



## COC REVIEW, SCORE, & RANKING PROCEDURES AND REALLOCATION PROCESS

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### Performance Scoring Policy

The Continuum of Care Program Applications for New and Renewal Projects will be subject to a threshold review to ensure compliance with the HEARTH Act, the Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO) and the local CoC Request for Applications. Any new or renewal project that does not meet the threshold requirement will not be further reviewed or considered for funding. Renewal projects have previously passed the threshold review and only in very exceptional cases of changed HUD policies or program changes will be at risk of not passing the threshold review.

The Glendale Continuum of Care (CoC) makes available the scoring standards for renewal and new projects on the City of Glendale's website and annually at the CoC Committee and CoC Board meetings. The HUD CoC Project Rating and Ranking tool was used to establish the Glendale CoC's scoring standards which was approved by the Glendale CoC Board and Committee.

Scoring of Renewal Projects is formulated by the Glendale CoC using the CoC Project Rating and Ranking Tool recently amended to model HUD's rating and ranking tool; the tool is largely based on prior year performance on HUD-approved System Performance Measures, project costs, project alignment with Housing First and the applicant's ability to spend the previous year's award.

### Ranking Policy

HUD requires Collaborative Applicants to rank all projects in two tiers. Tier 1 is defined by HUD in the NOFO as a percent of the CoC's Annual Renewal Demand (ARD) approved by HUD on the final HUD- approved Grant Inventory Worksheet (GIW). Tier 1 projects are traditionally protected from HUD cuts. Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for bonus (including the Domestic Violence Bonus) as described in the HUD NOFO. Tier 2 projects must compete for funding.

Renewal projects will be scored and ranked according to the HUD CoC Project Rating and Ranking Tool, alignment with Housing First and prior year spending of grant funds, except for Coordinated Entry projects, First Time Renewals including Expansion projects, Change of Project Sponsor or Consolidated projects funded as part of the NOFO competition that have not been in operation for at least one year. These projects will be placed at the bottom of Tier 1 ahead of any Renewal Projects who ranked in Tier 2 and New Projects unless otherwise instructed in the HUD NOFO.

Projects will be ranked as follows:

- Renewal Project applications ranked according to HUD CoC Project Rating and Ranking Tool (Tier 1 and 2)
  - Support Services Only-Street Outreach projects providing Coordinated Entry (Tier 1)
  - Projects funded as part of the NOFO competition that have not been in operation for at least one year including Expansion, Change of Project Sponsor and Consolidation Projects(Tier 1)
  - First Time Renewal Projects (Tier 1)
  - New reallocation, Expansion and Bonus Project applications ranked according to New Project scores that emphasize the HUD priorities outlined in the NOFO (Tier 2)
- The Planning Project is not ranked



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### Re-allocation Policy

Under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), the U.S. Department of Housing and Urban Development (HUD) states that one of the primary responsibilities of the Continuum of Care (CoC) is to develop a reallocation process for projects funded with CoC funds.

Reallocating funds is an important tool used by CoCs to make strategic improvements to their homelessness system. Through reallocation, the CoC can create new, evidence-informed projects by eliminating projects that are underperforming or are more appropriately funded from other sources. Reallocation is particularly important when new resources are not available.

The City of Glendale is committed to maximizing financial resources to house as many individuals and families as possible. Reallocation is a tool that may be used. Reallocation of existing CoC funding will be exercised with prudence.

The City of Glendale's Community Services and Parks Department (CSP) is designated as a Collaborative Applicant (CA) and is responsible for applying for a grant for Continuum of Care planning funds on behalf of the Continuum stated in 24 CFR 578.3. As such, the Glendale CoC assists with determining the priority of submitted projects for inclusion in the Collaborative Application to HUD.

HUD awards a master grant agreement to CSP; projects administered by an applicant will be formalized in a sub-recipient Agreement between the City of Glendale and the eligible applicant agency.

#### DEFINITION

Reallocation is the process of shifting CoC funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's Annual Renewal Demand (ARD). New projects created through reallocation must meet the requirements set forth in the annual CoC Notice of Funding Opportunity (NOFO), including project eligibility and quality thresholds established by HUD at a minimum. Each year HUD determines eligible reallocation project types in the HUD NOFO. Involuntary reallocation of funds should be considered when projects are determined to be underperforming, not meeting system performance measure standards, obsolete, or do not contribute substantially to meeting the goals of the CoC for preventing and/or reducing homelessness.

