

# GRCoC FY25 HUD CoC Program Competition Policies & Procedures

November 2025

## Table of Contents

Table of Contents.....	1
Overview and Purpose.....	2
Continuum of Care Structure and Roles.....	3
Continuum of Care.....	3
Continuum of Care Board.....	3
CoC Committees.....	4
Conflict of Interest Policy.....	4
Collaborative Applicant.....	5
New in the HUD FY25 NOFO.....	6
Priorities.....	6
Other Changes.....	6
Local Competition Priorities and Requirements.....	6
CoC Strategic Priorities.....	6
CoC Funding Amounts and Tiers.....	7
Local Application Types.....	7
Threshold Requirements.....	8
Scoring and Ranking policies.....	9
Reallocation Policy.....	9
Overview of Competition Process and Requirements.....	11
Appeals Policy and Process.....	12
Additional materials.....	14
Glossary.....	14
Appendix A: Requirements, Guidelines.....	15
Appendix B: Sample Documents and Resources.....	16

# Overview and Purpose

Each year, the United States Department of Housing and Urban Development (HUD) releases funding through the Continuum of Care (CoC) Program to assist people at imminent risk of or experiencing homelessness. To apply for CoC funding, communities must establish a Continuum of Care entity consisting of the stakeholders involved in the local effort to prevent and end homelessness. The Greater Richmond Continuum of Care (GRCoC) has been established for this purpose. The geographic area served by the Greater Richmond Continuum of Care includes the City of Richmond, and the counties of Charles City, Chesterfield, Goochland, Hanover, Henrico, New Kent, and Powhatan.

To launch the competition, HUD issues an annual CoC Notice of Funding Opportunity (NOFO) which outlines the funding available and general requirements of the process. Each Continuum of Care is notified of the maximum amount of funds for which it may apply. That amount is a combination of the CoC's Annual Renewal Demand (ARD), which is the total amount of funding needed to renew all the CoC's existing grants, and any bonus funds HUD makes available. Continuum's of Care must apply to fund both renewing and new projects for no more than the maximum amount allowed by HUD. The GRCoC is responsible for developing and implementing a local process that aligns with the NOFO, soliciting project applications, rating and ranking proposals, and submitting the community's Consolidated Application, which contains the project proposals that were successful in the local competition.

These Local Competition Policies and Procedures highlight how the local competition works, including the strategic direction and priorities reflected in the local competition, basic CoC program requirements, the application process for new and renewing projects, and how applications are scored and selected for the Consolidated Application. The policies also provide an overview of the structure and functions of the Continuum of Care for organizations and stakeholders who may be new to the process.

These policies are updated annually to reflect any changes in local CoC policies or structure as well as new information or guidance reflected in that year's NOFO announcement. Should this document and the GRCoC Coordinated Grant Review Process approved by the CoC Board in 2018, conflict, the policies and procedures described in the document will override that one for the purposes of the 2025 HUD Continuum of Care Program Notice of Funding Opportunity.

Please refer to the Glossary for definitions of key terms.

# Continuum of Care Structure and Roles

## Continuum of Care

A Continuum of Care is required by statute to prepare and oversee an application for federal funds targeted to homelessness which includes establishing priorities for funding projects within the geographic area; determining which applications can be received for consideration; and selecting the applications being submitted for funding. These requirements are outlined under the McKinney-Vento Homeless Assistance Act as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, section 42 U.S.C. § 11382. The primary purpose of a CoC in this context is to bring together various stakeholders, including service providers, local government agencies, and community organizations, to collaboratively assess the needs of the homeless population and strategize on the most effective interventions. This collaborative approach ensures that funding decisions are based on comprehensive, data driven assessments and are aligned with the broader goals of reducing and ultimately ending homelessness in the community.

To receive HUD CoC funding, every Continuum of Care must establish a governance structure that is codified in a Governance Charter or By-laws. The GRCoC has adopted Bylaws to describe its governance. This section summarizes the sections of the Bylaws most relevant to the local NOFO competition.

## Continuum of Care Board

The Continuum of Care must establish a board to act on behalf of the Continuum using the process established as a requirement by § 578.7(a)(3) and must comply with the conflict-of-interest requirements at § 578.95(b). The board must:

1. Be representative of the relevant organizations and of projects serving homeless subpopulations; and
2. Include at least one homeless or formerly homeless individual.

