



North Dakota-500 Statewide Continuum of Care

HUD Continuum of Care Program Application

2023 Local Competition Packet Local Materials for Agencies Applying for CoC Funding

CONTEXT

The Continuum of Care (CoC) Program (24 CFR part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding efforts by nonprofit providers, states, Indian Tribes or Tribally Designated Housing Entities (TDHEs), and local governments to quickly rehouse individuals and families experiencing homelessness, persons fleeing domestic violence, dating violence, sexual assault and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals; and to optimize self-sufficiency among those experiencing homelessness.

Each year the U.S. Department of Housing and Urban Development (HUD) releases a Notice of Funding Opportunity (NOFO) signifying the beginning of a funding competition among all CoCs. To be eligible for CoC funding in the competition, each CoC must submit a Consolidated Application to HUD by the designated deadline. The Consolidated Application includes:

1. A CoC Application, which describes the CoC's governance structure, overall performance, and the strategic planning process;
2. The Project Applications from entities seeking funding for new or renewal projects; and
3. The CoC Project Listing, which shows the CoC's priorities for funding, ranking each project application and identifying rejected applications (if applicable).

HUD requires CoCs to hold a local competition to determine which project applications will be included in the Consolidated Application. As a project applicant, you must participate in the review and ranking process to have your project considered on the CoC Project Listing and included in the CoC Consolidated Application. Projects rejected during the ranking process can submit a Solo Application to HUD.

The following is important information that Project Applicants must know about the CoC and HUD process. Competitive Project Applications must adhere to HUD eligibility criteria, as well as follow local CoC policies, procedures, and timelines.

Before you begin:

1. Carefully review and assure that your agency and project meet eligibility and threshold criteria found in this document (note some eligibility criteria is found through embedded links). Ineligible projects will not be ranked.
2. CoC ranking and review is a multi-step process. Projects must first complete the Intent to Apply/Threshold steps to be invited to apply. Please make sure you review each step and submit the required verification of eligibility by the CoC deadlines.
3. Ineligible projects will not be ranked. Incomplete or inaccurate information may negatively affect the project score. Late submissions or submissions that do not follow the submission instructions will not be considered.
4. You will submit your application through e-snaps, a web-based grants management system. The CoC will host two Application Labs to help you access and fill out the application, but an e-snaps registration and a UEI number (formerly DUNS number) is required to access your application. Registration for a UEI takes time to process so begin as soon as possible.
5. Applicants that do not follow the specified submission process and that do not meet the required deadlines, will not have their application reviewed or ranked.

OVERVIEW OF THE FY23 COC PROGRAM COMPETITION NOFO

Funding Opportunity Number: FR-6700-N-25

CFDA Number: 14.267

IMPORTANT PROJECT APPLICATION DATES AND DEADLINES

- July 5, 2023 – 2023 NOFO Published
- July 21, 2023 – Intent to Apply and Threshold Forms due to CoC in PDF format
- August 9, 2023 – NOFO Application Lab – NEW Projects
- August 11, 2023 – NOFO Application Lab – RENEWAL Projects
- August 24, 2023 – Project Applications submitted to CoC via e-snaps and PDF for ranking
- September 12, 2023 – Rating and Ranking Committee Meeting
- September 13, 2023 – Project Applications notified of inclusion in CoC Collaborative Application
- September 20, 2023 – Project response and appeals to CoC due on Application Rank and Score
- *September 21, 2023 – Vote on appeals to rank and score (if needed)*
- *September 21, 2023 – Projects notified of appeals outcome and amended rank/score (if needed)*
- September 22, 2023 – Final Project Application edits submitted in e-snaps and PDF to CoC
- September 22, 2023 – Draft Collaborative Application and Priority Listing posted on CoC website
- September 27, 2023 – CoC Membership vote on Collaborative Application and Priority Listing
- September 28, 2023 – Approved Collaborative Application and Priority Listing posted on CoC website

DEADLINE

September 28, 2023 at 7 p.m. CST

Note: Project Applications must be submitted by the Project deadlines NOT the Consolidated Application deadline.

FUNDING

Approximately \$3.1 billion is available in this FY23 CoC Program NOFO including up to \$52 million available for Domestic Violence, Dating Violence, Sexual Assault, and stalking Bonus (DV Bonus) projects and \$147.0 million for expiring Round 1 YDHP grants and the non-competitive renewal and replacement of expiring YHDP grants initially funded in Round 2 or later. Funds available in the ND-500 CoC include:

- Estimated Annual Renewal Demand (ARD): \$3,022,024
- Tier 1: ~\$1,904,406
- Tier 2: ~\$143,342
- YHDP Renewal/Replacement (non-competitive): \$974,276
- CoC Planning: ~\$90,661

RANKING

The CoC must rank all projects, except CoC planning and Youth Homelessness Demonstration Program (YHDP) renewal or replacement projects, placing all accepted projects in tiers. Ranking is based on capacity, quality, priorities, and performance.