#### GUIDING PRINCIPLES

- All funds are for the betterment of the community, not solely the individual agency.
- Through a coordinated system, agencies are able to use their funds in a more effective and efficient way to better support their clients in reaching permanent housing.
- Failing programs shall be recommended for reallocation.
- Each year, CSP staff, generally in coordination with a grants committee, will carefully review the HUD NOFO when released, and will use the prioritizations noted within the HUD NOFO to guide prioritization and scoring practices for the CoC. Note: Local community priorities, established using local data, gaps analysis, and/or needs assessments, will be given priority consideration and may take precedence over HUD's priorities.



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### **POLICY**

Decisions to reallocate funds shall be evidence-based. Each CoC-funded project will be evaluated using specific information to include, but not be limited to: data entered into the Homeless Management Information System (HMIS), the HUD Annual Performance Report (APR), the Point-in-Time (PIT) Count, Annual Homeless Assessment Report (AHAR), and the Housing Inventory Count (HIC), the CoC project application, cost per household served, HUD CoC system performance measurements and other field-applicable and HUD-recommended data tools. Consideration will also be given to the potential impact that involuntary (performance-based) reallocation may have on increasing homelessness resulting from a reduction in services caused by reallocation. The CoC intends to make data-driven decisions that align with HUD's goals and priorities for CoC funding, federal strategic plans, and local community needs.

### **TYPES OF REALLOCATION**

#### VOLUNTARY REALLOCATION

If a provider has determined that a project can better serve the community with changes made through reallocation, the provider may voluntarily submit the project for reallocation at renewal time using the "CoC Certification of Project Renewal" form. A provider's voluntary reduction is merely a proposal, and reallocation may or may not occur during the renewal process. Decisions regarding proposed renewal project for partial reallocations will be evaluated by the CoC Board.

#### PERFORMANCE-BASED REALLOCATION

Renewal projects scoring low in the below listed areas, not serving an identified community need, found to not meet minimum benchmark scores on performance measures (as determined by HUD and the local community), not utilizing funding effectively, or not meeting statutory, regulatory, threshold and compliance requirements may be considered eligible for reallocation. As part of the CoC Program Competition, new project applications will be sought from interested, eligible providers. New project applications must align with the eligibility requirements published in the HUD NOFO during that funding cycle.

### **PROCEDURE**

#### COC RELEVANT INFORMATION

The CSP will ensure that the Board members are provided, and familiar with, all relevant information related to:

- the HEARTH Act;
- the Continuum of Care;
- the role of the CoC Board;
- the Policies and Procedures governing the process; and
- the scoring tools and weighting information.

#### PERFORMANCE RATING

The CSP will evaluate projects eligible for performance-based reallocation based on the scoring tool approved by the CoC Board. The scoring tool can be subject to changes based on the need of the CoC and/or funding requirements. The scoring tool will be reviewed by the CoC Board at least once annually.



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### NOTIFICATION OF PROJECT REALLOCATION

Project provider will be notified of the reallocation recommendations to the Board within five (5) business days before the Board meeting. The notification will be sent via e-mail from the CSP. Upon Board decision, project provider will be notified of the reallocation decision within five (5) business days after the Board meeting. The notification will be sent via e-mail from the CSP.

### APPEAL PROCESS

Providers whose projects are selected for performance-based reallocation may appeal the decision in writing to CSP within five (5) business days after notification of the decision for reallocation. The written notification should provide documentation supporting continued need for the project in question, and an action plan detailing how the project will meet HUD funding priorities and maintain compliance with all applicable laws and regulations. The CSP will review appeals and provide a final recommendation within thirty (30) business days of receipt of the appeal. The submission shall be emailed to HUD [snapsappeal@hud.gov](mailto:snapsappeal@hud.gov).

The Appeals Process with HUD is found at 24 CFR 578.35. Sections 578.35(b)(3), (b)(4), (c)(1), and (d)(2), which authorize HUD to establish requirements for the form and manner for appeals by applicants.

### REALLOCATION OF FUNDS

CoC Program funds made available through performance-based reallocation may be used to develop one or more new projects. Should no viable, new project be identified, CoC Program funds made available through reallocation may be available for the expansion of other eligible renewal project(s), subject to current CoC funding priorities and HUD NOFO requirements.