

WESTERN PA CONTINUUM OF CARE POLICY FOR APPEALING COC FUNDING DECISION

Approved by the Continuum of Care Board, 8/25/17

The Western 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 FY17 CoC funding cycle and is relevant to renewal projects and new project applicants.

Data Review Process – Renewal Project Applicants only:

The CoC will collect information from PA-HMIS and other sources to evaluate each renewal project. Once this data is collected and compiled into a single document, the "Ranking Calculator", it will be distributed to the CoC and each grantee for review. Grantees will have 7 days to review the data for accuracy. Requests submitted after the indicated deadline will not be considered.

The procedure and timeline for submitting questions and corrections to the CoC Consultant will be described within the communications sent to grantees at the time the Ranking Calculator is distributed. 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, the grantee may request to have the CoC's Funding Committee consider their specific situation. Any grantees wishing to appeal to the Funding Committee will need to send an email to pa_coc@hotmail.com with the subject line, "Western PA CoC: Appeal for Funding Committee". The CoC Executive Committee members should also be copied on this email. This includes Kim Stucke kmstucke@stairwaysbh.org, Linda Thompson LAThompson@mckeancountypa.org, Amanda Feltenberger afeltenb@co.butler.pa.us and Tammy Knouse tknouse@fcaa.org. The appeal request should describe the specific situation, reference the relevant scoring criteria and provide 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.

Project Selection – Renewal and New Projects:

In order to maximize the impact of CoC funding, the CoC Board 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 20-county geography, pursue the goals and objectives within the CoC's strategic plan, and respond to changing policy priorities.

Appeal to CoC Board:

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 will be notified in writing of this decision and the reasons why they were not selected.

All project applicants, including renewal projects that have all or part of their funding reallocated and new project applications not selected for funding, may appeal this decision to the CoC Board.

The appeal will be reviewed and discussed by members of the CoC Board. Following this discussion, non-conflicted CoC Board members (those members who are not employed by organizations receiving CoC funding) will vote to determine if the decision stands or is overturned. 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.

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:

- 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 evaluation and ranking (the "Ranking 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 will be available via <https://www.hudexchange.info/programs/coc/>.