

TCHC Operational Policy and Guidelines

ARTICLE III – Policies and Guidelines for Renewal and New Grant Applications, Including Reallocated Project Funding

Section 1. Evaluation Form The HUD Collaborative Applicant & Grant Applications Selection Committee must use a point-based evaluation form to score and rank NOFA grant applications. Attached, as Appendix A, are the current forms, one for new grants and one for renewal Grants. The HUD Collaborative Applicant & Grant Applications Selection Committee may recommend changes to this form, from year to year depending on HUD’s priorities announced in the NOFA, which the Board of Directors must approve.

Section 2. Prioritizing Applications for Grant Funding When multiple funding applications are submitted those applications shall be ranked in priority order. Once the first priority application is established, the remainder of funds available shall be allocated to the second priority application, etc. until all available funds are included in the TCHC application for grant funding.

As a part of the application review process, the HUD Collaborative Applicant & Grant Applications Selection will review each new and/or renewal application for specific technical details and summarize their findings using the Continuum of Care New Project/ Renewal Project Technical Review Form.. [A current copy of this tool should be included in the Appendix.] Technical issues with a grant must be corrected prior to final acceptance by the CoC for rating and inclusion in the final application to HUD, provided the grant was approved by the HUD Collaborative Applicant & Grant Applications Selection Committee.

After renewal and new applications are reviewed for technical elements using the tool the applications are to be rated and ranked, as submitted, using the Renewal Project Rating Tool or the New Project Rating Tool as applicable.

Section 4. Public Posting, Documenting and Storing the CoC Collaborative Application It is the policy of the Corporation that the annual collaborative application to applicable grants containing the Continuum-of-Care narrative be publicly posted on the TCHC website (tchcsc.org) and made available to the person(s) preparing next year’s application. The President and the Secretary shall be responsible to each store in a separate and different safe place a copy of the computer disc and a hard copy of the complete application.

Section 4. Applicant Appeal Process

Applicants may appeal a scoring and ranking decision if they believe that the score they were given was unsubstantiated by project performance, or if they believe the score indicates a violation of one of TCHC’s written policies. Appeals regarding information that was not submitted in the original application will not be considered. Appeals must be in writing and submitted to the President in person or E-mail message within three (3) business days of the notification email going out that the results are posted on the TCHC website.

The HUD Collaborative Applicant & Grant Applications Selection Committee will meet to discuss any appeal that is brought to the President. The Committee will review the appeal, the reason, and make a determination as to whether a score and/or ranking decision should be altered based on the reason for the appeal. The decision of the Committee will be transmitted to the Board of Directors for their concurrence. The Board’s decision will be posted on the website for all CoC members and an E-mail message sent to the applicant.

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Upon completion of the above process the projects lists will be added to the annual CoC application to HUD.

Section 5. CoC Competition Workshop Training and NOFA Q&A

The Collaborative Applicant and CoC will provide a workshop training for current and prospective grantees that are members of TCHC to educate agencies on the local process, requirements, and ranking/ scoring guidelines of TCHC on a yearly basis, unless otherwise noted. This workshop must be announced in writing and posted to the TCHC website no less than 5 days in advanced.

TCHC will have a Q&A session on the NOFA at the regularly scheduled CoC Meeting immediately following the release of the NOFA, unless the NOFA is announced less than 7 days before the regularly scheduled meeting, in this circumstance the Board may vote and approve to move the regularly scheduled CoC Meeting, to accommodate the local CoC Competition process or provide Q & A through email to the TCHC Secretary for a defined period of time. During the NOFA process the Board and Staff will not be available to contact for any issues regarding project applications outside of these designated times.

Section 7. Public Announcement and Process

Upon publication, the HUD Notice of Funding Opportunity (NOFA) is posted to the TCHC website (tchcsc.org) and is emailed to all current members of ECHO. Reallocated funding, if any will be announced separately from renewal and new projects.

ECHO actively seeks out new organizations with an interest in combating homelessness and encourages them to join TCHC and collaborate with existing members on old and new projects. TCHC has the experience and expertise to assist new organizations in obtaining leveraged funds, complying with HUD requirements and partnering with existing members to expand the reach of TCHC's homeless programs.

