

FY 2024 NEW AND RENEWAL COC PROJECT REVIEW, RATING, AND RANKING POLICIES AND PROCEDURES

FULTON COUNTY COC (GA-502)

AUGUST 2024

INTRODUCTION AND BACKGROUND

The U.S. Department of Housing and Urban Development (HUD) released the [Notice of Funding Opportunity \(NOFO\) for Fiscal Year 2024 and 2025 Continuum of Care \(CoC\) Competition](#) on July 31, 2024. The purpose of the funding is to promote a community-wide commitment to the goal of ending homelessness and to provide funding for efforts by nonprofit providers, states, local governments, and Indian Tribes or tribally designated housing entities to quickly rehouse homeless individuals, families, youth, persons fleeing domestic violence, dating violence, sexual assault, and stalking while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals and families, and to optimize self-sufficiency.

In FY 2024, HUD will continue to require Collaborative Applicants to rank all projects, except CoC planning and UFA Costs, in two tiers. Tier 1 is equal to 90 percent of the combined Annual Renewal Amounts (ARA) for all projects eligible for renewal. Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for but does not include projects selected with Domestic Violence (DV) Bonus funds. All new and renewal projects, except the planning grant, will need to be ranked within the two tiers.

As stated in Section II.A of the FY 2024 CoC Program Competition NOFO, approximately \$3,134,000,000 is available in the FY 2024 CoC Program Competition NOFO, including at least \$52 million available for Domestic Violence (DV) Bonus projects, described in Section I.B.2.b.(6) and I.B.3.j of the NOFO. All requirements in the FY 2024 application process, including requirements for the entire CoC Consolidated Application and the total amount of funds available, are included in the FY 2024 NOFO.

CHANGES FROM PREVIOUS NOFO

Changes to Tiering:

Tier 1 is set at 90 percent of the CoC's Annual Renewal Demand (ARD). In FY 2023 Tier 1 was set at 93 percent

2-Year NOFO:

The Consolidated Appropriations Act, 2024, authorizes HUD to issue a single two-year NOFO for fiscal years 2024 and 2025.

The application and selection process for the FY 2024 funds awarded through this NOFO will proceed much like it has in prior-year competitions. However, CoCs are only required to submit one CoC application that will be applicable to the FY 2024 and FY 2025 funds. HUD reserves the right to award available FY 2025 funds based on this NOFO competition. Projects that are awarded FY 2024 funds may be eligible for award of FY 2025 funds using their FY 2024 application submission and are not required to apply for renewal for FY 2025 funds. CoC renewal projects expiring in CY 2025 (January 1, 2025, and ending December 31, 2025) are eligible to be renewed with FY 2024 CoC funds. Projects that will be eligible for renewal with FY 2025 CoC Program funds must have an expiration date in CY 2026 (January 1, 2026, and ending December 31, 2026). Should there not be sufficient appropriated amounts to fully fund all FY 2025 renewal grants, grant amounts may be reduced proportionately. If new competitive funding becomes available for FY 2025, this NOFO may be amended and the FY 2024 - 2025 CoC Application and score may be used for the FY 2025 application selection process.

Applications for FY 2025 eligible CoC renewal projects and new projects created through CoC and/or DV reallocation, must be submitted in e-snaps by the application submission deadline for FY 2025 CoC funds on August 29, 2025. HUD also reserves the right to modify this NOFO or issue a supplemental FY 2025 CoC NOFO if necessary (e.g., to accommodate a new CoC priority or new funding source).

Funding for Specific Subpopulations:

In the FY 2024 NOFO competition, HUD requires funding reallocated from projects previously funded with DV Bonus funding to continue to be used for projects dedicated to serving the same subpopulation. Therefore, prior to executing the reallocation of any project, HUD strongly recommends reviewing the Grant Inventory Worksheets (GIWs) published on the CoC Program Competitions page on the HUD.gov website to determine the type of new projects that can be created with reallocated funding intended for the specific subpopulations.

DV Reallocation:

In this NOFO, HUD has expanded reallocation to include DV Reallocation. HUD establishes these terms to distinguish between funding sources that must continue to serve the same populations of the projects being reallocated.

HUD is establishing a definition of DV reallocation to implement a congressional directive that requires projects previously funded using DV Bonus funds to continue to serve the same population, even when projects are reallocated. CoCs may reallocate eligible Renewal projects that were previously funded, in whole or in part, with DV Bonus funding to create DV Reallocation projects that are dedicated to serving the same population. New DV Reallocation projects must be 100 percent dedicated to serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who qualify under paragraphs (1) or (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act [see sections I.B.2.b.(24) and III.B.4.a.(4) of the NOFO for more information].

Cost of Living Adjustments for Conditionally Selected Grants:

The Consolidated Appropriations Act, 2024 authorizes HUD to make reasonable cost of living adjustments to renewal amounts to help afford increasing cost of operations due to inflation. See section V.D.2. of the NOFO for more information.

ELIGIBLE APPLICANTS

Non-profit organizations and units of local government that have the capacity to administer federal funding and have experience administering programs and services that assist people experiencing homelessness and/or a housing crisis are eligible to apply for FY 2024 HUD CoC funding.