### **The Continuum of Care Board of Directors, per GRCoC Bylaws, is responsible for:**

Responsibilities of the Board include, but are not limited to:

- A. Attend the CoC and CoC Board meetings;
- B. Actively participate in a minimum of one committee or workgroup;
- C. Ensure federal and state funds and required submissions are on time and of good quality;
- D. Ensure all new and renewal projects are evaluated annually and the implementation of a process to improve performance where needed;
- E. Ensure the CoC and projects funded are in compliance with HUD, HEARTH Act, and other relevant regulations;
- F. Ensure that all CoC-based funding applications are based on recommendations from the CoC and the Collaborative Applicant;
- G. Monitor the implementation of programs in regional or local plans to end homelessness; and,
- H. Ensure CoC and other public and private funds are being efficiently and effectively used to end homelessness in the region; and
- I. Establish annual MoU with Collaborative Applicant.

In relation to the HUD CoC NOFO the CoC Board is also responsible for:

1. Adopting the Local Competition Policies and Procedures for each coordinated funding competition;
2. Approving the membership of the Ranking Committee;

3. Setting strategic funding priorities;
4. Approving the priority listing of projects to be included in the Consolidated Application; and
5. Approving the submission of the Consolidated Application

## CoC Committees

- **Quality Improvement Leadership Workgroup (QIL)**- comprised of 2 members from every organization receiving CoC, ESG, and VHSP funds. QIL is responsible for providing feedback on project performance measures and the strategies for addressing system performance measures.
- **Governance Committee**—is comprised of 4-5 members of the CoC Board. It recruits unconflicted candidates for the Ranking and Review Committee and nominates them to the CoC Board to approve the roster.
- **Ranking & Review Committee (Ranking Committee)**- comprised of unconflicted members, recruited by the governance committee and appointed by the board. Membership of the Ranking Committee is targeted to local ESG recipients, local philanthropic funders, and people with lived experience of homelessness. The Ranking Committee is responsible for the ranking and review of all coordinated funding competition applications (Including HUD and VHSP), reviewing appeals, endorsing letters of support, and supporting informed community funding decisions. Members may not be current staff of an organization applying for funds.
- **Youth Action Board**- responsible for providing endorsement for replacement YHDP projects.

## Conflict of Interest Policy

Members of the CoC and its Committees shall comply with federal, state and local laws and related regulations. The business of the CoC should be conducted in a manner so as to avoid all conflicts of interest.

A. The program standards for conflicts of interest described by the U.S. Department of Housing and Urban Development's Interim Rule for the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, found at 24 CFR Part 578.95 (available at [www.hudexchange.info](http://www.hudexchange.info)) is outlined below.

1. No CoC board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.
2. Organizational conflict. An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or subrecipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this part, or when a covered person's, as in paragraph (d)(1) of the relevant regulations (cited above), objectivity in performing work with respect to any activity assisted under this part is or might be otherwise impaired. Such an organizational conflict would arise when a board member of an applicant participates in decision of the applicant concerning the award of a grant, or provision of other financial benefits, to the organization that such member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations under § 578.49(b)(2) and § 578.51(g) and housing quality inspections of property under § 578.75(b) that the recipient, subrecipient, or related entity owns.
3. Other conflicts. For all other transactions and activities, the following restrictions apply: No covered person, meaning a person who is an employee, agent, consultant, officer, or

elected or appointed official of the recipient or its subrecipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.

B. On issues in which a CoC Member has a conflict of interest as described above, neither the Member nor his/her delegate may vote. Members may not participate in discussions regarding funding allocation decisions while they are an applicant for that funding. The Chair of the CoC Board will be responsible for monitoring the disclosure of members' conflicts of interest.

C. In the event that a matter, which raises a potential conflict of interest, comes before the CoC, the CoC Board, or its Committees or workgroups for consideration, recommendation, and decision, the Member shall disclose the conflict of interest as soon as he or she becomes aware of it, and the disclosure shall be recorded in the minutes of the meeting.

D. Members found violating the conflict of interest policy or federal regulations will be referred to the CoC Governance Committee. The Governance Committee shall investigate all allegations of failure to comply with this conflict of interest policy. If a Greater Richmond Continuum of Care member is found to have violated the letter or intention of this conflict of interest policy, the Governance Committee will be responsible for recommending an appropriate response to this breach of policy to the CoC board. The Governance Committee may recommend any action including but not limited to a statement of reprimand recorded in the board minutes or removal from the board or other action. The CoC board will consider the recommendations of the Governance Committee and vote on corrective or punitive actions to be administered.

