Eastern PA Balance of State Continuum of Care (PA-509)
Working to ensure homelessness is rare, brief and a one-time experience

CoC-funding Process and Policies

This policy document was submitted to the Eastern PA CoC Governing Board for approval and was formally approved on February 28, 2022.

Eastern PA CoC – PA-509

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"
    o We must work together as a cohesive system in order to reach our goal
    o We must engage with the wider community
    o 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 - $ awarded by RHAB	2020 - $ awarded by RHAB	$ Change in funding, by RHAB	2013 - % RHAB allocation	2020 - % RHAB allocation	% Change, by RHAB
Central Valley	$1,946,248	$1,386,295	**($559,953)**	18.20%	12.79%	**-5.41%**
Lehigh Valley	$2,716,368	$3,447,230	**$730,862**	25.40%	31.81%	**6.41%**
Northern Tier	$787,866	$682,828	**($105,038)**	7.37%	6.30%	**-1.07%**
Pocono	$1,722,499	$1,969,436	**$246,937**	16.10%	18.18%	**2.08%**
South Central	$3,522,545	$3,349,586	**($172,959)**	32.93%	30.91%	**-2.02%**

*Note: As of the approval of these policies, the 2021 CoC awards are not yet available from HUD. This chart excludes DV Bonus regional projects and CoC infrastructure projects.

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 and oversee 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 role of the non-conflicted members of the Eastern PA CoC Governing Board will be to review a second appeal submitted by project applicants, if the project applicant submitted an appeal to the Funding Committee but was not satisfied with the outcome. This would apply to renewal project applicants that lose points during the renewal scoring process, renewal project applicants subject to full or partial reallocation,

and new project applicants who are not selected for funding, or are conditionally selected based on project changes requested by the CoC's Funding Committee. The decision made by the non-conflicted members of

the Eastern PA CoC Governing Board will be considered the final decision.

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

Regulatory requirements state that funding decisions be made by representatives that do not receive CoC funding (established in 24 CFR Part 578). Therefore, the CoC will establish a Funding Committee with the composition and responsibilities described below.

Composition of Funding Committee

In order to ensure a strong and transparent funding process, the Eastern PA CoC has established a Funding Committee, including the following as voting members:

- Two (2) non-conflicted representatives from each of the CoC's five (5) Regional Homeless Advisory Boards (RHABs), which includes the Chair of the Funding Committee
  - o 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.
- Representative of the Collaborative Applicant (DCED)
  - o As the CoC's HMIS Lead Agency, DCED applies for CoC funding to support the operation of HMIS. However, DCED is seen as non-conflicted because the HMIS grant is ranked in Tier 1 as a project that supports the CoC's infrastructure. In order to maintain the integrity of the CoC's funding process, DCED will not participate in any conversations about the ranking of the HMIS grant.
- Up to 5 persons with lived experience of homelessness (defined as current homelessness/housing instability, or recent homelessness/housing instability within the past 7 years), striving for geographic representation of all 5 RHABs when possible.

Consulting and staff support will be provided by the following non-voting participants:

- Staff from Diana T. Myers and Associates – provides consulting services regarding the CoC NOFA competition and application through the Eastern PA CoC's Planning grant
- CoC Staff Person – will provide administrative support where needed
- DCED CoC Staff – will provide administrative support where needed

Each RHAB appoints two (2) non-conflicted representatives to the Funding Committee with the following terms:

- Funding Committee members must participate in at least 50% of meetings or they may be asked to step down from their position.
- RHABs may choose to appoint a new Funding Committee representative every two (2) years.
- Funding Committee members may choose to step down at any time. If a Funding Committee member chooses to step down, they will notify their RHAB co-chairs and the Funding Committee chair within five (5) days.

When there is a member vacancy, the co-chairs for that RHAB will work with their membership to fill the vacancy with a non-conflicted representative. Upon selection of a representative to fill the vacancy, the RHAB co-chairs will be responsible for notifying the Funding Committee Chair and CoC Consultant of the name, organization and contact information for the new representative for the RHAB.

Responsibilities of the Funding Committee

The Funding Committee will be responsible for operating and following a collaborative process for selecting and ranking project applications and ensuring the strategic use of HUD funds and other resources available to the CoC, in collaboration with the Governing Board. Specific responsibilities include:

- Review and update the Funding Policies on an annual basis;
- Finalize scoring criteria for renewal projects;
- Identify funding priorities, based on the CoC's gap analysis and input from CoC Board, RHABs, Committees, and membership;
- Review and finalize new project solicitations and new project scoring criteria, as needed;
- Review new project applications and approve/deny funding requests, based on the CoC's priorities;
- Review and make determination regarding appeals of new project applications not selected and/or selected for funding based on changes to the project requested by the Committee;
- Review and approve/deny appeals regarding renewal project scoring;
- Review and approve/deny appeals regarding the reallocation (full or partial) of CoC project funds;
- Determine the ranking of renewal and new projects as required by HUD.

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 allocations to submit to the Funding Committee for consideration.

