



CoC Funding Policies & Procedures for HUD Grant Funded Projects

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Conflict of Interest Policy

The Prince William Area (PWA) Continuum of Care (CoC) policy is as follows:

- No member shall vote upon any matter which has a direct financial effect on the member or the member's organization. This includes, but is not limited to, matters regarding funding, awarding contracts and/or implementing corrective actions.
- No member whose organization is included in an upcoming vote shall request, advocate, lobby or coerce any other member to vote in a certain way that would benefit the requester's organization.
- All members may participate in discussions about impending CoC actions.
- Members whose organizations provide services to persons who are homeless and who receive funds or are applying to receive funds through any CoC, may not be a member of the Program Analysis and Ranking (PAR) Committee.

Roles and Responsibilities

PWA CoC Collaborative Applicant

Responsibilities:

- The Prince William County (PWC) Department of Social Services (DSS), in their role as Collaborative Applicant, is designated by the Continuum of Care to collect, complete, and submit the CoC Registration, Grant Inventory Worksheet, and CoC Consolidated Application (which includes the CoC Application and CoC Priority Listing).
- The Collaborative Applicant will apply for CoC Planning Grant funding.
- The Collaborative Applicant leads the review of the Annual Evaluation process and metrics for renewal projects, in collaboration with the PAR Committee. The Collaborative Applicant reviews the tools at the annual HUD workshop and obtains provider feedback and recommendations.
- The Collaborative Applicant evaluates and scores all renewal projects based on the approved criteria and process which is established by the PAR, Governance, and CoC Committees.
- The Collaborative Applicant will facilitate the annual monitoring process.
- The Program Analysis and Ranking Committee (PAR) and the Collaborative Applicant will develop an application for new projects, which will include a scoring tool. The Collaborative Applicant will submit all applications to the PAR Committee for review.
- The Collaborative Applicant will support the PAR Committee with data and information needed for reallocation decisions.

- The Collaborative Applicant will provide information to the PAR Committee related to renewal and new projects to inform ranking decisions.
- The Collaborative Applicant will convene the Appeal Panel related to renewal scoring, new project selection, or reallocation appeals, as needed.
- If funds are available as part of the annual HUD Competition and no additional eligible applicants exist, the Collaborative Applicant may submit an application for funding on behalf of the CoC. If HUD selects the project for funding, the Collaborative Applicant may issue an RFP identifying an agency to which the project should be transferred.

Program Analysis and Ranking (PAR) Committee

The PAR Committee is made up of individuals whose organizations do not receive CoC funds. The PAR Committee must be comprised of reviewers that do not have an application in the competition. All members of the PAR Committee must sign the conflict of interest, confidentiality, and non-disclosure statements. Responsibilities:

- The PAR Committee is responsible for annually refining the CoC's renewal evaluation process, Client Survey, scoring/points rubric, and evaluation criteria. The PAR Committee makes final recommendations to the Governance Committee on both evaluation criteria/metrics and the evaluation and scoring process.
- The PAR Committee and the Collaborative Applicant will develop an application for new projects, which will include a scoring tool. The PAR Committee will determine the new project application submission deadline.
- The PAR Committee will evaluate each new project application and make decisions related to new project funding.
- The PAR Committee will take the lead in the reallocation process to address specific assessment areas. The PAR Committee will develop a timeline for the process to ensure progress.
- Following evaluation and selection of new and renewal projects, the PAR Committee will rank the projects. The PAR Committee will make a recommendation to the Governance Committee on final ranking.

Governance Committee

Responsibilities:

- Review and approve renewal evaluation criteria and process and make recommendation to CoC Membership for final approval.
- Review and approve final ranking and make recommendation to CoC Membership for final approval.
- The Governance Committee is appointed to have final authority to make decisions and approve the CoC Consolidated Application on behalf of the PWA CoC.

CoC Membership at Large

Responsibilities:

- Final approval of renewal evaluation criteria and process.
- Final approval of ranking.

Appeals Panel

The Appeals Panel will consist of three persons of whom two will be from the PAR Committee.

- The Appeals Panel will review and make a determination on all appeals, including renewal evaluation appeals, new project appeals, and reallocation appeals. The decisions of the Appeals Panel will be considered final.