Fee requirements will be included in the request for proposal (RFP) posted to the TCHC website (tchcsc.org) and emailed to all current members of TCHC. If an agency is able to demonstrate the capacity to manage a HUD CoC Grant project but are unable to apply due to any fee, a wavier may be given to reduce or excuse the fee by the TCHC Board of Directors. Proposals for a waiver by an Agency/ Organization must be submitted in writing to the President of TCHC within 15 calendar days of the NOFA announcement by HUD, and must be approved by the Board of Directors. The written proposal must include the reason for the reduced or waived fee and demonstrate the capacity of the Agency/ Organization to manage and operate a HUD CoC grant program.

Upon publication of the NOFA, TCHC will establish a timeline for renewal projects and new projects (if new funding is available). The timeline for applications will be posted to the TCHC website (echomeless.org) and emailed. This allows TCHC to be flexible with establishing timelines to meet HUD requirements. All local timelines for project applications must be in compliance with the most recent NOFA release by HUD. All project applications must be entered directly in E-Snaps, unless otherwise announced and submitted in PDF format to the TCHC Secretary email (tchc.coc.secretary@gmail.com). Applications submitted in any other format will be rejected (ex: mail, fax, hand delivery, etc.). Applications submitted after the local deadline established after the announcement of the NOFA by HUD will be not be considered. Applications not considered or rejected by TCHC will receive written notification as for the reason why their project was not considered or rejected no later than 15 calendar days before the NOFA competition deadline.

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Section 8. Reallocation: Reasoning, Process, and Public Announcement

Reallocation Explained:

Reallocating funds is one of the most important tools by which CoCs can make strategic improvements to their homelessness system. Through reallocation, CoCs 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 scarce.

Reallocation refers to the process by which a CoC shifts funds in whole or in part from existing CoC-funded projects that are eligible for renewal to fund one or more new projects. CoCs can pursue reallocations through the Annual CoC Program Competition. A new project through reallocation may use resources from an existing project, including staff, but it cannot be a continuation of an existing project that serves existing participants. CoC's can reallocate funding from any project eligible for renewal in a competition year. The Annual CoC Program Competition Notice of Funding Availability (NOFA) dictates what types of projects may be created through reallocation in a given competition.

CoC Program recipients who do not meet local and/or HUD performance targets and/or do not meet expectations and compliance of program and grant management of their CoC programs, as documented in either or both the CoC monitoring report or monitoring and evaluation reports, may be subject to having their projects reduced in whole or in part and reallocated to other projects.

Because of the thorough review process for reallocation, TCHC will announce the availability of reallocated funding for new projects, if any, within 15 calendar days of the official announcement from HUD regarding the NOFA.

Reasons for Reallocation

There are multiple instances that may call for the Continuum to reallocate funding from a project. Each instance will have its own set of circumstances and challenges and will be analyzed by the Board on a case – by- - case basis. Below is an outline of some of the reasons why funding may be reallocated as well as types of reallocation processes that may present. This is not an exhaustive list, as each decision to reallocate, in whole or in part, can be a unique process that will require guidance from the CoC and possibly the Board of Directors.

1. Fiscal Non-compliance:
 - a. Projects with unspent funds in the most recently completed funding cycle may be considered for reallocation. This will depend upon the percentage of funds that were unspent, the reasons for recapture, and history of unspent funds.
 - b. Has the agency been audited by independent auditors? If yes, were there any findings that the recipient is required to resolve?
 - c. Has any program income been generated through any CoC Program-funded activities? (24 CFR Part 578.103(a)(6)), and if so have the following been met:
 - If program income has been generated, has the agency reported the income generated through the use of the CoC program funds?
 - If program income has been generated, has the program income been disbursed only for eligible CoC Program activities?