AVAILABLE FUNDING, ELIGIBLE PROJECTS, AND BONUS PROJECTS

AVAILABLE FUNDING

CoC Number and Name	PPRN	Estimated ARD	Tier 1	CoC Planning	CoC Bonus	DV Bonus
GA-502 – Fulton County CoC	2,162,988	\$2,691,704	\$2,422,534	134,585	323,004	324,448

ELIGIBLE PROJECTS AND BONUS PROJECTS

Renewal Projects:

Renewal project applications must be submitted by the same recipient that signed the executed grant agreement for the grant being renewed, or entity that became the recipient through a grant agreement transfer amendment. To be eligible as a renewal project, the application must (1) be for the same amount of funding before any adjustments described in the FY2024 NOFO (e.g. FMR adjustments), or the amount reduced due to reallocation of a CoC project; (2) be for the same program component; (3) in the case of CoC renewal projects, must continue to serve program participants who are enrolled in the project under the project's current grant agreement; and (4) in the case of DV Bonus renewal projects, must continue to serve the same subpopulation.

Subject to HUD approval and the terms of the NOFO, the following requests may be included in a renewal application:

- A. CoC renewal project applications may include requests to add eligible activities to a project, shift up to 10% of funds from one approved eligible activity to another, and change the subpopulation served.
- B. DV Bonus renewal project applications may include requests to add eligible activities to a project and shift up to 10 percent of funds from one approved eligible activity to another.

Renewal applications that include requests to shift more than 10 percent of funds from one approved eligible activity to another will not be considered during the CoC Program Competition by HUD. If an application includes a budget shift that exceeds 10 percent, HUD will correct the project budget to reflect the previously awarded budget amounts.

New Projects:

Applicants may submit new projects created through reallocation, DV reallocation, CoC Bonus, DV Bonus, or a combination of reallocation/ DV reallocation and CoC Bonus/ DV Bonus.

Reallocation and CoC Bonus Projects:

The following project types are available for new projects funded through reallocation or the CoC Bonus:

- A. Permanent Supportive Housing (PH-PSH)
 - i. New PH-PSH project must serve one of the following:
 - persons eligible to be served by DedicatedPLUS projects as described in section I.B.2.b.(5) of the FY 2024 NOFO in which case all units funded by the project must be used to serve program participants who meet the qualifications for Dedicated PLUS; or
 - persons who are experiencing chronic homelessness (see 24 CFR 578.3 definition of Chronically Homeless) at the time they initially enroll in the project.
- B. Rapid Rehousing (PH-RRH) – projects must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 Section 103(b) of the McKinney-Vento Homeless Assistance Act.
- C. Joint Transitional Housing and Rapid Rehousing (TH/PH-RRH) - projects must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 Section 103(b) of the McKinney-Vento Homeless Assistance Act.
- D. SSO- Coordinated Entry (SSO-CE) – Project to develop or operate a centralized or coordinated assessment system. Projects must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 Section 103(b) of the McKinney-Vento Homeless Assistance Act.
- E. Dedicated HMIS – projects that can only be carried out by the HMIS Lead listed in the CoC Applicant Profile in e-snaps. Eligible costs under a Dedicated HMIS grant can be found at 24 CFR 578.57(a).

Domestic Violence Reallocation and Bonus Projects:

DV Bonus funds can be applied for by an eligible applicant for projects that are dedicated to persons actively fleeing or are survivors of domestic violence, dating violence, sexual assault, human trafficking, or stalking who qualify under the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act. DV Bonus funding may be used for new projects and/or to expand an existing renewal project that is not dedicated to serving persons fleeing and/or survivors of domestic violence, as defined above, so long as the DV Bonus funds for expansion are solely used for additional units, beds, or services dedicated to persons eligible to be served with DV Bonus funding.

If an applicant proposes to use DV Reallocation funds to expand an existing renewal project that is not currently dedicated to serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking to dedicate additional beds, units, persons served, or services provided to existing program participants of this population, the entire project, including the renewal project being expanded, must serve 100 percent individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who qualify under paragraphs (1) or (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act.

Applicants may apply for the following types of DV Reallocation and DV Bonus projects:

- A. Rapid Re-housing (PH-RRH)
- B. Joint Transitional Housing and Rapid Rehousing (Joint TH/PH-RRH) component projects
- C. SSO Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of people experiencing homelessness who are survivors of domestic violence, dating violence, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different). CoCs may only submit one DV funded SSO-CE project per fiscal year competition.

Rapid Rehousing and Joint TH/PH-RRH component projects must follow a Housing First approach.

Transition Grants

A Transition grant can be used to transition an eligible renewal project, being eliminated through reallocation, from one program type to another eligible project type over a one-year period. For a new project to be considered a Transition grant, the applicant for the new project must be the recipient listed on the current grant agreement for the eligible renewal grant being transitioned through reallocation. The definition of the grant and process is defined in Section I.B.2.b.(30) of the FY 2024 NOFO. Transition grants in this competition are eligible for renewal in subsequent fiscal years for eligible activities of the new program component. The new transition project must meet the following requirements to be eligible:

- A. The current renewal project recipient must have the consent of its Continuum of Care; and
- B. The new project application must meet project eligibility and project quality thresholds established by HUD in sections III.C.4.a and b. of the NOFO.

