OK-501 Tulsa City and County
FY2024 Continuum of Care Program NOFO
Annual Consolidated Application
Standards of Operations
Leadership Council, NOFO Task Group Approval: 08/16/2024

Background & Governance:

Annually, the U.S. Department of Housing and Urban Development (HUD) holds a national competition for Continuum of Care (CoC) Program funds through the CoC Program Notice of Funding Opportunity (NOFO) authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act. This competition provides federal funding awards to service providers in the Tulsa City and County area dedicated to providing housing and services to individuals and families who are experiencing homelessness. HUD requires that CoCs facilitate a local review process to review and accept all projects included in the CoC annual consolidated grant application.

In accordance with 24 CFR 578, CoCs must follow a collaborative process for the development of an application in response to and in accordance with the requirement of the CoC Program NOFO issued by HUD. The AWH4T Governance Charter defines requirements specific to the local process. The AWH4T governing board, Leadership Council, is responsible for approving the agency designated as the Collaborative Applicant for the OK-501 Tulsa CoC. The Center for Housing Solutions, Inc. (Housing Solutions), the Collaborative Applicant for the Tulsa County Continuum of Care, has been appointed by the Leadership Council to:

1) Complete and submit the Consolidated Application consisting of the Collaborative Application, Priority Listing, and Project Applications; and
2) Facilitate the local competition for CoC Program funding, under the supervision of the Leadership Council, or its representative.

Continuum of Care Competitive Funding Policy:

The A Way Home for Tulsa (AWH4T) Tulsa City and County Continuum of Care (CoC) will competitively rank projects for funding based on projects' improvement of system performance. AWH4T seeks to facilitate a coordinated, equitable, and outcome-oriented community process for the solicitation, review, rank, and selection of project applications, and a process by which renewal projects are reviewed for performance and compliance with 24 CFR 578.1 and increase funding through overall performance in ending homelessness in Tulsa City and County.

Roles & Responsibilities:

The *Leadership Council* (LC) approves all NOFO related policies and procedures. The *Leadership Council,* or their designee, will recruit members for the *CoC NOFO Task Group*, *Project Review Panel*, and *Appeal Panel*. In the formation of each decision-making body, the CoC makes every effort to recruit members who are representative of the population served in the CoC including persons of different races and ethnicities, particularly those over-represented in the local homelessness population, in the review, selection, and ranking process. Individuals with lived experience of homelessness are included in the development, or revision, of the local competition rating factors.

The *CoC NOFO Task Group* is formed as a governing body to facilitate the collaborative development of the local competition policies, application materials, and scoring criteria implemented bi-annually. The CoC Leadership Council reviews and approves the NOFO Task Group's recommendations to the local review process and scoring criteria; and subject to necessary changes based on requirements outlined in the CoC Program NOFO.

The *Project Review Panel* is a group of appointed community members responsible for reviewing and objectively scoring all Renewal and New Project applications and making funding recommendations to Leadership Council. At least five (5) non-conflicted Project Review Panel Members will be recruited by Housing Solutions, the Collaborative Applicant. The panel will include at least one CoC Leadership Council member a non-conflicted provider (ideally a provider with experience administering Federal, non-CoC grants), and a representative from the Participant Advisory Group (PAG) and Youth Advisory Board (YAB). In addition, a Collaborative Applicant representative will attend panel meetings to act as a resource (leaving the room when a conflict requires it). For purposes of the CoC Project Review Panel participation, conflict will not extend to a substantially independent program or arm of a CoC recipient, subrecipient, or applicant organization, so long as the program is controlled by an independent board and does not receive or directly benefit from CoC funding or the potential award of a CoC grant.

A three-member *Appeal Panel* will be selected from the Leadership Council or its designees and must include at least one representative of either the PAG or YAB. Appeal Panel Members will not have a conflict of interest with any of the agencies or parties applying for CoC Program funding as defined by the existing Project Review Panel's conflict of interest rules. Voting members of the Appeal Panel shall not serve simultaneously on the Project Review Panel; however, a Project Review Panel Member and a staff person of the Collaborative Applicant will attend the Appeal Panel meeting to inform discussion.

Housing Solutions will collect and assemble application materials for the Project Review Panel and appeals documentation, if any, for the Appeal Panel.