Renewal Evaluation Process

On an annual basis, the PWA CoC Collaborative Applicant leads a review of the Annual Evaluation process and metrics. In collaboration with the Collaborative Applicant, the PAR Committee is responsible for annually refining the CoC's evaluation process, Client Survey, scoring/points rubric, and evaluation criteria. The Collaborative Applicant reviews the tools at the CoC's annual HUD workshop and obtains provider feedback and recommendations. The PAR Committee makes final recommendations to the Governance Committee on both evaluation criteria/metrics and the evaluation process, with the primary goal of continued alignment with HUD & CoC benchmarks and guidelines, and improved clarity and transparency. Once approved by the Governance Committee, a vote goes to the CoC membership to approve the evaluation criteria and process. Organizations that receive CoC funds are not permitted to vote related to evaluation criteria and process as they are conflicted. The PWA CoC Membership will make final decisions related to evaluation criteria and process.

Once the renewal project evaluation criteria have been approved, renewal projects will be evaluated using the following steps:

- The Collaborative Applicant will review the evaluation criteria with renewal project grantees. Renewal project grantees will have the opportunity to discuss the proposed performance standards.
- Renewal project grantees will follow the submission timeline and submit the required documents requested as follows:
 - HUD CoC APR from HMIS for program year.
 - Documentation supporting the amount and source(s) of the grant match from the provider's internal tracking system.

- Completed Renewal Project Evaluation Tool, including the following:
 - Scoring Tool: Add information where requested.
 - Financial Report: Complete report for program year.
 - Racial Equity questions: Complete narrative for racial equity measure.
 - Other information may be requested by the Collaborative Applicant as part of the annual renewal scoring evaluation.
- Based on the information submitted by the grantee, the Collaborative Applicant will score the renewal project using the evaluation tool.
The Collaborative Applicant will send scoring results to all renewal project grantees for review.
- Renewal project grantees may appeal the results (see process outlined below).
- Once appeals have been resolved, final scores will be distributed to the renewal project grantees.
- Renewal project grantees with lowest scores shall be scheduled for a monitoring visit. An organization may be exempt from a monitoring visit if they were monitored during the last monitoring cycle. Annually, at least one (1) organization will be monitored.

Renewal Evaluation Appeals

Following the distribution of the CoC renewal scoring results, there will be a window for grantees to appeal their score. The appeal process is as follows:

- Renewal project applicants will have two business days from the date of the notification of Renewal Evaluation results to submit notice that the grantee would like to appeal the results. This should be submitted to the Collaborative Applicant, Prince William County (PWC)-Department of Social Services (DSS) via email (by COB). For example, Monday (notification) – Wednesday (appeal submitted); Tue-Th; Wed-Fri; Th-Mon; and Fri-Tue. If an email is not received, the Collaborative Applicant will assume that the organization does not have any concerns about the scoring and results.
 - If there are no appeals, Collaborative Applicant will notify all renewal project applicants that no appeals have been filed and will confirm the final scoring results for renewal projects with all applicants. Final scoring results will be posted to the CoC's website, in accordance with CoC Notice of Funding Opportunity (NOFO) requirements.
- The email notice to the Collaborative Applicant must include:
 - The basis for the appeal.
 - A brief statement of the facts upon which the Project Applicant bases its appeal.
- Collaborative Applicant will contact the appealing Project Applicant in an attempt to clarify the scoring decision and determine if the appeal can be resolved without requiring a formal hearing.

- If a resolution is not possible, the Project Applicant will submit a formal appeal pursuant to the official CoC Competition timeline. The Formal Appeal must consist of a short, clear, written statement no longer than two pages describing the basis for the Project Applicant's appeal of the Priority Listing rankings, along with any supporting documentation.
- Upon timely receipt of the Formal Appeal, the Collaborative Applicant, as the neutral facilitator of the process, will convene the Appeals Panel and set a time and date for the Appeal Hearing. Composition of the Appeals Panel is detailed in the Roles and Responsibilities section of this document.
- The Appeals Panel will review the letter(s) of appeal and meet with the applicant(s) and a member of the PAR Committee. A DSS designee will be present during the appeal to address any questions regarding the grant requirements. Each letter of appeal should clearly demonstrate the reason for appeal and desired outcome. Each applicant and PAR Committee member will have no more than ten minutes to present information pertinent to the appeal to the Appeals Panel.
- The Appeals Panel will deliberate following the presentation and make a decision regarding the appeal.
- If the decision of the CoC is upheld by the Appeals Panel, the grant application timeline resumes. If the Appeals Panel overturns the decision of the CoC, the Collaborative Applicant will execute any needed administrative duties and responsibilities.
- The Appeals Panel may consider the effect of its decision on other Project Applicants and may include those project applicants in the appeals discussion. The decision of the Appeals Panel is final.
- DSS will have one business day after the appeal hearing to inform the applicant(s) of the Appeals Panel's decision. This notice will indicate if there will be changes in the results of the Renewal Evaluation. After notifying the appealing applicant(s) of the results of the appeal, the Collaborative Applicant shall notify all applicants of the final scoring results.

