

Before Starting the Project Listings for the CoC Priority Listing

The CoC Consolidated Application requires TWO submissions. Both this Project Priority Listing AND the CoC Application MUST be completed and submitted prior to the submission deadline stated in the Unsheltered and Rural Homelessness Special NOFO.

The CoC Priority Listing includes:

- Unsheltered Homelessness Set Aside New Project Listing – lists all new project applications applying for funding through the Unsheltered Homelessness Set Aside that were approved and ranked or rejected by the CoC.
- Rural Set Aside Project Listing – lists all new project applications applying for funding through the Rural Set Aside that were approved and ranked or rejected by the CoC.
- UFA Costs Project Listing – applicable and only visible for Collaborative Applicants that were designated as a Unified Funding Agency (UFA) during the FY 2022 CoC Program Registration process. Only 1 UFA Costs project application is permitted and must be submitted by the Collaborative Applicant. The UFA project must be ranked amongst projects submitted on the Unsheltered Homelessness Set Aside New Project Listing.
- CoC Planning Project Listing – Only 1 CoC planning project is permitted per CoC and must be submitted by the Collaborative Applicant. The CoC Planning project must be ranked amongst projects submitted on the Unsheltered Homelessness Set Aside New Project Listing.
- HUD-2991, Certification of Consistency with the Consolidated Plan – Collaborative Applicants must attach an accurately completed, signed, and dated HUD-2991.

Things to Remember:

- All projects must be approved and ranked or rejected on the Project Listings. This includes funding for CoC Planning and UFA Costs, which must be ranked amongst projects submitted on the Unsheltered Homelessness Set Aside New Project Listing.
- Collaborative Applicants are responsible for ensuring all project applications accurately appear on the Project Listings and there are no project applications missing from one or more Project Listings.
- If a project application(s) is rejected by the CoC, the Collaborative Applicant must notify the project applicant(s) no later than 15 days before the CoC Program Competition application deadline outside of e-snaps and include the reason for rejection.
- For each project application rejected by the CoC the Collaborative Applicant must select the reason for the rejection from the dropdown provided.
- If the Collaborative Applicant needs to amend a project application for any reason after ranking has been completed, the ranking of other projects will not be affected; however, the Collaborative Applicant MUST ensure the amended project is returned to the applicable Project Listing AND re-rank the project application BEFORE submitting the CoC Priority Listing to HUD in e-snaps.

Additional training resources are available online on HUD's website.
https://www.hud.gov/program_offices/comm_planning/coc/competition

1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this form, please reference the Unsheltered and Rural Homelessness Special NOFO Competition Priority Listing Detailed Instructions and Unsheltered and Rural Homelessness Special NOFO Competition Priority Listing Navigational Guide on HUD's website.
https://www.hud.gov/program_offices/comm_planning/coc/competition.

Collaborative Applicant Name: St. Louis County Public Health & Human Services

Unsheltered Homelessness Set Aside Listing

Instructions:

Prior to starting the Unsheltered Homelessness Set Aside Project Listing, review the CoC Priority Listing Detailed Instructions and CoC Priority Listing Navigational Guide available on HUD's website.

To upload all project applications submitted to this Project Listing, click the "Update List" button. This process may take a few minutes based upon the number of new projects submitted by project applicant(s) to your CoC in the e-snaps system. You may update each of the Project Listings simultaneously. To review a project on the Unsheltered Homelessness Set Aside Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If you identify errors in the project application(s), you can send the application back to the project applicant to make the necessary changes by clicking the amend icon. It is your sole responsibility for ensuring all amended projects are resubmitted, approved and ranked or rejected on this project listing BEFORE submitting the CoC Priority Listing in e-snaps.

https://www.hud.gov/program_offices/comm_planning/coc/competition.