## Collaborative Applicant

Homeward is designated by the CoC Board as the Collaborative Applicant for the GRCoC. This responsibility is governed by the Collaborative Applicant MOU. It submits the Consolidated Application in response to the HUD CoC NOFO and manages the local competition for soliciting and evaluating the projects applications that will be included in it. The collaborative applicant is also responsible for staffing GRCoC Committees and Workgroups, ensuring the GRCoC is able to meet all funder threshold requirements, and ensuring on-time submission for all public, coordinated funds requiring a collaborative applicant.

# New in the HUD FY25 NOFO

## Priorities

Below are new HUD priorities found within pages 12-13 in the FY2025 CoC Program NOFO. To maximize competitive funding opportunity, the GRCoC will work to meet funder requirements in the FY25 local competition.

1. **Ending unsheltered homelessness**
2. **Prioritizing treatment and recovery**
3. **Promoting self-sufficiency**
4. **Improving outcomes**
5. **Minimizing trauma**

## Other Changes

- Thirty percent of a CoC's funding is protected in Tier 1, down from 90 percent in past years.
- Permanent Housing (PSH, RRH, Joint TH-RRH) is capped at 30 percent of ARD.
- All projects except for CoC Planning/UFA must compete, including YHDP renewals and DV Bonus. These projects must be ranked and scored in Tier 2 with no special protections, increasing competition across the entire portfolio.
- Tier 2 scoring now favors projects with required services.
- Updated HUD Applicant and Recipient Assurances and Certifications (HUD-424B) that includes a certification that the applicant will not use federal funding to promote diversity, equity, and inclusion mandates, policies, programs, or activities that violate any applicable federal anti-discrimination laws.
- New Certification of Need and Compliance with Housing Quality and Habitability Standards in which the Collaborative Applicant must certify a demonstrated need for all PH projects included in the Renewal Project Listing and that they all comply with program requirements, including HQS or Habitability Standards (whichever is applicable).
- New Certification for Opportunity Zone Preference Points if the CoC is requesting up to 4 Opportunity Zone preference points.

# Local Competition Priorities and Requirements

## CoC Strategic Priorities

The GRCoC plans to advance these priorities through our coordinated work.

- Support the expansion of permanent housing resources. Review low-performing renewal projects for reallocation to expand high-performing permanent housing resources. Support bonus project applications, especially expansion projects for high-performing renewal projects. Bonus project for Permanent Housing (Rapid Re-housing, Permanent Supportive Housing), especially expansion projects for high-performing renewals
- Support the addition of new partners, including faith-based providers.

- Ensure funding for federally required system components (Homeless Management Information System, Coordinated Entry, Emergency Transfer Plan)
- Ensure funding for all renewal YHDP projects. Review low-performing renewal projects for re-allocation to high-performing renewal projects and new projects

(References: [GRCoC Ranking and Review Process](#) and [2025-26 Coordinated Funding Priorities & GRCoC Investment Strategy](#))

## CoC Funding Amounts and Tiers

HUD notifies CoCs how much funding they can request each year. That amount is a combination of the CoC's Annual Renewal Demand (ARD), which is the total amount of funding needed to renew all the CoC's existing grants, and any bonus funds HUD makes available. The GRCoC must submit a Consolidated Application with project applications that total no more than its ARD and its bonus opportunities. In recent years HUD has invited CoCs to apply for regular bonus projects, and Domestic Violence bonus projects.

All projects included in the Consolidated Application must be prioritized in rank order on a two-tiered list. The Tiering levels for FY25 are significantly different from FY24.

- **Tier 1**—is set to 30% of the CoC's Annual Renewal Demand. Projects that rank in Tier 1 will receive federal funding unless extraordinary circumstances affect the amount of federal funding expected to be available.
- **Tier 2**—is the balance of the Annual Renewal Demand and any bonus funding HUD makes available. Projects placed in Tier 2 must compete nationally for their award and are not guaranteed to be selected.

Because projects in Tier 2 are not assured funding, CoCs must be strategic about which projects are ranked in Tier 2.

## Local Application Types

There are two primary types of project applications for the NOFO Competition. There are also some "exception" applications that are treated differently, as described below.