ROLE	RESPONSIBILITY
Leadership Council	The CoC's governing board for the AWH4T. Leadership Council is responsible for designating the entity to serve as the CoC Lead Agency and Collaborative Applicant, creating task groups and approving the Consolidated Application and Final Project Ranking before it is submitted to HUD by the Collaborative Applicant entity.
Housing Solutions	The CoC Collaborative Applicant and CoC Lead Agency designated by the Leadership Council. The agency responsible for facilitating the activities needed to

	submit a complete and successful application to HUD as a part of the nation-wide competitive funding competition.
CoC NOFO Task Group	A Leadership Council designated Task Group under the AWH4T's governance structure assigned to review and revise the local policies and process in which the annual CoC NOFO funding competition operates under.
Project Review Panel (PRP)	A minimum of 5 non-conflicted community members are appointed by the Collaborative Applicant to review and score project applications in accordance with local policy and procedures. The review panel must include at least one person from YAB and PAG with lived experience of homelessness and must follow the AWH4T Conflict of Interest policy.
Appeal Panel	Three members selected from the CoC Leadership Council who are responsible for determining the results of an appeal during the funding competition. One of the three members selected must represent the YAB or PAG voting seat.

Project Application Process

Organizations that plan to submit applications for New or Renewal projects are requested to complete local application materials and guidelines following instructions based on the type of application being submitted with the exception of auto-ranked project types. Only renewal projects verified and submitted through the **FY2024 Grants Inventory Worksheet** registration process shall be considered eligible for renewal funding. In the event that funding becomes available through reallocation or HUD releases new or new bonus funding, the Tulsa City & County CoC will provide all CoC funding updates on the Housing Solutions' website (www.awh4t.org) and distribute to the AWH4T contact list.

A Technical Assistance (TA) Workshop to release information about the Continuum of Care (CoC) Notice of Funding Opportunity (NOFO) Competition and will be open to all prospective applicants. Dates and times will be announced and publicly posted on the Collaborative Applicant's website (www.awh4t.org) following the NOFO release.

Local Competition Deadlines

Local competition deadlines are established to ensure all project applications are finalized within the timeline outlined in the HUD NOFO. As part of the Housing Solutions application process, the implementation of deadlines that meet the standards for Project Applications shall be considered as part of scoring criteria for the CoC Consolidated Application. HUD defines federal competition deadlines based on the date that the CoC NOFO is released, which varies annually. The Housing Solutions will post the Local Competition Timeline on the Housing Solutions website and make updates as needed.

Reallocation

HUD expects CoCs to reallocate funds from non- and/or under-performing projects to projects addressing higher priority community needs that align with HUD priorities and goals. Reallocation involves using funds in whole or in part from existing eligible renewal projects to create one or more new projects. Organizations that release funds for reallocation from an existing project shall be given the right of first refusal for those funds if applying for a new eligible project. HUD requires funding reallocated from projects previously funded with YHDP or DV Bonus funding to be used for projects serving the same subpopulation. Otherwise, reallocation shall be based on standard competitive factors.

Applicants voluntarily releasing project funds to the CoC for reallocation of funding must submit notification to the Collaborative Applicant by email to nofo@housingsolutionstulsa.org by the date indicated in the Local Competition Timeline.

Project Application Submission

The local application procedure includes a two-part submission process.

1) Local application materials. Local application materials for project applications are required to be fully complete and submitted by the deadline to Homebase and Housing Solutions at TulsaCoCNOFA@homebaseccc.org and nofo@housingsolutionstulsa.org. The Local Competition Timeline outlines specific deadlines for new and renewal projects.

2) After the local review process has been finalized, all projects accepted for inclusion in the FY2024 Project Priority Listing and the CoC Annual Consolidated Application must complete a draft online project application in the e-snaps system and send a copy to the Housing Solutions for review prior to final submission in the e-snaps system. Housing Solutions will provide feedback on changes that need to be completed by the project applicant. All changes to project applications entered into the e-snaps system for HUD must be completed by the applicant by the deadline indicated in the Local Competition Timeline.