PWA CoC Monitoring Process

- All CoC-funded projects must undergo program monitoring at least once every four years, regardless of ranking or performance, to review compliance, financial documentation, client files, HMIS data quality, and overall program performance.
- Higher-risk or lower-performing projects, or those with prior monitoring findings, may receive more frequent monitoring or corrective action reviews as determined by the CoC Lead Agency.
- The CoC Lead may use desk audits, self-assessments, or other monitoring tools in interim years or as an alternative monitoring method to maintain oversight and ensure program compliance. The use of these alternative monitoring approaches must be reviewed and approved by the PAR Committee.

For any HUD grantee selected for the CoC's monitoring process, the Collaborative Applicant will take the following steps:

- Letter of Notification: A letter will be sent to the HUD grantee indicating the organization's HUD CoC Program-funded project has been selected to be monitored by the CoC (not to be confused with monitoring by HUD CPD staff). This letter will go out at least 30 days prior to a date being identified to conduct the CoC monitoring review.
- Monitoring Review Date and Time: The Collaborative Applicant will follow up with the HUD grantee to identify and agree on a date and time in which the monitoring review will be conducted.
- Documents Completed by the HUD Grantee: Once the date and time has been agreed upon, the HUD grantee will be sent the following: The Desk Audit Tool for completion; the most recent Evaluation Tool Score; and, the Client File Audit Tool as a reference point. The Client File Audit Tool will be used when reviewing client files.
- Monitoring Review: The monitoring review will consist of the following: A review of the Desk Audit Tool a discussion of Project Interview Questions; a review of the Evaluation Tool: a review of HMIS standards; and, a review of client files (physical & HMIS).
Monitoring Debriefing: At the conclusion of the CoC's monitoring review process, a debriefing will be established to ask questions for clarity and provide information regarding findings and concerns.
- Letter of Findings & Concerns: The Collaborative Applicant will send a letter to the HUD applicant that summarizes the findings and concerns. The letter will indicate the HUD grantee will need to complete a Corrective Action Plan (CAP) to submit to the CoC within 30 days of receipt of the letter. Additionally, the organization will be given a date in which they are responsible for presenting the CAP to the PAR Committee members.

New Project Selection Process

The PWA CoC Collaborative Applicant will annually announce that funds are available for HUD, State, and other community-based grants. The announcements will be posted on the CoC webpage and e-mails will be sent to all CoC stakeholders, and to the Washington D.C. Metropolitan Council of Governments.

The Program Analysis and Ranking Committee (PAR) and the Collaborative Applicant will develop an application for new projects, including a scoring tool. The PAR Committee must be comprised of reviewers that do not have an application in the competition. All members of the PAR Committee must sign the conflict of interest, confidentiality, and non-disclosure statements as outlined in the Conflicts of Interest section of this document.

Applicants interested in a new project will submit the new project application to the

Collaborative Applicant by the established deadline. The Collaborative Applicant will submit all applications to the PAR Committee for review and ranking. All applicants must sign the lobbying and truth statement on the new project application. The PAR Committee will determine the new project application submission deadline. Any applications submitted after the established deadline will NOT be considered for funding.

The PAR Committee will evaluate each new project application using the established scoring tool. When selecting new projects, the PAR Committee will consider the score of the project as well as other criteria, including history of performance of the grantee and need for the project. The PAR Committee will establish the amount of funding to be awarded to each selected applicant.

Upon selection, new project applicants must follow instructions from the CoC to submit their new project application to HUD in e-snaps. E-snaps is the electronic Continuum of Care (CoC) Program Application and Grants Management System that HUD's Office of Special Needs Assistance Programs (SNAPS) uses to support the CoC Program funding application and grant awards process for the CoC Program.

New Project Appeals

The PAR Committee will provide new project applicants with projects not selected for funding with a written notice. The notice details general information regarding the PAR Committee's decision not to fund the project, including the reasons the project was not selected for funding. Applicants may request more detailed information regarding the PAR Committee decision in writing.

Applicants may appeal the PAR Committee decision. The appeal process is as follows:

- For new project applications not recommended for funding by the PAR Committee or the CoC, the applicants will have two business days from the date of the notification of funding decisions to submit an appeal to the Collaborative Applicant via email (by COB). For example, Monday (notification) – Wednesday (appeal submitted); Tue-Th; Wed-Fri; Th-Mon; and Fri-Tue.
- This notice must include:
 - The basis for the appeal.
 - A brief statement of the facts upon which the Project Applicant bases its appeal.
- Upon timely receipt of the Formal Appeal, the Collaborative Applicant, as the neutral facilitator of the process, will convene the Appeals Panel and set a time and date for the Appeal Hearing. Composition of the Appeals Panel is detailed in the Roles and Responsibilities section of this document.