EX1_Project_List_Status_field List Updated Successfully

Project Name	Date Submitted	Comp Type	Applicant Name	Budget Amount	Grant Term	Rank	PSH/RRH	Expansion
Wadena West Apart...	2022-10-07 14:20:...	PH	Center City Housing	\$232,143	3 Years	4	PSH	
Coordinate d Entry...	2022-10-07 15:14:...	SSO	Housing and Redev...	\$210,750	3 Years	6		
Walkways with Youth	2022-10-06 15:27:...	SSO	Lutheran Social S...	\$705,915	3 Years	1		
Plover Place	2022-10-07 13:04:...	PH	The Salvation Army	\$402,600	3 Years	5	PSH	
Stepping On Up FY...	2022-10-07 16:19:...	SSO	Churches United i...	\$1,870,779	3 Years	2		
MN HMIS St Louis ...	2022-10-07 16:42:...	HMIS	Institute for Com...	\$206,738	3 Years	7		
SLC Unsheltere d O...	2022-10-17 12:11:...	SSO	HUMAN DEVELOP MENT...	\$337,659	3 Years	3		

Rural Set Aside Listing

Instructions:

Prior to starting the Rural Set Aside Project Listing, review the CoC Priority Listing Detailed Instructions and CoC Priority Listing Navigational Guide available on HUD's website.

To upload all project applications submitted to this Project Listing, click the "Update List" button. This process may take a few minutes based upon the number of new projects submitted by project applicant(s) to your CoC in the e-snaps system. You may update each of the Project Listings simultaneously. To review a project on the Rural Set Aside Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If you identify errors in the project application(s), you can send the application back to the project applicant to make the necessary changes by clicking the amend icon. It is your sole responsibility for ensuring all amended projects are resubmitted, approved and ranked or rejected on this project listing BEFORE submitting the CoC Priority Listing in e-snaps.

https://www.hud.gov/program_offices/comm_planning/coc/competition.

EX1_Project_List_Status_field List Updated Successfully

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Rank	PSH/RRH	Comp Type
This list contains no items							

Continuum of Care (CoC) Planning Project Listing

Instructions:

Prior to starting the CoC Planning Project Listing, review the CoC Priority Listing Detailed Instructions and CoC Priority Listing Navigational Guide available on HUD's website.

To upload the CoC planning project application submitted to this Project Listing, click the "Update List" button. This process may take a few minutes while the project is located in the e-snaps system. You may update each of the Project Listings simultaneously. To review the CoC Planning Project Listing, click on the magnifying glass next to view the project details. To view the actual project application, click on the orange folder. If you identify errors in the project application, you can send the application back to the project applicant to make necessary changes by clicking the amend icon. It is your sole responsibility for ensuring all amended projects are resubmitted, approved and ranked or rejected on this project listing BEFORE submitting the CoC Priority Listing in e-snaps.

Only one CoC planning project application can be submitted and only by the Collaborative Applicant designated by the CoC which must match the Collaborative Applicant information on the CoC Applicant Profile.

https://www.hud.gov/program_offices/comm_planning/coc/competition.

EX1_Project_List_Status_field List Updated Successfully

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Accepted?	Rank
CoC Planning Unsh...	2022-10-17 15:13:...	3 Years	St. Louis County ...	\$123,885	Yes	8

Funding Summary

Instructions

This page provides the total budget summaries for each of the project listings after the you approved, ranked; or rejected project applications. You must review this page to ensure the totals for each of the categories is accurate. The "Total CoC Request" indicates the total funding request amount your CoC's Collaborative Applicant will submit to HUD for funding consideration. As stated previously, only 1 UFA Cost project application (for UFA designated Collaborative Applicants only) and only 1 CoC Planning project application can be submitted and only the Collaborative Applicant designated by the CoC is eligible to request these funds..

Title	Total Amount
Unsheltered Homelessness Set Aside	\$3,966,584
Unsheltered Homelessness Set Aside - Rejected Amount	\$0
Rural Set Aside	\$0
Rural Set Aside - Rejected Amount	\$0
CoC Planning Amount	\$123,885
Total CoC Request Unsheltered Homelessness Set Aside	\$4,090,469
Total CoC Request Rural Set Aside	\$0
TOTAL CoC REQUEST	\$4,090,469

Attachments

Document Type	Required?	Document Description	Date Attached
Certification of Consistency with the Consolidated Plan (HUD-2991)	Yes	Certification of ...	10/17/2022
FY 2022 Rank Tool (optional)	No	Unsheltered NOFO ...	10/07/2022
Priority Listing	No	Priority Listing	10/07/2022
Other	No	Ranking & Review ...	10/07/2022

Attachment Details

Document Description: Certification of Consistency with the Consolidated Plan (HUD-2991)

Attachment Details

Document Description: Unsheltered NOFO Rank Tool

Attachment Details

Document Description: Priority Listing

Attachment Details

Document Description: Ranking & Review Policy

Submission Summary

WARNING: The FY2022 Special NOFO Consolidated Application requires 2 submissions. Both this Project Priority Listing AND the CoC Consolidated Application MUST be submitted.