The purpose of the tiered approach is for CoCs to notify HUD which projects are prioritized for funding based on local needs and gaps. Higher ranked projects are assigned to Tier 1 and lower ranked projects are assigned to Tier 2.

1. Tier 1 is equal to 93 percent of the CoC's Annual Renewal Demand (ARD) minus the Annual Renewal Amounts of YHDP renewal and replacement projects that were initially awarded through the FY 2017 YHDP Competition (Round 2) or later. HUD will be conditionally select project applications in Tier 1 from the highest scoring CoC application to the lowest scoring CoC application and according to the rank assigned by the CoC on the FY 2023 CoC Priority listing, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold. Project applications for new (including CoC Bonus and DV Bonus) and renewal projects can be placed in Tier 1. YHDP Renewal or YHDP Replacement projects that were initially funded in FY 2017 (Round 2) or later and CoC Planning projects are not competitively ranked, and therefore must be excluded from CoC ranking. If a DV Bonus project ranked in Tier 1 is selected with DV Bonus funds, HUD will remove the project from the FY 2023 Priority Listing and move the projects below it up one rank position. However, if HUD has not selected a new DV Bonus project in the initial DV Bonus selection, the project will retain its ranked position [see section I.B.3.I of this NOFO]. In the event insufficient funding is available to award all Tier 1 projects, Tier 1 will be reduced proportionately, which could result in some Tier 1 projects falling into Tier 2. Therefore, CoCs should carefully determine the priority and ranking for all project applications in Tier 1 as well as Tier 2, which is described below.
2. 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 YHDP Renewal or YHDP Replacement projects initially awarded funding in the FY 2017 YHDP Competition (Round 2) or later, CoC Planning projects, or projects selected with DV Bonus funds. If HUD selected a DV Bonus project during the initial DV Bonus selection, HUD will remove that project from the FY 2023 Priority Listing and move the projects below it up one rank position. See section I.B.3.I of this NOFO. HUD will assess project applications placed in Tier 2 for project eligibility and project quality threshold requirements and project renewal threshold requirements, if applicable; and HUD will determine funding using the CoC Application score as well as the factors listed in section I.B.3.j of this NOFO.

HUD will award a point value to each new and renewal project application that is in Tier 2 using a 100-point scale, and conditionally select applications in Tier 2 using this point value from the highest scoring project application to the lowest:

- a. **CoC Score.** Up to 50 points in direct proportion to the score received on the CoC Application; e.g., if a CoC received 100 out of 200 points on the CoC Application, the project application would receive 25 out of 50 points for this criterion.
- b. **CoC Project Ranking.** Up to 40 points for the CoC's ranking of the project application(s). To consider the CoCs ranking of projects, HUD will assign point values directly related to the CoC's ranking of project applications. The calculation of point values will be 40 times the quantity $(1-x)$ where x is the ratio of the cumulative funding requests for all projects or portions of projects ranked higher by the CoC in Tier 2 plus one half of the funding of the project of interest to the total amount of funding available in Tier 2 for the CoC. For example, if a CoC is eligible to apply for projects totaling \$500,000 in Tier 2 and applies for 5 projects ranked in Tier 2 of

\$100,000 each: the highest-ranked project would receive 36 points, and then the subsequently ranked projects would receive 28, 20, 12, and 4 points.

