

# MI-503 Macomb Continuum of Care

## Grant Rating and Ranking Policy and Procedure

### Roles and Responsibilities

The CoC Grant Ranking and Compliance Committee, in coordination with the Collaborative Applicant, will review the Grant Rating and Ranking Policy annually and update the rating and ranking metrics as needed using the HUD Rating and Ranking Tool, HUD NOFO, HUD guidance and local data/needs. The updated policy and metrics will be approved by the CoC Board.

The sections of the Grant Rating and Ranking for review include:

- HUD Threshold Requirements for New and Renewal/Expansion Projects
- CoC Threshold Requirements for New and Renewal/Expansion Projects
- Grant Rating Factor/Goal and Point Values by project type (RRH, PSH, TH, TH+RRH) and special populations (general, DV)
- Supplemental application metrics, questions, and narratives
- Ranking priorities

Per the Charter, the Grant Ranking and Compliance Committee is responsible for rating and ranking projects submitted for the CoC Homeless Assistance Grants Program Competition NOFO according to HUD guidelines. Final approvals of project rankings are approved by the CoC Board. Non-CoC funded agency representatives and knowledgeable volunteers from other CoCs, funders and government entities will make up this committee to avoid any potential conflict of interest.

### HUD CoC NOFO for Homeless Assistance Grants Process

Upon release of the annual HUD NOFO, the Collaborative Applicant will establish a timeline for the local competition for HUD CoC Homeless Assistance Grants funding. This timeline must meet all required HUD NOFO deadlines. The CoC Membership, CoC Board, existing recipients, and potential recipients will be provided with the timeline.

**For applicants seeking renewal/expansion** of existing projects, the applicants will complete the Project Renewal/Expansion applications in eSNAPS. The completed eSNAPS application, SAGE APR from the last current completed program year, and required supplemental application/documents will be submitted to the Collaborative Applicant by the established deadline in order to be considered for rating and ranking.

**For applicants seeking new funding** (including bonus projects), the applicant will complete a New Project application in eSNAPS. The completed eSNAPS application and any required supplemental application/documents will be submitted to the Collaborative Applicant by the established deadline in order to be considered for rating and ranking.

Upon receiving all submitted applications, the Grant Ranking Committee will:

1. Determine if the project applications meet/will meet the HUD Threshold Requirements. A project that does not meet the HUD Threshold Requirements is rejected and not accepted for rating and ranking.
2. Determine if the project applications meet/will meet the CoC Threshold Requirements. A project that does not meet the CoC Threshold Requirements is rejected and not accepted for rating and ranking.
3. Rate the project applications. The minimum rating score for a project to be accepted is 70%.
4. Rank the project applications, including renewal, new - reallocation, new - bonus and expansion projects

The project applications are ranked in eSNAPS by the Collaborative Applicant as part of the CoC Priority Listing following the ranking determined by the Grant Ranking Committee. The CoC Priority Listing must include reallocation forms that indicate which eligible renewal projects, if any, will be reduced or eliminated through the reallocation process. It must also include the project listing forms that require all CoC new project applications (including reallocated, CoC Bonus and DV Bonus applications) and CoC renewal project applications to be ranked with unique numbers in order of priority and include rejected CoC projects.

#### Key Terms (HUD CoC Program Rating and Ranking Tool Instructions Version 7.0)

**Rating:** The process of scoring projects based on standardized criteria. Projects are generally scored relative to other projects of the same type. Some projects such as HMIS or coordinated entry might not be rated since there is no clear mechanism to score them relative to other projects. The Tool refers to these as "non-rated" projects.

**Ranking:** The process of prioritizing projects for funding in rank order. The rating scores are generally an important input into the ranking process (e.g., projects might be ranked according to their score), but the CoC might want to add other factors to inform ranking. For instance, ranking might be prioritized based on project type, population groups served, relative levels of unmet need, or other local funding priorities.

#### **Grant Types (Renewal, Reallocated, Expansion, New):**

- Renewal grants represent previously funded projects that are requesting renewal funding. These projects should have historical performance data that CoCs can use for rating purposes.
- Replacement grants represent YHDP grants that replace a current YHDP project but may wholly or in part include activities ineligible under the CoC Program while still serving youth aged 24 and younger experiencing homelessness. Replacement grants replacing a Round 1 YHDP grant will be rated and ranked. Replacement grants for Round 2 or later YHDP grants will not be rated and ranked.
- Reallocated grants represent previously funded projects that are not being submitted for renewal. These projects will not be rated or ranked. The amount of the previous annual award will be available for new projects, meaning those coded either as new or expansion grants within the Tool.
- New grants represent funding requests for new projects that do not have any historical performance information to use for rating purposes. These projects could be funded with Bonus or reallocated funds. The New Project Rating criteria are largely narrative based.

