



# Fredericksburg Regional Continuum of Care

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## Funding Policies & Procedures

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## I. Policy Intent

This policy governs the solicitation, review, selection, and ranking of projects for funding through collaborative applications, including those for Continuum of Care Program and Virginia Homeless and Special Needs Housing (excluding HOPWA) funding. Collaborative applications will be handled in the following manner to ensure an objective, transparent, and competitive funding process.

## II. Key Documents

**Policy Priorities** – Annually developed and adopted by the CoC Board, this document will establish funding priorities and guide funding decisions.

**Project Performance Standards** – Annually developed by the Funding & Performance Committee, with staff support, and adopted by the CoC Board, this document will establish project performance standards, by project type.

**Local Notices of Funding Availability (NOFAs)** – Developed by CoC Staff for each collaborative application, local NOFAs will contain information on funding process and timeline, estimated funding available, applicant eligibility and requirements, and project requirements.

**Local Application Forms** – Developed by the Funding & Performance Committee, with staff support, and adopted by the CoC Board for each collaborative application, local application forms will be used either on their own or in conjunction with application forms required by the funding source to gather information from project applicants.

**Scoring Sheets** – Developed by the Funding & Performance Committee, with staff support, and adopted by the CoC Board for each collaborative application, scoring sheets will be used by the Funding & Performance Committee to review and score project applications.

## III. Policy Priorities & Project Performance Standards

Each January, the CoC Board will adopt policy priorities and project performance standards for the upcoming calendar year. In order to finalize the documents in January, draft priorities and standards will be developed and posted for public comment in the last quarter of the year.

Policy priorities will be developed by the CoC Board, with staff support, based on local data, full CoC membership input, consumer input, and state and federal priorities. Project performance standards will be developed by the Funding & Performance Committee, with staff support, for each project type (outreach, homelessness prevention, emergency shelter, rapid re-housing, permanent supportive housing, and housing location) based on local data and federal, state, and local priorities and plans.

Draft policy priorities and project performance standards will be opened to the full CoC membership and community for public comment. Priorities and standards will be amended as necessary before receiving final approval from the CoC Board.

Final policy priorities and project performance standards will be posted on the FRCoC website.

Policy priorities and project performance standards will be used in making funding decisions for all collaborative applications. Project outcomes from the previous year will be compared to that year's project performance standards.

## **IV. Funding Process**

The funding process for each collaborative application will follow these steps:

1. The Funding & Performance Committee will develop local application forms and scoring sheets for the collaborative application; these documents will be approved by the CoC Board.
2. The Collaborative Applicant will develop a local NOFA for the collaborative application.
3. The Collaborative Applicant will post the local NOFA, local application forms, and scoring sheets to the FRCoC website and distribute to the full CoC membership to solicit project applications at least 15 days before the project application deadline.
4. Project applications will be submitted to the Collaborative Applicant by the established deadline.
5. The Collaborative Applicant will submit all project applications to the Funding & Performance Committee for review and ranking.
6. The Funding & Performance Committee will review and score each application using Board-approved scoring sheets.
7. The Funding & Performance Committee will either reject or accept and rank each project application. The Funding & Performance Committee can also choose to reduce the amount of a project application.
8. The Collaborative Applicant will notify each applicant of the Funding & Performance Committee's recommendation to accept and rank, reject, or reduce their project application(s), and will share the completed scoring sheet for each project application with the project applicant. The Collaborative Applicant will also include specific instructions regarding the point of contact and deadline for appeals.
9. If applicable, any appeals will be handled according to the appeals process outlined in this document.
10. After the appeals process has concluded, if applicable, the Funding & Performance Committee will submit ranking recommendations to the CoC Board for final approval. If the CoC Board does not agree with the Funding & Performance Committee recommendation, the two groups will meet to determine the final ranking. If the two groups are not able to agree, the full CoC membership will vote on the final ranking.

11. The Collaborative Applicant will notify each applicant of the CoC Board's determination to accept and rank, reject, or reduce their project application(s).
12. If applicable, project applicants will have the opportunity to make changes to project applications based on feedback from the Funding & Performance Committee.
13. The completed collaborative application and project ranking will be posted to the FRCoC website and distributed to the full CoC membership for public review before the final deadline of the collaborative application.
14. The Collaborative Applicant will submit the final collaborative application on behalf of the FRCoC.

## V. Applicant Threshold Requirements

Applicants requesting funds through any FRCoC collaborative application process must meet the following conditions:

1. Be a member of the FRCoC as defined in the Bylaws.
2. Agree to adhere to the *FRCoC Coordinated Entry Policies & Procedures*, including the following requirements of that document:
  - a. Follow the Housing First model
  - b. Participate in the CoC's coordinated entry process
  - c. Adhere to established project standards
  - d. Collect data through HMIS or a comparable database
3. Meet the eligibility requirements of the funding agency.

## VI. Review & Ranking

The Funding & Performance Committee will review and score project applications using Board-approved scoring sheets. Scoring sheets may vary by project type and application type (new vs. renewal). Scoring sheets should consider the following elements:

- Eligibility and threshold requirements
- Alignment with local policy priorities
- Commitment to applicable state/federal policy priorities
- Strength of project application
- Project performance

CoC planning, HMIS, and coordinated entry projects should be reviewed for eligibility and threshold requirements to determine whether or not they should be accepted, but do not need to be scored if there are no projects of the same type to compare them to.

Project application scores should reflect the strength of the individual proposal as well as the relative strength of the proposal in comparison to other proposals for the same project type. Scores should also

reflect the proposal's ability to demonstrate strong collaboration among the network of projects within the homelessness response system.