- **Renewal Projects**, which are already funded and are applying for ongoing funding. Renewal projects are evaluated and scored based upon performance data generated from Annual Performance Reports (APRs) and e-LOCCs as well as responses to narrative questions. APR data is pulled from the Homeless Management Information System (HMIS), except for organizations serving victims of domestic violence that do not participate in HMIS. DV providers will extract data from their HMIS-comparable databases for the purpose of project evaluation. Renewal Project types that are eligible for participation in the GRCoC local competition are: Permanent Supportive Housing (PSH), HMIS, SSO-CE, SSO-SO, and SSO- standalone.
- **New Projects**, which are newly proposed projects that do not yet receive CoC funding in VA-500. New Project applications can be submitted by applicants that are currently receiving CoC funding for other projects, or by applicants that are not currently receiving any CoC funding. Renewal Project applicants seeking funding to expand their renewal projects to serve more households or provide more services must submit a New Project Application in addition to their Renewal Project Application. New Projects can only be funded through Reallocated Renewal Funds, CoC Bonus Funds, or DV Bonus Funds. New Projects are scored based upon information submitted during the application process, including basic program information, descriptive narratives and data from comparable projects when available.

- The GRCoC is seeking new Transitional Housing (TH), HMIS, and Supportive Services Only (SSO) projects (Including SSO-standalone, SSO-Street Outreach, SSO- Coordinated Entry) whether funded by transition grant, reallocation, or bonus funds. The GRCoC explicitly encourages organizations who do not currently receive HUD funding to apply under this competition.
- **Transition Grants:** Projects that are transitioning from one program type to another will be treated as new projects for the purposes of Scoring and Ranking. Transition projects are subject to the New Project Scoring tool and application process.
- **YHDP Replacement Projects** are New Project applications that are replacing one or more YHDP projects that are eligible for renewal. YHDP Replacement Projects are subject to the New Project Scoring tool and application process.

In the FY25 HUD CoC Competition, all renewal and new projects must be competitively reviewed and ranked. Planning is not eligible for renewal and is noncompetitive and will therefore be included separately in the CoC's priority listing.

## Threshold Requirements

New and renewal project applications must meet threshold requirements to be reviewed by the Ranking Committee and included in the Consolidated Application submitted to HUD. These requirements were revised by GRCoC Board of Directors February 8, 2018 - updated by Homeward staff based on bylaw changes January 5, 2023.

The Designated Collaborative Applicant will examine all coordinated grant applicants/projects to determine if they meet the threshold requirements listed below on a pass/fail standard. If the Designated Collaborative Applicant determines that the requirements have not been met, the application will be rejected. Rejected applications are not included in the Consolidated Application and will not receive federal funding. The Collaborative Applicant will host a "CoC Application webinar" and respond to Frequently Asked Questions (FAQs) during the competition period to ensure prospective applicants are fully informed of the Threshold Requirements.

1. **Be an active member of the GRCoC as defined in the bylaws, or commit to becoming an active member in the GRCoC.** Membership in the CoC will be composed of entities and individuals concerned with the development and coordination of homeless assistance programs. Entities members are human service agencies, departments of local government, businesses, faith organizations, businesses, educational organizations, and other public agencies. An Entity member will be considered a member in good standing, or Entity Active Member, by attending 75% of the general meetings held during the prior calendar year or by attending 75% of the meetings of a specific CoC committee held during the prior calendar year.
2. **Services must be delivered within the GRCoC service area** which includes: Charles City County, Chesterfield County, Goochland County, Hanover County, Henrico County, New Kent County, Powhatan County, the City of Richmond, and the Town of Ashland.
3. **The applicant must be incorporated as a 501 (c) 3 not for profit organization, or a unit of local government,** per the HUD's designation of eligible applicants in the Notice of Funding Availability by the funding agency.
4. **New applicants agree to comply with all GRCoC Homeless Management Information System (HMIS) requirements,** as laid out in the approved GRCoC HMIS Policies and Procedures and HMIS Policies Committee: Compliance and Monitoring Policy. Renewal applicants must have demonstrated compliance with all GRCoC HMIS requirements, as laid out in the approved GRCoC HMIS Policies and Procedures and



HMIS Policies Committee: Compliance and Monitoring Policy.