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Page	Last Updated
Before Starting	No Input Required
1A. Identification	09/30/2022
2A. Unsheltered Homelessness Set Aside New Project Listing	10/17/2022
2B. Rural Set Aside Project Listing	No Input Required
2D. CoC Planning Project Listing	10/17/2022
Funding Summary	No Input Required
Attachments	10/17/2022
Submission Summary	No Input Required

U.S. Department of Housing
and Urban Development

Certification of Consistency Plan
with the Consolidated Plan
for the Continuum of Care
Program Competition

I certify the proposed activities included in the Continuum of Care (CoC) project application(s) is consistent with the jurisdiction's currently approved Consolidated Plan.

Applicant Name: Duluth/St. Louis County CoC MN-509

Project Name: St. Louis County CoC Plan on Unsheltered Homelessness

Location of the Project: St. Louis County, MN


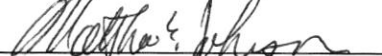
Name of

Certifying Jurisdiction: St. Louis County

Certifying Official

of the Jurisdiction Name: Linnea Mirsch Matthew E. Johnson

Title: Director, Public Health & Human Services Director, Planning & Community Development

Signature:  

Date: 10.11.22

10/17/2022

Public reporting burden for this collection of information is estimated to average 3.0 hours per response, including the time for reviewing instructions, completing the form, attaching a list of projects if submitting one form per jurisdiction, obtaining local jurisdiction's signature, and uploading to the electronic e-snaps CoC Consolidated Application. This agency may not conduct or sponsor, and a person is not required to respond to, a collection information unless that collection displays a valid OMB control number.

Privacy Act Statement. This form does not collect SSN information. The Department of Housing and Urban Development (HUD) is authorized to collect all the information required by this form under 24 CFR part 91, 24 CFR Part 578, and is authorized by the McKinney-Vento Act, as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 (42 U.S.C. 11371 et seq.).

HUD considers the completion of this form, including the local jurisdiction(s) authorizing official's signature, as confirmation the project application(s) proposed activities submitted to HUD in the CoC Program Competition are consistent with the jurisdiction's Consolidated Plan and, if the project applicant is a state or unit of local government, that the jurisdiction is following its Consolidated Plan per the requirement of 24 CFR part 91. Failure to either submit one form per project or one form with a listing of project information for each field (i.e., name of applicant, name of project, location of project) will result in a technical deficiency notification that must be corrected within the number of days designated by HUD, and further failure to provide missing or incomplete information will result in project application removal from the review process and rejection in the competitive process.

Instructions for completing the HUD-2991, Certification of Consistency with the Consolidated Plan

The following information must be completed by the Continuum of Care's designated Collaborative Applicant. If the CoC has multiple projects, it may complete a single HUD-2991 for the jurisdiction provided the Collaborative Applicant includes a list of all projects with applicant names, project names, and locations that will be submitted to HUD with the form when forwarding to the jurisdiction for signature. If there are multiple jurisdictions located within a CoC's geographic area, it must obtain a signed HUD-2991 for each jurisdiction where projects are located.

Completed by the CoC's Collaborative Applicant:

Applicant Name. Enter the name of the project applicant's organization.

Project Name. Enter the name of the project application that will be submitted to HUD in the Continuum of Care Program Competition.

Location of the Project. Enter the physical address of the project; however, if the project is designated as a domestic violence project, enter a P.O. Box or address of the main administrative office provided it is not the same address as the project.

Name of Certifying Jurisdiction. Enter the name of jurisdiction that will review the project information and certify consistency with the Consolidated Plan (e.g., City of..., County, State).

Must be completed by the certifying jurisdiction.

Certifying Official of the Jurisdiction. Enter the name of the official who will sign the form.

Title. Enter the official title of the certifying official (e.g., mayor, county judge, state official).

Signature. The certifying official is to sign the form.

Date. Enter the date the certifying official signs the form.

