



TX-604 WACO/MCLENNAN COUNTY CONTINUUM OF CARE COMPETITION PROJECT RANKING AND REALLOCATION POLICY

PURPOSE

On an annual basis, the TX-604 Waco/McLennan County Continuum of Care (CoC) is required to rank all new and renewal projects submitted to HUD for funding in an order that reflects the CoC's needs and priorities. Additionally, HUD requires CoCs to review the performance of all funded projects and seek to reallocate funding away from low performing projects or those providing services that are of a lower priority in preventing and ending homelessness.

The CoC is seeking to accomplish the following in the ranking and reallocation of projects:

- Incentivize all providers to focus on outcomes and to seek to achieve the performance targets specified by the CoC and by HUD.
- Encourage providers to adopt evidence-based practices including Housing First to more effectively employ CoC resources.
- Replace projects that are not high performing or following evidence-based practices with new projects that follow CoC priorities and HUD priorities laid out in the Notice of Funding Opportunity (NOFO).

YHDP PROJECTS

Unless specified by HUD in the NOFO, Youth Homelessness Demonstration Program grants are non-competitive, so are not scored by the Scoring and Ranking Committee nor are ranked on the Ranking List.

SCORING AND RANKING POLICY

All new and renewal projects will be ranked by the CoC. The primary factor controlling the ranking of projects will be the scores assigned to renewal and new projects. Scoring is based on project performance, grant

management, community outcomes, and adherence to policy priorities. Except as specified below, renewal projects will be ranked in the NOFO competition by the score received on the CoC's Scoring and Ranking Tool. There are two categories of renewal projects that will not be ranked according to performance scores:

- Projects that are essential to the operation of the CoC. This includes funding for HMIS and Coordinated Entry. These are unique projects focused on CoC operations and that cannot be readily evaluated or compared to other CoC funded projects. Failure to renew this funding would have negative consequences for the CoC and jeopardize future funding opportunities.
- First time renewal of newly funded grants. HUD requires newly funded one-year project grants to be renewed in the competition. In most instances, these projects will have not yet started operations. In other instances, the projects have just started but are far from being able to report on a full year of operations in the APR.

The two project types identified above will not be assigned scores and will be ranked by the CoC to assure – to the maximum extent possible – that they will be funded in the competition. Subject to review based on the actual NOFO, these projects will be ranked at the top of Tier 1 of the Ranking List, with HMIS and CE projects being ranked before any others due to these project types being required for CoC operations.

New projects will be ranked in order based on how well they meet the priorities of the CoC and HUD, with HMIS and Coordinated Entry grants being ranked above any other new projects if the new HMIS or CE project is necessary to meet the requirements HUD sets for CoC operations.

Any legal applicant for CoC funds can apply for new projects from the bonus pool or the uncommitted reallocation pool. The CoC will only rank new projects for which there is sufficient funding in the new or reallocation pool to fully fund the project.

REALLOCATION POLICY

Reallocation can be voluntary or involuntary.

Voluntary reallocation means that a project makes a choice to give up some or their entire project funding for the purpose of creating a new project. These reallocated projects will be evaluated as new projects and ranked in the same manner as other new projects. CoC grantees in good standing (no outstanding HUD or CoC monitoring findings and no open audit findings) may voluntarily reallocate their funding and will not have to compete with other organizations for that funding.

Involuntary reallocation is when the CoC reclaims some or all the renewal project funding. This funding is redirected from an existing renewal project for the purpose of expanding an existing renewal project or to create an entirely new project at another agency. Involuntary reallocation can occur if a project underperforms or demonstrates a history of chronic underspending. Chronic underspending is defined by a return of 10% or more of a project's awarded funds at the end of a project year, for two or more consecutive years.

If a renewal project scores below one hundred points on the Renewal Project Scoring Tool, the full project funds will be at risk for reallocation unless a Project Improvement Plan is submitted and approved by the Scoring and Ranking Committee. The Project Improvement Plan must specify how the project will improve performance and meet standards in the upcoming year. If the committee accepts the Project Improvement Plan, the project will be ranked on the Ranking List. Reallocation of a portion of the project is still possible if the project meets the parameters for reallocation due to chronic underspending. For projects that have been identified as underperforming for a second year in a row, the project may be at risk for reallocation even with the submission and approval of a Project Improvement Plan.

The Scoring and Ranking Committee will review renewal project spending during the competition process. If the last closed year is underspent by 10% or more, the committee will review the spending from the year before that as well. Those renewal projects who have underspent the last two contracts by 10% or more will be reviewed for reallocation due to underspending. Reallocation due to underspending will range from none to the average of the underspent amounts being reallocated. If an agency is aware that they have underspent their grant, they are able to provide information to the Scoring and Ranking Committee, when submitting their project for scoring, regarding any mitigating circumstances that may have contributed to this underspending (e.g., staff shortages).

VICTIM SERVICES PROVIDER EXCEPTIONS

Due to victim service providers not entering client data into HMIS for security and legal reasons, data will be obtained, where possible from the victim service provider's comparable database. Due to the nature of these programs, exceptions have been identified in bold italics on the Renewal Project Scoring Tool.



TX-604 WACO/MCLENNAN COUNTY CONTINUUM OF CARE GRIEVANCE PROCEDURES FOR APPLICANT ORGANIZATIONS

PURPOSE

The purpose of the Grievance Procedure is to settle any grievance between an Applicant Organization and the CoC's Scoring and Ranking Committee, as quickly as possible to assure an efficient Consolidated Grant Application process. In the case of a denial of said process the Applicant Organization may pursue the following instructions regarding an Appeal.