Project Renewal Threshold

In accordance with the CoC NOFO III.B.4.(c), CoCs must consider the need to continue funding for projects expiring in CY 2025 (Jan 1, 2025 - Dec 31, 2025). Renewal projects must meet minimum eligibility, capacity, timeliness, and performance standards identified in the NOFO or they will be rejected from consideration for funding. HUD will review information in eLOCCS, APRs, and information provided from the local HUD CPD field office (monitoring reports, audit reports, and performance standards on prior grants).

Deficiencies

Deficiency is used to refer to missing or omitted information within a submitted application. Deficiencies typically involve missing documents, information on a form, or some other type of unsatisfied information requirement (e.g., an unsigned form, unchecked box, etc.). Depending on specific criteria, deficiencies may be either curable or non-curable.

● Curable Deficiency – Applicants may correct a curable deficiency with timely action. To be curable, the deficiency must:
  o Not be a threshold requirement, except for documentation of applicant eligibility.
  o Be remedied within the time frame specified in the notice of deficiency.
● Non-Curable Deficiency – An applicant cannot correct a non-curable deficiency after the submission deadline. Non-curable deficiencies are deficiencies that, if corrected, would change an applicant's score or rank versus other applicants. Non-curable deficiencies may result in an application being marked ineligible, or otherwise adversely affect an application's score and final determination.

All applicants whose projects have identified both curable and/or non-curable deficiencies must be given at least two (2) business days to address and adequately resolve any deficiencies. If deficiencies cannot be sufficiently addressed, the applicant cannot move forward in the process.

Applicants can appeal the determination based on the appeal policy outlined below.

Local Project Review and Ranking Process

The CoC Program Competition is administered under the CoC Program Interim Rule. Scoring criteria and scoring tools have been developed to measure performance and capacity based on the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Performance Measures, in compliance with CoC Interim Rule and HUD identified priorities. The scoring criteria found in the **Scoring Tools** and these policies detail how the Housing Solutions Project Review Panel Members shall evaluate projects for the funding year, determine inclusion in the Project Priority Listing of the CoC Annual Consolidated Application and rank the CoC projects.

Projects submitted to the Continuum of Care will be thoroughly reviewed at the local level. Deficient project applications prolong the review process for HUD, which results in delayed funding announcements, lost funding for CoCs due to rejected projects, and delays in funding to house and assist individuals and families experiencing homelessness. CoCs are expected to closely review information provided in each project application to ensure:

1. All proposed program participants will be eligible for the program component type selected;
2. The information provided in the project application and proposed activities are eligible and consistent with program requirements in 24 CFR part 578;
3. Each project narrative is fully responsive to the question being asked and that it meets all the criteria for that question as required by this NOFO;
4. The data provided in various parts of the project application are consistent; and
5. All required attachments correspond to the list of attachments in e-snaps and contain accurate and complete information.

Review and Ranking Process:

1. Auto-ranking will be used for HMIS, SSO-CE and renewal projects with less than two years of data, as described in the Review and Ranking section below. Auto-ranked project types will be automatically ranked at the top of Tier 1 and will not be required to submit a local application. However, Project applicants must meet all local deadlines and requirements outlined in the NOFO and the local timeline - including timely and complete submission of project applications in the e-snaps system.

2. Bonus Projects: CoC Bonus projects evaluation and rank will be based on how they improve system performance as outlined in CoC NOFO section V.B.2.b.

3. Transition Grant Projects: All projects which plan to apply for a transition project must notify the CoC in advance before the local renewal application deadline. Transition projects will follow the new application process and will not submit renewal application materials.

4. All applicants will prepare and submit project application materials except for the auto-ranked project types specified above and Transition Grant projects.

   a. **Late Applications.** Applications received after the deadline will not be accepted unless there are extenuating circumstances such as a local natural disaster or with a

HUD waiver issued under extraordinary circumstances.

    b. **Administrative Errors.** Project Review Panelists shall have discretion to deduct up to 10 points from a project's total score for administrative errors, such as incomplete or incorrect application submissions. Panelists will take into consideration the extent of the error, due diligence in resolving the error, impact on the competition, and other factors subject to panelist discretion.

5. Renewal projects may voluntarily reallocate part or all of their funding in order to create new projects through the CoC Bonus process. Low-performing projects and/or projects that have a history of not spending at least 80% of their award are encouraged to reallocate, and potential applicants are encouraged to apply for new projects through reallocation.