SLC MN CoC 509 –2022 Special NOFO— Draft Scoring & Ranking Criteria

Organization				
Project Name				
CoC Model/Component				
Date of Review				
Reviewer				
THRESHOLD CRITERIA				
Criteria	Eligible	Ineligible	Eligible?	Data Source(s)
Eligible Entity	Nonprofits, States, local gov's, instrumentalities of State/ local gov, and public housing authorities.	Any entity that does not meet criteria identified in earlier column.		Project Application/Intent to Apply Form
Eligible Population	Meets HUD requirements	Does NOT meet HUD requirements		Project Application/Intent to Apply Form
Date of Project App	Application is complete and includes all required attachments and is submitted to CoC coordinator before the deadline.	Application is incomplete, does not include all required attachments and/or is submitted to CoC coordinator after the deadline.		Project Application Submission Date
HMIS	Project has capacity and plan to participate in HMIS (or other comparable database for DV providers)	Project does not have capacity and plan to participate in HMIS (or other comparable database for DV providers)		Project Application/Intent to Apply Form
Match	25% match for everything but leasing.	No required match.		Project Application
HUD Monitoring	HUD Monitoring Report is provided as applicable and no unresolved significant findings are identified.	HUD Monitoring Report is not provided (if applicable) or contains unresolved significant findings that should preclude applicant from inclusion.		Project Application
Administrative Costs	Admin costs are not greater than 10%	Admin costs greater than 10%.		Project Application
EVALUATION AND RANKING STANDARDS				

LOCAL CRITERIA					
Criterion	Most Desirable	Desirable	Least Desirable	Score	Data Source(s)
Housing First Assessment Points Possible: 15	Project scores between 13 and 15 points on the Housing First Assessment 13-15	Project scores between 10 and 12 on the Housing First Assessment 8-13	Project scores less than 10 on the Housing First Assessment 0-8	<u> </u> /15	Housing First Self-Assessment (Score indicated by number of points on self-assessment.)
Racial equity Points Possible: 5	Project has ongoing & active strategies that promote racial equity in programming, including training for staff. 5	Project has some strategies implemented that promote racial equity in programming. 2.5	Project does not have plans to implement strategies that promote racial equity in programming. 0	<u> </u> /5	CoC Supplemental Application
Evidence based, systemic approach to homelessness Points Possible: 5	Project utilizes and actively trains staff in evidence-based practices in their programming (i.e. harm reduction, trauma-informed, person centered) 5	Project utilizes some evidence-based practices in their programming (i.e. harm reduction, trauma-informed, person centered) 2.5	Project does not utilize evidence-based practices in their programming (i.e. harm reduction, trauma-informed, person centered) 0	<u> </u> /5	CoC Supplemental Application
Culturally Specific/Responsive Programming Points Possible: 5	Project provides culturally specific/responsive programming 5	Project has plans to provide culturally specific/responsive programming 2.5	Project does not provide culturally specific/responsive programming 0	<u> </u> /5	CoC Supplemental Application
Domestic Violence Policies	Project has implemented policies that promote safety for those fleeing domestic	Project has plans to implement policies that promote safety for those fleeing	Project has no policies that promote safety for those fleeing domestic violence, human trafficking, exploitation, stalking, and other forms of violence.	<u> </u> /5	CoC Supplemental Application

SLC MN CoC 509 –2022 Special NOFO— Draft Scoring & Ranking Criteria

	violence, human trafficking, exploitation, stalking, and other forms of violence.	domestic violence, human trafficking, exploitation, stalking, and other forms of violence.			
Points Possible: 5	5	2.5	0		
Consultation with people who have experienced homelessness	Trauma-informed consultation with people who have experienced homelessness outside of program participants occurred for this proposed project and directly informed this project proposal.	Consultation with program participants who have experienced homelessness and/or attendance in the CoC hosted listening session informed this project proposal.	No consultation with people who have experienced homelessness occurred for this proposed project and the agency has no existing structures for consolation.	___/5	CoC Supplemental Application
Points Possible: 5	5	2.5	0		
Plan addresses unmet needs & unsheltered homelessness	Plan articulates & addresses unmet needs & unsheltered homelessness in place.	Some evidence of plan to address unmet needs & unsheltered homelessness.	No clear plan to address unmet needs & unsheltered homelessness.	___/5	CoC Supplemental Application
Points Possible: 5	5	2.5	0		
Collaboration Bonus Points	Official MOU or contract with PHA &/or healthcare agency.	Some commitment of partnership demonstrated.	NO MOU or partnership commitment demonstrated.	___/0	CoC Supplemental Application
Points Possible: +5	5	2.5	0		
Total Points				___/45	Reviewer Comments:

Duluth/St. Louis County CoC (MN-509): 2022 Special NOFO Project Ranking

Ranking	Applicant	Project Name	Project types	Amount in HUD app	Amount Approved By CoC
1	1-Lutheran Social Services	Walkway	SSO	784,212	\$705,915
2	2-CHUM	Stepping On Up	SSO	1,870,779.00	1,870,779.00
3	3-HDC	HDC Unsheltered Outreach	SSO	443,558	\$337,659
4	4-Center City Housing	Wadena West	SSO	232,143	232,143
5	5-The Salvation Army	Plover Place	SSO	808,500	\$402,600
NA	NA-Duluth HRA	Coordinated Entry 2	SSO-CE	210,750	210,750
NA	NA-ICA	HMIS Expansion	HMIS	206,738	206,738
NA	NA-St. Louis County	Planning Grant 2	Planning Grant	123,887.00	123,887.00
			Current CoC Budget:	4,680,567	\$4,090,471
				Maximum amount approved by HUD: 4,129,591	

2021 St. Louis County (MN-509) Ranking & Review Policy for HUD NOFA

St. Louis County's HUD CoC NOFA Ranking and Review process utilizes non-biased criteria based on the HUD ranking tool, Local CoC priorities, and project performance. SLC CoC ranks project applications based on how they improve the CoC System Performance, as required by HUD guidelines for the CoC Program Competition.

The following describes the St. Louis County (SLC) Continuum of Care (CoC) process to score and rank projects for FY2021 CoC HUD NOFA funding.

1. Review and Ranking Process and Policies

1.a. Development and Approval of Ranking Criteria and Scoring Tools

The CoC Planning & Evaluation Committee is responsible for:

- Developing the Ranking Criteria and scoring
- Developing the Ranking Tool
- Submitting these documents to the CoC Governance Board (Heading Home Advisory Committee) for review and approval each year.

1.b. Eligibility for Ranking

To be eligible for ranking, all applicants and projects (new and renewal) must meet all HUD eligibility criteria (threshold criteria), as outlined in the NOFA and comply with Local CoC Competition requirements as described in this document and project application forms. Threshold requirements will be checked first for all project applicants. Projects that do not meet thresholds will not be scored or ranked.

Note: Committee members may request clarifications or additional information on threshold requirements from applicants if information is not clear enough to score the project. However, the committee must apply the same standard to all applications in seeking clarification.

Projects that meet the eligibility criteria are scored by CoC Ranking & Review Committee based on the Ranking Criteria and Scoring tool approved by the Heading Home Advisory Committee.

1.c. Ranking and Review Committee Scoring Process

The Ranking & Review Committee members read all project applications and documentation submitted for completeness and consistency. CoC Staff will compile initial scoring data for Ranking & Review committee members on all data-based scoring criteria (ex. % of exits to permanent housing). At least four reviewers from the Committee will read each applicant's materials to score individual elements.

The Ranking and Review Committee uses the CoC Ranking Tool designed by the CoC Planning & Evaluation Committee and approved by the Heading Home Advisory Council (CoC Governance Board) as the basis for scoring projects. They also follow the CoC Project Reallocation Policy, further detailed in this document.

If funding for new projects is identified due to reallocation, there may be a call by the CoC for new projects that will then also be scored and ranked.

1.d. Ranking of Housing Projects (PSH, RRH, TH)

HUD Requires Continuums of Care to rank all projects that are submitted for funding for the HUD CoC Notice of Funding Availability (NOFA). Ranking does not apply to CoC Planning Grants, which HUD does not require CoC's to rank with other projects. SLC CoC ranks project applications based on how they improve the CoC System Performance, as required by HUD guidelines for the CoC Program Competition.

Scoring informs but does not solely dictate the final ranking decisions.

The Ranking and Review Committee will initially rank all projects on the CoC Ranking tool, based on their overall scores. Projects are ranked in descending order, with highest review scores at top and lowest at bottom.

