



## HUD Continuum of Care Homeless Assistance Grants

### 2024 and 2025 Local Competition Guide

July 31, 2024

Project applicants should review this Guide along with the CoC's Call for Projects, application materials, HUD CoC Program Competition NOFOs, and the Program Rule 24 CFR 578 for full information.

# Table of Contents

---

I. Background	3
II. Local Competition Dates and Deadlines	4
III. Funding Overview	5
IV. HUD Guidelines for Local Competition	6
V. Local Competition, Solicitating Project Applications, Scoring Criteria and Award Notifications	10
VI. Ranking Policies	16
VII. Reallocation	18
VIII. Appeals	20

## I. Background

---

The Continuum of Care (CoC) Program (24 CFR part 578) is designed to:

- Promote a community-wide commitment to the goal of ending homelessness;
- Provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, and youth, while minimizing the trauma and dislocation caused by homelessness;
- Promote access to and effective utilization of mainstream programs by persons experiencing homelessness;
- Optimize self-sufficiency among those experiencing homelessness.

Each year the U.S. Department of Housing and Urban Development (HUD) releases a Notice of Funding Opportunity (NOFO), signifying the beginning of a funding competition among approximately 450 Continuums of Care (CoCs), the community stakeholder groups that guide local responses to homelessness.

The NOFO will consist of three parts:

- The CoC Application, which describes the CoC planning body governance structure, overall performance, and the strategic planning process;
- The CoC Priority Listing, which ranks the project applications for HUD and identifies any rejected applications, showing the CoC's priorities for funding;
- Individual Project Applications, each of which reflects one project seeking funding.

Before the application is submitted to HUD, the CoC is required to hold a local competition to determine which project applications will be included in the consolidated application, along with their relative priority. The results of the local competition dictate which projects the CoC will prioritize. As a project applicant, you must participate in the local review and rank process and have your project selected for submission with the CoC consolidated application in the national competition to be eligible for funding. You must follow local procedures and submit local documents, and you also need to prepare for the HUD submission of the project application. HUD requires the use of a web-based application and grants management system called e-snaps.

Southwest CoC (MN-511) is registered as a CoC with HUD for the following geographies in Minnesota: Big Stone, Swift, Chippewa, Kandiyohi, Meeker, McLeod, Renville, Redwood, Cottonwood, Jackson, Nobles, Lyon, Murray, Yellow Medicine, Lac Qui Parle, Lincoln, Pipestone, and Rock counties. This does not include the geographic area of the Upper Sioux and Lower Sioux communities.

This guide describes the policies and processes used by Southwest CoC (MN-511) to conduct a local competition for Project Applications in allowed geographies to be included in the CoC's consolidated application to HUD in the national CoC Program Competition.

## II. Local Competition Dates and Deadlines

Date & Time	Event	Action	Notes
Friday, June 14, 2024	Intent to Apply due	Send to Lillian Lamoreux at <a href="mailto:swmn.coordinator@swmhp.org">swmn.coordinator@swmhp.org</a>	Renewal projects
Friday, August 9, 2024	Call for New and Expansion projects sent out	Contact Lillian Lamoreux ( <a href="mailto:swmn.coordinator@swmhp.org">swmn.coordinator@swmhp.org</a> )	New, expansion projects
Friday, September 6, 2024	Original Date - Project application first drafts due: New, Renewal, Bonus, Planning	Email PDF to Lillian Lamoreux at <a href="mailto:swmn.coordinator@swmhp.org">swmn.coordinator@swmhp.org</a>	New, expansion, Renewal, Planning projects
By Wednesday Sept 11, 2024	Initial feedback on project applications sent to app writers.	Email will go out from Project Performance and Review Committee Members	New, expansion, renewal projects
Thursday, September 12, 2024	SW MN CoC Meeting and progress review	Montevideo	
Monday September 16, 2024	Project Ranking Meeting	Online meeting	Project Performance and Review Committee Members
Monday, September 23, 2024	New Extended Date - Project application first drafts due: New, Renewal, Bonus, Planning	Email PDF to Lillian Lamoreux at <a href="mailto:swmn.coordinator@swmhp.org">swmn.coordinator@swmhp.org</a>	New, expansion, Renewal, Planning projects
By Thursday Sept 26, 2024	Feedback on project applications sent to app writers.	Email will go out from Project Performance and Review Committee Members	New, expansion, renewal projects
Monday September 30, 2024	Project Ranking Meeting	Online meeting	Project Performance and Review Committee Members
Tuesday, October 1, 2024	Initial Ranking is posted on CoC website. Applicants notified if their projects will be accepted and ranked, rejected, or reduced.	Online posting	New, expansion, and renewal projects
By Monday, October 7, 2024	Appeals due	Email to Lillian Lamoreux at <a href="mailto:swmn.coordinator@swmhp.org">swmn.coordinator@swmhp.org</a>	Projects ranked in Tier 2
By Thursday, October 10, 2024	Voting to approve Project Ranking & Collaborative Application is completed.	Email voting	CoC Governing Board
Friday, October 11, 2024	Final Project Ranking and CoC Collaborative Application posted on CoC website.	<a href="https://www.swmhp.org/communities-resources/continuum-of-care/">https://www.swmhp.org/communities-resources/continuum-of-care/</a>	

By Tuesday, October 15, 2024	All project applications submitted in e-snaps.	Done in e-snaps by applicants.	New, expansion, renewal, planning projects
Friday, October 25, 2024 by 7:00 p.m.	CoC Project Applications, Project Ranking, Project Planning Application and CoC Collaborative Application <b>Submitted!</b>	e-snaps	
Wednesday, October 30, 2024 at 7:00 p.m.	ABSOLUTE Deadline to HUD		

### III. Funding Overview

This section describes the requirements that most directly affect project applicants. For more information, the NOFO and HUD’s other CoC competition resources are available at: [https://www.hud.gov/program\\_offices/comm\\_planning/coc/competition](https://www.hud.gov/program_offices/comm_planning/coc/competition).