- Expansion grants are new funding requests to expand an existing project. Therefore, the applicant should have historical performance data from the current project that CoCs can use as a proxy to rate the grant application. Expansion projects prioritized for funding must be listed as "New" grants in the CoC Application. These projects could be funded with Bonus or reallocated funds.

## HUD Threshold Requirements

All project applications must meet HUD requirements to be eligible to submit an application for rating and ranking. These requirements are verified through the completed applicant eSNAPS profile, Renewal Project Application, and/or New Project Application.

See full description of requirements in the HUD Project Rating and Ranking Tool Version 7.2.

1. SAM: Applicant has active SAM registration with current information and maintains an active SAM registration annually.
2. UEI: Applicant has a valid UEI (Unique Entity Identifier) Number.
3. CoC Program Eligibility: Project applicants and potential sub recipients meet the eligibility requirements of the CoC program.
4. Financial and management capacity: Project applicants and subrecipients demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds.
5. Certifications: Project applicants submit the required certifications specified in the NOFO.
6. Population served: The population to be served meets program eligibility requirements.
7. HMIS participation: Project applicants agree to participate in a local HMIS system. Victim service providers can use a comparable database that captures the required HMIS data in addition to meeting the needs of the local HMIS.
8. Federal Debts: Applicant has no outstanding delinquent federal debts.
9. Debarments/Suspensions: Applicant has no debarments and/or suspensions.
10. Pre-selection Review of Performance: If the organization has delinquent federal debts or is excluded from doing business with the federal government, the organization may be ineligible for an award. HUD reviews the organization information and reserves the right to deny funding and set other terms related to awards.
11. Sufficiency of Financial Management System: Applicants must have a financial management system that meets Federal standards.
12. False Statements: Recipient or applicant confirms all statements are truthful.
13. Mandatory Disclosure Requirement: Recipients or applicants disclose in writing to the awarding program office at HUD, all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award within 10 days after learning of the violation.
14. Prohibition Against Lobbying Activities: Recipients of federal awards are prohibited from using appropriated funds for lobbying.
15. Equal Participation of Faith-Based Organizations: Project must meet the requirements under 24 CFR 5.109.
16. Resolution of Civil Rights Matters: Outstanding civil rights matters must be resolved before the application submission deadline.

## CoC Threshold Requirements

The Macomb CoC establishes threshold requirements in alignment with HUD’s recommendations. All project applications must meet CoC Threshold Requirements to be eligible to submit an application for rating and ranking. For each requirement, the project must provide reasonable assurances that the project will meet the requirement, has been given an exception by the CoC or will request a waiver from HUD. The table below provides the requirement, a definition, acceptable response and how the response is verified.

	CoC Threshold Requirement	Definition	Acceptable Response and Verification Method
1.	Coordinated Entry Participation	The project participates or intends to participate in coordinated entry in compliance with the CoC’s Coordinated Entry Policies and Procedures and HUD’s Coordinated Entry Notice.	Yes. Verified by Collaborative Applicant records.
2.	Housing First and/or Low Barrier Implementation	The project is, or intends to be, designed, and implemented using Housing First principles including: no preconditions or barriers to entry except as required by funding sources, and provision of necessary supports to maintain housing and prevent a return to homelessness.	Yes. Demonstrated in the application documents/agency policies.
3.	Documented, Secured Minimum Match	Applicant has match commitments that satisfy CoC Program interim rule requirements for source and amount.	Yes. Total cash and in-kind match documented in the application for this project at least 25% of the total grant amount (minus funds for leasing)
4.	Project has reasonable costs per permanent housing exit as defined locally	Cost per permanent housing exit can be determined by dividing total project costs by the number of permanent housing exits. <i>These costs can be averaged across all projects within a project type to determine the average cost per permanent housing exit for the community for that project type. The CoC can use this information to define a reasonable cost locally.</i>	Yes. Demonstrated in application and APRs. If there are no exits to permanent housing (ie, project only has stayers), the threshold is considered met.
5.	Project is financially feasible	Project has funding commitments equal to or exceeding project budget.	Yes. Demonstrated in application budget.
6.	Applicant is an active CoC Participant	Applicant participation in CoC Board, CoC Membership, and/or committee meetings meets CoC requirements for a member in good standing.	Yes. Verified by Collaborative Applicant records.

7.	Application is complete and data is consistent	All required information is completed and all required attachments are provided. Data provided in response to different questions match.	Yes. Documented in application.
8.	Acceptable organizational audit/financial review	Applicant’s audit or financial review does not contain findings or other indications of financial or accounting problems.	Yes. Verified in application.

**Project Rating – Renewal/Expansion Projects**

Project Rating for Renewal/Expansion Projects includes rating factors in multiple categories. The categories for project types RRH, PSH, TH+RRH, and TH include:

- Performance Measures
- Serve High Needs Population
- Project Effectiveness
- Equity Factors
- Other/Local Criteria

Each category includes rating measures specific to the program type. The CoC Grant Ranking and Compliance Committee, in coordination with the Collaborative Applicant, will review the rating factors annually. The rating factor/goals and point scales are also established by the Grant Ranking Committee and Collaborative Applicant when a rating factor requires these elements.