5. **New applicants agree to comply with all the requirements laid out in the approved GRCoC Coordinated Entry Policies and Procedures.** Renewal applicants must have demonstrated compliance with all the requirements laid out in the approved GRCoC Coordinated Entry Policies and Procedures by having a signed and active CES MOU.
6. **The applicant must meet the eligibility requirements of the funding agency.** It is the applicant's responsibility to read and comply with these requirements. For CoC Program those requirements include providing match funding as delineated in the NOFO.
7. **Acknowledgement of GRCoC Funded Provider Standards:**
  - Participation in Coordinated CoC Activities, such as PIT and CoC Workgroup/Committee Participation
  - Furthering Community Identified Funding Priorities
  - Supporting the inclusion of people with lived experience of homelessness in decision-making roles within the continuum
  - Following the GRCoC-adopted program standards for relevant program types

(References: [GRCoC Applicant Threshold Requirements](#))

## Scoring and Ranking policies

- **Scoring of Late or Incomplete Applications:** Projects submitted after the deadline or missing mandatory attachments will not be considered/will receive reduced scores.
- **Project Scores:** The GRCoC Ranking Committee will score Renewal and New Project applications based on the scoring rubric approved by the Ranking Committee and provided with the local application. As noted above, local application scores will be generated from objective performance factors captured in the Annual Performance Reports or a comparable database, if applicable, and narrative responses. Project application scores will be the basis for rankings on the Priority Listing.
- **Project Ranking--**The Priority Listing will be generated as follows: All new and renewing projects will be ranked by their application scores

## Reallocation Policy

Approved by the Ranking Committee, July 2025

Federal and state coordinated grant processes permit a Continuum of Care (CoC) to move or reallocate funds between projects to better achieve federal, state and CoC goals for addressing homelessness. In particular, the US Department of Housing and Urban Development encourages the reallocation of funds from renewal projects to provide funding for new projects. Reallocation also presents an opportunity for CoC's to move funding from projects that are underutilized, not cost effective, under-performing, or obsolete.

### Reallocation Process for the Voluntary Return of Funds:

- The Virginia Department of Housing and Community Development may offer additional Virginia Housing Solutions Program funds to GRCoC that have been reallocated from other state CoCs; or
- GRCoC grantees may self-nominate to voluntarily return public funds coordinated through the CoC at any time during the grant period by providing a written proposal to the

collaborative applicant. A grantee seeking to return funds through the voluntary process must do so in accordance with federal and state requirements.

In the event that reallocated funds are available, GRCoC will notify current grantees and solicit written proposals from eligible grantees for use and amount of funds.

The GRCoC Ranking Committee will review the proposal and make a recommendation to the GRCoC Board of Directors for reallocation of the funds. The Ranking Committee may require additional information from grantees regarding the reallocation decision.

The GRCoC Board of Directors will review the reallocation recommendation of the Ranking Committee and vote to approve or disapprove.

The grantee will be notified of the Board's decision in writing within 24 hours.

### **Community Reallocation Review**

As a part of performance monitoring process, the Greater Richmond Continuum of Care (GRCoC) regularly evaluates the performance of programs receiving coordinated community funding. This review is designed to ensure that limited public resources are used efficiently and effectively, and to identify opportunities for reallocation when appropriate.

Each year, during the first half of the calendar year, the Collaborative Applicant completes a performance scorecard for each funded project using data from the project's previous calendar year CoC Annual Performance Report (APR). As part of this review, projects may be assessed for potential reallocation based on a variety of performance and compliance indicators.

The Collaborative Applicant and the Ranking Committee reserve the right to identify and recommend projects for reallocation review both during the annual competitive funding cycle and at other points throughout the year, to better support the CoC's strategic priorities or system performance.

### **Factors That May Trigger a Reallocation Review**

Projects may be flagged for reallocation review based on one or more of the following factors:

- **Underutilization of Resources:** This includes serving significantly fewer people or maintaining longer average lengths of stay compared to comparable projects operating in the community. Relevant performance data may include:
  - o CoC APR Question 7a: Total number of persons served annually
  - o CoC APR Question 22b: Median length of participation for both leavers and stayers
  - o Total project cost relative to its impact and service volume
- **Untimely or Incomplete Expenditures:** Documented delays or failure to fully expend prior year awards may indicate inefficient use of funds.
- **Regulatory Non-Compliance:** Evidence of non-compliance with federal, state, or local regulations may also trigger review.