Annual Renewal Demand Funding: **Approx. 2024 \$1,416,751**

This funding supports the existing housing and services funded by CoC resources. The CoC has the option to continue to support those programs, or to reallocate those resources, in whole or in part, to Permanent Supportive Housing, Rapid Rehousing, Joint TH-RRH, HMIS, or Coordinated Entry (SSO) projects. (Details regarding eligible populations follows.)

Permanent Housing Bonus Funding: **Approx. 2024 \$170,010**

This funding supports Permanent Supportive Housing, Rapid Rehousing, or Joint TH-RRH projects. (Details regarding eligible populations follows.)

Domestic Violence Rapid Rehousing Bonus Funding: **Approx. 2024 >\$151,303**

Up to \$52 million is available for the DV Bonus which will provide housing and services to survivors of domestic violence, dating violence, and stalking. The DV Bonus funding can support: Rapid Re-housing (PH-RRH) projects, joint TH and PH-RRH component projects as defined in Section I.B.I of this NOFO, SSO Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices that equip the CoC’s coordinated entry to better meet the needs of survivors of domestic violence, dating violence, sexual assault, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC’s coordinated entry and the victim service providers coordinated entry system where they are different).

CoC Planning Funds: **Approx. 2024 >\$68,834**

This funding supports CoC planning activities, and only the collaborative applicant may apply for it. The planning grant will not be ranked in this year’s competition and is not competitive with housing or service projects.

To ensure that CoCs can prioritize their projects locally in the event HUD is not able to fund all renewals, HUD may require that CoCs rank projects in two tiers. The tiers are financial thresholds.

Anticipated Tier 1 Amount: \$1,275,075

Anticipated Tier 2 Amount: \$361,813

CoCs are required to either accept and rank or reject all projects submitted by project applicants in e-snaps, except CoC planning projects. CoCs are encouraged to consider the policy priorities established in the NOFO in conjunction with local priorities to determine the ranking of projects. All projects must pass HUD's eligibility and threshold requirements to be funded, no matter their priority.

**TIER 1:** In 2024, the amount of funding available for Tier 1 is 90% of the CoC's Annual Renewal Demand amount. HUD will conditionally award projects from the highest scoring CoC to the lowest scoring CoC. Projects should be placed in priority order.

**TIER 2:** Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for.

**STRADDLING TIERS:** For any projects that straddle the two tiers, HUD will conditionally select the project up to the amount of funding that falls within Tier 1. Using the CoC score and other factors described in Section II HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award the project at the reduced amount, provided the project is still feasible with the reduced funding (e.g., is able to continue serving homeless program participants effectively).

## **IV. HUD Guidelines for Local Competitions**

---

### **Applicable Goals and Objectives from HUD's Strategic Plan**

#### Strategic Goal 1: Support Underserved Communities

- Fortify support for underserved communities and support equitable community development for all people.

#### Strategic Goal 2: Ensure Access to and Increase the Production of Affordable Housing

- Ensure housing demand is matched by adequate production of new homes and equitable access to housing opportunities for all people.

#### Strategic Goal 3: Promote Homeownership

- Promote homeownership opportunities, equitable access to credit for purchase and improvements, and wealth-building in underserved communities.

#### Strategic Goal 4: Advance Sustainable Communities

- Advance sustainable communities by strengthening climate resilience and energy efficiency, promoting environmental justice, and recognizing housing's role as essential to health.

### **HUD Priorities**

- 1) **Ending homelessness for all persons.** In 2022, the United States Interagency Council on Homelessness (USICH) presented All In: The Federal Strategic Plan to Prevent and End Homelessness to the President and Congress. The plan is built around six pillars: three foundations—equity, data and evidence, and collaboration—and three solutions—housing and supports, crisis response, and prevention. The work funded through this NOFO will support the actions and strategies proposed within the pillars. To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness. CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, those experiencing chronic homelessness, and people with disabilities, including those living with HIV/AIDS). CoCs should partner with housing, health care, and supportive services providers to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.
- 2) **Use a Housing First approach.** Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. CoC Program funded projects should help individuals and families move quickly into permanent housing, and CoCs should measure and help projects reduce the length of time people experience homelessness. Additionally, CoCs should engage landlords and property owners to identify housing units available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client-centered service methods. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.
- 3) **Reducing Unsheltered Homelessness.** In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the country. People living unsheltered have extremely high rates of physical and mental illness and substance use disorders. CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, and supportive services to provide permanent housing options for people who are unsheltered. CoCs should work with law enforcement and their state and local governments to eliminate policies and practices that criminalize homelessness.
- 4) **Improving System Performance.** CoCs should be using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations) to determine how effectively they are serving people experiencing homelessness. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing, and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent. CoCs should review all projects eligible for renewal in FY 2024 and FY 2025 to determine their effectiveness in serving people experiencing homelessness, including cost-effectiveness. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.
- 5) **Partnering with Housing, Health, and Service Agencies.** Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. This is especially important as the CARES Act and American Rescue Plan have provided significant new resources to help end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should: (a) Work closely with public and private healthcare organizations and assist program participants to receive primary care, receive housing related services, and obtain medical insurance to address healthcare needs. This includes developing close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS. (b) Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted

- programs such as Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new program resources provided through the Homelessness Assistance and Supportive Services Program (HOME-ARP) that was created through the American Rescue Plan. (c) Partner with local workforce development centers to improve employment opportunities. (d) Work with Tribal organizations to ensure that Tribal members can access CoC funded assistance when a CoC's geographic area borders a Tribal area.
- 6) **Racial Equity.** In nearly every community, Black, Indigenous, and other people of color are substantially over-represented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: developing a coordinated community response created in partnership with a racially diverse set of stakeholders and people experiencing homelessness and partnering with organizations with experience serving underserved populations. CoCs should review local policies, procedures, and processes with attention to identifying barriers that result in racial disparities and taking steps to eliminate barriers to improve racial equity and to address disparities.
  - 7) **Improving Assistance to LGBTQ+ Individuals.** Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlaps with other forms of prohibited discrimination. CoCs should address the needs of LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in their planning processes. Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure privacy, respect, safety, and access regardless of gender identity or sexual orientation in projects. CoCs should also consider partnering with organizations with expertise in serving LGBTQ+ populations.
  - 8) **Persons with Lived Experience.** The people who know best what solutions will effectively end homelessness are those who are experiencing homelessness. HUD expects CoCs to include people with lived homeless expertise and experience in their local planning and decision-making process. People with lived experience should determine how local policies may need to be revised and updated to improve the effectiveness of homelessness assistance programs, including participating in planning and oversight activities, and developing local competition processes. CoC leaders and stakeholders should prioritize hiring people who have experienced homelessness in areas where their expertise is needed.
  - 9) **Increasing Affordable Housing Supply.** The lack of affordable housing is the main driver of homelessness. CoCs play a critical role in educating local leaders and stakeholders about the importance of increasing the supply of affordable housing and the specific consequences of the continued lack of affordable housing. CoCs should be communicating with jurisdiction leaders, including for the development of Consolidated Plans, about the harmful effects of the lack of affordable housing, and they should engage local leaders about steps such as zoning and land use reform that would increase the supply of affordable housing. This FY 2024 and FY 2025 CoC NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable housing supply.

HUD has also identified performance-based decisions as critical to implementation of local CoC planning and competitions. Consistent with congressional appropriations for the program, HUD has required that:

1. Requests for new project applications are not allowed, other than through reallocation unless a CoC competitively ranks projects based on how they improve system performance as outlined in the NOFO; and
2. HUD will prioritize funding for CoCs that have demonstrated the ability to reallocate resources to higher performing projects.

## B. Creating New Projects



- **New Projects through Reallocation**

CoCs are encouraged to evaluate community needs and project performance regularly, and to use the reallocation process to improve CoC performance. Reallocation generally moves funding from areas of lower need and/or projects with lower performance to areas of higher need and/or projects with higher performance. With reallocation, CoCs may use funds taken in whole or in part from existing grants to create new projects through reallocation.

New projects created through reallocation may include expansions of existing high- performing projects or transition grants to change project component type to respond to community needs. Applications for new projects through reallocation are invited from any eligible and qualified applicant, whether the applicant has previously received HUD CoC Program funding.

Types of projects that may be created via reallocation in FY2024 and FY 2025 for eligible participants:

1. Permanent Housing - Permanent Supportive Housing (PH-PSH) projects
2. Permanent Housing - Rapid Rehousing (PH-RRH) projects
3. Joint Transitional/Rapid Rehousing (TH-RRH) projects
4. Support Services (SSO) for development or operation of the Coordinated Entry System.
5. Dedicated Homeless Management of Information System (HMIS) project submitted by the HMIS Lead

Not all project types that are eligible are prioritized by the local CoC. Information on new project priorities is available in the Call for New Projects and in the Reallocation section of this Competition Guide.

- **New Projects through CoC Bonus**

CoCs are eligible to apply for new projects created with CoC Bonus funds as described in FR- 6600-N-25. For FY2024 and FY 2025, the Bonus amount for each CoC equals up to 12% of the CoC's Final Pro Rata Need, as calculated by HUD.

New projects in this category may be proposed as standalone projects or as expansions of existing CoC-funded projects seeking renewal in the current funding round. In addition, applications for new projects through the CoC Bonus are invited from any eligible and qualified applicant, whether the applicant has previously received HUD CoC Program funding. Eligible project types for CoC Bonus funding are the same as those eligible via reallocation (listed above).

Not all project types that are eligible are prioritized by the local CoC. Information on new project priorities is available in the Call for New Projects.

- **New Projects through DV Bonus**

CoCs are eligible to apply for new projects created with DV Bonus funds as described in FR- 6600-N-25. For FY2024 and FY 2025, the Bonus amount for each CoC equals 15% of the CoC's Preliminary Pro Rata Need, as calculated by HUD. Projects seeking funding via the DV Bonus are dedicated to serving persons who qualify under paragraph (4) of the definition of homelessness, which includes survivors of domestic violence, dating violence, sexual assault, or stalking that are defined as homeless under 24 CFR 578.3. HUD has clarified that this definition includes persons fleeing or attempting to flee human trafficking qualify as homeless under paragraph (4).