- c. Commitment to Housing First. Up to 10 points based on the project application's commitment to follow a Housing First approach as defined in section I.B.2.b.(15) of the NOFO. Dedicated HMIS projects and supportive service only for centralized or coordinated assessment system (SSO-CE) projects will automatically receive 10 points.
3. All eligible projects submitted by project applicants in e-snaps by the CoC deadline, except CoC planning projects, will be reviewed and ranked. A combination of ranking score, CoC priorities, and anticipated tier thresholds will help inform a recommended Rank and Tier recommendation that the CoC NOFO will bring to the CoC membership for a vote.
4. Straddling Tiers. If a project application straddles the Tier 1 and Tier 2 funding line, HUD will conditionally select the project up to the amount of funding that falls within Tier 1. Using the CoC score, and other factors described in section I.B.3.j of the NOFO, HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award the project at the reduced amount based on the amount of funding that falls within Tier 1, provided the project is still feasible with the reduced funding (e.g., is able to continue serving homeless program participants effectively).
5. Rejection or Reallocation. Projects found with outstanding HUD audit findings, history of ineligible participants, evidence of untimely expenditures, financial management concerns, or other performance issues may be eliminated from the competition through rejection or full reallocation. The CoC may also reduce a portion of a submitted project due to underutilization.
6. Renewal and Replacement YHDP and CoC Planning Projects. Because CoC Planning projects and YHDP Renewal and YHDP Replacement projects initially funded in the FY 2017 YHDP Competition (Round 2) or later are not ranked, HUD will not include these project applications in the Tier 1 or Tier 2 calculations. CoCs may only submit one project application for CoC Planning costs. The Collaborative Applicant listed on the CoC Applicant Profile in e-snaps is the only eligible applicant that may apply for CoC Planning projects.
7. Domestic Violence, Dating Violence, Sexual Assault, and Stalking Bonus (DV Bonus). The Consolidated Appropriations Act, 2023 provides not less than \$52 million for "new rapid rehousing projects and supportive service projects providing coordinated entry, and for eligible activities that the Secretary determines to be critical in order to assist survivors of domestic violence, dating violence, sexual assault, or stalking." See section I.B.3.I. of the NOFO for additional information.

ELIGIBILITY

To be eligible for funding, applicants must meet all CoC and HUD statutory, regulatory, and threshold requirements. Project Applicants must abide by the CoC deadlines, meet eligibility criteria, request eligible activities, adequately answer all questions, and attach all required documents to be considered eligible for funding.

1. Eligible Applicants. Eligible project applicants for the CoC Program Competition are found at 24 CFR 578.15 and in the Act and include nonprofit organizations, states, local governments, instrumentalities of state and local governments, Indian Tribes and Tribally Designated Housing Entities (TDHEs) (as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103) and faith-

based organizations (as set forth at [24 CFR 5.109](#)). Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. For-profit entities are ineligible to apply for grants and are prohibited from being subrecipients of CoC Program grant funds. Before submitting an application, applicants must have the following:

- a. SAM Registration. Applicants must be registered with <https://www.sam.gov/SAM> before submitting their application.
 - b. Unique Entity Identifier. Applicants must provide a valid UEI number, registered and active at <https://www.sam.gov/SAM> in the application. A DUNS number is no longer valid.
2. Eligible Projects and Activities. The CoC is accepting applications from eligible entities for the following:
- a. *Renewal Projects*. One year renewal projects previously funded by HUD CoC funding and eligible for renewal (grants expiring between January 1, 2024 and December 31, 2024). 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. Total request amounts are limited to a project's Annual Renewal Amount.
 - b. *Transition Grants*. Transition grants to transition from one project type to another.
 - c. *Consolidation Projects*. Applicants intending to use the consolidation process to combine two or more eligible renewal projects, but no more than ten, may do so through the renewal project application.
 - d. *New projects*. The following new projects can be created through reallocation, CoC Bonus, or a combination of reallocation and CoC Bonus, DV Bonus projects, and CoC planning project. All new projects must utilize CARES, the CoC coordinated entry system.
 - DV Bonus projects that serve survivors of domestic violence, dating violence, sexual assault, or stalking.
 - Permanent Housing (PH)-Rapid Rehousing (RRH)
 - Joint Transitional Housing (TH) and PH-RRH
 - Supportive Services Only - Coordinated Entry (SSO-CE)
 - CoC Bonus/Reallocation projects
 - PH-PSH projects for DedicatedPLUS or Chronic Homeless
 - PH-RRH
 - Joint TH/PH-RRH
 - SSO-CE
 - e. *Expansion projects* can be requested through reallocation, CoC Bonus, and DV Bonus processes to expand existing projects to increase the number of units, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-CE projects. Expansion projects must submit separate renewal and new project applications, and both must be ranked by the CoC.