6. Project Review Panel Members will be oriented to the process and will receive applications, project performance data, and scoring materials. Scoring criteria used by the Panel members will be publicly posted on the competition website.

7. Project Review Panel Members will review and tentatively score the applications prior to their first meeting in a scoring spreadsheet provided by Housing Solutions.

    a. Housing Solutions' staff will ensure all applications meet threshold requirements (additional detail below). These threshold criteria may be found in the Scoring Tools.

    b. New projects (including Expansion projects and Transition Grant projects) will be scored using the New/Transition Scoring Tool.

    c. A new expansion project will not be ranked above the renewal project that it proposes to expand. If a new expansion project receives a higher score than the associated renewal project, it will be ranked directly below the renewal project.

    d. Renewal projects that are ranked competitively will be scored using the Renewal Scoring Tool.

    e. To enhance system performance by preventing returns to homelessness and promoting housing stability and retention, renewal projects that meet two out of three key *AWH4T Outcomes Standards* may be ranked above any new projects that have not demonstrated their ability to better enhance system performance.

    Key Outcomes Standards include:

        ● The extent to which programs are running at capacity based on occupied units/served persons
        ● The extent to which programs are spending down their CoC grants
        ● The extent to which participants achieve housing stability, i.e., retain or exit to permanent housing for permanent supportive housing and exit to permanent housing for rapid rehousing and transitional housing.

8. The Project Review Panel will meet over the course of one to two days to jointly discuss each application and individually score applications:

    a. Ranked list(s) will be prepared based on raw scores, then translated to a tiered list for

the annual competition process.

    b.   Auto-ranking will be used for HMIS, SSO-CE and renewal projects with less than two years of data, as described in the Review and Ranking section below. Auto-ranked project types will be automatically ranked at the top of Tier 1 and will not be required to submit a local application. Another mechanism will be used to evaluate HMIS and Coordinated Entry outside the CoC NOFO Review and Rank process.

    c.   The Panel will consider reallocating renewal projects – see *Reallocation* below. If the Project Review Panel identifies a renewal project(s) whose funding should not be renewed or should be decreased, the Panel will determine whether any new proposed projects should be awarded and will proceed with reallocation – see *Reallocation* below.

9. Housing Solutions and the Panel releases scoring results to applicants with information reminding them of the appeals process – see *Appeals* below. Housing Solutions will distribute a summary of general panel feedback on select scoring factors.

10. Appellate hearings will be held, if requested, and results will be distributed.

11. The Leadership Council will consider alternative ranking recommendations and will modify and approve the Final Priority Ranking Listing of projects, which is then included in the Housing Solutions' Consolidated Application.

12. Housing Solutions' Consolidated Application is made available for public review and reference on the Housing Solutions website.

13. Annual process debriefs are held with Project Review Panel Members, project applicants, and the Collaborative Applicant. This information will support the NOFO Task Group in making recommendations for improvements to the competition.

14. Tie Breaking: If a situation arises where two projects earn the same score, the Project Review Panel or the Appeal Panel (depending on what stage the tie occurs in) will determine which project will rank above the other.

Reallocation

HUD expects CoCs to reallocate funds from non- and/or under-performing projects to projects addressing higher priority community needs that align with HUD priorities and goals. Reallocation involves using funds in whole or in part from existing eligible renewal projects to create one or more new projects.

HUD expects that CoCs will use performance data to decide how to best use the resources available to end homelessness within the community. CoCs should reallocate funds to new projects whenever reallocation would reduce homelessness. Communities should use CoC approved scoring criteria and selection priorities to determine the extent to which each project is still necessary and address the policy priorities listed in the NOFO. Recent NOFOs have stated that HUD would prioritize those CoCs that have demonstrated a capacity to reallocate funding from lower performing projects to higher performing projects through the local selection process.