Recipients of an eligible renewal project that are interested in applying for a new Transition grant must notify the Fulton County CoC in writing by email fifteen days prior to the local project application submission date. The Fulton County CoC will work with recipients that have requested a Transition grant to determine if the transition from one project type to another is eligible, feasible, and is in line with CoC priorities.

Transition grants HUD conditionally awards in the FY 2024 CoC Program Competition will have one year to fully transition from the original project type to the new project type during the normal operating year once HUD executes the grant agreement.

Expansion Projects

The process by which a renewal project applicant submits a new project application to expand its current operations by adding units, beds, persons served, services provided to existing program participants, or in the case of an SSO-CE or HMIS grant, increase the current activities within the CoC's geographic area. DV Bonus funds can be used to expand an existing renewal project if the expansion project is dedicated to persons fleeing and/ or fleeing domestic violence, dating violence, sexual assault, human trafficking, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act. Only the new project application for the expansion will be considered for DV Bonus funds in these situations. The expansion project (i.e., the existing renewal project and the new expanded portion of the project) must meet the conditions below:

- A. The renewal project and the new expanded portion of the project must both have the same component type.
- B. Eligible project components for new expansion grants: PH-PSH, PH-RRH, Joint TH/PH-RRH, SSO-CE, or HMIS. The new expanded portion of the project may be funded through reallocation, DV reallocation, CoC bonus, or DV Bonus.
- C. If using DV Bonus funds, the new expanded portion of the project is solely for additional units, beds, or services dedicated to persons fleeing and/ or survivors of domestic violence, dating violence, human trafficking, or stalking as defined above.
- D. If using DV reallocation funds, to expand an existing renewal project that is not currently dedicated to serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking to dedicate additional beds, units, persons served, or services provided to existing program participants of this population, the entire project, including the renewal project being expanded, must serve 100 percent individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who qualify under paragraphs (1) or (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act.

To apply for an expansion grant with CoC Bonus, DV Bonus, DV Reallocation, or CoC Reallocation funding, project applicants must submit separate new and renewal project applications and both projects must be ranked by the CoC with unique rank numbers. If both the new expansion project and the renewal project it expands are conditionally selected for funding by HUD, one grant agreement incorporating both approved project applications will be executed by HUD.

Consolidated Projects

Eligible renewal project applicants will continue to have the ability to consolidate two or more eligible renewal projects (but no more than ten projects) into one project application during the application process. The projects being combined during a grant consolidation will continue uninterrupted. To be eligible for consolidation, the projects must have the same recipient and be for the same component and will be funded in this competition only with FY 2024 funds (meaning no funds recaptured from prior years will be awarded to the project). HUD will not permit projects with the following characteristics to consolidate:

- A. outstanding audit or monitoring findings,

- B. outstanding obligation to HUD that is in arrears,
- C. unresolved construction delays,
- D. history of poor financial management or drawdown issues,
- E. history of low occupancy levels, or lack of experience in administering the project type, or
- F. other capacity issues.

HUD will not permit a transitional housing and a permanent housing project to consolidate to form a Joint TH and PH-RRH component project and will not permit a transition grant to be consolidated with any other project. If a project meeting these characteristics attempts to consolidate as part of the project application process, the submitted consolidated project will be rejected by HUD during the application review process.

To apply for a consolidated grant, applicants must submit separate renewal project applications and supplemental applications for each of the grants that are proposed to be consolidated, and an application for the new consolidated grant with the combined budget and information of all grants proposed for consolidation. Project applications for the grants that are proposed to be consolidated will be ranked, and if all those grants are selected, HUD will award the single consolidated grant. If one of the grants proposed to be consolidated is found to be ineligible for consolidation or is not selected, HUD will award all grants that are eligible for renewal and selected as separate grants. See Section III.B.4.b.(7) of the FY 2024 NOFO for additional requirements.

REALLOCATION

Reallocation and DV reallocation are a process CoCs use to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD. New projects created through reallocation and DV reallocation must meet the requirements set forth in Section I.B.3.a, III.B.4.a.(3) and the project eligibility and project quality thresholds established in sections III.C.4.a and b. of the FY 2024 NOFO. CoCs may only reallocate eligible renewal projects that have been renewed by HUD during a previous CoC Program competition.

Reallocation provides CoCs with the opportunity to:

- A. Reallocate excess project funding, and
- B. Move funding from low-performing projects to newly created projects with the intent that the new projects will be higher performing.

