

2023 Ranking and Reallocation Policies – OR-500 Lane County Continuum of Care

This document summarizes the following policies as they apply to the FY23 HUD CoC Competition:

- A. Eligible Renewals and Evaluation
- B. Reallocation
- C. Ranking
- D. New Projects

A. Lane County will utilize the following process to determine eligible renewals through the CoC Competition:

- All projects will be evaluated using the current HUD CoC Intent to Renew and Evaluation, approved by the CoC Committee of the Poverty and Homelessness Board. All renewal projects are thoroughly reviewed based on objective criteria, such as established performance metrics, including exits to permanent housing, housing stability, level of vulnerability, priority population served, income and non-cash benefit increase, data quality, and expenditure of funds.
- Projects not meeting minimum requirements as outlined in the Intent to Renew, may be ineligible for funding and may be considered for reallocation.
- Projects not submitting the Evaluation or Intent to Renew by the stated deadline may be ineligible for funding and may be reallocated by the CoC.
- If a project is found ineligible due to not meeting Threshold or non-submission of the Evaluation/Intent to Renew, the *recipient* will be responsible for determining a new *subrecipient*, if necessary.
- If a *recipient* fails to meet Threshold requirements or other minimum expectations, the CoC (via CoC Committee) may reallocate to a new recipient, if necessary.
- Projects scoring more than one standard deviation below the mean score in the Evaluation may receive technical assistance from the Collaborative Applicant and will be closely reviewed for improvement in subsequent Evaluations.

B. Lane County will utilize the following process to determine available funds through reallocation from eligible renewals:

- Projects that have outstanding monitoring findings/concerns for at least two years in a row, may be considered for reallocation. The CoC committee will review all circumstances and determine if the findings/concerns are being actively addressed. If compliance is not able to be achieved in a timely manner, or if the non-compliance results in a high risk of loss or misuse of funding, the project may be considered for reallocation.
- Projects that are determined to have an expenditure issue will be considered eligible for reallocation of funds, if appropriate. Expenditure issues can include significant balances or unspent funds for more than one grant period; monitoring findings/concerns regarding expenditure of funds or compliance with eligible costs; or other misuse of funds. Lane County will review expenditure issues and provide recommendation to the committee.

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- Projects that are determined to have an ongoing project performance issue will be considered eligible for reallocation of funds, if appropriate. Performance issues include consistent poor or declining outcomes over multiple years; failure to correct deficiencies in program design, operations, or administration; or failure to comply with standards as outlined and prioritized by the Continuum of Care.
- Projects willing to *voluntarily* reallocate any portion of unused funds will be encouraged to do so, if appropriate, and if funds can be better utilized in a higher performing project.
- All projects or portions of projects being reallocated, either voluntarily or involuntarily, will be notified in writing prior to the competition deadline.

All factors and circumstances will be reviewed prior to making any final determination on reallocation. The committee and the CoC will make all attempts to provide proper notice to the project as concerns arise, provide technical assistance when appropriate, and communicate with the recipient and/or subrecipient about potential reallocation.

Reallocation Appeals

All recipients will be provided an opportunity to appeal a reallocation decision made by the CoC Committee. Appeals may be submitted first to the CoC Lead (Lane County) for review and will be reviewed by the CoC Committee. All appeals will be addressed by the committee within 10 business days. If the appeal is denied, the project may submit an appeal to the Poverty and Homelessness Board. All appeals to the PHB will be reviewed by the Executive Committee and responded to within 10 business days or the next scheduled meeting, whichever is first. Decisions made by the PHB are considered final.

C. Lane County will utilize the following process to rank projects for the purposes of the CoC Competition and prioritization for funding:

- Performance and expenditure data is provided to the CoC Committee following the annual HUD CoC Evaluation process to determine prioritization and ranking for the FY23 Priority Listing. The committee may request additional data or information during the ranking process.
- Ranking will be based on objective factors, with a significant emphasis on project performance and the extent to which projects contribute to achieving system performance goals.
- Final Ranking is provided to the PHB for approval.
- Recipients and subrecipients of CoC funds, or other individuals with a direct financial interest, are not able to participate in discussions on Ranking, due to conflict of interest (*See 24 CFR Part 578.95*)

D. Process for determining reallocation of funds to new and/or renewal projects:

- Lane County will complete a RFQP (Request for Qualified Providers) process at least every three years to establish eligible providers for CoC funds.
- Recipients for additional, new opportunities such as Bonus funding, are determined through subsequent Request for Proposal (RFP) processes.

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- The CoC Committee of the Poverty and Homelessness Board, in consultation with the CoC Lead, will determine opportunities to be made available for new projects.
- Lane County, as lead applicant, will consult with co-applicants Homes for Good and St. Vincent de Paul, to determine interest in being an applicant for new project opportunities. Interested parties outside of the established applicants may apply as subrecipients through the established Lane County RFP selection process.
- If more than one eligible co-applicant (Lane County, Homes for Good, and SVdP) is interested in applying for a new project, the CoC committee will review all potential applications and make a determination as to which will be submitted to HUD. If enough funding is available, more than one new project may be submitted.
- All eligible providers, including those not currently receiving HUD CoC funds, are encouraged to apply through these processes in order to be considered for CoC funding.
- All projects previously approved through the RFQP process and eligible to receive additional funds (*see FY23 HUD CoC NOFO for details*) will be considered by the CoC committee for expansion funding, if applicable.
- Low-performing projects or those with expenditure issues will not be eligible for expanded funding through reallocation. *See HUD CoC Expansion Criteria*