New projects in this category may be proposed as standalone projects or as expansions of existing CoC-funded projects, including projects that do not currently and specifically target the populations to be served with these bonus funds. Applications for new projects through the DV Bonus are invited from any eligible and qualified applicant, whether the applicant has previously received HUD CoC Program funding. Unlike in previous years, more than one project may be submitted under the following categories. However, per HUD guidelines, new DV Bonus project applications may not request less than \$50,000.

Eligible project types for DV Bonus funding are:

1. Rapid Rehousing (RRH) projects dedicated to serving survivors of domestic violence, dating violence, or stalking that are defined as homeless under 24 CFR 578.3;
2. Joint Transitional/Rapid Rehousing (TH-RRH) projects dedicated to serving survivors of domestic violence, dating violence, or stalking that are defined as homeless under 24 CFR 578.3;
3. Support Services (SSO) Coordinated Entry System project to implement policies, procedures, and practices that equip the CoC's Coordinated Entry System to better meet the needs or survivors of domestic violence, dating violence, or stalking, ONLY with recommendation of the CoC's Coordinated Entry Committee and commitment to enter agreement with the CoC regarding SSO activities

Not all project types that are eligible are prioritized by the local CoC. Information on new project priorities is available in the Call for New Projects.

### **C. Renewal Projects**

In the HUD CoC Program National Competition, renewal funds are limited to the projects listed on the Southwest CoC's List of Eligible Renewal Projects, which is developed from the HUD-approved Grant Inventory Worksheet and the results of Local Competition project reviews. Eligible project component types are those defined for each renewal project through the Grant Inventory Worksheet process.

Projects seeking renewal funding may not change project component type or exceed the allowed funding levels by line item or in total, as shown on the List of Eligible Renewal Projects (which includes component types and budgets as defined on the HUD-approved Grant Inventory Worksheet).

Projects may reduce budget line items, which would be considered voluntary reallocation. The CoC can also eliminate or reduce funding for these projects (involuntary reallocation) in accordance with the CoC's reallocation policy. Such changes create a reallocation fund which can be used to fund certain types of new projects described below.

## **V. Local Competition, Soliciting for Project Applications, Award Notices**

---

To participate in the HUD CoC Program National Competition, CoCs must conduct a Local Competition to select and prioritize projects to be included in the CoC's regional Collaborative Application to HUD.

Project priorities are developed using data from the CoC's HMIS, PIT, and HIC. The CoC Governing Board reviews the data to assess needs and gaps within the region. In addition to the needs and gaps identified in data, the Governing Board discusses needs providers are seeing on the ground. This community based experience is combined with the data analysis to set local project priorities. Priorities are voted on during a Governing Board meeting or via email following a Governing Board meeting where priorities are discussed.

Project scoring and ranking is conducted by the Project Performance & Review Committee of the CoC, as defined in the Southwest CoC Governance Charter. Committee members are nominated and affirmed by the CoC and must abide by the CoC's Conflict of Interest statement in their scoring and ranking.

New and renewal project proposals are solicited in different ways. Support is available for both new and renewal project applicants.

### **A. New Projects**

New projects are invited from eligible applicants that serve the CoC region, including from entities that have not previously received CoC Program funds. New projects may include new standalone projects or expansions of existing projects.

As soon as possible after the NOFO release, Southwest CoC issues a final Call for Projects to solicit new project applications from eligible and qualified applicants to propose eligible project types. The Call for Projects includes description of estimated funding available, eligible and priority project types for the Local CoC Competition, threshold requirements for applicants and projects, submission requirements and timelines, and resources for applicants.

The Call for Projects is posted on the CoC website, shared with all CoC community members during CoC meetings, and emailed to a wide distribution list of local providers and government entities.

### **B. Renewal Projects**

All renewal projects listed on the Grant Inventory Worksheet for the competition year are invited to declare intent to apply for renewal funds. The invitation is extended through announcement at a full CoC meeting and via email.

For the 2024 and 2025 competition, the Intent to Apply will be posted on the CoC website and distributed via the email at least 30 days before the Renewal Project Applicant deadline.

### **C. Resources and Support for Project Applicants**

Resources are available to assist project applicants with both Local CoC Program Competition and national competition processes. Technical assistance (TA) for the Local CoC Program Competition will be prioritized for new applicants, new projects proposals, and project applicants with new staff, but all applicants are encouraged to seek TA if needed.

These resources for Southwest CoC Project Applicants may include:

- Local Competition guidance and materials, along with HUD and *e-snaps* guides, are posted on the CoC website at <https://www.swmhp.org/communities-resources/continuum-of-care/>. General notifications are distributed via email as well.
- Applicant lab time with CoC staff may be scheduled prior to CoC competition deadlines for applications in *e-snaps* (online system for national competition). Details will follow and be posted on the CoC website.
- 1:1 Technical Assistance provided via phone/web conference by CoC staff, by appointment only.

Details on these resources, together with information on support available through the national HUD CoC Program Competition are included in the Call for Projects.

## D. Review and Scoring Process

All project applications will be reviewed and scored by the Project Performance & Review Committee. CoC staff will collect all application materials as described above and deliver them to the Committee.

The Committee members read all project applications and documentation submitted for completeness and consistency. Threshold requirements will be checked first for all project applicants. Projects that do not meet thresholds will not be scored or ranked.