It is the policy of the CoC that reallocation can occur through the following methods:

A. Voluntary Reallocation:

A recipient may voluntarily reallocate its existing project by fully or partially reducing its project's annual renewal amount. A recipient that voluntarily reallocates an existing project and wishes to create a new eligible project may submit a new project application to the Fulton County CoC during the local competition. Solicitation by the CoC for voluntary reallocation will be made prior to the opening of the CoC competition which typically occurs during the summer or early fall and during the annual application process. If possible, solicitation for voluntary reallocation will occur once the Grant Inventory Worksheet (GIW) is released by HUD for the upcoming fiscal year. If necessary, individual meetings will be scheduled with each applicant to discuss project performance, HUD CoC priorities, and other factors that may affect future funding for each project.

B. Involuntary Reallocation:

The CoC will make reasonable efforts to ensure that projects are meeting performance standards and fulfilling the requirements of CoC guidelines prior to enforcing involuntary reallocation. If after reasonable corrective efforts

have been made, there continue to be deficiencies in project performance, then the Fulton County CoC may recommend the project to be fully or partially reallocated involuntarily at the time of project rating and ranking.

A determination for involuntary reallocation will be made based on the following criteria:

- i. **Project Performance** - takes into consideration the type of project, its performance relative to that project type, timely submission of Annual Performance Reports (APRs) to HUD, and timely expenditure of funds. Reallocation will be considered for any project submitting an APR or any other required reporting six months or more past its due date.
- ii. **Utilization and Effectiveness** - factors bed/unit operating capacity and cost effectiveness relative to project type and population served. Reallocation will be considered for any project utilizing less than 80% of its bed/unit capacity for the most recently completed project term/grant year.
- iii. **Extent of participation in HMIS (or comparable database) and Coordinated Entry** - including but not limited to: bed coverage, data quality, participation in Coordinated Entry, and contribution to CoC System Performance Measures.
 - All CoC-funded programs, including Victim Service Providers (VSPs), are expected to accept housing referrals solely from the Fulton County Coordinated Entry. VSPs may operate a comparable HMIS database but are still required to accept referrals directly from the CoCs Coordinated Entry
 - All CoC-funded programs must contribute to meeting local System Performance Measurement goals, including data quality goals.
- iv. **CoC Funding Priorities** - as determined by the most recent CoC NOFO and/or other HUD published priority listings, and Fulton County CoC local funding priorities.

The CoC Rating and Ranking committee will evaluate all renewal projects submitted during the CoC Program Competition NOFO. The Rating and Ranking committee will evaluate these projects in conjunction with the HUD System Performance Measures, the CoC Strategic Plan, and other funder priorities to determine if any projects eligible for renewal should be reduced or eliminated to develop new projects. The committee makes decisions about involuntary reallocation(s) during the CoC Rating and Ranking committee meeting. The Rating and Ranking committee then submits its recommendations to the Fulton County CoC Board for a vote.

Recipients who administer a project that has been selected for involuntary reallocation will receive notification, including the reasons for the reallocation, from the CoC in writing, outside of e-snaps.

CoC program funds made available through reallocation may be used to develop one or more new projects, including new project expansions of eligible renewal projects.

Reallocation Appeal Process:

Recipients selected for involuntary reallocation may appeal the decision in writing to the Rating and Ranking committee within seven days after notification of selection for involuntary reallocation. The written appeal should provide justification for the continued need to maintain the project(s) funding at its current renewal amount along with a corrective action plan that addresses the reasons for the reallocation presented by the CoC in the notification letter.

Wind-Down Responsibility for Applicants of Reallocated Projects:

It is the responsibility of the agency whose original project is being reallocated to successfully place those currently receiving housing through the project into another comparable or better permanent housing situation. Other CoC funded projects can accept clients from a project being wound down if the project serves the same population types. The Fulton County CoC and Collaborative Applicant staff will support projects, being wound down, through planning efforts,

coordination with other resources, etc. However, the grantee of the reallocated project is ultimately responsible for the successful housing placement of clients impacted by the dissolution of the project.

LOCAL COMPETITION DEADLINES

The CoC is requesting renewal applications and new applications that meet the criteria for a bonus project, including the DV bonus, or that would provide rapid rehousing or permanent supportive housing using reallocated or DV reallocated funds, if made available.

