



## Eastern PA CoC PA-509 CoC-funding Process and Policies

This policy document was updated by the Eastern PA CoC Funding Committee on February 23, 2026 and approved by the Eastern PA CoC Governing Board on April 20, 2026.

### Eastern PA CoC – PA-509

The Eastern PA Continuum of Care (CoC) applies to the U.S. Housing and Urban Development (HUD) for Continuum of Care Program 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 Opportunity (NOFO), a national funding competition. As of 2024, HUD indicated an intent to move to a 2-year (biennial) NOFO cycle. In the case of a CoC NOFO “off year” (anticipated to be every other year), the CoC will submit an abbreviated application to HUD if new funds are available through HUD CoC Bonus, DV Bonus, or through reallocation.

Per the 2024/2025 HUD CoC NOFO, CoCs are responsible for conducting a “coordinated, inclusive, and outcome-oriented community process for the solicitation, objective review, ranking, and selection of project applications, and a process by which renewal projects are reviewed for performance and compliance.” While CoC grantees enter contracts directly with HUD, it is at the discretion of the CoC to determine which renewal and new projects are submitted to HUD on the CoC’s Priority List as part of the NOFO competition.

In response to HUD’s CoC NOFO, 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

Funding allocations are made equitably across the CoC where there are unmet needs, following the process outlined in the Funding Policy. The Funding Committee will use both quantitative data (gaps analysis data, community need data, etc.) and qualitative data (organizational capacity and past performance, feedback from Board, RHABs, and Committees) to inform funding allocation decisions. The Funding Committee will work to strategically allocate funds to communities based on unmet needs or other priorities of the CoC.

In addition to the guidance above related to Funding Allocations, the CoC Governing Board has set a fixed funding allocation of 5% of the CoC’s Annual Renewal Demand (ARD) to support the operation of the mainstream Coordinated Entry System. As the CoC’s ARD increases over time, the Coordinated Entry Committee will provide a recommendation to the CoC Board as to whether or not to expand CE funding. This recommendation would be reviewed and approved by the CoC Board.

## Roles and Responsibilities

As detailed below, the CoC 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.)
- Approve/ deny funding requests and any potential changes to the project recipient for all Coordinated Entry and HMIS projects.

## 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, which would occur if the project applicant submitted an appeal to the Funding Committee but was not satisfied with the outcome. This situation could occur when a renewal project applicant is subject to full or partial reallocation and when a new project applicant is 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.

All Funding Committee members must review and sign the CoC's Conflict of Interest Policy.

## 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
  - 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)
  - 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 non-competitively 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 Framework Strategies – provides consulting services regarding the CoC NOFO 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

The Funding Committee is limited to 1 representative per organization.

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.
- Funding Committee members may also be asked to step down from the Committee due to issues such as not complying with CoC Conflict of Interest policy or Code of Conduct<sup>1</sup>. This will be at the discretion of the CoC Governing Board and/or RHAB Chair.
- 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.

If a Funding Committee member becomes conflicted (organization for which they work begins to receive CoC funding), they will be asked to step down from the Funding Committee. If a Funding Committee member works for an organization that plans to apply for CoC funding, the Funding Committee member must recuse themselves from the entire evaluation/selection/ranking process for CoC new project funding. If new project funding is awarded, the member will need to step down from the Committee. If a Funding Committee member works for an organization that plans to continue to apply for CoC new project funding, they will be asked to step down from the Committee. The Funding Committee may not have more than one representative per organization.

If a person leaves a CoC-funded organization and wishes to join the Funding Committee, they must have at least one year out of their role with the CoC-funded organization to be eligible to join the Funding Committee as a Non-Conflicted member. In addition, they must recuse themselves from funding decisions

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<sup>1</sup> Code of Conduct can be found in the [CoC’s Governance Charter](#).

specifically related to their former organization (e.g., reallocation decisions, specific ranking decisions) for at least 3 years after leaving that organization.

### **Responsibilities of the Funding Committee**

The Funding Committee will be responsible for operating and following a collaborative process for evaluating, selecting and ranking project applications to ensure 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.

A quorum of the Funding Committee is needed to vote on the following decisions: 1) Finalize new project selections; 2) Finalize renewal reallocations; 3) Finalize ranking of new and renewal projects. A quorum is defined as 75% of Funding Committee members. If less than 50% of Committee members are eligible to vote due to a conflict of interest or other reasons, the Funding Committee will not take a vote and will defer the vote to the Non-Conflicted Governing Board. If there is not a quorum present during a meeting in which a vote is taking place, a vote can be taken from the present members and a follow-up email will be sent to members who were not present to request that they cast their vote via email within 24 hours of the meeting.

