



North Carolina Balance of State Continuum of Care

bos@ncceh.org

919.755.4393

<https://ncceh.org/nc-bos-coc-overview/>

CoC Competition Project Review and Ranking Policies

Introduction

This document outlines the North Carolina Balance of State Continuum of Care's (NC BoS CoC) policies for reviewing and ranking project applications in the Continuum of Care Program funding competition. This process is separate from the determination made by HUD that a project application meets the requirements established by the Notice of Funding Opportunity (NOFO). This process is structured to inform applicants and our Project Review Committee on how project applications in the NC BoS CoC will be scored and ranked on our CoC's local Priority Listing in the Consolidated Application.

The Priority Listing is a required component of the Consolidated Application and lists our CoC's project applications in the current CoC Program competition in order of priority for funding. The Priority Listing is divided into two tiers: Tier 1 projects are traditionally awarded by HUD, so long as both the CoC's Consolidated Application and the individual project applications meet all requirements established by the NOFO. Tier 2 projects are at a higher risk of not being awarded by HUD, as Tier 2 awards are based on how well the CoC's Consolidated Application competes on the national level. The cap for the amount of funding that can be placed into Tier 1 is a percentage of the CoC's Annual Renewal Demand (ARD) as established by the current NOFO. Any funding request that exceeds the Tier 1 cap must be placed in Tier 2. The NC BoS CoC has created a Project Review Committee to determine which project applications should be placed in Tier 1 and Tier 2 on the Priority Listing and in what order.

Project Review Committee

The Project Review Committee consists of one elected representative from each of the NC BoS CoC's Regions. Representatives cannot be staff from an agency that currently receives CoC Program funding or that is applying for CoC Program funding in the current competition. Once elected by their Region, committee members participate in the evaluation and scoring of CoC Program project applications and are responsible for recommending a final ranked list of applicants, the Priority Listing, to the Governance Board for approval. The scoring of project applications is conducted using the New or Renewal Project Scorecard.

Scorecard Committee

The Scorecard Committee consists of one elected representative from each of the NC BoS CoC's Regions. Representatives may be staff from a CoC Program-funded agency. This committee is tasked with the annual review of the New and Renewal Project Scorecards to ensure these tools award points to projects that adhere to the CoC's Funding Priorities and achieve performance benchmarks, as established by the Funding and Performance Subcommittee.

Funding and Performance Subcommittee

The Funding and Performance Subcommittee is an open committee and can be joined by anyone in the CoC's Membership. The purpose of this subcommittee is to assist the Governance Board in setting goals and priorities for the CoC and in making funding decisions. This subcommittee analyzes data and develops performance benchmarks to ensure our CoC is competitive in the national CoC Program competition for

funding. The priorities established by HUD in the current NOFO are foundational to our CoC's priorities. Other factors of consideration include project coverage across the CoC and diverse project availability in areas identified as "high need" during our Point in Time Count and Housing Inventory Count.

Project Review Policy

In each CoC Program competition, both new and renewal applicants are required to submit a local application to the CoC's Collaborative Applicant, the North Carolina Coalition to End Homelessness (NCCEH). The local application requires an export of the applicant's official project application as submitted to HUD in e-snaps and is supplemented with additional questions and required documents that will inform the project's review. After the local application deadline, NCCEH staff and the Project Review Committee work together to apply the New or Renewal Project Scorecard to each application.

All NCCEH staff and members of Project Review Committee will be partnered together in a group of two and assigned a proportionate number of local applications to review. Both partners will individually apply the scorecard to each local application and will convene after completion to reach an agreed upon final score. This combined review helps reduce the likelihood of error when completing the scorecard. Materials needed to complete the scorecard are provided by the applicant as part of the local application. However, some components of the scorecard are informed by information only NCCEH staff can provide, such as an agency's participation in the Point in Time Count and Housing Inventory Count or a project's participation in the Coordinated Entry System—such components are only completed by NCCEH staff.

Scoring projects with both the New and Renewal Project Scorecards consists of three steps, all of which are determined by both HUD requirements and the Scorecard Committee: the first step is a Threshold Review. Thresholds are mandatory components, and agencies that do not meet one or more thresholds are ineligible to apply for funding in the current CoC Program competition. The second step is a Standard Review. Standards are components that, if met, are indicative of good project management and a high level of performance. Agencies that do not meet one or more standards are still eligible to apply for funding but should identify a corrective plan to meet the standards. The third step is to utilize the components of the scorecard that assign a point value. These components are derived from HUD, as published in the current NOFO, and from the CoC Funding Priorities and performance benchmarks. Each component has a point value that is proportionate to its importance, and the final product of the scorecard is for each local application to have a summed numerical point value that is indicative of its level of priority for funding.

Project Ranking Policy

Once all local applications have passed the Threshold Review and are assigned a numerical point value from the scorecard, the Project Review Committee is tasked with creating the CoC's Priority Listing. The initial draft of the Priority Listing is created by listing all projects from highest priority to lowest priority based solely on their numerical point value. Then, the Project Review Committee conducts their Ranking Options meeting to form the Priority Listing, revising the first draft.

The Ranking Options meeting is designed to be led by Project Review Committee members without competitive influence by NCCEH or any other applicant. During this meeting, committee members make revisions to the first draft of the Priority Listing based on the CoC Program Funding Priorities. For example, the current CoC Program Funding Priorities express that NCCEH's Supportive Services Only – Coordinated Entry grant and Homeless Management Information System (HMIS) grant should be prioritized in Tier 1, as they provide CoC-wide infrastructure that is essential to all projects. Committee members may also make revisions, meaning the shifting of projects from one ranking position to another, based on other Funding Priorities. For example, a lower-scoring project may be ranked above a higher-scoring project if the lower-scoring project better fills the community gaps identified by our CoC Program Funding Priorities.