- f. *Planning Grant.* The CoC Collaborative Applicant may request planning dollars for eligible CoC planning activities. The Planning Grant is not ranked.
- g. *New eligible costs.* Section 605(a)(2) of VAWA 2022 amends section 423(a) of the McKinney-Vento Homeless Assistance Act to add the following eligible activity to the CoC program: “Facilitating and coordinating activities to ensure compliance with the emergency transfer plan requirement in 34 U.S.C. 12491(e) and monitoring compliance with the confidentiality protections in 34 U.S.C. 12491(c)(4).” HUD has determined that this new eligible activity category is not subject to the CoC program’s spending caps on administrative costs under section 423(a)(10), (11), and (12). This activity may be included in new project applications. It may also be added to eligible renewal projects through expansion or added to eligible renewal projects by shifting up to 10 percent of funds from one eligible activity to the VAWA costs line item.
 - Examples of eligible costs for emergency transfer facilitation include the costs of assessing, coordinating, approving, denying and implementing a survivor’s emergency transfer which includes:
 - Assistance with moving costs.
 - Assistance with travel costs.
 - Security deposits.
 - Utilities.
 - Housing Fees.
 - Case management.
 - Housing navigation.
 - Technology to make an available unit safe.
 - Examples of eligible costs for monitoring compliance with the VAWA confidentiality requirements include the costs of ensuring compliance with the VAWA confidentiality requirements which includes:
 - Monitoring and evaluating compliance with VAWA confidentiality requirements.
 - Developing and implementing strategies for corrective actions and remedies.
 - Program evaluation of confidentiality policies, practices, and procedures.
 - Training on compliance with VAWA confidentiality requirements.
 - Reporting to Collaborative Applicant, HUD, and other interested parties on compliance with VAWA confidentiality requirements.
 - Costs for establishing methodology to protect survivor information.
 - Staff time associated with maintaining adherence to confidentiality requirements.

Section 5707 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (PL 117-263, December 23, 2022, 136 Stat 2395) amends section 423(a) of the McKinney-Vento Homeless Assistance Act to allow projects in rural areas [as defined in section I.B.2.b.(26) of the NOFO] to use Continuum of Care Program funds to pay for the following eligible activities:

- Payment of short-term emergency lodging, including in motels or shelters, directly or through vouchers.
- Repairs to units in which homeless individuals and families will be housed' or are currently not fit for human habitation.
- Staff training, professional development, skill development, and staff retention activities.

HUD has determined that this new eligible Rural cost category may be included in new project applications or added to eligible renewal projects through expansion. HUD will publish a list of CoCs located in rural areas as defined in section I.B.2.b.(26) of the NOFO.

- h. *Special YHDP Activities.* YHDP Renewal and YHDP Replacement projects may submit applications that include special YHDP activities in addition to activities eligible under the CoC program. The activities, which are ineligible under the CoC Program, may also be included in a YHDP Renewal and YHDP Replacement project and award, subject to the conditions specified in the NOFO.
3. Threshold Criteria. Threshold criteria is listed in the 2023 CoC Intent to Apply. Projects must complete the form and either attest to or submit all required threshold verification categories. Only projects submitting this form on time and meeting all eligibility criteria will be invited to proceed with the application process.
 4. Deadlines. Please refer to the important deadlines listed at the beginning of this document and subscribe to the CoC email list for any changes or updates to the CoC Competition deadlines.
 5. HUD. Projects should visit the HUD competition page for additional instructions including the full FY2023 NOFO and Project Application instructions.
 - a. The entire FY2023 NOFO and associated competition materials can be found on the [HUD competition page](#).
 - b. HUD Ask A Question (AAQ) is available for applicant questions. Before asking a question, please review the list of previously answered questions. You may submit questions at: <https://www.hudexchange.info/program-support/my-question/>.
 - c. For issues with e-snaps during the application process, visit: <https://www.hudexchange.info/e-snaps/faqs/>. You are also encouraged to attend the scheduled Application Lab.

SOLO APPLICANTS

Eligible project applicants that attempted to participate in the CoC planning process in the geographic area in which they operate, that believe they were denied the right to participate in a reasonable manner, may submit a solo project application to HUD by following the procedure found in 24 CFR 578.35. If HUD finds in favor of the solo applicant, HUD may award grant funds. Solo applicants must submit their solo project application in e-snaps to HUD by 8:00 PM EST, on September 28, 2023. See section VII.C of this NOFO for additional information regarding the Solo Applicant appeal process.

HUD'S HOMELESS POLICY PRIORITIES

1. Ending homelessness for all persons. In 2022, 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, 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 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 experiences of homelessness to develop housing and supportive services tailored to their needs.
2. Use a Housing First approach. Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. CoC Program funded projects should help individuals and families move quickly into permanent housing, and CoCs should measure and help projects reduce the length of time people experience homelessness. 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 methods. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.
3. 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 extremely high rates of physical and mental illness and substance use disorders. CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, and supportive services to provide permanent housing options for people who are unsheltered. CoCs should work with law enforcement and their state and local governments to eliminate policies and practices that criminalize homelessness.
4. Improving System Performance. CoCs should be using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations) to determine how effectively they are serving people experiencing homelessness. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing, and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent. CoCs should review all projects eligible for renewal in FY 2023 to determine their effectiveness in serving people experiencing homelessness, including cost-effectiveness. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.