### **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 NOFO, 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, Ranking and Transfers

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, Ranking and Transfers

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.

**Project Recipient Transfers:** In the case that a project (not including Coordinated Entry and HMIS projects) needs to be transferred to a new recipient (whether a voluntary or involuntary transfer), the Funding Committee will review the circumstances of the transfer and determine the mechanism for determining the new recipient, which may include:

- a) Distribute an RFP for a new recipient to the full CoC. Funding Committee to review RFP responses and select a new recipient, or;
- b) In the case that an appropriate recipient has already been identified, the project may be transferred without a formal RFP upon approval of the Funding Committee.

In the case that a Coordinated Entry or HMIS project needs to be transferred to a new recipient, the Governing Board will determine the mechanism for determining the new recipient, which may include:

- a) Distribute an RFP for a new recipient to the full CoC. Governing Board to review RFP responses and select a new recipient, or;

- b) In the case that an appropriate recipient has already been identified, the project may be transferred without a formal RFP upon approval of the Governing Board

**CoC grantees no longer wanting to operate their grants must notify the CoC as soon as possible** so that the CoC can either a) work with the grantee to voluntarily reallocate the grant during the CoC NOFO Competition, or b) work to transfer the grant outside of the CoC NOFO Competition (to avoid the grant funds being returned to HUD). In order for a project to be transferred to a new recipient, HUD requires 3 letters to be submitted: a) letter from CoC approving the transfer, b) letter from organization relinquishing the grant, and c) letter from organization taking over the grant.

Recipient transfers will be reviewed and approved by HUD.

### Involuntary Project Transfers

For the same reasons outlined in the reallocation section of this document, or in the case of other serious grant management concerns or failure to comply with HUD and CoC requirements, a project may be at risk of an involuntary project transfer (transferring from one organization to another at the direction of the CoC). Involuntary project transfers may be necessary due to timing (i.e., issues cannot wait until next CoC NOFO to resolve through reallocation), or when there is a desire to keep the project intact without causing an undue interruption for current clients. In the case of an involuntary project transfer, the Funding Committee would vote on a recommendation to involuntarily transfer a project. All project transfers must receive approval from HUD. As noted above, the Funding Committee would facilitate next steps to identify a new recipient organization.

If a CoC grantee fails to sign their HUD grant agreement within 45 days of project start date (which could put the grant at risk of not being executed), the Funding Committee may also recommend an involuntary transfer to the Non-Conflicted Board to ensure that resources are not lost.

### Escalating Concerns

If staff at a CoC-funded organization are non-responsive to concerns from the CoC about grant management, to the extent that the project may be at risk of reallocation, the Funding Committee may recommend that the CoC reach out to the organization's board of directors. This would only occur in extenuating circumstances where the organization's staff are consistently non-responsive to concerns. The Funding Committee would have the final vote on whether to escalate concerns to a board level.

## 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. Evaluation of CoC renewal projects will happen each year, even in HUD's CoC NOFO "off years". 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 severity of need/vulnerability, Housing First and Equity
- 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 Criteria

The CoC uses Renewal Scoring Criteria to list and describe the scoring standards to be used to evaluate and score renewal projects. This document includes the evaluation 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 Criteria, 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.
- 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 (Framework Strategies). 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 criteria.
- Upon approval, final renewal project scoring criteria 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 Criteria and associated policies.

## Renewal Project Scoring Process

Evaluation and scoring of CoC-funded renewal projects will inform project ranking and tiering for the CoC NOFO competition. Evaluation of CoC-funded renewal projects will also take place in the CoC NOFO “off year” even when ranking/tiering may not be required; this evaluation will inform potential grantee monitoring and/or reallocations. 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:

- Renewal projects can be competitively ranked if they are operating the entirety of the lookback period (e.g., if lookback period is 10/1/24-9/30/25, the project would need to have operated for that entire period). If a project’s initial start date was within 3 months of the beginning of the look

back period (7/1/24-10/1/24 in the above scenario), they will be exempt from being competitively scored/ranked, as the start-up of new projects can take some time to get underway during first grant cycle, which could negatively impact project score. The Funding Committee may consider additional exceptions to competitively ranking projects that were operational the entire lookback period if there was a delay in starting the project (e.g., if project was not able to draw down funds in a timely fashion following grant start up due to HUD delays. This will be determined on a case-by-case basis by the Funding Committee. In the case of a project transferring to a new recipient, the Funding Committee will determine when the new recipient can be evaluated based on timing of the transfer.

