



# Fredericksburg Regional Continuum of Care

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## Funding Policies & Procedures

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## I. Revision Log

<u>Version</u>	<u>Approval Date</u>	<u>Revisions Made</u>
<u>1.0</u>	<u>2/7/2018</u>	<u>Document created.</u>
<u>2.0</u>	<u>2/28/2019</u>	<ul style="list-style-type: none"> <li>• <u>Expanded the purpose to include all funding decisions that the CoC is involved in rather than just collaborative applications. Provided clarity on the process for each type of funding decision.</u></li> <li>• <u>Terminology changes</u></li> <li>• <u>Reorganization of the document order to assist with flow and clarity.</u></li> <li>• <u>Added process for the lead agency to apply for funding on behalf of the CoC</u></li> <li>• <u>Added organizational review separate from the funding application process</u></li> <li>• <u>Added process for allocating Virginia Homeless Solutions Program (VHSP) award</u></li> <li>• <u>Added process for requesting a Letter of Support</u></li> <li>• <u>Added process for requesting CoC endorsement</u></li> </ul>
<u>2.1</u>	<u>2/6/2020</u>	<ul style="list-style-type: none"> <li>• <u>Changed “FRCoC” to “CoC”</u></li> <li>• <u>Added “in writing” to all notification mentions to clarify that all communication with grantees/applicants would be provided in writing</u></li> <li>• <u>Clarification of abbreviations not otherwise explained in the document</u></li> </ul>
<u>2.2</u>	<u>03/25/2021</u>	<ul style="list-style-type: none"> <li>• <u>Added more factors of consideration when making ranking decisions</u></li> <li>• <u>Expanded the “Process for Allocating Virginia Homeless Solution Program (VHSP) Awards” to cover all “community awards” in which the CoC receives a community allocation after applying for funds</u></li> <li>• <u>Added process for Using Special Funding Process</u></li> </ul>
<u>2.3</u>	<u>3/23/2023</u>	<ul style="list-style-type: none"> <li>• <u></u></li> </ul>

## III. Policy Intent

This policy governs the process for the Fredericksburg Regional Continuum of Care's (CoC) funding decisions, including the review and approval of applications submitted by the Lead Agency on behalf of the CoC; the solicitation, review, selection, and ranking of projects for collaborative applications; the solicitation, review, and selection of projects subgranted by the Lead Agency; and the review of requests for letters of support or CoC endorsement of a project application. All CoC funding decisions will be handled in the following manner to ensure an objective and transparent funding process.

## III. 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 Opportunities~~ (NOFAs)** – Developed by CoC staff for each funding process, local NOFAs will contain information on funding procedure 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 funding process, 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 funding process, 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 begin to adopt policy priorities and review project performance standards for the upcoming fiscal year (July - June). In order to finalize the documents in April, draft priorities and standards will be developed and posted for public comment in the first quarter of the calendar 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 prior to final approval. 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 CoC website.

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

## **IV.V. Process for Lead Agency to Apply for Funding on Behalf of CoC**

The CoC Board will review and approve all applications for funding submitted by the CoC Lead Agency on behalf of the CoC. CoC staff will alert the CoC Board of the funding opportunity as soon as possible and obtain approval from the CoC Board to pursue the funding opportunity. CoC staff will submit the funding announcement and the completed application to the CoC Board for review and approval. The CoC Board will review the application for community need and compliance with the CoC's 10-Year Strategic Plan and the Federal Strategic Plan to Prevent and End Homelessness. When allowable by the funding source, the CoC Lead Agency is permitted to charge an administrative fee to any funding in which the Lead Agency serves as the fiscal agent. The amount budgeted for this fee will be provided to the CoC Board at the time of approval of the application.

## **V.VI. Process for Collaborative Applications and Projects Subgranted by the Lead Agency**

### **A. Applicant Requirements**

#### **Applicant Threshold Requirements**

Applicants requesting funds through any CoC funding process must meet the following conditions:

1. Be a member of the Fredericksburg Regional CoC 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.

#### **Organizational Review**

In the last quarter of each calendar year, the CoC will perform organizational review for grantees that anticipate applying for funding through a CoC funding process in the upcoming calendar year in order to monitor compliance with threshold requirements and financial integrity and stability. Grantees will be required to submit the following for review by the Funding & Performance Committee:

- Board of Directors Listing
- Organizational Chart
- IRS Form 990 (if applicable)
- Profit and Loss Statement (prior year audited statements and most recent YTD)
- Spending Plan
- Program Policies and Procedures

Pursuant ~~to~~ a Memorandum of Understanding (MOU), the Rappahannock United Way will assist in sharing documents submitted by organizations through their funding process with the CoC to avoid duplication of efforts.