5. 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. This is especially important as the CARES Act and American Rescue Plan have provided significant new resources to help end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:
 - a. Work closely with public and private healthcare organizations and assist program participants to receive primary care, receive housing-related services, and obtain medical insurance to address healthcare needs. This includes developing 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.
 - b. Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies 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 Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) 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.
 - c. Partner with local workforce development centers to improve employment opportunities.
 - d. Work with Tribal organizations to ensure that Tribal members can access CoC-funded assistance when a CoC's geographic area borders a Tribal area.
6. Racial Equity. In nearly every community, Black, Indigenous, and other people of color are substantially over-represented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: developing a coordinated community response created in partnership with a racially diverse set of stakeholders and people experiencing homelessness and partnering with organizations with experience serving underserved populations. CoCs should review local policies, procedures, and processes with attention to identifying barriers that result in racial disparities and taking steps to eliminate barriers to improve racial equity and to address disparities.
7. 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 privacy, respect, safety, and access regardless of gender identity or sexual orientation in projects. CoCs should also consider partnering with organizations with expertise in serving LGBTQ+ populations.
8. Persons with Lived Experience. 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 process. People with lived experience 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, and developing local competition processes. CoC leaders and stakeholders should prioritize hiring people who have experienced homelessness in areas where their expertise is needed.

9. 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 FY 2023 CoC NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable housing supply.

NORTH DAKOTA COC NOFO POLICIES

NORTH DAKOTA COC REALLOCATION POLICY

Pending Membership approval August 2023

I. Introduction

- A. The North Dakota Continuum of Care (ND CoC) has created this process to guide the ND CoC in determining if, when, and how the ND CoC should reallocate funds. Reallocating funds is one of the tools the ND CoC uses to make strategic improvements to our homeless response system. Through reallocation, the ND CoC can create new, evidence-informed projects by eliminating projects that are underperforming, underutilized, or are more appropriately funded from other sources. While reallocation can be complicated and does not come without risk, it is a necessary part of ensuring that our homeless response system meets the needs of people experiencing homelessness.
- B. Definition: Reallocation refers to the process by which the ND CoC shifts funds in whole or in part from one or more existing ND CoC funded projects that are eligible for renewal to create one or more new projects. A reallocated project must be a new project that serves new participants or is an expansion project serving additional clients.
- C. The annual U.S. Housing and Urban Development (HUD) CoC Program Competition Notice of Funding Opportunity (NOFO) dictates what types of projects may be created through reallocation in each competition. New reallocated projects applied for from the agency reallocating funds must include a component change (i.e., TH to PSH or RRH to PSH) or a significant change in the program's population (i.e., youth to single chronically homeless).

II. Identifying Projects for Reallocation

- A. The ND CoC Board, Rating and Ranking Committee, and CoC staff all assist in identifying projects which may be considered for reallocation. Projects may also choose to offer all or a portion of their renewal funding for reallocation during the CoC competition on the Intent to Apply form.
- B. Various factors will be considered for identifying projects for reallocation including:
 - 1. Regional need: Existing inventory, system gaps, duplication, or over-abundance of a project type, population/sub-population served.
 - 2. Program performance: Utilization, data quality, outcome performance, service model, coordination with other services, coordinated entry participation. If applicable, the ND CoC will first attempt to provide technical assistance to underperforming projects through a Performance Improvement Plan. If agencies neglect to follow through with the identified plan or show performance improvement after one year, they may be at risk of reallocation.
 - 3. Fiscal Management: Spending down of grant funds, audits, fiscal practices, financial reports, cost effectiveness, matching funds.
 - 4. Other system needs: Coordinated entry and HMIS funding needs, potential grant mergers/collaborations, and other funding resources or restrictions (both new and existing).

- C. Underperforming, underutilized, financial mismanagement, or low-need projects may be targeted for reallocation at any time but are most likely identified following an annual performance review or during the ND CoC competition process. However, when appropriate, the ND CoC is dedicated to first working with any underperforming or underutilized project to address deficiencies prior to recommending for reallocation. The ND CoC feels it is worth the investment to increase the capacity of existing projects and agencies to meet the needs of our region.

III. Reallocation Process

If a targeted project is not interested in or has not been responsive to a ND CoC Project Improvement Plan, the project's funding may be reallocated. The ND CoC will contact the project in person and in writing, notifying the project of the reason for consideration and to help develop a transition plan. The transition plan will be developed to help assure compliance with other funding commitments and prevent anyone from becoming homeless because of the reallocation.