- In advance of and/or in tandem with the renewal scoring process (depending on the timeline of the release of the NOFO), the CoC's Consultant (Framework Strategies) 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. Framework Strategies will aim to give grantees 2-4 weeks to review and clean up their data, depending on the timeline of the release of the NOFO.
- The CoC's Consultant (Framework Strategies) 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.
- Preliminary renewal scoring results will be circulated to all CoC-funded grantees.
  - If an error on the preliminary renewal scoring results is identified, Framework Strategies will resolve that error, with support from the Funding Committee as needed. In this situation, revised scoring results will be circulated and the change will be noted.
- 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.
- At the conclusion of the renewal project scoring process, each project will have a score. In the year of a full CoC NOFO application, this score will be used to inform the ranking and tiering process.
- Once the CoC NOFO is published, the CoC Funding Committee reserves the right to modify the renewal scoring criteria and re-score projects if needed to comply with HUD requirements outlined in the CoC NOFO.
- 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 Funding Committee may also evaluate HMIS and Coordinated Entry grants including, but not limited to, evaluation of compliance with HUD requirements. However, a more thorough evaluation of

HMIS and Coordinated Entry (i.e., CoC infrastructure projects) may be conducted by the CoC Governing Board. The Planning Grant is overseen by the CoC Governing Board.

### **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 the total CoC NOFO period is less than 60 days, the CoC may need to forego an appeals process to ensure the CoC can meet HUD’s deadlines.

### **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 NOFO 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 can occur in both the year of a full CoC NOFO Competition and in the NOFO “off year.”

#### **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 scored 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. Technical Assistance may be mandatory in some circumstances at the direction of the Funding Committee.

### **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 is 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 performance expectations. The project applicant will be expected to formally respond to the letter. Technical Assistance will be offered to projects with underspending. Technical Assistance may be mandatory in some circumstances at the direction of the Funding Committee. The Funding Committee may also mandate technical assistance for any renewal project with greater than \$10,000 underspent during last fully completed grant year. This requirement will be at the discretion of the Funding Committee.

### **Reallocation of Projects Based on Underutilization**

If it is determined that a project has been underutilized (with or without underspending), the project may be considered for full or partial reallocation. Underutilization is defined as average utilization (calculated at 4 points in time during the year) of less than 85% compared to HUD-contracted units/households. In addition, projects with a pattern of underutilization (2 or more years) will be notified by letter following the HUD CoC Competition that their renewal project did not meet performance expectations. The project applicant will be expected to formally respond to the letter. Technical Assistance will be offered to projects with underutilization. Technical Assistance may be mandatory in some circumstances at the direction of the Funding Committee.

### **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 needs 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<sup>2</sup>:
  - 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 interested in voluntary reallocation must contact the CoC Consultant ([easterncoc@pennsylvaniacoc.org](mailto:easterncoc@pennsylvaniacoc.org)) prior to initiating any reallocation with HUD. 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 in order to convert project from one type to another ("transition grant") should contact the CoC Consultant ([easterncoc@pennsylvaniacoc.org](mailto: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.

## Reallocation of Projects Previously Funded with DV Bonus Funds

Per the FY24/25 CoC NOFO, HUD requires funding reallocated from projects previously funded with DV Bonus funding to be used for projects serving the same subpopulation. If the Funding Committee determines that a project previously funded with DV Bonus funds should be fully or partially reallocated, those reallocated funds may only be used to create new projects that are 100 percent dedicated to serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking.

## Reallocation Process

When the Funding Committee identifies a project for reallocation, the CoC consultant will notify the project via email. The email will include a letter outlining the reallocation, including reason(s) for reallocation.

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<sup>2</sup> 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. Project applicants must notify the CoC of their desire to appeal within 24 hours (excluding weekends and federal holidays) of receiving a reallocation notification. The project applicant will then have an additional 48 hours to submit their official appeal. To submit an appeal, grantees will follow instructions provided by the CoC consultant. The CoC may provide additional time to submit appeals, if possible, given the CoC NOFO timeline. The timeline to submit an appeal will be included in the reallocation letter.

