

UNION COUNTY CONTINUUM OF CARE (CoC) PROJECT PRIORITY LISTING AND RANKING PROCEDURE

CoC PRIORITY RANKING COMMITTEE'S ROLE

The Union County Continuum of Care Priority Ranking (CPR) Committee serves as the primary vehicle for ranking the annual Continuum of Care application for the Union County Continuum of Care (UC-CoC). This is an Ad Hoc Subcommittee under the Union County Comprehensive Emergency Assistance System (CEAS) and Continuum of Care (CoC) Committee (hereafter referred to as CEAS/CoC).

The CPR Committee is a network of public and private entities. Committee members may not submit project applications or receive HUD CoC Homeless Assistance Program funding. Committee members sign conflict of interest forms for the purpose of assessing any potential conflicts of interest. (See below for more detail.)

The UC-CoC has utilized a CPR Committee to rank new projects since 1998. In 2013 the CPR Committee began ranking both New and Renewal projects.

The CPR Committee meets annually dependent on the release of the Continuum of Care application. Special meetings may be called provided that five (5) business days' notice is given electronically or by mail to the members. At each meeting an agenda is developed and meeting minutes are prepared immediately following. Both items are maintained on file with the meeting sign in sheet, materials distributed and the Committee member's conflict of interest form.

The functions and purpose of the Committee are as follows:

- a. assess provider organization(s) (applicant/sponsor) eligibility and capacity;
- b. review and evaluate project readiness/eligibility;
- c. review project quality;
 - % of permanent housing exit destinations
 - % increases in income
 - program participant eligibility
 - utilization rates
 - drawdown rates
 - frequency and/or amount of funds recaptured by HUD
- d. review project match and all leveraging letter(s) to ensure it meets HUD requirements;
- e. review site visit(s) and CoC Monitoring Findings;
- f. review CoC membership involvement;
- g. review HMIS participation status;
- h. assess cost effectiveness;
- i. assess provider organization experience;
- j. assess spending (fast or slow); and
- k. review HUD APR for Performance results.

The HUD approved CoC Ranking Tool is utilized during the annual meeting as the Committee reviews and assesses each project's priority listing. Priority is given to projects that target specialized populations, such as:

- Youth
- Chronic Homeless
- Veterans
- Families with children

Each project is then evaluated to ensure that it meets the Project Threshold Requirements listed below:

- Coordinated Entry Participation
- Housing First/Low Barrier Implementation
- Documented, secured minimum match

- Project has reasonable costs per permanent housing exit, as defined by UC CEAS/CoC
- Project is financially feasible
- Applicant is active CoC Participant
- Data quality at or above 85%
- Bed/Unit utilization rate at or above 90%

Lastly, they review the severity of needs and vulnerabilities experienced by program participants for in the project ranking and selection process:

- Abuse/victimization or a history of victimization/abuse, Domestic Violence, Sexual Assault
- Childhood Abuse
- Criminal Histories
- Chronic Homelessness
- Low or no income
- Current or past substance abuse

The spreadsheet also details the project's target population. A Power Point Presentation of the ranking tool is utilized during the meeting to visually show Committee members the projects they are discussing. After discussion and once consensus is reached, the Project Priority Listing is finalized.

If any project is rejected by the Committee, a written letter is provided to the provider organization listing the reason for denial. This letter is required to be sent to the provider organization no later than 15 days prior to the submission of the CoC consolidated application to HUD. The provider organization can appeal the process. (See below for more detail.)

All motions and other actions of the CPR Committee are approved by a majority vote. This recommendation is then presented at the CEAS/CoC Committee meeting. Once approved a copy of the Consolidated application is uploaded to the County's website (www.ucnj.org) under the Continuum of Care unit and the UC-CoC consolidated application is submitted to HUD.

CONFLICT OF INTEREST POLICY

Members of the Continuum of Care Priority Ranking Committee are precluded from participating in their official capacity in discussions and/or decision making regarding funding of programs or monitoring of programs for which they are employed, serve as a board member, or as a volunteer, or have a financial interest. In addition, the potential for conflict of interest is reviewed.

For purposes of assessing potential conflict of interest, Continuum of Care Priority Ranking members are asked to disclose information on themselves, their spouse, and other family members*.

**Family members include: children, parents, grandparents/grandchildren, uncles/aunts, siblings, in-laws, significant other, or other members of the immediate household.*

COUNTY'S ROLE

The County's role in this CPR Committee shall be through the Union County Department of Human Services Continuum of Care Unit (UC-CoC). This unit sends an email solicitation notification to the UC-CoC informing them of the Continuum of Care application. This solicitation outlines the requirements for provider organizations interested in applying for these funds. Outreach is done to faith-based groups and all homeless social service provider agencies within the geographic area of UC-CoC. It is announced at the CEAS/CoC meeting and other meetings in the geographic area of UC-CoC.

UC-CoC staff provides detailed information on HUD and Union County Independent Monitoring Unit (IMU) findings in an effort to assist CPR Committee members in the ranking of project applications. IMU findings include, but are not limited to: adherence to HUD regulations, participant eligibility documentation, level of service, length of stay, support services provided and audit findings which, if

found, are disclosed to the committee. HUD APRs are reviewed monthly by UC-CoC staff and negative APR results are shared with the CPR Committee. UC-CoC staff provides all Project applications to the CPR Committee for review. Committee members ask detailed questions and are provided the necessary information to rate project applications.