Only eligible renewal projects that have previously been renewed under the CoC Program will be considered for reallocation. When considering reallocation, the Project Review Panel will:

- Consider unspent funds and the ability to cut grants without cutting service/housing levels;
- Consider history of reallocation (e.g., if a grant was reduced one year, this will not be apparent in spending the following year);
- Consider the project's performance;
  - The CoC will work with projects that scored low in the most recent local review process. The CoC will assess the project and set up goals and objectives to bring a failing project up to standards.
  - If the project continues to underperform and cannot meet the stated objectives and goals, then that project will be recommended for reallocation in the next HUD CoC NOFO process.
- Consider the project's ability to meet financial management standards;
  - The CoC will work with grantees that have had HUD Monitoring findings that call into question the project's ability to meet financial management standards. The CoC will assess the project and set up goals and objectives to bring a failing project up to standards and will provide technical assistance to address the findings.
- If the project cannot meet the stated objectives and goals or cannot address HUD findings, then that project will be recommended for reallocation in the next HUD CoC NOFO process.
- Consider specific new permanent supportive housing or rapid rehousing project(s) and specific renewal project(s) at risk of not being funded;
- Consider alternative funding sources available to support either new or renewal project(s) at risk of not being funding;
- Consider renewal HUD "covenant" concerns related to grant funds for acquisition, rehabilitation, or new construction;
- Consider impact on system performance and the CoC's Collaborative Application score; and
- Consider impact on the community in light of community needs.

The impact of this policy is that high-scoring projects may be reallocated if these considerations warrant that decision.

CoC Notification to Project Applicants

Housing Solutions shall notify project applicants in writing whether or not their project applications shall be included in the FY2024 CoC Project Priority Listing as a part of the Annual CoC Consolidated Application submission. Applicants who submit applications that are rejected shall be notified of the reason for the rejection and may submit a request for reconsideration or appeal as outlined in the Appeals Policy and Procedures outlined within this document.

Appeals

For the AWH4T CoC Competition, the CoC Project Review Panel reviews all applications and ranks them based on approved scoring criteria. The Preliminary Priority Ranking Listing will be used in the delivery of the ranking recommendations made to Leadership Council. If an appeal to this Preliminary Priority Ranking is filed and accepted, the Appeal Panel will adjust the Preliminary Priority Ranking Listing based on the results.

Who May Appeal

An agency may appeal a rank assigned to a project by the Project Review Panel if the Panel determination:

- results in the project not being funded, in whole or in part;
- places the project in the bottom 15% of Tier 1; or
- places the project in Tier 2.

Basis for Appeal

An appeal must relate to specific scoring factors and the number of points awarded to the project by the Project Review Panel and/or other criteria mentioned throughout the NOFO Standard of Operations document. All appeals must be based on the information submitted by the application due date. No new or additional information will be considered. Responses or data not included with the application are not a valid basis for appeal.

Appeal Submission

Any agency desiring to appeal must contact Housing Solutions to submit its formal appeal to the Project Review Panel's decision regarding their rank or exclusion from the Priority Listing by the date and time indicated in the Local Process Timeline.

The Formal Appeal must consist of a short, clear, written statement (no longer than two pages) of the agency's appeal of the Project Review Panel's decision. The statement can be in the form of a letter, a memo, or email.

The Formal Appeal must be emailed (nofo@housingsolutionstulsa.org) or delivered (Housing Solutions, P.O. Box 4628, Tulsa, Oklahoma 74159) so that it is received by the date and time indicated in the Local Process Timeline.

Appeal Consideration

If an appeal is filed, the Appeal Panel will meet (by telephone, video conference, or in person) with a representative(s) of the party making the appeal to discuss the issue(s) at an Appeal Hearing on the date indicated in the Local Process Timeline. The Panel will then deliberate.

The Appeal Panel will inform appealing agencies of its decision by the deadline indicated in the Local Process Timeline. Please note that the Appeals Process may result in an upward or downward change in a project's ranking.

Appeal to HUD: Denied or Decreased Funding

Eligible applicants who submitted an application to HUD in response to the NOFO, and who were either not awarded funds by HUD or 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 - the Annual Renewal Demand (ARD). See the FY24 HUD CoC NOFO for more details.

Strategic Allocation of CoC Funding

The CoC is committed to using Continuum of Care Program funding efficiently and strategically as a component of the community's broader continuum to maximize availability of high performing programs to end homelessness.