The Committee may, but is not required to, request clarifications or additional information from applicants if information is not clear enough to score the project. However, the committee must apply the same standard to all applications in seeking clarification. The Committee will record and submit questions to the CoC Coordinator, who will seek input from the applicant on behalf of the Committee.

The Committee will use an objective review and rating tool that meets HUD requirements and aligns with CoC objectives for the funding round to calculate a total score for each project. A rating tool that incorporates DV-specific criteria will be employed for all DV projects. The Rating Tools address the HUD and Southwest CoC scoring criteria defined in this Guide and in the HUD Continuum of Care Program Competition NOFO, thus ensuring that projects are scored based on their ability to improve the CoC's System Performance and meet CoC objectives.

The Committee may place conditions on applications regarding corrections or clarifications to be made before final submittal in *e-snaps*. Conditions identified during scoring will be shared with applicants in writing when the project scores are released. Conditions identified during ranking will be shared with applicants in writing when the ranking is released to the CoC for review and comment.

After reviews are complete, the Committee will finalize preliminary voluntary and involuntary reallocation amounts per the process described in the Reallocation section of this Guide.

All projects are assessed a score for each element on the Scoring Tool, according to the scale described on the tool and using the data sources named in the tool. The score for each element is then added together to create a raw score. Because total points possible for each project type are not equal, all scores are then weighted to a common 100-point scale as follows:  $(\text{Raw score} / \text{Points possible for project type}) \times 100$ . The resulting weighted score constitutes the project's Review Points, which are used in the ranking process.

A score report is generated for each project application. The Score Report includes:

- Notification of whether the project is accepted or rejected for the Local CoC Competition, with reason for any rejections
- Notification of whether the project is subject to reallocation, with reason for any reallocation
- Score calculations for each element
- Total raw score
- Weighted score
- Reviewer notes, including any conditions placed on the application in preparing the *e-snaps* application

A list of Eligible Projects for Renewal will also be generated, including all project Review Scores, allowed maximum funding request, any funds reallocated, and budget detail from the Grant Inventory Worksheet. This List is distributed to project applicants and posted to the CoC website (with notification of posting to the CoC via email).

## E. Scoring Criteria

The Project Scoring Tool for New Projects, for Renewal Projects, and for Projects serving Survivors addresses the following applicant and project eligibility and project quality thresholds established by HUD, as well as Southwest CoC criteria. Applicants should review the NOFOs and the CoC Project Scoring Tools for details. This section includes a general review of criteria and standards.

### *1. Criteria for New Projects*

New projects must meet minimum project eligibility, capacity, and timeliness standards identified in the NOFO. All New Project Applications must meet the following requirements:

- Projects must submit application materials for the Local CoC Competition within published timelines for the competition and via the methods prescribed
- Project applicants and subrecipients must provide evidence of eligibility under the CoC program
- Project applicants and subrecipients must demonstrate the financial and management capacity to carry out the project as proposed and administer federal funds
- Project applicants must submit the required certifications as specified in the NOFO
- Projects applications must establish eligibility of project applicants and propose to serve eligible populations applicable to the project type, per 2 CFR §578.3 and any guidance in the NOFO
- Project must meet an identified need in the region and provide evidence of ability to advance system performance measures
- Projects providing housing must agree to participate in the local Homeless Management Information System. Victim service providers must use a comparable database that meets HUD and local CoC requirements, including ability to generate and deliver data for HUD and CoC reporting/planning
- Projects providing housing must agree to accept and prioritize client referrals through the CoC Coordinated Entry System, using the process approved by the CoC
- Projects must commit to policy and model alignment with CoC expectations for:
  - Housing First/Low Barrier approach
  - Equal Access Rule
  - Ensuring education services for children and youth
  - Coordinated Entry for program participants
  - Participant self-sufficiency supports, including Moving On
  - Advancing advance equity for populations disparately impacted by homelessness
- Projects must maximize leveraging and identify non-HUD funding for the project, including the use of mainstream resources. A minimum of 25% match from other sources is required, and partnerships for rental subsidies or healthcare services are strongly encouraged.
- Projects must request less than 10% in administrative funding HUD will review all projects to determine that projects meet the quality threshold. The criteria and scoring for the HUD project quality threshold review are included in NOFO.

### *2. Criteria for Renewal Projects*

Renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards identified in the NOFO. HUD will review information in eLOCCS, APRs, HUD CPD Field Office monitoring reports, and performance standards to evaluate:

- Whether the project's performance met the plans and goals established in the application
- Whether the project applicant demonstrated all timeliness standards for grants being renewed, including full expenditure of grant funds
- The project applicant's performance in assisting program participants to achieve and maintain independent living and records of success, except dedicated HMIS projects that are not required to meet this standard
- Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site

The CoC will also review how the project advances CoC-wide system performance for people experiencing homelessness in the areas of:

- Advancing equity for disparately impacted populations through program design and implementation
- Leadership or participation in CoC-wide strategies

### *3. Performance Criteria for all Housing Projects*

The performance measures will be based on measures and policy priorities established by HUD and supported by Southwest CoC. (Exceptions and alternatives for DV Bonus and other projects targeted specifically for survivors are noted in #4 below.) Performance measures for all housing projects are:

- Percent of project participants who either remain in permanent housing or exit to permanent housing
- Percent of those exiting permanent housing who do not return to homelessness within 12 months
- Percent of participant households maintain or increase earned income and unearned income between program entry and exit or annual assessment
- Utilization rate of beds/units in the project
- Speed at which program moves households into housing after referral
- Commitment to serving high-need and/or priority populations
- Effective program management – use of funds, bed utilization, data quality
- Commitment to and documented implementation of
  - Housing First/Low Barrier approach
  - Equal Access Rules
  - Requirements to ensure education services for children and youth
  - Coordinated Entry for program participants
  - Participant self-sufficiency supports, including Moving On
  - Efforts to advance equity for populations disparately impacted by homelessness
- Extent to which the applicant participates in and invests in improving CoC system performance

### *4. Criteria for Housing Projects serving Survivors*

Projects serving survivors of domestic violence, dating violence, sexual assault, trafficking, or stalking that are defined as homeless under 24 CFR 578.3 must meet general new or renewal project criteria listed in the HUD Notice of Funding Opportunity and in this section of the Guide. The performance measures are based on

measures and policy priorities established by HUD or the U.S. Interagency Council on Homelessness and supported by Southwest CoC.

Additional and alternative performance measures for housing projects targeted for survivors, including project seeking DV Bonus status, are:

- Percent of participants who report a lower perceived risk of violence upon exit from the program
- Percent of participants who exit and report being stably housed 6 months after exit
- Average time to connect participants to permanent housing
- Commitment to services and programs specific to the needs of survivors in the program
- Commitment to use of alternate, equivalent database to produce required aggregate outcome reports for CoC and HUD reporting

## F. Alternative Performance Measures

Southwest CoC recognizes that scoring criteria may not accurately reflect the strength of certain subpopulation-specific programs. As a result, for the 2024 CoC program competition, programs that 1) offer culturally specific programming or 2) target exclusively youth, victims of domestic violence or sexual assault, or persons seeking sober living/recovery may offer alternative program data measures to review.

All measures submitted must be accompanied by data generated directly from a program database, published industry performance standards (or performance standards from another funder) that support the proposed measure, and definitions of data fields used in the measure.

## G. Award Notifications

**New projects:** The Southwest CoC Performance Review and Rating Committee will review new project applications using the CoC Project Scoring Tools. By the date posted in the Call for Projects, the CoC Committee (via the CoC Coordinator) will provide all new project applicants final notice of project acceptance/rejection, any funding changes, score, rank, Tier 1/Tier 2 status, and source of funds expected for the project (i.e., reallocated funds, CoC Bonus, or DV Bonus). The notification will also include any required changes applicants must make in *e-snaps* to meet project quality thresholds described in the NOFO.

**Renewal projects:** The Southwest CoC Performance Review and Rating Committee will review renewal project performance data and documentation using the CoC Project Scoring Tool and provide scoring and approval to submit renewal project applications.

By the date posted in the Call for Projects, the Committee (via the CoC Coordinator) will provide all renewal project applicants final notice of project acceptance/rejection, any funding changes, score, rank, Tier 1/Tier 2 status, and source of funds expected for the project (i.e. reallocated funds, CoC Bonus, or DV Bonus). The notification will also include any required changes applicants must make in *e-snaps* to meet project quality thresholds described in section D.2. All corrections in *e-snaps* must be made and the *e-snaps* project application resubmitted by 4:00pm on the date set in the Call for Projects to be ranked and included in the project list submitted for review in the national CoC Program Competition.

## H. HUD CoC Program Competition

HUD will conduct a threshold review of ranked projects for all CoCs that submit the CoC Consolidated Application by the application deadline. Projects and applicants that do not meet threshold eligibility and capacity requirements set forth in the applicable NOFO will be rejected. HUD may also place conditions on a grant award that must be satisfied before HUD will execute a grant agreement with the applicant for the project.

HUD may issue up to two conditional funding announcements, which have generally occurred between January and March following the CoC Collaborative Application deadline. HUD will score the CoC Application portion of the CoC Collaborative Application in accordance with the criteria set forth in the applicable NOFO.

HUD may employ rating panels to review and rate all or part of the CoC Applications according to the rating criteria identified in the applicable NOFO.

Projects with rental assistance, leasing, or operations may be adjusted by HUD during the review process to reflect changes in Fair Market Rents (FMRs) for the project area.

Following the evaluation process, HUD will notify successful applicants of their selection for funding. Notification of project awards will be posted on the HUD website and distributed via the HUD Homeless Assistance Listserv. HUD will notify all other applicants, whose applications were received by the deadline, that have not been chosen for award by email. Award information will be sent by mail to the authorized representative(s) named in form SF424, lines 8 and 21.

Administrative and reporting requirements for successful applicants is outlined in the applicable NOFO.

## **VI. Ranking Policies**

---

Southwest CoC ranks project applications based on how they improve the CoC System Performance, as required by HUD guidelines for the CoC Program Competition. Ranking based on performance is required for projects applications in the CoC to be eligible for Bonus Project funding.

To be eligible for ranking, all applicants and projects (new and renewal) must meet all HUD eligibility criteria, as outlined in the NOFO and must comply with Local CoC Competition requirements as described in this Guide, the Call for Projects, and project application forms. Projects that meet the eligibility criteria are scored by the Project Performance & Review Committee based on quality, performance capacity, and cost effectiveness. The Committee uses a CoC approved scoring tool as the basis for ranking projects for each respective project priority list required by HUD.