While there is no appeals process for being identified for reallocation review, organizations may appeal the reallocation recommendation per the Competition Policies and Procedures. The Ranking Committee will review data from projects recommended for reallocation review and may consider the following factors during a reallocation review:

- Audit finding(s) for which a response is overdue or unsatisfactory
- HMIS compliance, as outlined in the HCIS Policies and Procedures linked [here](#)
- Project alignment with GRCoC funding priorities
- Project operational role within the Coordinated Entry System (does this project serve a specific sub-population prioritized by the CoC, etc.)
- Coordinated application ranking in prior funding competitions
- Other quantitative or qualitative information requested by the Ranking Committee

If reviewed and recommended for reallocation, grantees will be notified in writing of the Ranking Committee's reallocation recommendation and justification. Grantees will be provided with a copy of the Appeals process in the Competition Policies and Procedures.

At the end of the appeal period, the Ranking Committee will provide the reallocation recommendation to the GRCoC Board of Directors as part of the coordinated grant application for review and vote to approve or disapprove.

Reference: [GRCoC Reallocation Process](#)

## Overview of Competition Process and Requirements

The GRCoC Local HUD Continuum of Care Program Funding Competition is initiated when the funder (HUD) released their FY CoC Program NOFO. Homeward, as the collaborative applicant, notifies the community and opens local applications. Community process & timeline, application documents and scoring forms are posted on the CoC website ([endhomelessnessrva.org](http://endhomelessnessrva.org)) and GRCoC Members are notified via email listserv. Within 2 weeks of local applications becoming available, Homeward will host a "CoC Application & How to apply" webinar. Attendance at these webinars is not required, though highly encouraged for interested applicants. Additionally, Homeward will host a series of open office hours to respond to applicant questions.

Applicants applying for new projects are encouraged to submit a letter of intent to Homeward within 14 days of the "CoC Application Overview & How to Apply" Webinar to ensure eligibility before beginning the project application. In the webinar slides, a link will be provided with instructions on how to complete the letter of intent.

For the FY25 GRCoC Competition, local applications will submit project application responses on the WiseHive online platform. Application links and detailed will be reviewed at the "How to Apply" webinar and posted on the CoC website. Homeward will provide a list of FAQs along with application details on the CoC website.

For renewing projects, all objective scores will be pulled from HMIS APR reports. Homeward staff will complete objective performance scorecards and provide these scorecards to the Ranking Committee for review.

For new and renewing projects, applicants will have the opportunity to provide narrative responses via online project application. The Ranking Committee will score narrative responses for objective criteria.

The Ranking Committee will independently review and score individual applications prior to meeting as a panel. After independently reviewing and scoring applications, the committee meets to review project ranking order.

Projects are notified of their score and ranking via direct email, publicly on the CoC's website. These policies and processes are reviewed annually by Collaborative Applicant staff, considered for review and enhancement by ranking every 2 years, with board action as needed.

*Reference:* [GRCoC Ranking and Review Process](#)

## Appeals Policy and Process

Approved by the GRCoC Board 9/10/2014, Adjusted by Homeward Staff July, 2024 for clarity and continuity

The CoC Ranking Committee ("RC") has established the following appeal process for coordinated funding applications. Once the RC has reviewed and scored the applicants' proposals, the results will be emailed to applicants' points of contact listed in the application and/or letter of intent. The results will also be publicized in accordance with any funder requirements. Applicants should note that scores reflect the individual program proposal as well as the relative strength of each program in comparison with other proposals for the same eligible activity and the need to ensure a strong collaborative network of homeless assistance programs across the entire geographic area of the Continuum of Care. Applicants who have specific concerns regarding the review and scoring of their application may file an appeal.

**Appeals will only be considered for concerns specific to the review process and scoring of the application.** Appeals specific to the funding recommendation will not be considered. All notices of appeal must be based on:

- Information submitted by the application due date.
- The applicant's in-person presentation to the Ranking Committee (RC).

**The following cannot be appealed:**

- Appeals specific to the funding recommendation.
- New or additional information not submitted by the deadline.
- Omissions to the application by the applicant.

### Appeals Committee Structure

An Appeals Committee will be formed, composed of:

- Three voting members of the GRCoC Board.
- One non-voting member of the RC.

The voting members of the Appeals Committee must not have reviewed the proposal seeking appeal or have a conflict of interest with any of the agencies applying for the applicable funding.