1. **Publishing of the Local Project Application Competition.** FY 2024 New and Renewal CoC Project Review, Rating, and Ranking Policies and Procedures Published on **August 15, 2024.**
2. **Mandatory Applicant Meeting.** All applicants interested in applying for funds through the local competition are required to have a staff member attend the mandatory meeting on **August 21, 2024, at 10:30am.** The meeting will consist of a brief overview of the FY 2024 CoC NOFO, the local competition timeline and process, and a question-and-answer period. The meeting link will be sent in a separate communication. If you do not receive the meeting link, please email Homelessinfo@fultoncountyga.gov.
3. **New and Renewal Project Applications Due.** All e-snaps project applications and Supplemental Applications (outside of e-snaps) are required to be submitted to the CoC through BidNet: <https://www.bidnetdirect.com/>. Renewal project applications are due on **August 26, 2024, at 11am** and New Project applications are due on **September 13, 2024 at 11am.** All documents must be received as individual electronic files. Individual documents may be scanned but must be submitted as individual files. If all documents are scanned together, they will not be accepted. **Applications will not be accepted via email. Late submissions will not be accepted.**
4. **Rating and Ranking.** Raters will review applications individually between **September 26, 2024, and September 30, 2024.** The Rating and Ranking committee meeting will take place on **October 1, 2024.**
5. **CoC Board Review and Vote on the CoC Priority Listing.** The Fulton County CoC Board will meet on **October 8, 2024,** to review project rating and ranking recommendations and vote on the CoC Priority Listing.
6. **Project Applicant Notification.** Applicants will be notified through written notification outside of e-snaps by **October 10, 2024.** The notification will indicate if your project(s) will be included in the CoC Application to HUD, the ranked position of your project(s) in the CoC Tiered Ranking, and the funding amount the project is being submitted for.
7. **Applicant appeals process.** CoC project applicants who have specific concerns regarding the review and scoring of their application may file an appeal starting **October 11, 2024, through October 15, 2024.** Appeals will only be considered in cases where the applicants have material concerns specific to the review process and scoring of their application. Please see the Appeals Process section contained later in this document for more information.
8. **Rating and Ranking Debrief.** Applicants that receive notification that their application is being included in the CoC Application to HUD will receive a written rating and ranking debrief by **October 16, 2024.** The debrief will contain any revisions to the application the committee deemed necessary and any suggestions to strengthen the application. Thereafter, applicants will have the opportunity to revise and strengthen applications based on the debrief.
9. **Project Applicant Technical Assistance Sessions.** Project Applicants will be offered the opportunity to review their Rating and Ranking debrief document and e-snaps application with Collaborative Applicant staff and their consultants **October 16, 2024, through October 18, 2024.** More information on scheduling this technical assistance session will be available to project applicants through separate communication.

10. **CoC Board Review and Vote on the Consolidated Application and Priority Listing.** The Fulton County CoC Board will meet on **October 24, 2024**, to review and vote on the submission of the CoC Consolidated Application and Priority Listing to HUD.
11. **Revised Project Applications Due.** Revised project applications are due to in e-snaps on or before **October 28, 2024**.
12. **Posting of Full CoC Application.** On **October 25, 2024**, the CoC will post the FY 2024 Consolidated Application, including attachments, and the FY 2024 CoC Priority Listing to the CoC website. The CoC will notify community members and key stakeholders, through the CoC email listserv, that the CoC Application is available to review.
13. **HUD Submission.** The FY 2024 CoC Consolidated Application and FY 2024 Priority Listing will be submitted to HUD in e-snaps by **8:00pm on October 30, 2024**.

PROJECT APPLICATION REVIEW AND OVERSIGHT

HUD expects each CoC to implement a thorough review and oversight process at the local level for both new and renewal project applications submitted to HUD in the FY 2024 CoC Program Competition. To meet this expectation, the CoC closely reviews information provided in each project application in order to ensure that:

1. All proposed program participants will be eligible for the program component type selected;
2. The proposed activities are eligible under 24 CFR Part 578;
3. Each project narrative is fully responsive to the question being asked and that it meets all of the criteria for that question as required by the FY 2024 NOFO and included in the detailed instructions provided in e-snaps;
4. The data provided in various parts of the project application are consistent; and
5. All required attachments correspond to the attachments list in e-snaps and the attachments contain accurate and complete information, and are dated between May 1, 2024, and October 30, 2024.

SUPPLEMENTAL APPLICATION

All renewal, expansion, and new projects are required to submit a supplemental application along with their project application. The CoC supplemental application components and narratives serve to: (1) confirm the capacity of agencies to provide CoC funded programs; (2) provide information on program delivery in order to evaluate performance and meeting HUD criteria for scoring and ranking of projects by the Rating and Ranking committee; and (3) provide project level narrative to be utilized in the CoC Consolidated Application. **The New Project and Renewal Project Supplemental Applications can be found on BidNet: <https://www.bidnetdirect.com/>**

RATING CRITERIA

Each of the questions included in the supplemental project applications correspond to criteria articulated in the Department of Housing and Urban Development's Rating and Ranking Tool and the FY 2024 CoC NOFO. An overview of the rating criteria that will be considered during the rating and ranking process is provided below. According to guidance from HUD, CoCs should use objective, performance-based scoring criteria and selection priorities to determine the extent to which each project addresses HUD's policy priorities.

The following describes the objective criteria by which agencies submitting a project application for the FY 2024 Local CoC Competition will be rated by the Fulton County CoC. For the CoC to receive maximum points in the competition at least 33% of the total points available for project applications will be based on objective criteria and/or system performance measures.

HUD THRESHOLD REQUIREMENTS

The CoC requires project applicants to submit an attachment entitled “Assurances” that will ask applicants to attest to their compliance with HUD Threshold criteria. These Assurances address issues such as compliance with federal law and standard accounting practices.

COC THRESHOLD REQUIREMENTS

The CoC has established seven threshold criteria. If an applicant does not meet these threshold requirements, their application will not be rated and submitted to HUD for consideration.