While revising the Priority Listing, the Project Review Committee is responsible for ensuring that our Priority Listing adheres to HUD requirements:

- The projects on our Priority Listing must not sum a total funding request that is greater than the CoC's ARD, CoC Bonus, and DV Bonus funds as identified by the NOFO. Lower-scoring or lower-priority projects may not ultimately be included on the Priority Listing due to the funding request limit.
- The projects on our Priority Listing placed in Tier 1 must not sum a total funding request greater than the percentage of ARD identified as the Tier 1 funding cap by the NOFO. This may result in a project "straddling" Tier 1 and Tier 2, meaning a portion of the project's funding request is placed in Tier 1, but the remainder is placed in Tier 2 so as not to exceed the Tier 1 funding cap.
- The projects on our Priority Listing must adhere to any applicable permanent housing or supportive service funding caps as identified by the NOFO. For example, in the case of a percentage of total funding request cap on permanent housing, the Project Review Committee will exclude lower-scoring/lower-priority permanent housing projects from the Priority Listing to adhere to the permanent housing funding cap.
- All projects will be evaluated and ranked based on the degree to which they improve or are expected to improve overall CoC system performance and further CoC and HUD priorities. Renewal projects may be evaluated using demonstrated project performance and outcomes, while new projects may be evaluated based on projected impact, project design, capacity, and the extent to which the proposed project addresses identified system and community needs. New and renewal projects will be considered equally within the CoC's review and ranking process, consistent with HUD NOFO requirements

Additionally, the revision of the Priority Listing may result in a project's funding request being involuntarily reallocated. If in order to fund a higher-scoring/higher-priority project and still adhere to the Priority Listing total funding request limit the Project Review Committee must reduce the funding request of a lower-scoring/lower-priority project, they may do so through involuntary reallocation. This decision will result in the applicant needing to revise their project's budget before submitting the official project application to HUD through e-snaps.

Once the Project Review Committee has determined a final version of the Priority Listing that is adherent to all HUD requirements, the committee will present the Priority Listing to the Governance Board no later than any deadline established by the NOFO for final approval. If rejected by the Governance Board, then the Project Review Committee will be tasked with revising a new draft for Governance Board approval. All applicants will be notified of their rejection or acceptance and ranking on the Priority Listing over email from NCCEH by any deadline established by the NOFO. Any applicant whose project was rejected from the Priority Listing or involuntarily reallocated may submit an appeal to the Governance Board under the following criteria.

Appeals Process

The NC BoS CoC strives to create a fair and transparent process for reviewing and ranking CoC Program competition project applications. The Project Review Committee may recommend that some project applications ~~should~~ not be included in the project priority ranking or that some project applications ~~should~~ be partially or fully reallocated. To ensure fairness, these projects will have the opportunity to appeal the NC BoS CoC Governance Board's decision based on the Project Review Committee's recommendation.

Who may appeal:

- New project applicants whose projects were not included in the NC BoS CoC's project priority ranking

- Renewal project applicants whose projects were partially or fully reallocated

Eligible Appeals:

Appeal request letters must present information that shows the Project Review Committee made a clear error by mistakenly using incorrect or significantly incomplete information to make decisions, and additional information presented as part of the appeal will address the deficiencies in the application review.

Ineligible Appeals:

The Project Review Committee will not consider appeals that present information that the applicant neglected to include in its original application or supplementary materials, except in extenuating circumstances. Extenuating circumstances can be defined as an unexpected, nonrecurring event beyond the applicant's control that has resulted in a sudden and significant burden or other catastrophic loss experienced by the applicant that can be verified with documentation. The Project Review Committee will not consider appeals from applicants that:

- Did not follow the advertised process or took steps that are not allowed by HUD policy,
- Engaged in discriminatory activity, as defined below, or
- Had a conflict of interest.

Appeals request letters must also address any deficiencies in the project application. Letters requesting an appeal without addressing deficiencies in the project application will not be considered.

How to Appeal:

Applicants must submit an appeal request letter on agency letterhead, signed by a director-level staff, by the deadline established on the current local CoC Competition timeline. Letters must be submitted via the online form made available on the timeline.

Appeal Decisions:

The Project Review Committee will carefully review each appeal request that meets the eligibility guidelines outlined above. The Project Review Committee may, but is not required to, overturn its original ranking decisions for the applicant filing an appeal.

In the event that an appeal claims one or more members of the Project Review Committee has a conflict of interest that affected the Project Review Committee's decision, or that one or more members of the Project Review Committee discriminated against the applicant, the Project Review Committee must conduct a new full review of the application that does not include the member(s) in question. This full review does not guarantee the Project Review Committee's original decision will be overturned. Discrimination is defined as unjust evaluation of the project due to the applicant or service population's race, ethnicity, language, religion, sex, familial status, age, domestic or sexual violence victim status, disability, or other personal characteristic.

The Project Review Committee will consider each appeal and decide whether to amend the recommended project priority listing by the deadline established on the current local CoC Competition timeline.

If the Project Review Committee decides to recommend amending the project priority listing after reviewing appeals, the updated project priority listing will be reviewed and considered for approval by the NC BoS CoC Governance Board by the deadline established on the current local CoC Competition timeline.

If an appeal is granted, revised project applications must be submitted in e-snaps by the deadline established on the current local CoC Competition timeline. Applications that fail to make revisions and submit in e-snaps by the deadline will be at risk of not being funded.