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. This appeal must be submitted within 24 hours of receiving the Funding Committee's decision (excluding weekends and federal holidays). The CoC may provide additional time to submit appeals, if possible, given the CoC NOFO timeline. The timeline to submit an appeal will be included in the reallocation letter. The Non-conflicted Board Members will meet to review and discuss the appeal and supporting documentation and offer a decision within 24 hours after their meeting. The decision of these Board members will be considered final.

If the total CoC NOFO period is less than 60 days, the CoC may need to forego an appeals process to ensure the CoC can meet HUD's deadlines.

### New Project Selection

As part of the CoC NOFO 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 (Framework Strategies) 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 may 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 (NOI)**

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**

Framework Strategies 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, Slack, 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. Typically, Framework Strategies will review the new project RFP as part of the CoC NOFO webinar, as well as providing links to the gaps analysis data and gaps analysis presentation. The webinar will be recorded and made available along with the accompanying slide deck.

### **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 score awarded to each applicant via the scoring tool is one component of how the Funding Committee will determine new projects that are selected to be submitted for funding under the CoC Competition. The Funding Committee will also factor in need for the project based on gaps analysis data as compared to other projects submitted under this RFP, monitoring findings and compliance, as well as prior performance of the applicant operating CoC or ESG-funded projects. 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 will be included with the CoC's funding request through the CoC NOFO 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 or reductions, 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. If a new project preliminary application is rejected or reduced, the written notice will include the reason for rejection/reduction (which may be based on limited funds available). 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.

### **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. Project applicants must notify the CoC of their desire to appeal within 24 hours (excluding weekends and federal holidays) of receiving a reallocation notification. The project applicant will then have an additional 48 hours to submit their official appeal. To submit an appeal, grantees will follow instructions provided by the CoC consultant. The CoC may provide additional time to submit appeals, if possible, given the CoC NOFO timeline. The timeline to submit an appeal will be included in the new project decision letter.**

**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. This appeal must be submitted within 24 hours (excluding weekends and federal holidays) of receiving the Funding Committee's decision. The CoC may provide additional time to submit appeals, if possible, given the CoC NOFO timeline. The timeline to submit an appeal will be included in the new project decision letter. The Non-conflicted Board Members will meet to review and discuss the appeal and supporting documentation and offer a decision within 24 hours after their meeting. The decision of these Board members will be considered final.**

**If the total CoC NOFO period is less than 60 days, the CoC may need to forego an appeals process to ensure the CoC can meet HUD's deadlines.**

## Ranking of Projects for the Priority List

### Project Ranking

The CoC expects that the CoC NOFO 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 guidelines over the last several years have included principles outlined below. It is important to note that these general ranking guidelines have been based on Tier 1 being set at 85%+ of the CoC's ARD. **In the case that Tier 1 is set below 85% of the CoC's ARD, the CoC will determine the most strategic ranking scenarios to maximize CoC funding and resources.**

- The ranking process will begin by ranking all renewal projects in their descending score, as determined through the renewal scoring process.
  - In the event that a tie breaker is needed in order to complete the Tier 1 renewal project ranking, the score based only on the project's performance-related criteria will be used.
- Renewal projects that have not operated throughout the entire "look back" period (the most recently completed HUD SPM cycle October 1 to September 30<sup>th</sup>) 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 renewal 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. When renewal projects in Tier 2 have the same score, projects will be ranked at the discretion of the Funding Committee.

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. In addition, the Funding Committee reserves the right and has discretion to make changes to the ranking in an attempt to preserve the CoC's overall funding allocation. Ranking of new CE or HMIS projects will be informed by the CoC Governing Board.

Note regarding projects previously funded under DV Bonus: HUD has emphasized in the FY24/25 CoC NOFO that projects previously funded using DV Bonus funds must continue to serve the same population, even when projects are reallocated. It is a priority of HUD and the CoC that DV Bonus funding be preserved to serve survivors of domestic violence, dating violence, sexual assault, or

stalking. As such, the Funding Committee reserves the right to rank projects previously funded using DV Bonus funds in Tier 1, to preserve resources for individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking. As stated above, partial or full reallocation of DV projects will be pursued when needed related to project performance.

#### **Appeal to HUD**

**If the grantee or project applicant is not satisfied with the outcome of their appeal, the HUD CoC NOFO 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 NOFO. In past CoC Competition NOFOs, 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 Criteria, 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. All information will also be posted on the CoC’s website.**
- **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 NOFO, which is/will be available at <https://www.hudexchange.info/programs/coc/>.**

#### **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 NOFO. 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.