Guiding Principles for 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 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 identify individuals experiencing homelessness, prioritize assistance toward those with the greatest needs, and rapidly connect 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 the Funding Committee to reflect HUD priorities and CoC needs as identified through RHAB input and data regarding gaps and 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 Priority List. Ranking and tiering decisions will be informed by CoC and HUD priorities, as well as local needs and project performance.

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
- HMIS participation, including data quality

Process for Developing the Renewal Project Scoring Sheet

The CoC uses a Renewal Scoring Sheet to list and describe the scoring criteria to be used to evaluate and score renewal projects. This Sheet includes the annual criteria, as well as the data source and point structure for each criterion. Renewal projects will be scored in accordance with the 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 prior year's 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, projects serving families w/children, DV projects, etc.).
    - RHAB Co-Chairs may 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 renewal project scoring sheet to the Funding Committee.
- Analysis of the prior year's point structure is conducted by the CoC's Consultant. The purpose of this analysis is to ensure adequate distribution of points, particularly 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 Funding Committee. This group will discuss, finalize and approve the renewal project scoring sheet.
- Upon approval, final renewal project scoring sheet and all related policies 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 Renewal Scoring Project Sheet and associated policies.

Renewal Project Scoring Process

Evaluation and scoring of CoC-funded renewal projects will inform project ranking and tiering for the 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:

- In advance of and/or in tandem with the renewal scoring process (depending on the timeline of the release of the NOFA), the CoC's Consultant (DMA) will send instructions to grantees to review their data in HMIS, using a common time period (most recently completed HUD year - October to September), including instructions on cleaning up their data if needed. Grantees may reach out to the DCED HMIS team with questions or issues related to their data. DMA will aim to give grantees 2-4 weeks to review and clean up their data, depending on the timeline of the release of the NOFA.

- The CoC's Consultant (DMA) will distribute a Renewal Summary Form to all CoC-funded renewal project applicants, requesting data and information. This form 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 asked to provide an APR or will be provided with an expanded Renewal Summary Form, as Victim Service Providers do not enter data into PA-HMIS.
- Renewal scoring results will be circulated to all CoC-funded grantees.
  - If an error on the 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 a formal renewal scoring appeal. All renewal scoring appeals will be discussed, deliberated and decided by the Funding Committee. If the project applicant is not satisfied with the outcome of the appeal, they may submit a final appeal to 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.
- The ability and methodology for evaluating expansion projects will be determined based on the timeline of each project's contract and expansion activities.
  - Note: projects that have been approved for consolidation by the HUD Field Office will be scored as individual projects, as they are submitted as individual projects within esnaps. The Funding Committee will make decision regarding the ranking of the "surviving project".

The CoC will also evaluate HMIS, Coordinated Entry, and Planning grants including, but not limited to, evaluation of compliance with HUD requirements.

Renewal Scoring Appeal

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. Examples may include: loss of points due circumstances very specific to your project type, outcomes typical of projects operating within their first full year, outcomes typical of projects with specific subpopulations, etc. Any grantees wishing to appeal to the Funding Committee must make their request within the timeline specified by the CoC, following the instructions provided by the CoC consultant. The appeal request will ask the appellant to 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 and make a determination regarding the disposition of the appeal; grantees will be informed by email of the outcome of their appeal.

If a renewal project applicant submits an appeal to the Funding Committee and is not satisfied with the outcome of their appeal, the applicant can appeal to the Non-conflicted Governing Board members. The decision of these Board members will be considered final.

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 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 and/or CoC priorities;
- Determining which projects are underperforming and whether their current funding, in full or in part, 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 funds 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) and/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 a reallocation appeal, as indicated within the appeal process noted below.

Reallocation of Underperforming Projects

Low performing projects (based on a project's outcomes) will be considered for reallocation, as well as projects scoring the least number of points for two consecutive years (based on outcomes and/or grant management related findings) will be considered for reallocation. "Projects scoring the least number of points" is defined as renewal projects with scores in the bottom 20% of all renewal projects scored   . To be considered for reallocation, a project would need to have operated long enough to be competitively ranked for two years. Underperforming projects will be notified by letter following the HUD CoC Competition that their renewal project did not meet scoring/performance expectations. The project applicant will be expected to respond to the letter. Technical Assistance will be offered to all underperforming projects.

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 of Projects Based on Underspending

The CoC's renewal scoring process includes the evaluation of a project's spend down of grant funds. If it determined that a project has spent less than 90%, or has greater than $10,000 underspent, during the last fully completed grant year, the project may be considered for full or partial reallocation. In addition, projects with a pattern of underspending (2 or more years) will be notified by letter following the HUD CoC

Competition that their renewal project did not meet scoring/performance expectations. The project applicant will be expected to formally respond to the letter. Technical Assistance will be offered to projects.