These threshold criteria are:

- ✓ Coordinated Entry Participation (See the Rating and Ranking Tool for more details)
- ✓ Housing First and/ or Low Barrier Implementation
- ✓ Documented, secured minimum match of at least 25% of the CoC funds requested (excluding any amount in the leasing budget line item).
- ✓ Active participation in the CoC. An Agency representative has attended or will commit to attending a minimum of four CoC membership meetings.
- ✓ Acceptable organizational audit and management letter (if any) or financial statements
- ✓ Project will use the local Homeless Management Information System established by the CoC. For Victim Service Providers (VSPs) project must use RI’s comparable database for survivors of domestic violence.

COC LOCAL CRITERIA

The CoC local criteria ensure that applicants are responsive to local needs and requirements, while also meeting the standards laid out in the 2024 CoC NOFO. This is a high-level overview of the local criteria. The detailed Rating and Ranking tool will be made available to all project applicants and posted on the CoC’s website as soon as possible.

New Projects

For new projects these criteria address:

- ✓ Organizational experience and capacity
- ✓ Design of housing and supportive services
- ✓ Timeliness
- ✓ Documented organizational financial stability
- ✓ Project effectiveness based on best practices
- ✓ Financial feasibility of project
- ✓ Projected cost per exit to permanent housing
- ✓ Application is complete and data consistent throughout the application
- ✓ Serves a high need population
- ✓ Strategy to reduce rate of returns to homelessness
- ✓ Identification of common factors of individuals that return to homelessness
- ✓ Street outreach
- ✓ Strategy to further fair housing and market housing and supportive services
- ✓ Assistance to clients increasing access to employment and non-employment cash resources and other mainstream benefits
- ✓ Equity in leadership, governance, policies, and program participant outcomes
- ✓ Persons with lived experience are meaningfully involved in the project planning and review process

Additionally, rating criteria for specific new project types will be included in the Rating and Ranking tool to ensure that HUD’s minimum requirements for new projects are met.

Renewal Projects

For renewal projects, these criteria address:

- ✓ System Performance Measures, including length of stay, exits to permanent housing, returns to homelessness, and new or increased income and earned income
- ✓ Serves a high need population
- ✓ Project effectiveness and use of best practices
- ✓ Financial feasibility of project

- ✓ Reasonable cost per exit to permanent housing
- ✓ Application is complete and data is consistent throughout the application
- ✓ Data quality is at or above 90%
- ✓ Bed/utilizations rates are at or above 80%
- ✓ Strategy to reduce rate of returns to homelessness
- ✓ Identification of common factors of individuals that return to homelessness
- ✓ Street outreach
- ✓ Collaboration and Coordination
- ✓ Strategy to further fair housing and market housing and supportive services
- ✓ Assistance to clients to increase access to employment and non-employment cash resources and other mainstream benefits
- ✓ Equity in leadership, governance, policies, and program participant outcomes
- ✓ Persons with lived experience are meaningfully involved in the project planning and review process

The Rating and Ranking Committee may also review information in the Line of Credit Control System (LOCCS); Annual Performance Reports (APRs); and information derived from monitoring, including monitoring reports and financial audit reports as applicable, as well as performance standards on prior grants.

RATING AND RANKING OVERVIEW

All renewal and new applications will be reviewed by an unbiased review panel composed of representatives from neutral (non-applicant) organizations, referred to as the Rating and Ranking committee. The Rating and Ranking committee will drive the rating and ranking process and will adopt a rating and ranking tool that meets all HUD and CoC requirements.

The Rating and Ranking process will take place between September 26, 2024, and September 30, 2024. Rating and Ranking committee members will be oriented to the NOFO, the CoC Competition, the Rating and Ranking tool, and the CoC's priorities. The committee coordinator will review each application to ensure it meets the applicable HUD and CoC Threshold Requirements. Raters will then receive each application electronically and rate each application independently.

On October 1, 2024, raters will convene to review rating scores and rank applications. Individual scores will be collected and averaged to achieve a preliminary score for each element on the rating sheet. The Rating and Ranking committee will then discuss and adjust the ranking for each project based on its own established criteria and strategy as they align with the priorities of the CoC and FY 2024 NOFO. The Rating and Ranking committee will finalize the ranking as the CoC Priority List. The approval of the CoC Priority List will include a motion, a second, and a majority vote of the Rating and Ranking committee voting in favor of the CoC Priority Listing to be recommended to the Fulton County CoC Board.

RATING AND RANKING COMMITTEE MEMBERS

The Rating and Ranking committee will be comprised of local representatives and consultants who are knowledgeable about homelessness and housing in our CoC and the best practices nationally and who are broadly representative of the relevant sectors, subpopulations, and geographic areas. These representatives will be comprised of a consulting firm that specializes in the HUD CoC program and a cross-section of groups participating in the CoC, including faith-based providers, private sector, non-profit providers of homeless services, housing and jurisdiction staff, healthcare providers, domestic violence service provider, and/ or people with lived experience. Rating and Ranking committee members have no financial stake or interest in a CoC funded project application being reviewed.

RATING

Each project application will be reviewed and scored by independent reviewers from the Rating and Ranking committee before the date of the Rating and Ranking committee meeting.