NORTH DAKOTA COC RANKING AND REVIEW POLICY

Pending Membership approval August 2023

I. Introduction

- A. The North Dakota Continuum of Care (ND CoC) requires an annual project review for all U.S. Housing and Urban Development (HUD) Continuum of Care (CoC) and Emergency Solutions Grant (ESG) projects. This policy specifically applies to projects seeking funding under the annual HUD CoC competition.
- B. These conditions are designed to inform performance evaluation and Notice of Funding Opportunity (NOFO) Rating and Ranking Committee deliberations and provide all new and renewal applicants with clarity regarding how ranking and prioritization occur.

II. Roles and Responsibilities, ND CoC Rating and Ranking Committee

On behalf of the ND CoC Board of Directors, the ND CoC Rating and Ranking Committee is charged with overseeing the rank and review process. As stated in the ND CoC Governance Charter, the committee is responsible for:

- A. Updating CoC policies for the annual HUD CoC competition and presenting them to the CoC Board and CoC Membership for vote;
- B. Conducting an annual review of all projects applying for the HUD CoC competition using established criteria; and
- C. Ranking projects according to criteria and placing them in a recommended funding order by tier and presenting ranking recommendations to the CoC Board and CoC Membership for vote.

III. Important Project Application Dates and Deadlines

Each year, the ND CoC will publish annual HUD CoC competition deadlines that include both local and HUD deadlines. Any agency applying for the CoC competition must comply with the published deadlines or risk point loss and possible ineligibility for the funding competition. The dates and deadlines will be published on the ND CoC website and sent out via email through the ND CoC membership email list. Projects who do not submit their project application packet by the ND CoC deadline will not be eligible to be ranked.

IV. Eligibility

To be eligible for inclusion in the ND CoC Rating and Ranking process, all projects must pass all facets of the ND CoC application process including:

- A. HUD Threshold Requirements including, but not necessarily limited to (*please go to the HUD competition page for a full list of HUD Threshold requirements*):
 - 1. Applicant has a Unique Entity Identifier (UEI) # and has current SAM registration.
 - 2. Project draws down funds from eLOCCS at least quarterly (only applicable to agencies that are currently federally funded).
 - 3. Project applicants and potential subrecipients must meet the eligibility requirements of the CoC program as described in the Act and the Rule (nonprofit organization, state or local government, instrument of state or local government, public housing agency, or Indian Tribe or Tribally Designated Housing Entity) and

provide evidence of eligibility required in the application (e.g., nonprofit documentation).

4. Project applicants and subrecipients must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds.
 5. Project applicants must submit the required certifications as required in the NOFO.
 6. The population to be served must meet program eligibility requirements as described in the Act, the Rule, and the NOFO.
 7. Project applicants must agree to participate in the local HMIS system. Victim Service Providers (VSP) must use a comparable database that meets the needs of the local HMIS.
 8. Project applicants agree to meet the criteria set forward by HUD for project quality thresholds for their specified project. Criteria can be found in the NOFO.
- B. CoC Eligibility and Threshold Requirements
1. Project agrees to incorporate Housing First principles, including low barrier access, into agency policies and practices. Agency will be required to submit policies during the local competition.
 2. Applicant agrees to be compliant with Fair Housing, Equal Opportunity, and Equal Access including assuring adaptations to marketing, access, interpretation, and reasonable accommodations.
 3. Project will incorporate CoC housing stability best practices to assist households in achieving and maintaining independent living, adapted to their individual needs and goals.
 4. Applicant agrees to invite program participants (persons with lived experience) to participate in their board of directors, regional/local coalitions, or consumer advisory boards and any other opportunity for persons with lived experience to provide input on ND CoC or project improvement.
 5. Project has a signed CoC Membership Agreement.
 6. Project agrees to participate in local and regional planning including attending ND CoC and local homeless committee/coalition meetings.
 7. Project agrees to fill all beds using CARES prioritization process, tools, and policies (PH, including PSH and RRH, or Joint projects ONLY).
 8. Project agrees to utilize CARES Receipts and checklist to assure linkage of households to mainstream services.
 9. Project agrees to verify recipient eligibility and maintain documentation of eligibility.
 10. Project history and or assurance (if a new applicant) to maintain current and clean data and respond to quality and compliance issues in a timely manner.
 11. History (renewal projects only) or agreement (new projects only) to provide timely documentation and reports.