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- Has the agency expended program income to pay program costs prior to taking further HUD-fund cash withdrawals?
2. Non-compliance with HUD/CoC Regulations, Policies & Procedures, and Processes:
 - a. Agency/Organizational non-compliance with the CoC Final Interim Rule
 - b. Agency/Organizational non-compliance with the Housing First Approach to end homelessness
 - c. Agency/Organizational non-compliance with Coordinated Entry System Policies and Procedures
 - d. Agency/Organizational non-compliance with CoC process

Not attending trainings provided by the CoC for new and updated processes (i.e., HMIS, CES), lack of involvement in committee activities and calls, lack of attendance at General Membership meetings and other CoC-sponsored events, lack of awareness regarding current or new policies, procedures, and standards set forth by HUD and the CoC, general lack of knowledge regarding the current events that affect the day-to-day operations of programs and projects in the CoC
 3. Poor Performance
 - a. Failure to meet the original performance standard as set forth in the original grant agreement
 - b. Under-utilization of units
 - c. Failure to justify the dollar-client ratio; fiscal inefficiency
 - d. Sub-standard Annual Performance Report (APR)
 - e. Below HUD data quality target for HMIS

Types of Reallocation

1. Voluntary Reallocation of whole or part of a project:
 - a. Currently-funded NOFA project applicants interested in voluntarily reallocating should notify TCHC in writing of their intent by the due date of HUD's Grant Inventory Worksheet (GIW). The GIW will serve as TCHC's tool to identify Project Applicants' intent to reapply for CoC funding.
 - b. For purpose of reallocated project funding (to create a new and innovative project), strong preference will be given to those projects that voluntarily apply to reallocate, and especially for those within a compliance period.
 - c. This Reallocation Policy and Procedure incorporates the following general objectives:
 - To ensure the CoC's responsibility in submitting to HUD an application that is consistent with HUD guidelines and the HEARTH ACT;
 - To ensure the amount to be reallocated is sufficient to fund new and effective projects;
 - To further the CoC's efforts to end homelessness throughout the geographic area
2. Involuntary Reallocation of whole or part of a project:

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- a. TCHC will consider involuntary reallocation as appropriate and as necessary per the language in the annual NOFA and/or the results of the annual project monitoring site visit. Project applicants who do not meet the standards set forth by HUD and the CoC that were examined during the project monitoring will be notified in writing and then required to submit a plan of corrective action and increase project outcomes and/or address concerns prior to the release of the following year's NOFA.
- b. Projects that do not meet threshold or successfully implement their corrective action plan will be subject to involuntary reallocation. While the above described process will be followed in most cases, TCHC, as the Continuum of Care, retains the right to reallocate any project for the aforementioned causes (See Section 8: Reasons for Reallocation).

There are many combinations of funding for projects that can be involved in a reallocation.

Examples include:

- a. Funding from one project (or partial funding from one project) can be reallocated into a new project operated by the same provider;
- b. Funding from one project (or partial funding from one project) can be reallocated into a new project operated by a different provider;
- c. Funding from one project (or partial funding from one project) can be reallocated into many new projects;
- d. Funding from many projects (or partial funding from many projects) can be reallocated into one new project; and
- e. Funding from many projects (or partial funding from many projects) can be reallocated into many new projects.

Request transfer of whole or part of a project PRIOR to Grant Application Process

Prior to grant application process, if an organization decides that they are not able to administratively carry out a program and would like to transfer it in whole or in part to another agency with whom they have come to an agreement, this may be a preferable option to reallocation; however this process must be completed and approved by HUD prior to the release of the NOFA. In some situations, an agency or organization may decide they want to give up or transfer a grant program that they are currently administering – in whole or in part – to another agency. For this process, each grantee will collaborate to determine what is the most efficient and least disruptive process for the individuals that are participating in the program as well as any administrative issues that arise due to the transfer of funding and administration.

All new projects that are submitted that will be applying for any reallocated funding will be reviewed, ranked, and scored in the same manner that a new project would be. All applicants applying for funding must take into account any language and new or updated standards set forth in the most recent NOFA, as each year HUD amends the CoC program requirements, criteria, and policies.

Announcement of Reallocation

It is the intent, as so specified in these Guidelines, that the recommendation for reallocation from the Grant Applications Selection Committee and approval by the board will be available within 15 days of the NOFA

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announcement. However, the process is complex and relies on the activities of several committees so is not guaranteed. Also, the Selection Committee could recommend reallocation of after grant submission and technical review, if the review showed extensive technical flaws in the submission.

