This document summarizes the following policies as they apply to the FY21 HUD CoC Competition:

A. Eligible Renewals and Evaluation
B. Reallocation
C. Ranking
D. New Projects

A. Lane County will utilize the following process to determine eligible renewals through the CoC Competition:

- All projects will be evaluated using the current HUD CoC Intent to Renew and Evaluation, approved by the RFP-Eval-HMIS Committee of the Poverty and Homelessness Board. All renewal projects are thoroughly reviewed based on established performance metrics, including exits to permanent housing, housing stability, level of vulnerability, priority population served, income and non-cash benefit increase, data quality, and expenditure of funds.
- Projects not meeting minimum requirements as outlined in the Intent to Renew application, may be ineligible for funding and may be considered for reallocation.
- Projects not submitting the Intent to Renew by the stated deadline may be ineligible for funding and may be reallocated by the CoC.
- If a project is found ineligible due to not meeting minimum requirements or non-submission of the Intent to Renew, the recipient will be responsible for determining a new subrecipient, if necessary.
- If a recipient fails to meet minimum requirements or other minimum expectations, the CoC (via RFP-Eval-HMIS Committee) may reallocate to a new recipient, if necessary.

B. Lane County will utilize the following process to determine available funds through reallocation from eligible renewals:

- Projects that have outstanding monitoring findings/concerns for at least two years in a row, may be considered for reallocation. The RFP-Eval-HMIS committee will review all circumstances and determine if the findings/concerns are being actively addressed. If compliance is not able to be achieved in a timely manner, or if the non-compliance results in a high risk of loss or misuse of funding, the project may be considered for reallocation.
- Projects that are determined to have an expenditure issue will be considered eligible for reallocation of funds, if appropriate. Expenditure issues can include significant balances or unspent funds for more
than one grant period; monitoring findings/concerns regarding expenditure of funds or compliance with eligible costs; or other misuse of funds.

- Projects that are determined to have a project performance issue will be considered eligible for reallocation of funds, if appropriate. Performance issues include consistent poor or declining outcomes over multiple years; failure to correct deficiencies in program design, operations, or administration; or failure to comply with standards as outlined and prioritized by the Continuum of Care.

- Projects willing to voluntarily reallocate any portion of unused funds will be encouraged to do so, if appropriate, and if funds can be better utilized in a higher performing project.

All factors and circumstances will be reviewed prior to making any final determination on reallocation. The committee and the CoC will make all attempts to provide proper notice to the project as concerns arise, provide technical assistance when appropriate, and communicate with the recipient and/or subrecipient about potential reallocation.

**Appeals**

All projects will be provided an opportunity to appeal a reallocation decision made by the RFP-Eval-HMIS Committee. Appeals may be submitted to the first to the CoC (Lane County) for review by the RFP-Eval-HMIS Committee. All appeals will be addressed by the committee within 10 business days. If the appeal is denied, the project may submit an appeal to the Poverty and Homelessness Board. All appeals to the PHB will be reviewed by the Executive Committee and responded to within 10 business days. Decisions made by the PHB are considered final.

**C. Lane County will utilize the following process to rank projects for the purposes of the CoC Competition and prioritization for funding:**

- Performance and expenditure data is provided to the RFP-Evaluation-HMIS Committee following the annual HUD CoC Evaluation process to determine prioritization and ranking for the FY21 Priority Listing. The committee may request additional data or information during the ranking process.

- Ranking will be based on objective factors, with a significant emphasis on project performance and the extent to which projects contribute to achieving system performance goals.

- Final Ranking is provided to the PHB for approval.

- Recipients and subrecipients of CoC funds, or other individuals with a direct financial interest, are not able to participate in discussions on Ranking, due to conflict of interest (See 24 CFR Part 578.95)

**D. Process for determining reallocation of funds to new and/or renewal projects:**

- Lane County will complete a RFQP (Request for Qualified Providers) process at least every three years to establish eligible providers for CoC funds.

- Recipients for additional, new opportunities such as Bonus funding, are determined through subsequent procurement processes.
• Co-applicants, SVdP and Homes for Good, may submit a request for/propose a new bonus project to the CoC Lead Applicant (Lane County) for consideration. If more than one applicant (recipient) submits a request for a new project, the committee will review all eligible proposals and make a final determination.

• All eligible providers, including those not currently receiving HUD CoC funds, are encouraged to apply through these processes in order to be considered for CoC funding.

• All projects previously approved through the RFQP process and eligible to receive additional funds (see FY21 HUD CoC NOFA for details) will be considered by the RFP-Eval-HMIS committee for new or expansion funding.

• Low-performing projects or those with expenditure issues may not be recommended for expanded funding.

The REH/PHB Executive ad-hoc committee approved the following motions at the 9/10 meeting:

The committee voted to approve the 2021 HUD CoC Competition Policies as outlined in this document.

The committee voted to approve submission of the Nel (1100 Charnelton) Project (RFP 21076) for the New Bonus Project opportunity through the FY21 HUD CoC Competition. This project will be submitted under Lane County as the applicant/recipient, with Laurel Hill as subrecipient, in collaboration with Homes for Good.

The committee voted to approve Lane County release of a Request for Proposals (RFP) for a new TH-RRH or RRH project to be funded through the DV Bonus Funding Opportunity outlined in the FY21 HUD CoC NOFO on behalf of the CoC. Any new project approved for submission to HUD may be submitted as a standalone project or as an expansion of an existing renewal, as appropriate and in alignment with the Expansion policies noted in this document.