC Governing Board are defined as Board members who are not recipients or subrecipients of CoC funding, nor are applying for new project funding as a recipient or sub-recipient.

The non-conflicted members of the Eastern PA CoC Governing Board will review projects recommended for full or partial reallocation by the CoC Consultant. (More information about when reallocation will be a tool that is exercised is provided below.) Non-conflicted Board members will make final reallocation decisions regarding which projects should be fully or partially reallocated.

In the event that an appeal is submitted to the Funding Committee and the renewal project provider or new project applicant is not satisfied with the decision of the Funding Committee, non-conflicted Board members will review the appeal request and will provide a final decision to approve/deny the appeal.

In addition, for the 2019 CoC Competition the non-conflicted Board members will finalize scoring criteria for renewal projects and recommend funding priorities.

## Collaborative Applicant

The PA Department of Community and Economic Development (DCED), in their role as Collaborative Applicant, is designated by the Continuum of Care to collect and submit the CoC Registration, Grant Inventory Worksheet, and CoC Consolidated Application (which includes the CoC Application and CoC Priority Listing). In addition, DCED will apply for CoC Planning Grant funding, with input and approval from the CoC Board.

## Funding Committee

Due to the regulatory requirement that the Funding Committee is limited to representatives that do not receive CoC funding (established in 24 CFR Part 578), the Funding Committee is comprised of two CoC members appointed by each of the CoC's five Regional Homeless Advisory Board. In addition, the Collaborative Applicant also participates in the Funding Committee. The Funding Committee is staffed by the CoC Consultant, who will help to facilitate meetings in partnership with the Committee Chair.

The responsibilities of the Funding Committee include:

- Designing, operating, and following a collaborative process for selecting and ranking project applications, in collaboration with the Governing Board;
- Coordinating the annual project selection process, which includes the ranking of renewal and new projects as required by HUD; and
- Ensuring the strategic use of HUD funds and other resources available to the CoC.

## Regional Homeless Advisory Boards (RHABs)

The CoC's five RHABs meet and conduct business throughout the year and coordinate with local providers to meet the CoC's goals.

As time permits, responsibilities of the RHABs, in relationship to the CoC NOFA, include:

- Providing input on the renewal scoring criteria, which is to be used to inform the recommendations from the CoC Consultant to the Funding Committee;
- Providing input for the prioritization of the region's needs, including recommendations that inform the priority needs; and
- Identifying additional resources available for households experiencing homelessness, as well as local gaps in supports and services; and
- Developing recommendations for funding allocation to submit to the Funding Committee for consideration.

## Guiding Principles for 2019 Project Evaluation, Reallocation, Selection and Ranking

The CoC seeks to conduct a fair, unbiased process in which projects are selected and ranked according to project performance, CoC priorities and local need, and federal priorities.

## Guiding Principles for 2019 Project Evaluation, Reallocation, Selection and Ranking

The Eastern PA CoC seeks to achieve the following goals as part of the evaluation and ranking of CoC-funded renewal projects:

- Maximize funding available to end homelessness throughout the CoC;
- Prioritize available funding for projects that are most successful in ending homelessness;
- Create new resources in order to respond to the increased needs identified in many communities within the CoC;
- Build upon the CoC's existing infrastructure by increasing capacity to quickly identifying individuals experiencing homelessness, prioritizing assistance towards those with the greatest needs, and rapidly connecting households to permanent housing;
- Incentivize all CoC-funded providers to continuously monitor and improve their project performance, implement HUD policy priorities, and participate in the CoC meetings, committees and other initiatives.

Upon the availability of new or reallocated funds, the CoC will conduct a fair, open and transparent process to select new projects. Priorities for new projects will be established by non-conflicted Governing Board members to reflect HUD priorities and CoC needs as identified through RHAB input, data showing unmet needs. New project selection will be based on criteria outlined by the CoC through a new project solicitation process.

The CoC will also conduct a fair and transparent process regarding the ranking and tiering of projects to be included on the 2019 Priority List. Ranking and tiering decisions will be informed by CoC and HUD priorities, as well as local needs and project performance.