Project application scores should inform the final project ranking, but the Funding & Performance Committee should also consider other factors, such as project type, population group served by the project, levels of unmet need, or other parameters. The Funding & Performance Committee will consider all of these factors to determine one of the following actions for each project application:

- Accept at full amount
- Accept at reduced amount
- Reject

The Funding & Performance Committee will rank all accepted projects. Renewal projects for CoC planning, HMIS, and coordinated entry that are accepted should be placed at the top of the ranking, as the system relies on these projects to operate. New projects for CoC planning, HMIS, and coordinated entry should be ranked based on the needs of the system.

## **VII. Reallocation**

Collaborative application processes permit a CoC to reallocate funds between projects to better achieve federal, state, and CoC goals for addressing homelessness. In particular, the US Department of Housing and Urban Development (HUD) encourages the reallocation of funds from renewal projects to provide funding for new projects. Reallocation also presents an opportunity for CoCs to move funding from projects that are underutilized, not cost effective, underperforming, or obsolete.

The FRCoC will reallocate funds granted through collaborative application processes, as needed, to more effectively resolve homelessness, help households achieve stable housing, and improve CoC performance. Reallocation will be based on the adopted annual FRCoC policy priorities, 10-Year Strategic Plan, federal and state strategic goals, and project performance. Project funds may be reallocated through either the collaborative application process or the voluntary return of funds.

### **Reallocation through the Collaborative Application Process**

During the collaborative application process, the Funding & Performance Committee may recommend that it is necessary to reallocate funds from a project, in part or in whole, to another project based on the factors described above. Additionally, the Funding & Performance Committee will consider the capacity of other project(s) to receive additional funding and their performance. The Funding & Performance Committee will reallocate funds by reducing or rejecting a renewal project and accepting a new project for the reallocated amount.

Grantees will be notified in writing of the Funding & Performance Committee's reallocation recommendation and justification. Grantees will also be provided specific instructions regarding the point of contact and deadline for appeals. In the event of an appeal, grantees will be notified of the decision in writing within 24 hours of the decision. At the end of the appeal period, the Funding & Performance Committee will provide the reallocation recommendation to the CoC Board as part of the ranking recommendation.

## **Reallocation through the Voluntary Return of Funds**

FRCoC grantees may voluntarily return funds at any time during the grant operating year by providing a written request to the Collaborative Applicant. Any funds that are not able to be utilized without changing the intent of the grant funding should be voluntarily returned. A grantee seeking to return funds through the voluntary process must do so in accordance with federal and state requirements. The FRCoC Funding & Performance Committee will review the request and make a recommendation to the CoC Board for reallocation of the funds within seven days of receiving the request. During the review process, the Funding & Performance Committee will consider the following factors in determining how to reallocate funds:

- FRCoC policy priorities
- Collaborative application ranking
- Capacity and performance of other grantees and their project(s)

The CoC Board will review the reallocation recommendation of the Funding & Performance Committee and vote to approve or disapprove within three days of receiving the recommendation. The grantee will be notified of the CoC Board's decision in writing within 24 hours of the decision.

## **VIII. Appeals**

Appeals can be made by applicants who have specific concerns regarding the review and scoring of their applications or by CoC members who feel that they were unfairly left out of the funding process.

Applicant appeals will only be considered in cases where applicants have material concerns specific to the review and scoring of their application. Applicant appeals specific to ranking or funding allocation recommendations will not be considered. (See "Eligible Appeals" below.) All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application by the applicant cannot be appealed.

Upon receipt of a notice of appeal, an Appeals Committee, composed of three members of the CoC Board and one member of the Funding & Performance Committee (non-voting), will be formed. The voting members of the Appeals Committee will not have reviewed the project application seeking appeal review or have a conflict of interest with any of the agencies applying for the applicable funding. The Appeals Committee will review each appeal to determine whether the appeal meets the eligibility criteria stated below. The Appeals Committee will review only those areas of the application that are being appealed. The recommendation of the Appeals Committee will be final.

### **Eligible Appeals**

Applicants may appeal if they can:

- Prove their score is not reflective of the application information provided; or
- Describe bias or unfairness in the process, which warrants the appeal; or
- Document a compelling organizational necessity not specifically described elsewhere in this document.

CoC members may appeal if they can:

- Demonstrate that they were unfairly left out of the funding process

## **Appeals Process**

1. The appeals process and deadline will be included in the local NOFA and posted on the FRCoC website.
2. The Collaborative Applicant will notify each applicant of the Funding & Performance Committee's recommendation to accept and rank, reject, or reduce their project application(s), and will share the completed scoring sheet for each project application with the project applicant. The Collaborative Applicant will also include specific instructions regarding the point of contact and deadline for appeals.
3. All notices of appeal must be submitted to the point of contact by the publicized deadline for appeals. Receipt of the notice of appeal will be confirmed within 24 hours.
4. The notice of appeal must include a written statement specifying in detail all grounds asserted for the appeal. The appeal must be submitted by an individual authorized to represent the agency and must include the specific sections of the application on which the appeal is based. The appealing agency must specify facts and evidence sufficient for the Appeals Committee to determine the validity of the appeal. That is, the notice of appeal must have attached the specific areas of the application being appealed and must also clearly explain why the information provided was adequate to gain additional points.
5. The Appeals Committee will review and evaluate all notices of appeal and determine whether or not each appeal meets the FRCoC requirements to make an appeal.
6. All eligible appeals will be read, reviewed, and evaluated by the Appeals Committee within 48 hours of the deadline for appeals.
7. The Appeals Committee will provide a determination on the appeal, and a written summary of the determination will be provided to the appealing applicant and the Funding & Performance Committee within 24 hours of the decision. The recommendation of the Appeals Committee will be final.