Palm Beach County Homeless and Housing Alliance

U.S. Department of Housing and Urban Development Continuum of Care Program

2019 Local Project Application Notice of Funding Availability (NOFA) Competition

2019 Local Application Packet For Agencies Applying for Renewal Projects

2019 LOCAL NEW & RENEWAL PROJECTS REVIEW PROCESS

STATEMENT OF POLICY:

While all decisions about the Palm Beach County Continuum of Care (CoC) Program project review process are subject to review and approval by the Homeless and Housing Alliance (HHA), our community values public input and community discussion around all aspects of the CoC. In the event of requirements or policy directives in the U.S. Department of Housing and Urban Development (HUD) CoC Program Notice of Funding Availability (NOFA) that necessitate changes to the scoring process, Palm Beach County Department of Community Services (CSD), Division Human and Veteran Services (DHVS) staff will endeavor to provide a public process for discussion and community input.

- If renewal project applicants are predetermined to not meet current HHA threshold, the HHA Executive Committee will determine if renewal projects are to be reallocated.
- DHVS collects and reviews Annual Performance Reviews (APRs) or equivalent, Data Quality Reports or equivalent and supplemental information, as needed, and prepares project evaluations.
- New and Renewal CoC Program Project Applicants will be invited to complete their application on eSnaps once the portal is available by the application deadline date. Note that these applications will be viewed by the NCG Review Committee to rank and rate so final submission to HUD is not required at this time.
- New and Renewal CoC Program Project Applicants will print and submit their eSnaps project applications to DHVS, along with required local application materials and match documentation. All documents must be delivered to the DHVS offices by the deadline date per application instructions.
  - Late applications will not be accepted.
  - Incomplete applications cannot be cured for Scoring Meeting but, if selected for funding by the NCG Review Committee, must be corrected prior to HUD submission.
- All documents are submit by walk-in at the HS offices by the deadline date per application instructions.
- Projects receive preliminary scores based on the agency's HMIS data with their project evaluations and are invited to provide a narrative response to be considered by the Non-Conflict Grant (NCG) Review Committee. The NCG Committee will review only those scoring factors identified by the projects and other factors may remain at the pre-Scoring Meeting score.
- New and Renewal CoC Program Project Applications will be emailed and announced at the monthly HHA meeting.
- HHA will offer a Technical Assistance Meeting to New and Renewal CoC Program Project Applicants.
- DHVS staff recruits NCG Review Committee members, prioritizing members who have served on the Committee in the past or who have other relevant experience and are approved by the HHA Executive Committee. NCG Review Committee members will sign "no conflict of interest" and confidentiality statements.
- DHVS staff reviews submitted project applications and determines whether projects meet local and HUD thresholds requirements.
- NCG Review Committee members are trained, as appropriate, and receive submitted applications. Committee members review, but not score, applications prior to Scoring Meeting.
- NCG Review Committee meets during Scoring Meeting to review and discuss project applications and finalize individual scores. NCG Review Committee scores are added and applications are ranked and placed into either Tier 1 or Tier 2.
  - Renewal projects that do not yet have performance data for a full year of operation will be held harmless and awarded full points on all scoring factors that cannot be evaluated.

2

Second-time or older renewal projects that do not have performance data for a full year of operation will be required to submit an explanation as to why they have not started spending out project funds and provide a plan for doing so within the HUD-mandated period. In extreme cases where community funding is at risk, NCG Review Committee members may exercise discretion, including recommending reallocation or placement into Tier 2.

- o Due to the nature of the programs, renewal domestic violence projects will be held harmless for the following questions as these items processes are different for DV programs: new, increased and earned income; and on coordinated entry (CE). DV program will be awarded full points for questions regarding program participants' assessment score.
- o Due to the nature of the programs, youth projects will be held harmless for questions regarding homeless category as the processes are different for youth projects.
- o If the HUD tier rules allow for projects to "straddle" the tiers, i.e. to fall partially in Tier 1 and partially in Tier 2, then the top-scoring non-HMIS, non-Coordinated Entry project in Tier 2 will be moved to straddle the tiers.
- o New projects will be scored and ranked based on the New Project Scoring Tool.
  - ▪ HHA prioritizes projects with established track records in enhancing system performance. New projects must promote system performance by increasing housing stability, preventing returns to homelessness and shortening episodes of homelessness.