- The Collaborative Applicant will notify all new project applicants that an appeal has been submitted and provide a general timeline regarding the resolution of the appeal and notification of final new project selection results.
- The Appeals Panel will review the letter(s) of appeal and meet with the applicant(s) and a member of the PAR Committee. A DSS designee will be present during the appeal to address any questions regarding the grant requirements. The letter of appeal should clearly demonstrate the reason for appeal and desired outcome. Each applicant and PAR Committee member will have no more than ten minutes to present information pertinent to the appeal to the Appeals Panel.
- The Appeals Panel will deliberate following the presentation and make a decision regarding the appeal.
- DSS will have one business day after the appeal hearing to inform the applicant(s) of the Appeals Panel's decision.
- If the decision of the CoC is upheld by the Appeals Panel, the grant application timeline resumes. If the Appeals Panel overturns the decision of the CoC, the Collaborative Applicant will execute any needed administrative duties and responsibilities. The Appeals Panel may consider the effect of its decision on other project applicants and may include those project applicants in the appeals discussion.
- The decision of the Appeals Panel is final.

Reallocation Process

Summary:

- *WHAT: 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 create one or more new projects.
- *WHY:* Reallocating funds is one of the most important tools by which CoCs can make strategic improvements to their homelessness system. CoCs should strive to match their inventory of projects to the needs of people experiencing homelessness within the CoC.
- *WHEN:* Guided by an overall strategic plan, in which the CoC assesses existing projects for their performance and effectiveness in ending homelessness.

Preface:

The Program Analysis and Ranking (PAR) Committee will take the lead in the reallocation process to address specific assessment areas. The PAR Committee will develop a timeline for the process to ensure progress.

Process:

1. The CoC may reallocate funds for any of the following reasons (including any combination of the following reasons):
 - a. To support higher-priority projects consistent with The U. S. Department of Housing and Urban Development recommendation for creating new projects.
 - b. Lack of need within the CoC for the project.
 - c. Poor or underperforming programs:
 - i. The CoC will evaluate HUD-funded projects against the CoC agreed upon outcomes. Underperforming projects are defined as projects that receive less than 50% of total available points AND/OR projects that are in the bottom two (2) scored projects. Projects that are underperforming for two (2) or more years and/or projects that fail to meet the required outcomes after given a chance to improve may have funds fully or partially reallocated to another higher-performing project or to a new higher priority project.
 - d. Underspending:
 - i. CoC grantees who have underspent their grant (95% or less of grant funds expended) for two (2) or more years may be subject to full or partial relocation.
 - e. Serious and repeated problems with the project identified through monitoring or other avenues, including a lack of compliance with CoC or HUD policies, which could include, but is not limited to, the following:

- i. Lack of compliance with Housing First; ii. Lack of compliance with the CoC's Written Standards; iii. Lack of compliance with Coordinated Entry policies/procedures; and/or iv. Monitoring findings identified by HUD that are not resolved.
 - f. Failure to make progress on and/or resolve findings from a Corrective Action Plan.
 - g. Voluntarily giving up HUD funds:
 - i. If a recipient can no longer provide CoC-funded services to the community for any reason, the PAR Committee will determine how these reallocated funds will be awarded. Depending on timing of the decisions, funds may be available for competition, or the PAR Committee may choose to award funds based on need/priority. Final recommendations are given to the Governance Committee and then finalized by the CoC.
- 2. Regardless of how funds are reallocated, a plan will be put into place to ensure clients served by the program losing HUD funds will have access to appropriate services.
- 3. The PAR Committee will use an analysis of needs and gaps to inform how reallocated funds will be awarded. This analysis may include beds available, PIT/HIC data, homeless demographics, HMIS data, and other local data to determine the needs of people experiencing homelessness in the community.

Reallocation Appeals

The PAR Committee will provide renewal project applicants with projects recommended for full or partial reallocation with written notice. The notice will include general information regarding the reasons for the PAR Committee's decision not to fund the project. Applicants may request more detailed information regarding the PAR Committee decision in writing. The appeal process is as follows:

- For renewal projects recommended for full or partial reallocation by the PAR Committee or the CoC, the applicants will have two (2) business days from the of the notification of funding decisions to submit an appeal to the Collaborative Applicant, Prince William County (PWC)-Department of Social Services (DSS) via email (by COB). For example, Monday (notification) – Wednesday (appeal submitted); Tue-Th; Wed-Fri; Th-Mon; and Fri-Tue.
- This notice must include:
 - The basis for the appeal
 - A brief statement of the facts upon which the Project Applicant bases its appeal.
- Upon timely receipt of the Formal Appeal, the Collaborative Applicant, as the neutral facilitator of the process, will convene the Appeals Panel and set a time and date for the Appeal Hearing. Composition of the Appeals Panel is detailed in the Roles and Responsibilities section of this document.