**Project Rating – New Projects**

Project Rating for New Projects includes rating factors in multiple categories. The categories for rating factors include:

- Experience
- Design of Housing & Supportive Services
- Timeliness
- Financial
- Project Effectiveness
- Equity Factors
- Other/Local Criteria

Each category includes rating measures specific to the program type, as determined by the CoC Grant Ranking and Compliance Committee, in coordination with the Collaborative Applicant. The rating measures will be reviewed annually. The rating factor/goals and point scales are also established by the Grant Ranking Committee and Collaborative Applicant when a rating factor requires these elements.

**Ranking**

After rating, the grants are ranked based on their rating percentage score and the guidance below. The ranking guidance is reviewed at least annually, or more frequently as needed, by the CoC Grant Ranking and Compliance Committee Rating and Ranking workgroup with approval from the CoC Board. Ranking guidance should take into consideration the entire CoC project/funding inventory, community and CoC needs assessments, and gaps analysis recommendations.

The CoC Planning Grant is not subject to rating and ranking.

Infrastructure grants are ranked highest in the order of HMIS grants first and Supportive Services Only – Coordinated Entry (SSO-CE) grants next.

1. Planning Grant: Not ranked
2. Infrastructure: HMIS, SSO-CE
3. Renewal Permanent Supportive Housing (PSH), Permanent Housing – Rapid Re-housing (PH-RRH), Transitional Housing-Rapid Rehousing (TH-RRH), Transitional Housing (TH)
4. Supportive Services Only for non-Coordinated Entry
5. New Projects – New Reallocation
  - a. In priority order by project type (Infrastructure, PSH, PH-RRH/TH-RRH, TH)
  - b. Then by percentage rating score
6. New Projects – CoC and/or Domestic Violence Bonus Funding
  - a. In priority order by project type (Infrastructure, PSH, PH-RRH/TH-RRH, TH)
  - b. Then by percentage rating score

If as a result of this process, projects devoted to special populations (for example, chronically homeless, survivors of domestic violence/sexual assault, unaccompanied homeless youth, severely mentally ill/substance abuse, etc.) or those projects serving a greater proportion of clients with the highest severity of needs are disproportionately placed in Tier 2, the Macomb CoC Grant Ranking and Compliance Committee Rating and Ranking workgroup may elect to adjust the ranking to ensure services to those populations are maintained.

Final approvals of project rankings are approved by the CoC Board, as recommended and presented to the CoC Board. The Collaborative Applicant is responsible for entering the project ranking into the CoC Priority Listing in eSNAPS as part of the Collaborative Application.

## Grant Reallocation Policy

Reallocation is a process by which the 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. Reallocation occurs during the HUD CoC NOFO Homeless Assistance Grants competition period. A reallocated project must be a new project that serves new participants through a program design allowable under HUD CoC funding. An agency may use existing agency resources, such as staff, but a new project funded under reallocation is not a continuation or expansion of an existing project.

### Reallocation Process

The CoC Grant Ranking and Compliance Committee can recommend a reallocation of funding from any eligible renewal project that is part of the HUD CoC NOFO competition to a new project. The annual HUD NOFO dictates what types of projects may be created through reallocation in a given competition and must be considered when reviewing applications for reallocation.

Projects are considered for full or partial reallocation under the following circumstances (this list is not all inclusive and additional circumstances may be taken into consideration):

- A project does not meet the HUD Threshold Requirements
- A project does not meet the CoC Threshold Requirements
- A project's overall rating score does not meet the established Rating Threshold Requirement
- An agency requests less funding for an existing project (making the difference available for reallocation)

Recommendations for reallocations are made by the Grant Ranking and Compliance Committee Rating and Ranking workgroup to the CoC Board as part of the overall ranking recommendation.

## Appeals for Grant Rating, Ranking and Reallocation

Appeals will be reviewed by a group established by the Macomb CoC Board and the CoC Grant Ranking and Compliance Committee Rating and Ranking workgroup. Members of an appeal committee will not be recipients of any projects funded through the HUD CoC Program Competition to ensure there is no conflicts of interest.

An agency may appeal decisions made by the CoC Grant Ranking and Compliance Committee Rating and Ranking workgroup/CoC Board following the process below.

- Appeals must be submitted in writing via email, with relevant attachments, to [coc@macombgov.org](mailto:coc@macombgov.org).
- The appeal must contain detailed information, including the name of the project the appeal relates to, the reason for the appeal, and evidence on why a decision being appealed should be changed.
- The appeal must be received by the close of the business within five business days of the communication of rejection or reallocation.
- The appeal committee will review the appeal and issue a decision. The decision of the appeal committee is final.
- The Collaborative Applicant will notify the appealing entity within five business days of the appeal committee's decision.