### 2019 Renewal Project Evaluation and Scoring Policy

On an annual basis, the Eastern PA CoC establishes scoring standards to evaluate and score HUD CoC-funded renewal projects in preparation for the ranking of projects for the NOFA. In order to determine whether renewal projects are performing well or underperforming, each project's performance will be evaluated in the following areas:

- HUD policy priorities, including vulnerability and housing first
- Performance outcomes, including exits to permanent housing, returns to homelessness, and increases in income
- Grant management, including unit utilization, percent of funds expended, and cost effectiveness
- CoC Participation, including attendance at CoC/RHAB meetings and training
  - Note: Coordinated Entry participation will not be a scored criteria in 2019, but may be in 2020
- HMIS participation, including data quality

## Process for Developing the 2019 Renewal Project Scoring Sheet

Renewal projects will be scored in accordance with the 2019 Renewal Project Scoring Sheet, which will be developed through the process described below:

- Solicit input from CoC-funded grantees on the criteria included in the 2018 renewal project scoring sheet. This input will be requested via email and distributed to all CoC-funded projects, as well as the CoC's entire mailing list and posted on Workplace for Facebook, the CoC's interactive communication tool used for collaboration.
- Any type of feedback will be accepted. Specific feedback desired includes: ways that the renewal scoring criteria may negatively impact a group/class of projects (e.g. projects with a small number of units). In addition, feedback is requested on alternate methodology for the following criteria: evaluation of housing first compliance; cost effectiveness; and the evaluation of application narrative.
  - RHAB Co-Chairs will also be asked to facilitate a local discussion regarding the renewal scoring criteria and will provide feedback to the CoC Consultant (DMA - Diana T. Myers & Associates, Inc.). The Consultant will review this input in conjunction with considerations and provide recommendations for modifications to the 2019 renewal project scoring sheet to the non-conflicted Governing Board members.
- Analysis of the 2018 point structure is conducted by the CoC's Consultant. The purpose of this analysis is to ensure adequate distribution of points on performance-related criteria. This will help to determine if the benchmarks are set to encourage strong outcomes, without favoring certain types of projects (e.g. projects with turnover that are serving the CoC's most vulnerable households vs. projects with no turnover that are serving more stable clients).
- Present the above information to the non-conflicted Governing Board members. This group will discuss, finalize and approve the 2019 renewal project scoring sheet.
- Upon approval, final renewal project scoring sheet and all related policies (e.g. appeal policy/process) will be publicly posted to the CoC's website and distributed to CoC-funded agencies via email.
- Scoring of renewal projects commences following the approval of the 2019 Renewal Scoring Project Sheet and associated policies.

## 2019 Renewal Project Scoring Process

Evaluation and scoring of CoC-funded renewal projects will inform project ranking and tiering for the FY19 CoC NOFA competition. With the exception of CoC-level infrastructure (e.g. HMIS and Coordinated Entry grants), the CoC will follow the below process for scoring renewal projects that have operated throughout the entire data lookback period:

- The CoC's Consultant (DMA) will distribute a Renewal Summary Form to all CoC-funded renewal project applicants, requesting data and information that is not available through the PA-HMIS (the CoC's Homeless Management Information System). This request will identify the

data/information requested, the process for submitting that information, as well as the timeline/deadline.

- Projects operated by Domestic Violence organizations will be provided with an expanded Renewal Summary Form, as their performance data cannot be pulled from PA-HMIS.
- DMA will collect all information, enter it into an Excel file, and provide the information to the PA-HMIS IT Specialist at DCED.
- The 2019 Renewal Project Scoring Sheet will be provided to the PA-HMIS IT Specialist. The PA-HMIS IT Specialist will create a “Renewal Scoring Calculator”. The Calculator, an Excel Spreadsheet, includes one worksheet per scoring element, providing each projects outcome and the associated point value of the outcome. Data presented in the Calculator will include data from HMIS and collected through the Renewal Summary Form.
- Once the Renewal Scoring Calculator has been created, it will be circulated to all CoC-funded grantees. Grantees will be asked to review their data. Grantees should alert DMA of any errors associated with data reported on the Renewal Summary Form within the timeline indicated within the email. In addition, grantees can submit concerns/questions to DMA if there are questions/concerns with the data pulled from HMIS. DMA will serve as a liaison between grantees and the PA-HMIS IT Specialist, forwarding any potential programming or technical concerns with the data presented in the Calculator. DMA and the PA-HMIS IT Specialist will work together to address questions/issues identified.
  - Note: to assist grantees in understanding what HMIS-generated data points are driving their project performance, the PA-HMIS IT Specialist has created a “CoC Ranking HMIS Details Guide”, which will be circulated along with the Renewal Scoring Calculator.
- If an error on the 2019 Renewal Project Scoring Sheet is identified, DMA will work with the Funding Committee to resolve that error. In this situation, a revised Scoring Sheet will be circulated and posted on the CoC’s website.
- In the event that a grantee is not satisfied with the outcome of an issue raised, the grantee may opt to submit an appeal (see CoC’s attached appeal policy). All appeals will be discussed, deliberated and decided by the non-conflicted Governing Board members.
- At the conclusion of the renewal project scoring process, each project will have a score, which will be used to inform the ranking and tiering process.
  - Note: projects that have been approved for consolidation by the HUD Field Office will be scored as a single project, using the data from each project to be consolidated.