### **B. Ranking Projects**

Ranking applies to all project applications, except CoC Planning, which HUD does not require CoCs to rank with other projects. All projects ranked fall into one of two Tiers as described in the Funding Overview section of this Guide.

#### *1. Housing Projects*

All housing projects are ranked on the CoC Project Ranking Form, based on their weighted Review Scores. Projects are ranked in descending order, with highest review scores at top and lowest at bottom. The highest ranked projects whose grant amounts total the Tier 1 ARD minus the HMIS renewal(s), SSO-Coordinated Entry renewal, and newly funded projects will be placed in Tier 1.



If there is a tie between two or more projects, a tiebreaker will be used. The score will be based on cost effectiveness (cost to CoC program funds per positive housing outcome), and will be calculated as follows, with the APR used for project reviews:

- For PSH: ( $\# \text{ Stayers} + \# \text{ Leavers to Permanent Housing}$ ) / Total HUD CoC Program funds requested
- For RRH and Joint TH/RRH:  $\# \text{ Leavers to Permanent Housing}$  / Total HUD CoC Program funds requested

The project with the lower cost per positive housing outcome will be placed one rank higher than the other(s) in order.

If there is still a tie between two or more projects after the cost effectiveness tiebreaker has been applied, a second tiebreaker will be applied based on the percentage of performance points awarded on the Scoring Tool. The project that received the highest percentage of performance points will be placed highest of the tied projects, followed by the next highest, and following.

## 2. Non-Housing Projects

After housing projects are ranked, projects for HMIS and SSO-Coordinated Entry are placed in the ranking as follows, based on CoC policy objectives to ensure a functioning Coordinated Entry System and a Homeless Management Information System (HMIS) as required by HUD. The projects are reviewed annually and affirmed as necessary and effective by the CoC Governing Board or by the HMIS Governing Board, as applicable.

Assuming that eligible applications are received, HMIS projects totaling a minimum of 3.5% of Annual Renewal Demand (ARD) and Coordinated Entry projects will be ranked in Tier 1 immediately below new housing projects from the previous funding round.

Once the rank order of projects has been determined, the projects at the top of the list will be in Tier 1 and projects at the bottom of the list may fall into Tier 2.

The CoC reserves the right to re-order the project list or request applicants increase/decrease their budget to best position the Southwest CoC to receive the maximum overall amount of funding and improve the CoC's homeless response system performance. These adjustments are described in the next section.

## C. Adjustments within Project Ranking

After reviewing the full ranking and breakdown by funding tier (if applicable), the Committee may recommend adjustments to the ranking or increase/decrease individual funding requests as described in this guide. The Committee may also make recommendations about which projects should be designated as bonus projects and which should receive reallocated funds (if applicable). Rationale for any adjustment made will be included in the Committee report on ranking, the individual project ranking form (in notification to applicants), and in the Project Priority List posted for public review. In addition, any adjustment applied by the Committee will be applied uniformly across applicable projects.

Reordering for individual projects during ranking may be proposed when:

1. A project straddling Tier 1 and Tier 2 would not likely be feasible if only the Tier 1 portion were funded. Reordering in this case cannot reduce the rank for another housing project that would have been ranked fully in Tier 1 if reordering had not occurred.

2. Analysis of likely project scores in HUD's review of projects within Tier 2 (as described in the NOFO) indicates that a revised order would result in higher overall scores for projects in Tier 2.
3. Comment (with verification) received during the posting period for the proposed project priority list indicates the project was ranked incorrectly. Reductions in funding requests for individual projects during ranking may be proposed when:
  - A project application falls fully or partially below the funding line (below Tier 2 in Regular NOFO ranking), exceeds the HUD-approved Allowed Renewal Amount for the project, or exceeds the total available bonus or reallocated funds according to HUD and CoC rules.
  - A project in Tier 1 meets any of the thresholds for reduction or rejection AND a second project is straddling Tiers or falling partially below Tier 2. Renewal projects with a history of recaptured funds or low bed utilization will be prioritized for reductions. Reduction of this kind will only be applied during the ranking process if 1) the reduced project can reasonably be expected to continue to operate the project as proposed in the project application, and 2) the amount of the reduction does not exceed the amount of funds necessary to prevent a project from straddling Tiers or falling below Tier 2.
  - A new project proposes a significantly higher cost per expected positive housing outcome than other similar projects.
  - A new project overlaps with another project of similar target population, geographic service area, and project component type.

Along with the project-specific reorder and reduction considerations listed above, the Committee may also consider the following in adjusting the order (rank) or funding level for the final Project Priority List:

1. Geographic diversity and geographic need. To provide access to CoC-funded housing and services across the CoC region, the Committee will review the project list in terms of potential impact on geographic regions and communities that have greater numbers of homeless households, especially from populations disparately impacted by homelessness. Projects may be reordered or reduced to align greater potential funding with high-need areas.
2. Target population diversity and equity. To advance the CoC goal of ending homelessness for all people, the Committee may review the project list in terms of potential disparate impacts on persons who have a disability or who identify as LBGQTQIA+, Hispanic/Latinx, or as Black, Indigenous, or other Persons of Color.
3. Funding diversity: Grant amounts may be reduced and projects may be reordered if the overall mix of funding requests represented on the Project Priority List does not move the CoC closer to its optimal mix of program types based on need in the table below or as described in the applicable CoC Plan (Special NOFO projects).

When adjustments are completed and all rationale is recorded on the project form and the list, the Committee will vote to approve the Project Priority List. The proposed Project Priority List must be posted to the CoC website in accordance with HUD's timelines and requirements.