12. Ability to achieve ND CoC utilization and performance standards or if not achieved, identify a performance improvement plan approved by the ND CoC.
 13. Project agrees to participate in all CoC required trainings . Trainings may include, but may not be limited to: Housing First, Client Centered Care, Low Barrier Access, Harm Reduction, Motivational Interviewing, Trauma Informed Care, Creative Engagement, coordinated entry, Violence Against Women Act (VAWA), Fair Housing and Discrimination, Equal Access, Stop Evictions, and Homelessness 101 (CoC Overview, Homeless Definitions, Self-Care, Core Principles of Ending Homelessness, Intro to Homelessness).
 14. Applicant agrees to participate in an annual performance evaluation and follow-up with any technical assistance requirements if your project has been identified as under-performing.
 15. Project agrees to follow ND CoC Policies and Written Standards.
- C. Project adheres to all local ND CoC competition deadlines.
1. Project submits an Intent to Apply and Threshold Assessment by designated deadline.
 2. Initial and final Project Application submitted in e-snaps and via PDF by deadline.
- D. Provide Annual Performance Reports to the ND CoC at least 15 days prior to submission to HUD for pre-review.

V. Guidance on Required Ranking and Tiers

- A. The ND CoC Rating and Ranking Committee will review all projects and rank in either Tier 1 or Tier 2 according to ND CoC ranking criteria including: ND CoC and HUD policies and priorities, project performance, equity, and project design. Tier 1 projects are more likely to be renewed by HUD. Tier 2 projects are conditional and will depend on ND CoC score, project score, and rank. HUD will award a point value to projects in Tier 2. Projects may straddle Tier 1 and Tier 2, but the portion in Tier 1 must adequately fund the project in the case that funding in Tier 2 is not awarded.
- B. New or Expanded Project Ranking Priority Bonus: The ND CoC will award bonus points to projects based on project type to help prioritize new or expanded project applications that fill the gaps and needs within the ND CoC. New or expanded projects will receive bonus points based on the following criteria.

Project Type	Eligibility Type	Priority Bonus	Justification for Priority
New Joint Transitional Housing-Rapid Rehousing (TH-RRH) projects that serve youth, families, and individuals.	Bonus or Reallocation	4	<ul style="list-style-type: none"> • There is not sufficient shelter coverage in our rural region. • Fixed site TH, with ability to transition to RRH rapidly, helps address the need to have immediate access to housing and gain rental history necessary to find scattered site housing. • TH-RRH is more cost effective and client friendly than motel vouchers.

New Supportive Services Only (SSO) projects for the ND CoC's Coordinated Entry System.	Bonus or Reallocation	5	<ul style="list-style-type: none"> CE needs to be sufficiently funded to assure the ND CoC is compliant with HUD and to help the ND CoC operate a system that can help reach our goal to end homelessness.
New or expanded Permanent Supportive Housing (PSH) projects that serve chronically homeless individuals, unaccompanied youth, and families.	Expansion, Reallocation or Bonus	3	<ul style="list-style-type: none"> Sufficient PSH is necessary to continue to prioritize serving the most vulnerable.
New or expanded Rapid Re-Housing (RRH) projects for homeless individuals, unaccompanied youth, and families coming directly from the streets, emergency shelter, or fleeing domestic violence.	Expansion, Reallocation or Bonus	1	<ul style="list-style-type: none"> Rapid rehousing continues to have a high unmet need for both singles and families.

VI. Scoring and Ranking Process: HMIS Projects

The ND CoC recognizes that a quality HMIS is not only required by HUD but is used as a valuable tool to operate and evaluate our regional homeless response system. However, ranking and scoring HMIS like Supportive Housing Projects is not feasible due to the unique aspects of our statewide system. Therefore, the ND CoC will rely on the ND CoC Data Committee to annually evaluate our HMIS system administrator's performance and provide the ND CoC with a letter of review and recommendation for renewed funding or reallocation. Furthermore, the ND CoC recognizes that a robust homeless management information system needs sufficient funding and therefore will strive to renew or reallocate funding of our system by placing one or more HMIS applications for a minimum of 2.5 percent of the CoC's ARD at the top of Tier 1 if the request comes from the designated state system administrator. Requests for over the ARD or 2.5 percent, whichever is greater, may be placed in Tier 2.

VII. Scoring and Ranking Process: Supportive Housing and Supportive Services Only Projects

- A. The following describes the ND CoC process to score and rank supportive housing projects for CoC funding. It should be noted that the ND CoC uses "scoring", "reallocation", and "ranking" as three distinct steps. Scoring informs, but does not dictate, the final ranking decisions. Where ranking and scoring do not correlate, the ND CoC Rating and Ranking Committee may recommend adjustments. The committee will indicate in comments why the project is ranked in their position versus directly following scoring.
- B. Scoring criteria: The ND CoC Rating and Ranking Committee or other designated committee is responsible for reviewing, updating, and distributing ranking criteria to the ND CoC Board and Membership for approval each year. The process utilizes non-biased, objective criteria based on the HUD ranking tool, established ND CoC

priorities, and project performance. The ND CoC uses an objective HMIS ranking report, the project threshold assessment, and a ND CoC ranking scorecard that incorporates both an agency self-assessment and required attachments. The Rating and Ranking Committee may adjust the presented documents based on verification and review of documents presented.