## 2019 Renewal Project Reallocation

As stated earlier in this document, the Eastern PA CoC will use project evaluation and scoring to determine which projects should be allocated funds under the FY19 CoC NOFA Competition. The CoC will employ a reallocation process aimed at the following:

- Determining which projects should continue to receive funding based upon performance, meeting CoC needs and furthering HUD priorities;

- Determining which projects are underperforming and whether their current funding may be better utilized if reallocated to another project;
- Determining whether projects are cost effective and, if not, whether the project, in full or in part, should be reallocated; and
- Identifying whether CoC funding are being fully utilized by each project. If there is a history of underspending, the Funding Committee will determine if funding should be partially reduced (reallocated) or if a reallocation plan should be developed to ensure all funding awarded to the CoC is furthering progress to reduce and end homelessness.

Projects subject to reallocation will be provided with an opportunity to submit an appeal, as indicated within the CoC's appeal policy.

### Reallocation of Underperforming Projects

Low performing projects will be considered for reallocation and projects scoring the least number of points for two consecutive years (2018 and 2019) will be considered for reallocation. A project is considered to be low performing when the project's score places the project in the bottom 5 projects of the projects scored. To be considered for reallocation, a project would need to have operated long enough to be competitively ranked for two years.

### Reallocation of Projects Based on Cost Effectiveness

The CoC's renewal scoring process includes the evaluation of a project's cost effectiveness. If it is determined that a project's budget exceeds the typical costs of similar projects, additional information to explain the higher costs may be requested from the grantee. In some circumstances, the Funding Committee may determine that a partial reallocation of CoC-funds is appropriate.

### Reallocation for Other Reasons

The Eastern PA CoC will also consider reallocation of projects for other reasons, including:

- Lack of need within the CoC for the project
- Funds needed to respond to an urgent/emerging issue within the CoC
- Monitoring indicates serious problems with the project, which could include a lack of compliance with CoC policies such as housing first and following Coordinated Entry policies/procedures

## New Project Selection

As part of the annual CoC NOFA Competition, the Eastern PA CoC may identify funds available for new projects. The CoC is committed to ensuring an open and transparent process for the selection of new projects. As such, where funding availability permits, the CoC will issue a new project solicitation for new projects to be distributed widely to interested parties.



## New Project Priorities

In order to determine priorities for new projects, the CoC's consultant (DMA) analyzed data from the Coordinated Entry System Community Queue, the Point-in-Time count and the CoC's Housing Inventory Chart. This information will be presented to the CoC via a pre-recorded webinar by August 20, 2019.

The webinar stressed that the CoC's unmet needs will heavily inform the new project selection process.

## Distribution of New Project Solicitations

DMA will draft the new project solicitation and release a new project Request For Proposal (RFP) to the public. The CoC will work to identify multiple outlets for distribution of the solicitations, including through the CoC's website, email distribution list, Workplace by Facebook, as well as those of related and partner organizations throughout the region and the state.

The new project solicitation will emphasize that new project applicants must incorporate data demonstrating local unmet needs. DMA will provide a new project webinar that presents the unmet needs/ gaps analysis data. The webinar will be recorded and made available along with the accompanying slide deck providing the data presented.

## Review of New Project Pre-Applications

New project solicitations will request that those interested in applying submit a pre-application for CoC review. The information to be included in the pre-application will be detailed in the new project solicitation.

All pre-applications submitted by the deadline stated in the new project solicitation will be reviewed by the Funding Committee. The Funding Committee can request additional information from the applicants where clarification would be helpful in the decision-making process. For each pre-application submitted, the Funding Committee will make a recommendation as to whether or not the project should be included with the CoC's funding request through the FY19 CoC NOFA Competition. The Funding Committee also has the ability to conditionally approve a project, based on the applicant making requested changes to the proposed project. This may include an increase or decrease in units, budget changes, expansion of geography (when needed and possible), etc.