- The R&R lead will first read through each application for completeness, then double check to see if each application meets the HUD and CoC Threshold Requirements.
- Each independent reviewer will then score the applications that passed the threshold review based on the criteria outlined in the previous section entitled “Rating Criteria” using the CoC approved Project Rating & Ranking Tool.
- After each reviewer scores the application using the CoC approved Rating and Ranking Tool, the committee will calculate the average of the scores, and enter the calculated scores in the final scoring matrix. This calculation will give the Rating and Ranking committee the preliminary project ratings.

RANKING AND HUD’S HOMELESS POLICY PRIORITIES

The scores from each Rating and Ranking committee member will be computed and averaged for each project and entered into HUD’s Rating and Ranking tool, which generates the preliminary project ranking list from highest to lowest average score. The CoC Rating and Ranking committee will then discuss all projects and move up in ranking those project applications that the committee determines are high priority, high performing, and meet the needs and gaps as identified by the CoC. The committee will consider the policy priorities established in the FY 2024 NOFO in conjunction with local priorities to determine the ranking of new and renewal project application requests.

See Section I A.4.b of the NOFO for more information on HUD’s homeless policy priorities. The following provides additional context regarding the selection criteria:

- **Ending homelessness for all persons.** In 2023, the United States Interagency Council on Homelessness (USICH) presented All In: The Federal Strategic Plan to Prevent and End Homelessness to the President and Congress. The plan is built around six pillars: three foundations — equity, data and evidence, and collaboration — and three solutions — housing and supports, crisis response, and prevention. The work funded through this NOFO will support the actions and strategies proposed within the pillars. To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness. CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, older adults, those experiencing chronic homelessness, and people with disabilities, including those living with HIV/AIDS). CoCs should partner with housing, health care, and supportive services providers and agencies to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest periods experiencing homelessness to develop housing and supportive services tailored to their needs.
- **Using a Housing First approach.** Housing First prioritizes rapid placement and stabilization in permanent housing and utilizes housing as a platform for providing supportive services that improve a person’s health and well-being. CoC Program funded projects should help individuals and families move quickly into permanent housing without preconditions and ensure that participants can choose the services they need to improve their health and well-being and remain in their housing. Additionally, CoCs should engage landlords and property owners to identify housing units available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client centered service practices. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.
- **Reducing Unsheltered Homelessness.** In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the country. People living unsheltered have high rates of physical and mental health challenges, including substance use disorders. CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, health care programs, and other supportive services to help improve unsheltered people’s well-being and help them move as quickly as possible to permanent housing. CoCs should work with law enforcement and their state and local governments to enlist their support for housing people residing in encampments, and to avoid practices that criminalize homelessness. Criminalization of homelessness risks the health of people living

unsheltered and makes it more difficult for them to move into permanent housing. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services, and ensure people experiencing homelessness receive assistance quickly.

- **Improving System Performance.** CoCs should be assessing the performance of all homelessness projects using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations). CoCs should review all projects eligible for renewal under the FY 2024 – 2025 CoC NOFO to determine their effectiveness in serving people experiencing homelessness, including their cost-effectiveness. The CoC Competition includes several options to help CoCs improve their effectiveness, including reallocation, expansion, and transition grants, and CoC's should take advantage of these options to improve their overall performance. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.
- **Partnering with Housing, Health, and Service Agencies.** Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:
 - Work closely with health care systems and agencies and assist program participants to obtain health care and supportive services, including behavioral health services, including those covered and financed by Medicaid. In addition, CoCs should develop close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.
 - Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing assistance to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) Vouchers, Fostering Youth Independence (FYI) Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new program resources provided through the Homelessness Assistance and Supportive Services Program (HOME-ARP) that was created through the American Rescue Plan. CoCs should also work with organizations administering other housing assistance, such as assistance provided through HUD's Section 202 and 811 programs, HUD's Project Based Rental Assistance, and U.S. Department of Agriculture's housing assistance programs.
 - Partner with local workforce development centers to improve employment opportunities.
 - Work with Tribal organizations to ensure that Tribal members can access CoC-funded assistance when a CoC's geographic area borders a Tribal area.
- **Racial Equity.** In nearly every community, Black, Indigenous, and other people of color are substantially over-represented in the homeless population. In this NOFO, HUD is emphasizing system and program changes to address racial equity within CoCs and projects. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: partnering with a racially diverse set of community partners and people experiencing homelessness and partnering with organizations with experience serving underserved populations. CoCs should review local data, policies, procedures, and processes to identify barriers that result in racial disparities and take steps to eliminate barriers to improve racial equity and to address disparities.
- **Improving Assistance to LGBTQ+ Individuals.** Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlaps with other forms of prohibited discrimination. CoCs should address the needs of LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in their planning processes. Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure that all projects provide privacy, respect, safety, and access regardless of gender identity or sexual orientation. CoCs should also partner with organizations with expertise in serving LGBTQ+ populations.