### 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.

### **Appeal Process**

1. The results of the RC review and scoring will be emailed to applicants' points of contact (listed in the application and/or letter of intent) and posted pursuant to the funder's requirements. Specific instructions regarding the point of contact and the deadline for appeals will be included in this information.
2. All notices of appeal must be submitted electronically to the point of contact by the publicized deadline. Receipt of the notice of appeal will be confirmed within 24 hours.
3. 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.
  - It 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 (e.g., attaching the specific areas of the application and clearly explaining why the information provided was adequate to gain additional points).
4. The Appeals Committee will review and evaluate all notices of appeal to determine whether the appeal meets the GRCoC eligibility requirements.
5. All eligible appeals will be read, reviewed, and evaluated by the Appeals Committee within 48 hours of the appeal deadline.
6. The Appeals Committee will provide a determination of the appeal to the appealing applicant and the Ranking Committee.
7. The recommendation of the Appeals Committee will be final.
8. A written summary of the Appeals Committee's decisions will be provided to the appealing agency.

(Reference: GRCoC Appeals Process)

# Additional materials

## Glossary

- **Annual Performance Report (APR):** Required electronic report submitted to HUD annually by recipients of CoC homeless assistance grants. Data collection is aligned with HMIS Data Standards. It assesses grantee performance and is used in local application scoring. Projects serving domestic violence survivors may use a comparable database instead of HMIS.
- **Annual Renewal Demand (ARD):** The total sum of the annual renewal amounts of all projects within the CoC that are eligible for renewal in that fiscal year's competition, prior to FMR-based adjustments.
- **Collaborative Applicant:** The entity responsible for preparing and submitting a CoC's consolidated application in response to HUD's annual NOFO. Homeward is the appointed Collaborative Applicant for the GRCoC (VA-500).
- **Consolidated Application:** Consists of three required parts: the CoC Application, the CoC Priority Listing, and all the CoC's project applications (approved/ranked or rejected).
- **Continuum of Care (CoC):** Established by the 2009 HEARTH Act, the CoC Program aims to:
  - Promote communitywide commitment to ending homelessness.
  - Provide funding to quickly rehouse homeless individuals and families.
  - Promote access to and utilization of mainstream programs.
  - Optimize self-sufficiency among individuals and families experiencing homelessness.
- **Coordinated or Centralized Entry System (CES):** (as defined by HUD) A centralized or coordinated process for program participant intake, assessment, and referrals. It must cover the geographic area, be easily accessed and advertised, and include a comprehensive, standardized assessment tool.
- **eLOCCS:** The electronic Line of Credit Control System, HUD's primary grant disbursement system, which handles disbursements for CoC Program and other HUD programs via the Internet.
- **Eligible Applicant:** (as defined by HUD) A private nonprofit organization, State, local government, or instrumentality of State and local government.
- **e-SNAPS:** The electronic grants management system used by HUD's Office of Special Needs Assistance Programs (SNAPS) for CoC Program funding applications and grant award processes.
- **Grant Inventory Worksheet (GIW):** A report used to record all grants within a CoC's area eligible for renewal funding. It calculates the Annual Renewal Amount (ARA) for each project and the CoC's Estimated Annual Renewal Demand (ARD).
- **Homeless Management Information System (HMIS):** The local IT system used to collect client-level data on the provision of housing and services to homeless individuals and families. The GRCoC uses Wellsky as its HMIS software. Data from HMIS is used to score renewal applications. Homeward is the HMIS Lead Agency.
- **Housing Quality Standards (HQS):** The HUD minimum quality standards for tenant-based programs, applying to the building, premises, and unit.
- **HUD Continuum of Care Notice of Funding Opportunity (NOFO):** The annual announcement from HUD that initiates the national competition for CoC funding.
- **Match:** Cash and/or in-kind resources contributed by the CoC and ESG grant recipient as a condition of funding. All grant funds must be matched with an amount no less than 25% of the awarded grant (excluding the leasing budget line item).

- **Priority Listing:** The ranked list of all Project Applications (approved/ranked or rejected) that the Collaborative Applicant must submit to HUD, with each project assigned a unique rank number.
- **New Project Application:** An application for a newly proposed project applying for CoC NOFO funding for the first time in a given year.
- **Project Sponsor:** The organization responsible for carrying out the proposed project activities. The sponsor can be the applicant or a sub-recipient.
- **Reallocation:** A process used by CoCs to shift funds, in whole or part, from existing eligible renewal projects to create one or more new projects without affecting the CoC's ARD. It is often used for unspent funds or to convert projects (e.g., transitional housing to Rapid Rehousing (RRH)).
- **Recipient:** An applicant of CoC Program funds that executes a grant agreement with HUD. Must be a private nonprofit organization, State, local government, etc., to be eligible.
- **Renewal Application:** An application submitted by a project with an existing HUD CoC contract (generally one year) that is expiring and seeking to have its funding renewed through the local process.
- **Tier 1/Tier 2:** HUD-required ranking for all projects in the Consolidated Application:
  - **Tier 1:** A percentage of the CoC's ARD (defined by HUD in the NOFO). Projects ranked here are confidentially expected to be funded, provided they meet HUD's threshold requirements.
  - **Tier 2:** The balance of Tier 1 and the CoC's ARD, plus any bonus funding (including DV Bonus). Projects in Tier 2 are not assured funding and compete nationally for an award.