All agencies submitting pre-applications will be notified in writing via email regarding the CoC's decision to include their proposal among ranked projects within the CoC's funding request to HUD. In addition, the CoC will publicly post a list of new project pre-applications received, noting which were selected for inclusion on the Eastern PA CoC FY19 Priority List.

Upon selection, new project applicants must submit a new project application through the HUD e-snaps system in a timely manner and within the deadline established by the CoC.

## Ranking of Projects for the Priority List

### Project Ranking

The CoC expects that the 2019 CoC NOFA will require the CoC to rank projects included on the 2019 Priority List. As part of this process, the CoC anticipates that projects will be sorted into either Tier 1 or Tier 2. In past CoC Competitions, projects placed into Tier 2 have been individually scored by HUD in order to determine if they will receive funding.

The CoC's ranking "rules" over the last several years have included the following principles:

- The ranking process will begin by ranking all renewal projects in their descending score, as determined through the renewal scoring process.
- Renewal projects that have not operated throughout the entire "look back" period (10/1/17 – 9/30/18) will not be competitively ranked; instead these projects will be ranked at the bottom of Tier 1.
- Projects that support CoC infrastructure and operations will be ranked at the bottom of Tier 1. This includes HMIS and Coordinated Entry funding. Planning grants are not ranked.
- The Funding Committee may opt to review performance data across multiple years for renewal projects ranked in Tier 2. Projects with a history of poor performance may be ranked lower than projects with one year of poor performance, even if the 2019 renewal score is higher than a project that has not had performance issues in recent years.
- Based on the CoC priorities and unmet needs, regional priorities identified by each RHAB, and the quality of new project applicant, the Funding Committee will determine how to incorporate the new projects into the overall ranking. The Funding Committee reserves the right to rank new projects in Tier 1 and/or Tier 2.

### Applicant Notification & Public Posting

All applicants will be notified of the results of the ranking process according to the deadline established in the 2019 CoC Competition NOFA. Applicants will be notified regarding the project's rank order on the 2019 Priority List, project placement into Tier 1 or Tier 2, or the rejection of their project for inclusion on the Priority List. The CoC will provide notification in writing via email. The CoC will also publicly post information on ranking and tiering of projects and the list of projects accepted or rejected for inclusion on the 2019 Priority List on the CoC's website.

## Policy Approval & Adoption

This policy document was submitted to the Eastern PA CoC Governing Board for approval and adoption on August 27, 2019.

## EASTERN PA CONTINUUM OF CARE POLICY FOR APPEALING COC FUNDING DECISION

The Eastern PA CoC will follow the procedure below to provide organizations applying for CoC funding with the opportunity to appeal the CoC's funding decision. This policy is effective for the FY19 CoC funding cycle and is relevant to renewal projects and new project applicants.

### **Background:**

In order to ensure a strong and transparent funding process, the Eastern PA CoC has established a Funding Committee, consisting of 11 members; including:

- 2 non-conflicted representatives from each of the CoC's five Regional Homeless Advisory Boards (RHABs), which includes the Chair of the Funding Committee
  - Non-conflicted Funding Committee members are defined as RHAB members who are not recipients or subrecipients of CoC funding, nor are applying for new project funding as a recipient or sub-recipient.
- Collaborative Applicant (member of Committee)
- CoC Consultant (provides staffing and consulting, but is not included as a member)

The recommendations of the Funding Committee, as presented to the Board, will seek to maximize funding to reduce and end homelessness throughout the CoC's geography. The recommendations made by the Funding Committee will be adopted by the Eastern PA CoC Governing Board.

### **Data Review Process – Renewal Project Applicants only:**

The CoC will collect information from PA-HMIS and a Renewal Summary Form to evaluate each renewal project. Once this data is collected and compiled into a single document, the "Renewal Scoring Calculator", will be distributed to CoC-funded grantees for review. Grantees will have a period of time to review the data for accuracy.

The procedure and timeline for submitting questions and corrections to the CoC Consultant will be described within the communications sent to grantees along with the Renewal Scoring Calculator. The period of time during which grantees can make corrections to their data and submit questions to the CoC will be no less than one week. Requests submitted after the indicated deadline will not be considered. Additional documentation may be requested from grantees in order to make corrections to the data.