- Preliminary scoring results are delivered to applicants with a reminder about the appeals process.
- Appeals, if any, are reviewed by the HHA Appeals Committee.
- HHA Executive Committee meets to consider and approve a final recommended CoC Program ranked funding list. If any renewal project does not apply for funding or is identified by the NCG Review Committee as in need of reallocation, that funding may be reallocated to a new project.
- All project documents must be submit electronically through eSnaps for HUD final review by the deadline date per application instructions.
- **The HHA Executive Committee's final recommended CoC Program ranked funding list is presented to the Palm Beach County Board of County Commissioners (BCC) for final approval.**
- If funding becomes available after approval of the final ranked list, through reallocation or budget corrections, the HHA Executive Committee will offer the excess funding to new project applicants in order of project ranking.
- Projects will submit copies of letters or documentation for all match resources listed in their application.
- Applications are submitted along with the DHVS's (the Collaborative Applicant) application to HUD.

The process is welcoming to persons with disabilities, persons who have experienced homelessness, and persons with limited English proficiency. If you need any accommodations, please contact Sonya McNair, SMcNair@pbcgov.org, 561.355.9901.

2019 APPEALS POLICY AND PROCESS

Grievances must be submitted on the HHA CoC Program Grievance Notice Form. 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 cannot be appealed. The decision of the HHA Appeals Committee is be final.

The HHA Appeals Committee consists of three (3) members of the HHA Executive Committee, CSD Director, DHVS Director and one non-voting representative from the NCG Review Committee. The voting members will not have participated on the original NCG Review Committee or have a conflict of interest with any of the agencies applying for CoC Program funding. The role of the HHA Appeals Committee is to read and review only those areas of the application that are being appealed.

PROCESS

- All notices of appeal must be submitted electronically to Wendy Tippett at wtippett@pbcgov.org.
- The notice of appeal must include a written statement specifying in detail each and every one of the grounds asserted for the appeal. The appeal must be signed by an individual authorized to represent the appealing applicant (i.e., Executive Director, CEO, CFO) and must include (highlight and/or cite) the specific sections of the application on which the appeal is based. The appealing applicant must specify facts and evidence sufficient for the HHA Appeal 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 is adequate to gain additional points. The HHA Appeal Committee may take notice of the fact that issues are being raised that could and should have been raised in final submissions and may use their discretion in reviewing those and other factors during the Appeals Process.
- The HHA Appeals Committee will review and evaluate all notices of appeal and decide whether or not the appeal has any validity based on the appeal policy.
- All valid appeals will be read, reviewed and evaluated by the HHA Appeals Committee.
- HHA Appeals Committee deliberates and votes electronically.
- Appealing Applicants will receive, in writing, the decision of the HHA Appeals Committee within two (2) business days.
- **HHA Appeal Committee List is submitted for consideration and approval by the HHA Executive Committee.**

2019 RENEWAL PROJECTS SCORING TOOLS

THRESHOLD CRITERIA

Required but not scored. If "no" for any threshold criteria, the project is ineligible but will be presented to the Non Conflict Grant Review Committee.