If there is a tie between two projects, a ½ point tiebreaker score will be used. The tiebreaker score will be based on cost effectiveness (cost per positive housing outcome), and will be calculated as follows, with the APR used for project reviews:

- For PSH: (# Stayers + # Leavers to Permanent Housing) / Total HUD CoC Program funds requested.
- For RRH and Joint TH/RRH: # Leavers to Permanent Housing / Total HUD CoC Program funds requested.

The project with the lower cost per positive housing outcome will be placed one rank higher than the other.

If there is a tie between more than two projects, the ½ point cost effectiveness tiebreaker will be applied as described above, followed by a tiebreaker based on the percentage of performance points awarded on the Ranking Tool. The project that receives the highest percentage of performance points will be placed highest of the tied projects, followed by the next highest, and following.

1.e. Placement of NOFA Projects in Tiers

HUD requires that Continuums of Care designate projects into either Tier One or Tier Two based on their ranking.

Each year, with the publication of the HUD CoC NOFA, HUD establishes the percentage of a Continuum's Annual Renewal Demand (ARD) that must be ranked in Tier One and the percentage that must be ranked in Tier Two.

i. Ranking of New Housing Projects from the Previous Funding Round

Any project that has not had a full year of operating will not be scored on performance, but will be scored on other components of the ranking & review score tool.

ii. Ranking of Non-Housing Projects (Planning, HMIS, SSO-Coordinated Entry)

After housing projects are ranked, the CoC's HMIS Grant and SSO-Coordinated Entry grant are always placed in Tier One.

This action is based on CoC policy objectives to ensure a functioning Coordinated Entry System and a Homeless Management Information System (HMIS).

HMIS projects totaling a minimum of 2% of Annual Renewal Demand (ARD) and Coordinated Entry projects totaling up to a minimum of 5% of ARD will be ranked in Tier One.

iii. Ranking of Bonus Projects

If a bonus grant is available and a bonus project (or projects) are included in ranking, the bonus grant(s) is placed at the bottom of Tier Two.

1.f. Adjustments to Project Ranking

It is the role of the Ranking and Review Committee to recommend the final Ranking List/Project Priority List for approval by the Heading Home Advisory Council. It is the role of the Heading Home Advisory Council to approve the final Ranking List/Project Priority List prior to submission of the NOFA to HUD.

After reviewing the full ranking and breakdown by tier, the Ranking & Review Committee members may recommend to the Heading Home Advisory Committee adjustments to the ranking. Rationale for any adjustment made will be included in the ranking tool, in notification to applicants, and in the Final Ranking/Project Priority List posted for CoC membership review. In addition, any adjustment applied by the Committee will be applied uniformly across applicable projects.

Reordering may be proposed when:

- A project straddling Tier 1 and Tier 2 would not likely be feasible if only the Tier 1 portion were funded. Projects whose ranking may change will be consulted.

After the specific reorder and reduction considerations listed above, Committee members may also consider the following in making adjustments for the final Project Priority List.:

- Geographic Diversity: The Ranking & Review Committee will review the project list in terms of potential impact on geographic regions. Projects may be reordered or reduced to align with need across the rural and urban geography of the CoC.

1.h. Scoring and Ranking Notice

- i. The Ranking & Review Committee (via the CoC Coordinator) will provide all project applicants preliminary notice of project acceptance/rejection, any funding changes due to reallocation, score, rank, Tier 1/Tier 2 status, and source of funds expected for the project (i.e. reallocated funds, CoC Bonus, or DV Bonus).
- ii. Information on the Appeals process will also be provided, and a deadline will be set for appeal submissions.

2. CoC Project Reallocation Policy

2.a. Policy Statement

- a. Under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), the HUD reallocation process allows Continuums of Care (CoC) to fund new projects by transferring all or part of funds from any existing CoC grant which is eligible for renewal into a new project.
- b. Under HEARTH CoC Regulations and the FY2021 NOFA, a reallocation project can be funded if all of the following apply:
 - i. The reallocation project is for a program component that HUD identified as allowable to apply for new funding in the FY2021 NOFA.
 - ii. The reallocation project meets all of HUD's threshold requirements.
- c. The St. Louis County MN Continuum of Care will reallocate funds granted through HEARTH CoC programs as needed to more effectively resolve homelessness, help households achieve stable housing and improve CoC performance.
- d. CoC program funds may be reallocated either by a voluntary process or by a competitive system transformation process. If reallocation is a possibility, the entire CoC is informed and a request for new project applications is announced.