If the grantee raises an issue that cannot be resolved with the CoC Consultant and/or PA-HMIS IT Specialist, the grantee may request to have the CoC's Funding Committee consider their specific situation. Any grantees wishing to appeal to the Funding Committee must make their request within the timeline specified by the CoC. To submit an appeal, grantees will submit the "Eastern PA CoC Renewal Appeal Form" via email to [easterncoc@pennsylvaniacoc.org](mailto:easterncoc@pennsylvaniacoc.org) with the subject line, "Eastern PA CoC: Appeal to Funding Committee".

The appeal form will ask the grantee to indicate the relevant scoring criteria, reason for the request and compelling information and/or documentation for consideration. The Funding Committee will evaluate

any requests received during their next scheduled meeting, and grantees will be informed by email about the outcome of their appeal.

- The Governing Board's Executive Committee will receive a summary of all appeals submitted.

### **Project Selection – Renewal and New Projects:**

In order to maximize the impact of CoC funding, the Funding Committee will allocate funding to renewal projects that achieve strong performance outcomes and are responsive to HUD and CoC policies, procedures and priorities. In addition, the CoC will solicit new projects in order to improve system-level outcomes, respond to unmet needs throughout the CoC's 33-county geography, pursue the goals and objectives within the CoC's strategic plan, and respond to changing policy priorities.

In the selection of new projects, the CoC reserves the right to request changes to the project prior to its approval. Changes may include, but are not limited to, an increase or decrease of the amount of funding requested, removal of and/or modifications to specific budget line items, revisions to case management ratio, project type, etc.

The CoC's Funding Committee will use a standardized scoring tool to review and select new project applications. New projects selected for inclusion as part of the CoC's Consolidated Application will be informed and provided with additional instruction for completing the HUD e-snaps application. Projects not selected will be notified in writing of this decision.

The CoC will distribute a list of renewal and new projects to be included to HUD as part of the CoC's Consolidated Application no less than 15 days prior to the NOFA deadline.

### **Submitting an Appeal:**

#### **Step 1 - Appeal to CoC Board**

New projects applicants selected for inclusion as part of the CoC's Consolidated Application will be informed upon selection by the Funding Committee and approval by the Governing Board. Any organization not selected for funding, or selected but required to make changes to their proposed project may submit an appeal. Appeal must be submitted via email to [easterncoc@pennsylvaniacoc.org](mailto:easterncoc@pennsylvaniacoc.org) by the next business day. This appeal will be reviewed by non-conflicted CoC Board members (those members who are not employed by organizations being competitively scored and ranked during the CoC competition). The outcome of the appeal will be communicated via email to the appellant within 24 hours of the Board's decision.

In addition, the CoC will distribute a rank-ordered list of renewal and new projects to be submitted to HUD as part of the CoC's Consolidated Application 15 days prior to the NOFA deadline. Projects not selected for inclusion in the CoC's Consolidated Application may appeal. This opportunity to appeal includes both renewal projects that have all or part of their funding reallocated and new project applications not selected.

The procedure and timeline for submitting an appeal will be described in the CoC's Consolidated Application Announcement. The appeal will be reviewed by non-conflicted CoC Board members. The outcome of the appeal will be communicated via email to the appellant within 24 hours of the Board's final decision.

The CoC's final ranking will then be posted on the CoC website. No additional changes will be made to the final ranking unless an internal error is identified.

If issue remains unresolved - Appeal to HUD

In addition to the CoC's appeal process, the HUD CoC NOFA provides project applicants an opportunity to appeal to HUD. This appeal is limited to "eligible project applicants that attempted to participate in their CoC planning process and believe they were denied the right to participate in a reasonable manner".

In order to ensure that all project applicants have the opportunity to participate in the CoC's planning process and to provide input in the CoC's funding process, the CoC has/will provide the following opportunities:

- Circulation of the 2018 Renewal Scoring Sheet, with an opportunity to provide feedback and input on scoring criteria.
- The CoC's ranking criteria will be distributed prior to project scoring.
- Project applicants will have the ability to review and question the data to be used for project evaluation and scoring (the "Renewal Scoring Calculator").
- The CoC will provide a new project application and scoring criteria in order to score all new project applications in a consistent and transparent method.
- Updates will be provided by the CoC during in-person CoC meetings, during RHAB meetings, and via written and electronic communications.
- The CoC provides an appeal policy for any project applicant not selected for funding.

To submit an appeal to HUD, follow the instructions as indicated in the HUD CoC NOFA, which is available at <https://www.hudexchange.info/programs/coc/>.