APPEALS

It is the policy of Union County that any agency/organization participating in Continuum of Care funding processes shall have the recourse to an appeal **based on procedural matters**. To ensure a uniform and equitable means of applying this policy, the following guidelines shall structure the appeals procedures. Any agency/organization shall have the right to appeal any Union County CPR Committee's funding recommendation on a **Procedural** basis if:

- a) *The funding was not publicized; there was insufficient time to prepare a completed proposal; or the application requirements or processes were inappropriate for the funds requested; or*
- b) *A conflict of interest charge can be substantiated against any Committee member.*

If any agency/organization chooses to appeal the funding disposition, the agency's Executive Director and/or Chief Operating Office must:

- i. *Contact the Union County Division of Planning as of the date specified in the letter of funding disposition in order to formally initiate an appeal. The first contact must be by telephone to 908-527-4839 to be followed by a formal letter setting forth the reason(s) for the appeal.***
- ii. *Personally appear to present the appeal and submit any documents of evidence or proof of the procedural violation on the day/time of the appeal hearing as set forth by the Appeals Committee.*

*** All appeals must be initiated by telephone (with follow-up letter) on or before the date specified in the notification letter to the Union County Division of Planning, Administration Building – 4th Floor, Elizabeth, NJ 07207, or by FAX (908) 558-2562. Program staff will notify the appealing agency of the date, time and location of the appeal hearing by telephone during the afternoon preceding the scheduled appeal hearing.*

Appeals Process

- A. Agencies applying for funds are advised of "Appeals Process".
- B. The Continuum of Care Priority Ranking (CPR) Committee makes tentative decisions regarding agency funding.
- C. All agencies submitting funding requests are advised of the tentative allocation recommendations in writing. Agencies not recommended for funding are given a brief explanation of the CPR Committee's decision, and are advised of procedures for appeal.
- D. The Committee will convene a meeting to hear appeal presentation(s) of agencies (up to 15 minutes allowed per agency). The Committee can reject the agency's appeal which thereby upholds the CPR Committee's original funding recommendations. The Committee can concur with the agency's appeal. In this case, the Committee must return documentation to serve as compelling reasons for the CPR Committee to review its original funding recommendations. In all cases, the final determining authority for all funding recommendations shall be the CPR Committee. The resulting recommendations are presented to CEAS/CoC.
- E. CEAS/CoC votes on the final funding recommendations. Persons in conflict shall abstain from the vote.

AMENDMENTS

The Project Priority Listing and Ranking Procedure may be amended by the two-thirds (2/3) vote of the voting members of the CEAS/CoC Committee, following an electronic or written notice at least two (2) weeks in advance to all Committee members indicating the proposed amendment or revision.

UNION COUNTY CONTINUUM OF CARE (CoC) - REALLOCATION PROCESS & PROCEDURE

CoC PRIORITY RANKING COMMITTEE'S ROLE

The Union County Continuum of Care Priority Ranking (CPR) Committee serves as the primary vehicle for reallocation of any Continuum of Care projects for the Union County Continuum of Care (UC-CoC). This is an Ad Hoc Subcommittee under the Union County Comprehensive Emergency Assistance System (CEAS) and Continuum of Care (CoC) Committee (hereafter referred to as CEAS/CoC).

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REALLOCATION PROCESS

The UC-CoC considers reallocation through the CPR Committee meeting(s). This process includes a review of HUD priorities, gaps analysis of homeless populations and types of housing and services available in the community, utilization rates, quarterly reviews of HMIS data including the PIT and HIC counts and data trends over time, annual monitoring and threshold review data of the current CoC and ESG funded programs, and prioritizing needs of subpopulations.

Any decision to reallocate is considered and recommended by the CPR Committee. The recommendation is then presented to the full CEAS/CoC Committee for review/approval.

CoC Projects can voluntarily reallocate:

- **Voluntary Reallocation** - **Currently-funded NOFA project applicants interested in voluntarily reallocating should notify UC-CoC in writing of their intent no later than 2 weeks prior to the due date of HUD's Grant Inventory Worksheet (GIW).** The GIW will serve as UC-CoC tool to identify Project Applicants' intent to reapply for CoC funding.

For purpose of reallocated project funding (to create a new permanent housing project), strong preference will be given to those projects that voluntarily apply to reallocate.

This Reallocation Policy and Procedure incorporates the following general objectives:

- To ensure the CoC's responsibility in submitting to HUD an application that is consistent with HUD guidelines and the HEARTH ACT;
- To ensure the amount to be reallocated is sufficient to fund effective PH program(s); and,
- To best position the bulk of the existing transitional housing (TH) programs for continued HUD funding in an environment of changing strategies.

All renewal projects are reviewed by the Union County Department of Human Services (UCDHS) to determine if a project should be considered for reallocation. The UCDHS staff will provide technical assistance, correcting technical inaccuracies if they arise in conversation, and reminding the project funded agency of their responsibilities if they step outside their authority.

Through the reallocation process, the UC-CoC ensures that projects submitted with the CoC Collaborative Application best align with the HUD CoC funding priorities and contribute to a competitive application that secures HUD CoC dollars to address and end homelessness in Union County. The UC-CoC will make decisions based on alignment with HUD guidelines, performance measures, and unspent project funds. Reallocated projects will be encouraged to seek funders that will support the contributions these projects make to the CoC.