- The Appeals Panel will review the letter(s) of appeal and meet with the applicant(s) and a member of the PAR Committee. A DSS designee will be present during the appeal to address any questions regarding the grant requirements. The letter of appeal should clearly demonstrate the reason for appeal and desired outcome. Each applicant and PAR Committee member will have no more than ten minutes to present information pertinent to the appeal to the Appeals Panel.
- The Appeals Panel will deliberate following the presentation and make a decision regarding the appeal.
- DSS will have one business day after the appeal hearing to inform the applicant(s) of the Appeals Panel's decision.
- If the decision of the CoC is upheld by the Appeals Panel, the grant application timeline resumes. If the Appeals Panel overturns the decision of the CoC, the Collaborative Applicant will execute any needed administrative duties and responsibilities.
- The decision of the Appeals Panel is final.

Ranking Process

The CoC expects that the CoC NOFO will require the CoC to rank CoC-funded projects included on the Priority List. As part of this process, the CoC anticipates that projects will be sorted into either Tier 1 or Tier 2. In past CoC Competitions, projects placed into Tier 2 have been individually scored by HUD to determine if they will receive funding.

Following evaluation and selection of new and renewal projects, the PAR Committee will rank the projects. The following guidelines apply to the ranking process:

- In general, renewal projects will be ranked from highest to lowest evaluation score.
- Renewal projects that did not operate for the entire look-back period used for the evaluation process will not be competitively ranked; instead, these projects will be ranked at the bottom of Tier 1.
- Renewal projects that support CoC infrastructure and operations will be ranked at the bottom of Tier 1. This includes HMIS and Coordinated Entry funding.
- Planning grants are not ranked.
- Based on the CoC priorities and unmet needs and the quality of a new project applicant, the PAR Committee will determine how to incorporate the new projects into the overall ranking. The PAR Committee reserves the right to rank new projects in Tier 1 and/or Tier 2. New projects may be ranked above renewal projects. New projects that support CoC infrastructure and operations will be competitively ranked. This includes HMIS and Coordinated Entry funding.
- The PAR Committee may opt to review performance data across multiple years for renewal projects ranked in Tier 2. For example, projects with a history of poor performance may be ranked lower than projects with one year of poor performance,

even if the renewal evaluation score is higher than a project that has not had performance issues in prior years. The PAR Committee will also determine which Tier 2 ranking scenarios are most beneficial to both preserve and increase the CoC’s overall funding allocation. The PAR Committee may consult with the CoC’s HUD Consultant to determine options to maximize funding for the CoC via the final ranking.

- The PAR Committee will make a recommendation to the Governance Committee on final ranking. Once approved by the Governance Committee, a vote goes to the CoC Membership to approve the evaluation criteria and process. Organizations that receive CoC funding are not permitted to vote related to evaluation criteria and process as they are conflicted. If the CoC Membership does not approve the applicants recommended by the PAR Committee, the disapproved applicant(s) will be dropped and the next eligible applicant will be funded. If no additional eligible applicants exist, the Collaborative Applicant (DSS) will submit an application on behalf of the CoC.

The Collaborative Applicant will provide notification in writing to both renewal and new project grantees regarding the results of the ranking process. Ranking results may also be posted to the CoC’s website.

History of Adoption/Revisions

Approval Date	Summary of Approved Language/Revision
8/10/2023	Governance Committee is appointed to have final authority to make decisions and approve the CoC Consolidated Application.
5/14/2026 PWA CoC Monitoring Process	<p>All CoC-funded projects must undergo program monitoring at least once every four years, regardless of ranking or performance, to review compliance, financial documentation, client files, HMIS data quality, and overall program performance.</p> <p>Higher-risk or lower-performing projects, or those with prior monitoring findings, may receive more frequent monitoring or corrective action reviews as determined by the CoC Lead Agency.</p> <p>The CoC Lead may use desk audits, self-assessments, or other monitoring tools in interim years or as an alternative monitoring method to maintain oversight and ensure program compliance. The use of these alternative monitoring approaches must be reviewed and approved by the PAR Committee.</p>