ELIGIBILITY

- I. Filing Grievance by Applicant Organization:
 - A. A grievance may be filed by any Applicant Organization that claims it has been adversely affected by:
 1. Improper application of rules, regulations and procedures concerning participation in the Consolidated Grant application process.
 2. Improper interpretation of rules, regulations and procedures concerning participation in the Consolidated Grant application process.
 3. Disparity in the application of rules, regulations, and procedures regarding participation in the Consolidated Grant application process.
 4. Violation of rules, regulations or procedures concerning participation in the Consolidated Grant application process.
 5. The score assigned by the Renewal Scoring Tool or reallocation or Ranking and Prioritization Policy.

APPEALS & GRIEVANCE PROCESS

- I. Applicant Denied:
 - A. If an agency and/or application for a grant is denied, the following shall occur, and the following steps may not be omitted:

1. The Scoring and Ranking Committee will notify applicants, in writing, stating the reason(s) for the denial.
 2. Applicant must prepare an Appeals Letter.
 3. Submit: Appeals Letter and Grievance Form to: the CoC Board at heartoftexashomelesscoalition@gmail.com, within three working days of date of receiving the Denial Letter.
 4. The Response Letter must include a reason(s) for appeal and in what way the denial was contrary to regulations and/or in some other way inequitable.
 5. The period for submission starts on the first workday and shall not include holidays and/or long weekends observed by the CoC.
- B. Note, any said efforts at Informal Resolution are unrelated to the Formal Grievance Procedure and do not extend to the time limits included in the procedure.
- II. Appeals Process:
- A. The CoC Board will appoint a Grievance Committee to consider the appeal and provide a written response within three working days of receipt of the organization's appeal letter.
 - C. A copy of the Grievance Form and Letter shall be retained by the Applicant Organization and a copy shall be filed in the Applicant Organization's file.
 - D. All copies should note the date that the grievance was filed and the date and time that the CoC Board received the Grievance Form and Letter.
 - E. Email correspondence is acceptable to: heartoftexashomelesscoalition@gmail.com
- III. All Written Responses:
- A. Final decision shall come from: Grievance Committee
 - B. Brief statement of the reason(s) for the final decision, shall include:
 1. If the decision to deny is overturned because of the appeal, processing will resume, and the applicant will be notified of the next step in the process.
 2. If denial is not overturned the Grievance Committee shall inform the applicant, by email and mail, of the results.

DISPUTE RESOLUTION PROCESS – COC STEERING COMMITTEE

- I. If an applicant is dissatisfied during the process, the applicant organization has 24 hours to file an appeal to the CoC Board with the CoC Grievance Committee on the official form. This committee has three working days to talk with the Grievant.
- II. The CoC Grievance Committee will submit any responses, in writing, to the CoC Steering Committee, which will respond within three working days.
- III. Lastly, if the Applicant Organization is still not satisfied with the determination for the appeal by this committee, then the Applicant may appeal directly to HUD, according to procedures in 24 CFR 578.35.

GENERAL PROVISIONS – GRIEVANCE FORM

- I. The Grievance Forms is provided by the CoC Board and should be used in pursuing a resolution of the grievance.
- II. The Applicant Organization may represent itself or be represented by a chosen representative when presenting the organization's grievance to the committees.

GRIEVANCE FORM – AGENCY

Please type or print.

Applicant Organization: _____

Applicant Representative: _____ Job Title: _____

Organization's Address: _____

Organization's Phone Number: _____

We have discussed this complaint with the chair of the Scoring and Ranking Committee and received his/her verbal answer on _____. Because this answer is unacceptable to us, we wish to file a formal complaint.

Nature of grievance. Explain how your organization was unfairly treated including names and dates. (Use additional pages if needed.)

A just and fair solution of our grievance is:

We understand that if we wish to further appeal our complaint, we have twenty-four (24) hours from response to submit a grievance form to the next level of appeal. Grievances not appealed timely are considered settled at the previous level.

Signature

Date

Copy retained by Applicant Organization. Copy retained in Applicant Organization file. Applicant Organization submits a copy to proper appeals person.

GRIEVANCE FORM – GRIEVANCE COMMITTEE RESPONSE

Please type or print.

Applicant Organization: _____

Applicant Representative: _____

Response:

If you wish to further appeal your complaint, you have twenty-four (24) hours from response to submit a grievance form to the next level of appeal. Grievances not appealed timely are considered settled at the previous level.

Signature

Date

CoC Lead Agency retains copy for Applicant Organization's file and returns original to Applicant Organization.

GRIEVANCE FORM –STEERING COMMITTEE RESPONSE

WE HAVE RECEIVED THE GRIEVANCE COMMITTEE’S RESPONSE ON _____.
WE ARE DISSATISFIED WITH THE SOLUTION TO OUR GRIEVANCE. WE HEREBY APPEAL TO THE COC STEERING COMMITTEE.

REASON FOR FURTHER APPEAL. (USE ADDITIONAL PAGES IF NEEDED.)

Signature

Date

CoC Steering Committee Response:	

Signature

Date

The CoC Steering Committee decision is final.

CoC Lead Agency retains copy for Applicant Organization’s file and returns original to Applicant Organization.