Decisions of the Appeal Review Subcommittee will also be incorporated into the final ranking. All adjustments based on appeals will be documented in the Rationale section of the ranking form.

Upon approval by the CoC, the final project priority list, together with a final draft of the Collaborative Application will be posted for CoC review at least two business days before the Collaborative Application is submitted to HUD, or an earlier date if required by HUD in the Notice of Funding Opportunity.

## **VII. Reallocation**

---

Through the reallocation process, the CoC ensures that projects submitted with the CoC Collaborative Application best align with the HUD CoC funding priorities and contribute to a competitive application that secures HUD CoC dollars to address and end homelessness in Southwest CoC. The CoC will make reallocation decisions based on alignment with HUD guidelines, performance measures, and unspent project funds.

### **A. Criteria for reallocation**

The CoC may reduce or reject a funding request from a project applicant. For renewal projects, this is considered reallocation. Reallocation may be required for any of the following reasons:

The CoC reserves the right to reduce or reject a funding request from a project applicant for any or the following reasons:

- They have been underutilized and returned money to HUD.
- They are underperforming.
- They no longer meet the CoC's Priorities.
- Applicant choice to voluntarily reallocate all or a part of its award, or
- Funding limits set within the applicable NOFO.

Any criteria applied by the CoC for reducing or rejecting funding requests will be applied equitably to similar projects within the same priority/ranking list, based on project type, performance level, or other standard criteria. Funds claimed by renewal projects that are reduced or rejected will be available to new projects through reallocation.

### **B. Involuntary Reallocation**

Involuntary Reallocations may be initiated by the Project Performance & Review Committee based on any of the criteria above, during the scoring phase or during the ranking phase of project reviews. Whenever possible, reallocation decisions will be made during the scoring phase. The Committee will evaluate and determine if programs will have a full or partial reallocation of funding, based on the extent of compliance or noncompliance with the criteria above and impact on persons served. Any reallocation strategy the Committee chooses will be applied for all projects with the same violation, and rationale will be recorded for inclusion with the Project Priority List.

All funds freed through involuntary reallocations may be made available for one or more new or expansion projects.

Project applicants that are subject to partial involuntary reallocation must develop a plan to continue with their renewal project at the reduced level of funding. This includes HUD contract compliance for numbers of persons served and the types of services provided. It may be possible to seek a contract amendment from HUD for some changes; applicants should contact their HUD representative to discuss any options for amendment. If the reduction in funding will result in loss of assistance for persons currently served by the program, the applicant must work with the CoC Coordinated Entry Specialist to develop a transition plan for these persons.

### **C. Voluntary reallocation**

For projects not subject to involuntary reallocation, an applicant may choose to reallocate funds from an existing renewal project.

If the same applicant wishes to apply for a new project using those same funds, the following parameters apply:

- The applicant may choose to reallocate all or a portion of its renewal funds to create the new project.
- The applicant who reallocates renewal funds will have “first rights” to the funds IF the existing (reduced or ended) project scored at or above average for project type in the previous year, and IF the new project proposed is eligible if the NOFO, and IF the new project will meet a high priority project type for the project location (identified in the priorities for reallocation). First rights does not confer any preference in scoring. As a new project, it will be scored and ranked like other similar new projects.
- The applicant may also choose to compete for a portion or all of the funds available to the CoC through involuntary reallocation of other projects or bonus funds, if available. Project applicants that voluntarily reallocate must submit a plan to continue with the renewal project at the reduced level of funding. This includes HUD contract compliance for numbers of persons served and the types of services provided. It may be possible to seek a contract amendment from HUD for some changes; applicants should contact their HUD representative to discuss any options for amendment. If the reduction in funding will result in loss of assistance for persons currently served by the program, the applicant must work with the CoC Coordinated Entry Specialist to develop a transition plan for these persons.

#### **D. Priorities for use of reallocated and bonus funds**

This policy establishes the CoC’s approach to grant reallocation for the 2024 and 2025 HUD CoC application. Refer to the section above for details on voluntary vs. involuntary reallocation processes.

The following types of projects will be prioritized for reallocated and Bonus funding in FY2024 and FY2025. These are listed below in order of priority:

1. Permanent Housing Projects (RRH, RRH-TH, PSH) that create intentional partnership between healthcare and housing.

### **VIII. Appeals**

---

Project applicants may submit appeals to the decisions of the Project Performance & Review Committee in certain circumstances where the applicant believes the project application was harmed by a miscalculation on the part of the Committee, a violation of established CoC or HUD policy, or a violation of CoC Program Competition guidelines as defined in this document. Disagreement with the results of a decision that followed appropriate process will be deemed an invalid appeal.

Appeals will be limited to:

1. Verified Conflict of Interest
2. Violation of CoC-established voting policies or procedures
3. Violation of regulations established by HUD
4. Technical error such as mathematical miscalculation by the scoring Committee.

Projects wishing to appeal related to scoring must submit the appeal in writing by the deadlines set forth in the Call for Projects. All agencies filing an appeal must be prepared to rapidly respond to requests from the committee.

The Performance Review Committee will assess claims within three business days and communicate decisions on that day via the CoC Coordinator. Decisions of the Performance Review Committee are final for the purposes of the Local CoC Program Competition. Applicants may review the applicable NOFO for guidelines regarding appeals in the National Competition.