- **Persons with Lived Experience/Expertise.** Persons with Lived Experience/Expertise. The people who know best what solutions will effectively end homelessness are those who are experiencing homelessness. HUD expects CoCs to include people with lived homeless expertise and experience in their local planning and decision-making processes. People with lived experience/expertise should determine how local policies may need to be revised and updated to improve the effectiveness of homelessness assistance programs, including participating in planning and oversight activities, developing local competition processes, monitoring and evaluation. CoC leaders and community partners should prioritize hiring people who have experienced homelessness in areas where their expertise is needed.
- **Building an Effective Workforce.** Homeless assistance providers need effective, well supported staff to provide high quality assistance. Unfortunately, recruiting and retaining qualified staff for programs to assist persons experiencing homelessness has proven difficult due to low pay and the challenging nature of the work. To address this issue, HUD is applying cost of living adjustments to supportive service activities and other staffing-focused budget lines to allow CoC budgets to better keep up with rising costs. HUD also encourages CoCs to work with their funders and other community stakeholders to improve pay and support for people who work in the homelessness sector.
- **Increasing Affordable Housing Supply.** The lack of affordable housing is the main driver of homelessness. CoCs play a critical role in educating local leaders and stakeholders about the importance of increasing the supply of affordable housing and the specific consequences of the continued lack of affordable housing. CoCs should be communicating with jurisdiction leaders, including for the development of Consolidated Plans, about the harmful effects of the lack of affordable housing, and they should engage local leaders about steps such as zoning and land use reform that would increase the supply of affordable housing. This NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable and accessible housing supply.

TIERS

To ensure that CoCs have the opportunity to prioritize their projects locally in the event that HUD is not able to fund all renewals, HUD requires that CoCs rank projects in two tiers. Tier 1 is equal to 90% of the CoC's Annual Renewal Demand (ARD) minus the Annual Renewal Amounts (ARAs) of YHDP renewal and YHDP replacement projects. Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, DV reallocation and CoC Bonus funds that a CoC can apply for but does not include YHDP renewal or YHDP replacement projects, CoC planning projects, or projects selected with DV Bonus funds. All projects except the planning grant will be rated and ranked within the two tiers.

RANKING RESULTS

The Rating and Ranking committee will meet on October 1, 2024, to establish and vote on the recommendation for the CoC Priority Listing. The CoC Priority Listing recommendation approved by the committee will be presented to the Continuum of Care Board on October 24, 2024, for final approval.

PROJECT APPLICATION APPEALS PROCESS

Once the Rating and Ranking committee has reviewed and scored the submitted applications 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 who have specific concerns regarding the review and scoring of their application may file an appeal within 7 days of receiving notification of the Rating and Ranking results. Appeals will only be considered in cases where applicants have material concerns specific to the review process and scoring of their application. Appeals specific to the funding recommendation will not be considered. (See "Eligible Appeals" below.)

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 on the application submitted by the applicant cannot be appealed.

An Appeals Committee will be formed composed of the governance committee members and one member of the Rating and Ranking committee (non-voting.) The voting members of the Appeals Committee will not have reviewed the application seeking appeal review or have a conflict of interest with any of the agencies applying for the applicable funding. The Appeals Committee will review each appeal to determine whether the appeal meets the eligibility criteria stated below. The Appeals Committee will review only those areas of the application that are being appealed.

The recommendation of the Appeals Committee will be final.

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; or
- Document a compelling organizational necessity not specifically described elsewhere in this document.

Process:

1. The results of the Rating and Ranking committee review and scoring will be emailed to applicants' points of contact listed in the application 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 deadline publicized. 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 and 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. 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 was adequate to gain additional points.
4. The Appeals Committee will review and evaluate all notices of appeal and determine whether or not the appeal meets the FCCoC requirements to make an appeal, as described in Eligible Appeals above.
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 Rating and 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.

SOLO APPLICANTS

Project applicants whose project was rejected may appeal the local CoC competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local CoC planning process in a reasonable manner by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline of 8:00 PM EST on October 30, 2024. See Section VII.C. in the FY 2024 NOFO for more information.

DENIED OR DECREASED FUNDING BY HUD

Eligible applicants, including project applicants and Collaborative Applicants, that submitted an application to HUD in response to this NOFO, that were either not awarded funds by HUD, or that requested more funds than HUD awarded, may appeal HUD's decision within 45 days after the final funding announcement. HUD will only consider for funding or additional funding applicants the CoC ranked within the CoC's maximum amount available. Collaborative Applicants that submitted CoC planning, and if applicable, UFA Costs project applications can appeal decreased funding if they can demonstrate HUD decreased the submitted project application's funding request to less than 5 percent of the CoC's FPRN or \$1,250,000; whichever is less. To appeal HUD's decision, the applicant must submit a written appeal to HUD, with a copy to the authorized representative from the CoC's designated Collaborative Applicant. The written appeal must include evidence demonstrating HUD error and follow the instructions in this section.

The applicant must submit its written appeal by email to snapsappeals@hud.gov, from the organization's email address on the organization's letterhead and signed by the authorized representative—electronic signatures are acceptable.

For more information about denied or decreased funding by HUD please see section VII.D.1. and 2. In the FY 2024 NOFO.