C. Specifically, ranking incorporates the following four categories:

1. ND CoC and HUD Policies and Priorities: CoC priorities (new projects only, project services, geographical location (new projects only), CoC and regional membership participation, dedication to chronic homelessness, Housing First and low barrier policies, housing stability and supportive services, safety and support to victims, use of HMIS or a comparable database (including data quality), targeting higher need populations, and including persons with lived experience on agency's board of directors.
2. Project Performance
 - a. Project performance for renewal projects will review the project's system performance measures, use of coordinated entry, grant expenditures, unit utilization rate, timely draws for grant funds, match documentation, most recent audit, and responsiveness and communication to CoC reports and audit findings
 - Project performance for new projects will review the projects unit utilization rate, match documentation, most recent audit, experience with federal grants, use of HMIS or comparable database, and use of coordinated entry.
3. Equity: Guidelines and rules in other languages, client-facing bilingual staff, contract with interpreter services, anti-discrimination policy, equal access hiring clause in job postings, percentage of staff and leadership reflecting race of clients, and equity training.
4. Project Design: Collaboration or plan with mainstream and key support services, client to staff ration, employment and income services, health and wellness explanation and enrollment assistance, and partnerships with healthcare organizations.
- 5.

D. Scoring & Ranking Process

1. Intent to Apply
 - a. The ND CoC solicits interest and designates a Rating and Ranking Committee identified through a public application process with no representatives being accepted from applicant agencies (staff, clients, or board members).
 - b. The ND CoC solicits Intent to Apply and project threshold assessments to renewal applicants and an open invite for new projects via the ND CoC email list and notice at other regional meetings or public notices.
 - c. The ND CoC coordinator follows-up with agencies interested in applying for new or expanded projects.
 - d. Within 10 days after the NOFO publication, application packets are posted on the ND CoC website.

- e. Ranking process, criteria, submitted Intent to Apply and timelines are presented at the first ND CoC meeting after the NOFO release. Any proposed updates to the policy in response to the NOFO are presented and voted upon at this time.
 - f. The ND CoC promotes and hosts at a minimum, two application labs to assist with completing the application in e-snaps.
2. Submission: Project applicants submit application packet in PDF format (scorecard, project application, and required supporting documentation) to the ND CoC by the deadline to be eligible for ranking.
 3. Review and Ranking
 - a. The ND CoC coordinator collects and organizes the application ranking materials and shares with the Rating and Ranking Committee.
 - b. The committee reviews the application packet (scorecard, project application, and supporting documentation) and scores each application. This includes:
 - Reviewing project eligibility.
 - Validating applicant self-score, noting any discrepancies.
 - Identifying specific concerns or noting questions for the applicant.
 - Assigning a preliminary score and rank to each project.
 - c. The Rating and Ranking Committee meets to collectively review and align scores and ranking. Each project is assigned a score based on the percent of eligible points and any adjustments (note adjustments may be made for extenuating circumstances like a change in agency leadership, disaster, etc.).
 - d. The ND CoC coordinator notifies applicants of the inclusion/exclusion in the ND CoC Collaborative Application that will be submitted to HUD.
 - e. Projects are given 3-5 days to appeal the committee's recommendation to exclude their application from the ND CoC Collaborative Application that will be submitted to HUD.
 - f. If received, appeals are reviewed by the Rating and Ranking Committee. Scores may be adjusted if validated (supporting documentation or appropriate clarification is provided). If needed, the Rating and Ranking Committee will meet to deliberate score adjustments.
 - g. The committee will recommend 1-3 ranking scenarios to the ND CoC Board and membership based on project score, ND CoC priorities, and eligible funding. When ties exist, the committee shall rank the following preferences:
 - The project with higher housing stability and the project with the least returns to homelessness shall be ranked first.
 - Projects with existing clients shall also be ranked higher if scores are identical or within one point.
 4. Vote on Rank
 - a. The ND CoC Rating and Ranking Committee presents final applicant scores and 1-2 tiering options to the ND CoC Membership. Although rare, members

may reject the proposed options and identify another desired option. The membership votes on proposed rank and tier.

- b. Projects are notified of final rank, tier, and inclusion/exclusion in the collaborative application. Projects not accepted or ranked in Tier 2, are also again notified of their ability to appeal to HUD.
5. Public Posting: The approved priority listing will be placed on the ND CoC website and mailed to the ND CoC mailing list, which includes project applicants.