## **B. Funding Process**

The funding process for collaborative applications and projects subgranted by the Lead Agency will follow these steps:

1. The Funding & Performance Committee will develop local application forms and scoring sheets, which will be approved by the CoC Board.
2. CoC staff will develop a local ~~NOFA-NOFO~~ for the funding process.
3. CoC staff will post the local ~~NOFA~~, local application forms, and scoring sheets to the CoC website and distribute to the full CoC membership to solicit project applications at least 15 days before the project application deadline. **Note:** Time allowed for soliciting applications may be altered based on the timeline of funding opportunity.
4. Project applications will be submitted to CoC staff by the established deadline.
5. CoC staff will submit system needs data, project performance data, past funding expenditures, and all project applications to the Funding & Performance Committee for review.
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 each project application. The Funding & Performance Committee can also choose to reduce the amount of an accepted project application.
8. For collaborative applications, the Funding & Performance Committee will rank accepted projects.

9. CoC staff will notify each applicant in writing of the Funding & Performance Committee's recommendation to accept and rank (if applicable), reject, or reduce their project application(s), and will share the completed scoring sheet for each project application with the project applicant. CoC staff will also include specific instructions regarding the point of contact and deadline for appeals.
10. If applicable, project applicants will have the opportunity to make changes to project applications based on feedback from the Funding & Performance Committee.
11. If applicable, any appeals will be handled according to the appeals process outlined in this document.
12. After the appeals process has concluded, if applicable, the Funding & Performance Committee will submit its recommendation 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 make a final determination. If the two groups are not able to agree, the full CoC membership will vote on a final determination.
13. CoC staff will notify each applicant in writing of the CoC Board's determination to accept and rank (if applicable), reject, or reduce their project application(s).
14. For collaborative applications, the final collaborative application, project applications, and project ranking will be posted to the CoC website and distributed to the full CoC membership for public review before the final submission deadline. For projects subgranted by the Lead Agency, project applications and a summary of CoC Board determinations will be posted to the CoC website and distributed to the full CoC membership within 3 business days of the determination.
15. For collaborative applications, CoC staff will submit the final collaborative application on behalf of the CoC.

## **C. Review, Selection, & Ranking**

### **Review**

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 [and best practices](#)
- Commitment to applicable state/federal policy priorities
- Strength of project application
- Project performance

CoC planning, HMIS, and coordinated entry projects should be reviewed by the Funding & Performance Committee 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.

## Selection

Once all projects have been scored, the Funding & Performance Committee will determine one of the following actions for each project application:

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

To be considered for acceptance, a project must pass a threshold review. The Funding & Performance Committee will also consider funding availability, application score, and ability of the applicant to carry out the proposed project.

## Ranking

For collaborative applications, the Funding & Performance Committee will rank all accepted projects. 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 filling unmet need and system gaps, project performance, or other parameters. 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.

## Process for Allocating Community Awards

Once the CoC is notified of the final amount awarded to the community, project allocations will be finalized. First, the CoC Lead Agency will be awarded the total amount allowed for CoC Planning. The remaining funds will be used to allocate project applications. Projects will be allocated funding in the order they are ranked until all funding has been allocated. Any funding for which the category is specified will be allocated only to projects of that category, even if they are ranked below projects that ultimately do not receive funding.

Upon funding allocation, a project applicant can choose to reduce the amount of or eliminate a project for any of the following reasons:

- Other funding has been secured for the project that can replace all or part of the requested funding
- The project is partially funded and not viable at the partial amount

- The agency is no longer able to carry-out the proposed project

In the event that a project is reduced or eliminated, recaptured funding will be allocated to remaining projects in the order they are ranked until all funding has been allocated. Any recaptured funding for which the category is specified will be allocated only to projects of that category, even if they are ranked below projects that ultimately do not receive funding. If there are no remaining projects of the specified category, the CoC will solicit proposals, in accordance with the Funding Policies & Procedures, for projects in that category. In the event that a CoC planning, HMIS, or coordinated entry project is eliminated and results in insufficient system coverage, the CoC shall solicit proposals, in accordance with the Funding Policies & Procedures, for projects in that category to ensure sufficient system coverage.

## **D. Reallocation**

The CoC is permitted to reallocate funds among projects to better achieve federal, state, and CoC goals for addressing homelessness. Reallocation can present an opportunity for CoCs to move funding from projects that are underutilized, not cost effective, underperforming, or obsolete.

The CoC will reallocate funds granted through the CoC funding process, as needed, to more effectively support those projects that align with approved Policy Priorities and meet and/or exceed approved CoC Project Performance Standards. Reallocation will be based on the adopted annual CoC Policy Priorities, 10-Year Strategic Plan, federal and state strategic goals, and project performance. Project funds may be reallocated through either the funding process or the voluntary return of funds.