The announcement of reallocated funding and timeline will be publicly posted on the TCHC website (tchcsc.org) and will be emailed to all current members. Determination of reallocated funding can be at any time during the NOFA process by the TCHC Board of Directors. HUD Collaborative Applicant & Grant Applications Selection committee will technically review the applications and review, score, and rank the projects, as submitted and submit their recommendation to the TCHC Board of Directors. The TCHC Board of Directors must vote and approve all projects recommended for reallocated funding.

Avoiding Participant Displacement due to Project Reallocation or total/partial loss of funding

It is of utmost importance to ensure that no participant in a HUD CoC program becomes displaced as a result of project reallocation or loss of funding. In order to protect participants from displacement, it is critical that the director of the program or project that is to be reallocated or losing funding contacts the CoC to begin to work out the process of transferring participants to other housing programs (e.g., Rapid Re-housing, Emergency Solutions Grant, Tenant Based Rental Assistance Voucher, or another PSH program, if units are available) within the continuum as soon as possible upon receiving written notification that the project is either being transferred, reallocated or being defunded.

The type of project may determine if and how participants are to remain in the same unit or if they will have to be moved. Each participant must be re-screened for eligibility using the most recent version of the CoC Program Final Interim Rule, the current NOFA in effect, and/or the prioritization standards set forth by the CoC. If the project that is to be reallocated or defunded is losing PSH units and has no access to additional funding for housing to ensure that the participants are not being displaced, the program director will immediately contact the Community Data Solutions Coordinator at ECHO to place each household on the CES Prioritization List for housing resources. Each household will have an intake and assessment done to get them placed onto the list, with the understanding that these participants will have the highest priority for being re-housed. Once the households have been identified, assessed, and placed onto the list, and a project opening becomes available they will be referred to a housing case manager that will contact them and begin the process of locating appropriate housing for their family size and need.

It is the objective of the Continuum and the current grantees to make the best effort to connect current participants, in a reallocated or defunded grant to available resources that the individuals or families are eligible for, as to not displace participants into homelessness. Once the Board makes the final decision to reallocate or has official notice of a defunded project, the Community Data Solutions Coordinator will be contacted to begin the participant transfer process.

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ARTICLE IV - CoC Project Monitoring

Section 1. HUD Grant Monitoring Committee

The ECHO Board of Directors will establish a Program Monitoring Sub-committee under the CoC Committee which will conduct the project monitoring activities for ECHO.

The Program Monitoring Sub-committee will develop and execute a program monitoring process for both remote off-site and on-site monitoring visits. Members of the Sub-committee may include ECHO members and consultants to ECHO (however, not ECHO board members).

Sub-committee members conducting monitoring visits must not have real or perceived conflicts of interest. Sub-committee members may not monitor their own agency's program. They must sign a conflict of interest statement to verify they are not a current project recipient or member of an affiliate agency to the project recipient being monitored.

Section 2. CoC Program Monitoring Tool

The Projects Monitoring Sub-committee will develop and maintain a monitoring tool to be used to monitor all projects. The CoC Program Monitoring Tool can be found in Appendix B. The CoC Program Monitoring Tool must be reviewed at least annually and updated as needed to stay in compliance with the HUD CoC Interim Rule and HUD funding priorities.

Section 3. Notification of CoC Program Monitoring

1. Recipients will be notified, no less than 30 days by email of their monitoring date and a list of information and documents they need to provide to the monitor by the due date, see Appendix D. Monitoring can be conducted in two (2) ways:
 - a. Desk or remote monitoring from the ECHO office.
 - b. On-site monitoring at the recipient's office location.

Section 4. CoC Monitoring Process

See Appendix C for the detailed ECHO CoC monitoring process.

Section 5. Actions to be Taken Against Poor Performing Recipients

1. ECHO will make reasonable efforts to provide training opportunities to staff of poor performing recipients as determined by the Board of Directors with recommendations from the CoC Committee.
2. Poor performers that do not accept ECHO's staff help or attend recommended technical training may be dropped from the CoC project listing. Poor performing projects may be transferred to another high performing recipient or have funding cancelled and offered up for reallocation to another applicant.