2.b. Competitive Reallocation

- a. If a project is deemed to be low performing by scoring poorly in the project scoring process and/or having unsatisfactory project performance outcomes, the CoC reserves the right to reallocate funding and make it available through a competitive process. Low performing is determined based on scoring criteria identified by the Evaluation and Planning Committee and approved by the St. Louis County Minnesota Continuum of Care Heading Home Advisory Council (Continuum of Care Governing Board).

- b. The CoC may initiate a competitive system transformation process due to a renewal grantee ending a CoC program.
- c. As part of the application process for renewal projects, applicants are required to supply information so that the CoC can determine if each renewal project will meet the minimum threshold requirements. The minimum threshold requirements are outlined in the Ranking and Scoring Criteria, as identified in the FY2021 NOFA and by the CoC Evaluation and Planning Committee and approved by the St. Louis County CoC Governing Board.
- d. The CoC Ranking & Review Committee may make a recommendation to reallocate some or all of a project's funding for any project that has returned 15% or more of their funding award. The Ranking & Review Committee will review funding information for the last three completed grant terms to identify if there is a pattern of under-expenditure. Projects will be given the opportunity to provide explanations for under-expenditure and plans or actions taken to improve spending.
- e. In addition, a project may be subject to reallocation by the Ranking & Review Committee if any, or all, of the following are true:
 - i. Has an outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
 - ii. Audit finding(s) for which a response is overdue or unsatisfactory;
 - iii. History of inadequate financial management accounting practices;
 - iv. Evidence of untimely expenditures on prior award;
 - v. History of other major capacity issues that have significantly affected the operation of the project and its performance;
 - vi. History of serving ineligible program participants, expending funds on ineligible costs or failing to expend funds within the established time frames.
- f. Projects transferred to a new grantee within the last two NOFA cycles are exempt from reallocation due to unspent funds.
- g. If the CoC determines that a renewal project does not meet minimum threshold requirements, is deemed to be low performing, and/or has shown to consistently under-expend funding, a meeting of the CoC Review and Ranking Committee will be held to determine whether or not a recommendation should be made to the CoC Governing

Board for funds to be released for a competitive reallocation process. The following process will be followed:

- i. Any member of the Governing Board whose agency receives funding through the CoC programs shall recuse themselves from the Board deliberation process.
- ii. The CoC Governing Board will make the final decision whether or not to reject the renewal application for any agency that does not meet minimum threshold requirements, is deemed to be low performing, and/or has shown to consistently under-expend funding.
- iii. All Governing Board deliberations will be documented in meeting minutes.
- iv. If any renewal project application is rejected, the funds that were allocated to that project will be released as new funds and agencies will have the opportunity to apply for them.

2.c. Voluntary Reallocation Process

- a. CoC grantees may self-nominate to voluntarily reallocate CoC-funded renewal funds to create new projects.
- b. A grantee seeking the ability to reallocate funding through the voluntary grantee-self-nominating process must do so in accordance with the timeline set by the CoC in that year's application process and complete a new project application by the deadline set by the CoC to be eligible.
- c. The CoC Ranking & Review Committee will review the applications and make determinations regarding the acceptance and ranking of the proposed project.
- d. If the new project meets HUD's CoC funding priorities, local needs, and is an eligible reallocation project type under the NOFA, the applicant will be given the opportunity to apply to HUD for the new project.

If the new project does not meet HUD's CoC priorities, local needs, is an ineligible project type, or does not request the full grant amount awarded to the existing project, the funds either in total or in part not covered by the request, will be released by the CoC for proposal during the CoC competitive reallocation process.

3. CoC NOFA Scoring and Ranking Appeal Process

3.a. Introduction

The Duluth/St. Louis County CoC (CoC) strives to conduct a transparent rating and review process in determining which projects will be included in the local submission to the national CoC competition. Although a local appeals process is not required by the U.S. Department of Housing and Urban Development (HUD), this CoC offers a local appeals process. The appeals process occurs after the public release of the initial rating and ranking list but before the final ranking and allocations list is submitted to HUD.