### **Reallocation through the Funding Process**

During a funding process, the Funding & Performance Committee may recommend that it is necessary to reallocate funds from a renewal 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**

Grantees may voluntarily return funds at any time during the grant operating year by providing a written request to the CoC Lead Agency. 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 Funding & Performance Committee will review the request and make a recommendation to the CoC Board for



reallocation of the funds within 7 days of receiving the request. During the review process, the Funding & Performance Committee will consider the following factors in determining how to reallocate funds:

- CoC Policy Priorities
- Application score and/or 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.

## **E. 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 NOFAO and posted on the CoC website.

2. CoC staff will notify each applicant in writing 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. CoC staff 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 in writing 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 CoC 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.

## VI.VII. **Process for Using a Special Funding Process**

In unique circumstances, the CoC Board can approve the use of a special funding process for the solicitation, review, selection, and allocation of CoC funding. The approval of a special funding process should be used to allow the CoC to make funding decisions on emergency funding needs, in an efficient manner. The funding process should continue to be as objective and transparent as possible.

### **Funding Process**

The full CoC Board can approve the use of a small CoC Board for the purpose of funding decisions. The small CoC Board will be made up of CoC Board members not applying for or receiving funding through the CoC funding process. Any member affiliated with an organization applying for or receiving funding through the special funding process, including board members, staff, and volunteers, shall not serve on the small CoC Board.

### **Solicitation of requests for funding?**

The small CoC Board will review requests for funding and evaluate proposals against widely acceptable criteria included such as project type, population group served by the project, levels-filling unmet needs  
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~~and system gaps of unmet need~~, project performance, project compliance with past funding, fit within the community's homelessness strategies and priorities, and other available funding sources. Small CoC Board will come to consensus on funding allocations.

CoC staff will notify each applicant in writing of the small CoC Board's allocation decision. CoC staff will also include specific instructions regarding the point of contact and deadline for accepting allocations. Once allocations are accepted, CoC staff will notify the Full CoC Board and the Funding and Performance Committee of the decision and post funding allocations on the CoC website.

## ~~VII.~~**VIII. Process for Requesting a Letter of Support or CoC Endorsement**

CoC members are able to request letters of support or letters of endorsement from the CoC as needed for funding opportunities. Letters of support are provided to showcase past work with the CoC and that the requested funding supports the CoC's 10 year plan to end homelessness. Letters of Endorsement are provided in instances in which the CoC will play a larger role in the administration of funding or programming and the funding sought directly impacts CoC's Coordinated Entry System or has the potential to be sought by numerous CoC members.

### **A. Letter of Support**

CoC members may request a letter of support for a funding application from the CoC via email to the CoC ~~Coordinator~~[staff at funding@fredericksburgcoc.org](mailto:staff_at_funding@fredericksburgcoc.org). Requests should be submitted no less than 10 days prior to the application due date. Requests must include a copy of the funding announcement, draft application, and draft letter of support.

The process for requesting a letter of support from the CoC will follow these steps:

1. Upon receipt of the request, the information will be reviewed by CoC staff. Additional information will be requested if necessary.
2. The CoC Board will review the request and vote whether or not to approve the request for a letter of support.
3. CoC staff will notify the requestor in writing of the CoC Board's determination.
4. If approved, CoC staff will provide a letter signed by the CoC Board Chair to the requestor within 3 days of the determination.

### **B. Letter of Endorsement**

CoC members may request CoC endorsement of a project application via email to the CoC ~~Coordinator~~[staff at funding@fredericksburgcoc.org](mailto:staff_at_funding@fredericksburgcoc.org). Requests should be submitted no less than 30 days  
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prior to the application due date. Requests must include a copy of the funding announcement as well as a brief description of the project that includes, at a minimum, the following information in no more than 2 pages:

1. Brief summary of project proposal
2. Need addressed by project
3. Target population and eligibility requirements
4. Experience working with target population
5. Expected number served/outcomes

The process for requesting CoC endorsement of a project application will follow these steps:

1. Upon receipt of the request, the information will be reviewed by CoC staff. Additional information will be requested if necessary.
2. The request will be forwarded to the Funding & Performance Committee for review. The Funding & Performance Committee will make a recommendation to the CoC Board on whether or not to endorse the project application. CoC staff will notify the requestor in writing of the Funding & Performance Committee's recommendation.
3. The CoC Board will review the request and vote whether or not to endorse the project application.
4. CoC staff will notify the requestor in writing of the CoC Board's determination.
5. If approved, CoC staff will provide a letter signed by the CoC Board Chair to the requestor within 3 days of the determination.