Reallocation for Other Reasons

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

- Lack of need/change in need within the CoC for the project
  - Assessment of CoC need will be informed by Coordinated Entry and CoC Gaps Analysis data
  - Program model/design does not meet the needs of CoC participants
  - Needs within the CoC are expected to evolve over time, both in response to a changing landscape within the CoC as well as in response to major events. The goal of the CoC is to be responsive to the needs within the CoC, which may include shifting funding as needed.
- Funds needed to respond to an urgent/emerging issue within the CoC
- Monitoring indicates serious and repeated problems with the project, including a lack of compliance with CoC policies, which could include[1]:
  - a lack of compliance with Housing First, including receiving concerns and evidence of violation
  - a lack of compliance with the CoC's Written Standards, including receiving concerns and evidence of violation
  - a lack of compliance with Coordinated Entry policies/ procedures, including receiving concerns and evidence of violation
  - Monitoring findings identified by HUD that are not resolved.
- Voluntary reallocation or project convert from one project type to another. Providers who are in good standing with the CoC (e.g. those with strong performance, history of strong grant management, etc.) and interested in voluntary reallocation should contact the CoC Consultant (easterncoc@pennsylvaniacoc.org). The CoC historically has looked favorably upon providers seeking to voluntarily reallocate projects to repurpose the same level of project funding and in some cases to maintain the rank position where the renewal project would otherwise be ranked. The decision to allow a project conversion is at the discretion of the Funding Committee.

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[1] In general, the CoC (including Collaborative Applicant, Consultant, Board, and/or Funding Committee) will make attempts to resolve any monitoring concerns with the grantee. However, if there are ongoing, repeated problems related to the areas identified above that are not resolved, the project may be subject to potential reallocation.

Reallocation Appeal

Any project applicant subject to full or partial reallocation may appeal this decision. There are up to two opportunities to appeal, as described below. All appeals must be submitted within 24 hours of receiving a reallocation notification. To submit an appeal, grantees will follow instructions provided by the CoC consultant.

Any applicant appealing a reallocation decision will first appeal to the Funding Committee. The Funding Committee will review additional documentation submitted by the applicant along with the appeal request. The Funding Committee will consider the supporting documentation and offer a decision within 24 hours after they meet to discuss the appeal.

If the project applicant is not satisfied with the Funding Committee's decision regarding their appeal, the applicant can appeal to the Non-conflicted Governing Board members. The decision of these Board members will be considered final.

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 new project solicitations as needed 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) will analyze data from the Coordinated Entry System Community Queue, the Point-in-Time Count and the CoC's Housing Inventory Chart and other relevant sources as available and appropriate in order to create a gaps analysis. The gaps analysis will be supplemented with input from the Governing Board and RHABs. This information will be presented to the Funding Committee for review, discussion and determination of the CoC funding priorities and for other funding opportunities when possible.

Distribution of New Project Notice of Intent

In an effort to identify potential applicants for new projects, the CoC may choose to issue a Notice of Intent form and encourage organizations interested in applying for new CoC-funding to respond. This will allow the CoC to determine if additional outreach needs to occur in order to identify an applicant to pursue funding aligned to the CoC's funding priorities.

In addition, the NOI process will allow the CoC to identify potential applicants that have not previously applied for CoC funding, as these applicants might need a higher level of technical assistance in submitting an application to the CoC.

Distribution of New Project Solicitations

DMA will draft the new project solicitation and once approved by the Funding Committee, will 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 using a standardized scoring tool. 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 determination as to whether or not the project should be included with the CoC's funding request through the 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 Priority List, as well as the amount of funding approved.

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.

New Project Funding for CoC Infrastructure Projects

Requests for new project funding for CoC infrastructure projects (HMIS and Coordinated Entry) will be reviewed and approved by the Governing Board. If the Governing Board determines that new project applications will be submitted to HUD for HMIS and Coordinated Entry funds, the Governing Board will also advise the Funding Committee related to how to prioritize these projects in the ranking.

Appeal New Project Selection Decision

New project applicants not selected for inclusion in the CoC's Consolidated Application may appeal this decision. There are up to two opportunities to appeal, as described below. All appeals must be submitted within 24 hours of receiving project selection notification. To submit an appeal, grantees will follow instructions provided by the CoC consultant.

Any applicant appealing the CoC's project selection decision will first appeal to the Funding Committee. The Funding Committee will review the justification for the appeal and/or documentation submitted for reconsideration. The Funding Committee will reconsider the funding decision and provide a response within 24 hours after they meet to discuss the appeal.

If the project applicant is not satisfied with the Funding Committee's decision regarding their appeal, the applicant can appeal to the Non-conflicted Governing Board members. The decision of these Board members will be considered final.

Ranking of Projects for the Priority List

Project Ranking

The CoC expects that the CoC NOFA will require the CoC to rank projects included on the 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 (the most recently completed HUD SPM cycle October 1 to September 30th) 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 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 CoC Competition NOFA. Applicants will be notified regarding the project's final budget submitted, rank order on the 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 Priority List on the CoC's website.

Appeal to HUD

If the grantee or project applicant is not satisfied with the outcome of their appeal, the HUD CoC NOFA provides project applicants an opportunity to appeal to HUD. Agencies interested in appealing to HUD should carefully review the eligibility criteria and appeal process established by HUD and described in the annual CoC NOFA. In past CoC Competition NOFAs, this appeal has been 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 prior year's 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/will be available at https://www.hudexchange.info/programs/coc/.