The initial rating and ranking list will be released approximately 30 days prior to the national CoC Competition deadline. The appeals process timeline begins immediately upon release of the initial rating and ranking list. The Duluth/St. Louis County CoC process requires submission of the appeals form and material as described in this notice no later than the date stipulated in the Scoring and Ranking Notice.

The Appeals Committee reviews the submittals and extends an invitation to a brief in-person session, as warranted.

3.b. Types of Appeal

Applicant agencies that can appeal include those applications that:

- a) are unranked,
- b) dispute their scoring,
- c) dispute their ranking, or
- d) disagree with the Review and Ranking Committee's decision to reallocate some or all of their funding.

3.c. How to File an Appeal

- Projects wishing to appeal must submit the appeal in writing using the Heading Home St. Louis CoC Appeals form. Appeals Forms can be found at the end of this document.
- A signed Appeals Form and any relevant evidence must be submitted for each project being appealed.
- Email Appeals form to CoCHomelessPrograms@StLouisCountyMN.gov.

3.d. Appeal Timeline

- Appeals forms and supporting evidence are due to the email address **no later than the date stipulated by the Scoring and Ranking Notice.**
- All agencies filing an appeal must be prepared to rapidly respond to requests from the Appeals Committee.
- The Appeals Committee will inform appealing agencies of its decision **no later than the date stipulated by the Scoring and Ranking Notice.**

3.e. In-Person Session

After review of the information submitted, the Appeals Committee will invite applicants to a brief in-person or online meeting with the Appeals Committee. At this meeting, applicants will have an opportunity to further discuss the reason for their appeal.

3.f. The Appeal Committee

The Appeal Committee will be made up of three (3) voting members of the CoC Governance Board (Heading Home Advisory Council). Two members will not have participated on the original Rating & Ranking Committee. At least One committee member must be a member of the original Review & Ranking Committee.

No member of the Appeal Committee may have a conflict of interest with any of the agencies applying for funding and must sign a conflict-of-interest statement.

The role of the Appeal Committee is to read and review only those areas of the application that are being appealed. The Appeals Committee makes recommendations to the Ranking & Review Committee on any final adjustments to ranking based on the appeals process.

4. Development and Approval of Final Ranking List


4.a. Review of Final Ranking

After project applications are ranked and all adjustments are made, including adjustments made based on appeals, the recommendations of the Ranking and Review Committee will be presented to the CoC Governing Board (Heading Home Advisory Council), and all adjustments based on input and appeals will be documented in the ranking form.

A ranking order for application submission will be voted on and approved by the CoC Governing Board prior to submission to HUD.

Upon approval by the CoC Governing Board, the final project priority list, together with a final draft of the Collaborative Application will be posted for CoC review in accordance with HUD's timelines and requirements. Project applicants, COC members, and the general public will be given no less than 48 hours to provide comment.

4.b. Selections and Award Notifications

- i. The Ranking & Review Committee (via the CoC Coordinator) will provide all project applicants final notice of project acceptance/rejection, any funding changes, score, rank, Tier 1/Tier 2 status, and source of funds expected for the project (i.e. reallocated funds, CoC Bonus, or DV Bonus).
- ii. The notification will also include any required changes applicants must make in e-snaps to meet HUD requirements.
- iii. All corrections in e-snaps must be made and the e-snaps project application re-submitted in pdf format by  be included in the project list submitted in the national CoC Program Competition.

Appendix A

Heading Home St. Louis County CoC Appeal Form

Agency: _____

Project: _____

Date: _____

Reason for Appeal (mark with an x)

<input type="checkbox"/>	Unranked Project	<input type="checkbox"/>	Scoring Appeal
<input type="checkbox"/>	Ranking Appeal	<input type="checkbox"/>	Reallocation/Reduction Appeal

Project Type (mark with an x)

<input type="checkbox"/>	CoC Bonus Project	<input type="checkbox"/>	Standard Renewal Project
<input type="checkbox"/>	DV Bonus Project	<input type="checkbox"/>	Consolidated Renewal Project
<input type="checkbox"/>	Reallocated Fund Project	<input type="checkbox"/>	
<input type="checkbox"/>		<input type="checkbox"/>	

For each item being appealed, please identify the reason, and attach evidence to support your claim.

To request a brief in-person meeting, please check here: _____

Contact information to set appointment:

Name: _____ Phone _____

Email: _____