If funding is still available once the application deadline has passed, the Collaborative Applicant will solicit new applications. Top ranked projects in order will be allowed to submit an expansion grant

past the deadline in order to ensure the community applies for the full funding amount under the competition.

Once the Preliminary Priority Ranking Listing is completed either by the Review and Rank Group or the Appeal Panel, it will be presented to the NOFO Task Group. In the case of an appeal, the Appeal Panel will create the final Preliminary Priority Listing Ranking. Following the Appeal Panel, the appeal results will be provided to the NOFO Task Group.

The NOFO Task Group will convene to review the Preliminary Priority Listing. The NOFO Task Group may recommend alternative ranking recommendations to present to the Leadership Council outside of the scoring criteria. Recommendations may address ranking only; recommendations regarding reallocation developed by the Project Review Panel and sustained by the Appeal Panel may not be considered or modified by the NOFO Task Group after appeals are complete.

In recommending changes to the ranking of Tier 2 projects, the NOFO Task Group may consider the following:
- The project's ability to continue operations by accessing alternative sources of funding that are available if HUD CoC Program funding is not awarded; and
- The impact on the CoC's bed or unit inventory and overall resources to address homelessness if a project is not awarded CoC funding. Information will be provided regarding number of beds and units, amount of grant request, operating year dates, population served, and current unit utilization rate.

Homebase will develop a process for providing information about projects to the NOFO Task Group and guidelines for participation by applicants.

Any NOFO Task Group recommendations to the CoC Leadership Council must be either:
- Consensus recommendations, or
- Recommendations based on a vote of at least 60% of the NOFO Task Group members in attendance, in which case the vote must be recorded and given to the CoC Leadership Council alongside the recommendation of the voting majority as well as the grounds for opposition.

The AWH4T LC will approve the Project Priority Rank Listing for submission to HUD and may consider recommendations from the NOFO Task Force when making their final decision. The decision of the CoC Leadership Council will be final.

Continuum of Care Program Statutory and Regulatory Requirements

The CoC Program Interim Rule at 24 CFR part 578 outlines the requirements with which projects awarded funds through the competition must comply. To be eligible for funding under this NOFO, project applicants must meet all statutory and regulatory requirements in the CoC Program Interim Rule. Project applicants can obtain a copy of the Act and the CoC Program Interim Rule on the HUD Exchange website https://www.hudexchange.info/) or by contacting the NOFO Information Center at 1-800-HUD-8929 (483-8929).

Organizations awarded CoC funds within Housing Solutions shall individually enter into a grant agreement with HUD.

Final Project Quality Review

Housing Solutions, as the Collaborative Applicant, will provide staff responsible for reviewing applications submitted in e-snaps and approving the final project submission to HUD to ensure all applications meet the requirements of 24 CFR 578.15 and any additional threshold requirements outlined in the NOFO.

1. All proposed program participants will be eligible for the program component type selected;
2. The information provided in the project application and proposed activities are eligible and consistent with the NOFO and CoC Plan;
3. Each project narrative is fully responsive to the question being asked and that it meets all the criteria outlined in NOFO required sections;
4. The data provided in various parts of the project application are consistent;
5. All required attachments correspond to the list of attachments in e-snaps and contain accurate and complete information.

Conflict of Interest Policy

No member of the Review Panel may have a conflict of interest in creating the recommended Priority Listing. Review Panel Members will be asked to sign a statement declaring that they do not have a conflict of interest.

A conflict of interest exists if:
1. Panelist or a member of their immediate family is now, has been within the last year, or has a current agreement to serve in the future as a Board member, staff member, or paid consultant of an organization making a proposal for funding;
2. Panelist is currently employed by or sits on the Board of Directors for an organization that has a contractual relationship with any entity making a proposal for funding or has had one within the past year. However, no conflict exists under this provision if the panelist's employer, or the organization on whose Board the panelist serve, is a funding entity or if the contractual relationship in place is not impacted by the proposals being made; or,
3. Any other circumstances exist which impede the panelist's ability to objectively, fairly, and impartially review and rank the proposal for funding.

Exception: Panelist may serve on a panel if they are no longer affiliated with an organization making a proposal for funding, AND the potential conflict has been waived through public notice to the CoC with no opposition raised within the period listed in that public notice.