Item	Yes, No, NA
HUD Threshold Requirements	
System for Award Management (SAM) Registration: Applicant must have active SAM registration with current information.	
DUNS Number: Applicant must have valid DUNS number in application	
Delinquent Federal Debts: Applicant must have no outstanding Delinquent Federal Debts, unless (a) negotiated repayment schedule is established and the repayment schedule is not delinquent, or (b) Other arrangements satisfactory to HUD are made before the award of funds by HUD.	
Debarments & Suspensions: Applicant must have no Debarments and/or Suspensions.	
Accounting System: Applicant must have a financial management system that meets with federal standards as described at 2 CFR 200.302.	
Federal Criminal Law Violations: Applicants must disclose in a timely manner, in writing to HUD, all violations of federal criminal law involving fraud, bribery or gratuity violations potentially affecting federal award. This mandatory disclosure requirement also applies to sub-recipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.	
Eligible Project Applicants: Applicants must demonstrate they are eligible project applicants under 24 CFR 578.15 and 24 CFR 5.100 for the CoC Program Competition.	
Certifications: Applicants must submit required certifications as specified in the CoC Program NOFA	
Cost Effectiveness with Reasonable Project Costs: Applicant must demonstrate the project(s) cost effectiveness, including costs of construction, operations and support services. Such costs must not deviate substantially from the local norm for the type of structure or activity.	
HMIS Implementation: Applicants that do not participate in HMIS are not eligible for CoC Program funding, unless the project is a victim-service agency, serving survivors of domestic violence or a legal services agency.	
Project Quality Threshold (a): Applicants and potential sub-recipients must have satisfactory capacity, drawdowns and performance for existing grant(s) funded under SHP, S+C or CoC Program as evidenced by timely reimbursement of sub-recipients, regular drawdowns and timely resolution of any monitoring findings.	

Item	Yes, No, NA
Project Quality Threshold (b): For expansion projects, applicant must clearly articulate the part of the project that is being expanded. Additionally, the project applicants must clearly demonstrate that they are not replacing other funding sources.	
Project Quality Threshold (c): Applicant must demonstrate ability to meet all timeliness standards per 24 CFR 578.85	
Jurisdictional Consolidated Plan(s): All projects must be consistent with the relevant jurisdictional consolidated plan(s).	
Palm Beach County HHA Threshold Requirements	
Coordinated Entry Participation: Applicants that have not agreed to participate in Coordinated Entry, when it is available for the project type, are not eligible for funding. Victim-service agencies or those serving survivors of domestic violence shall participate with Coordinated Entry while protecting client data and safety to ensure fair and equal access to the coordinated entry process, and housing and services opportunities.	
Housing First and/or Low Barrier Implementation	
Match: Applicant must demonstrate a minimum match of 25% of the grant for the project.	
Feasibility: Project is financially feasible.	
Active Participation: Applicant must be an active participant in the CoC.	
Complete Application: Applicant must submit a complete application and the data within the application must be consistent.	
Utilization Rate: Project's bed/unit utilization rate must be at or above (≥) 95 percent (%).	
Organizational Audit & Financial Review: Applicant must demonstrate an acceptable organizational audit and financial review	
Deadline Date: Applicant must submit project applications by the date and time specified in the RFP.	
Member in Good Standing: Applicant must be a member in good standing per the HHA's Bylaws.	
Data Quality: Applicant's data quality must be at or above (≥) 90 percent (%).	
CoC Strategic Plan Compliance: Applicant project aligns with the Palm Beach County Ten-Year Plan Strategic Plan.	
Equal Access and Non-Discrimination: Applicant ensures equal access to program participants regardless of their race, color, national origin, religion, sex, sexual orientation, gender identity, age, familial status or disability. Applicants complies with all federal and state civil rights and fair housing laws, including the Fair Housing Act, Title VI of the Civil Rights Act and the Equal Access Rule.	

2019 LOCAL RENEWAL APPLICATION MATERIALS – WHERE TO FIND THE DOCUMENTS YOU MAY NEED

Timeline: Please refer to the Submission Checklist and the Timeline (separate document) to see when these documents are due.

Each PROJECT must submit the following:

1. **Project Application**
Visit e-snaps to update or submit application without changes:
https://esnaps.hud.gov/grantium/frontOffice.jsf
Training Modules can be found at the HUD Exchange CoC Program Competition Resources page:
https://www.hudexchange.info/programs/e-snaps/

2. **Local Project Narrative (for Renewal Projects)**
Attached or online at: http://discover.pbcgov.org/communityservices/humanservices/Pages/HHA.aspx

3. **HUD 2880 – Applicant/Recipient Disclosure/Update Report** online at:
https://portal.hud.gov/hudportal/documents/huddoc?id=2880.pdf
   This document is required for construction projects only.

4. **Most recent audited financial statement**

5. **Match Forms**
Attached or online at: http://discover.pbcgov.org/communityservices/humanservices/Pages/HHA.aspx