## Appendix A: Requirements, Guidelines

- CoC Program Interim Rule
- CES P&P GRCoC Coordinated Entry System Policies and Procedures
- HMIS policies: HMIS Compliance

## Appendix B: Sample Documents and Resources

### Sample Service Participation Agreement

#### Greater Richmond Continuum of Care (GRCoC)

#### Standard Service Participation Agreement for HUD Funded Projects (Non-SUD Treatment)

*\*Please customize this standard template for your project's specific service offerings to ensure applicability to your specific project type.*

As required by the FY2025 CoC NOFO, this Service Participation Agreement outlines the supportive service expectations for participants in the project. Supportive Services include case management, employment training, substance use treatment, etc. These services are designed to help participants obtain and maintain housing stability, increase income, improve health and well-being, and/or successfully exit to permanent housing.

Project Name:	Effective Date:
Participant Name:	Unit/Room:

#### Participant Rights

Participants have the right to:

- Access services in a trauma-informed and housing focused manner.
- Decline disability-related services.
- Request reasonable accommodations.
- File grievances without retaliation.

#### Required Service Participation

Participants agree to the following required participation:

- Meet with a case manager at least one time per month.
- Participate in a Housing Stability Plan.
- Engage in housing retention activities.
- Attend required appointments for housing stability.
- Cooperate with documentation and re-certification.

#### Optional Services (Not Required)

Additional voluntary, customized services are available for each participant.

#### Termination & Appeals

Terminations follow 24 CFR 578.91 with due process.

#### Signatures

Role	Name	Signature	Date
Participant			
Staff			



**Notes:** This agreement complies with:

- 24 CFR 578.75(h) stating, “[Programs] may require the program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. Notwithstanding this provision, if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program.”
- 24 CFR 578.91 defining due process as: “In terminating assistance to a program participant, the recipient or subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of: (1) Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; (2) Written notice to the program participant containing a clear statement of the reasons for termination; (3) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and (4) Prompt written notice of the final decision to the program participant.

**Greater Richmond Continuum of Care (GRCoC)**  
**Standard Service Participation Agreement for HUD Funded SUD Treatment Projects**

*\*Please customize this standard template for your project's specific service offerings to ensure applicability to your specific project type.*

As required by the FY2025 CoC NOFO, this Service Participation Agreement outlines the supportive service expectations for participants in the project. Supportive Services include case management, employment training, substance use treatment, etc. These services are designed to help participants obtain and maintain housing stability, increase income, improve health and well-being, and/or successfully exit to permanent housing. This agreement applies to projects whose purpose is to provide Substance Use Disorder (SUD) treatment.

Project Name:	Effective Date:
Participant Name:	Unit/Room:

**Participant Rights**

Participants have the right to:

- Person-centered, trauma-informed services.
- Reasonable accommodations.
- Non-discrimination.
- Ability to file grievances without retaliation.

**Required Service Participation**

Participants agree to the following required participation:

- Work to attend individual and group SUD service available on-site and off-site.
- Complete clinical assessments and treatment plan updates.
- Work to engage in case management and recovery support.
- Follow health and safety rules.
- Work to comply with referrals for appropriate levels of care.

**Optional Services (Not Required)**

Additional voluntary, customized services are available for each participant.

**Noncompliance & Corrective Action**

Staff will review barriers, adjust treatment plans, provide accommodations, and create corrective action plans before considering discharge.

**Termination & Appeals**

Terminations follow 24 CFR 578.91 with due process.

**Signatures**

Role	Name	Signature	Date
Participant			
Staff			

**Notes:** This agreement complies with:

- 24 CFR 578.75(h) stating, “[Programs] may require the program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. Notwithstanding this provision, if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program.”
- 24 CFR 578.91 defining due process as: “In terminating assistance to a program participant, the recipient or subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of: (1) Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; (2) Written notice to the program participant containing a clear statement of the reasons for termination; (3) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and (4) Prompt written notice of the final decision to the program participant.