KS-507 Balance of State Continuum of Care (CoC) Application Ranking, Review, Reallocation, and Appeal Policies

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Disclaimer:

This document is based on the assumption that the general process and terms of the CoC NOFO will remain consistent; however, changes may occur with each NOFO release. KSHC will present all specific changes to this document at CoC Steering Committee and CoC Membership meetings as they arise. As this document is not all-inclusive, applicants are encouraged to review the official NOFO for comprehensive guidance and requirements.

Reviewed and Approved by:
KS BoS CoC Steering Committee: November 24, 2025

Effective Date:
November 24, 2025

1. Purpose and Overview

This policy establishes a comprehensive framework for evaluating, ranking, prioritizing, and reallocating project applications submitted to the KS-507 Balance of State Continuum of Care (KS BoS CoC) for HUD funding. It outlines eligibility requirements, scoring criteria, and reallocation processes to ensure funding decisions align with HUD priorities, local needs, and the goal of ending homelessness.

2. Key Definitions and Concepts

Annual Renewal Demand (ARD): The total amount of funding required to renew all eligible CoC projects, including renewals, HMIS, and CES programs. The ARD determines the funding allocated to Tiers 1 and 2.

Collaborative Applicant: The Kansas Statewide Homeless Coalition (KSHC) serves as the Collaborative Applicant for the KS BoS CoC. KSHC manages the CoC's HUD funding application process, facilitates the Rank and Review process, coordinates local priorities, and ensures compliance with HUD requirements.

Coordinated Entry System (CES): A standardized process that assesses and refers individuals and families experiencing homelessness to appropriate housing and services. CoC-funded programs must exclusively accept referrals through CES unless serving populations exempted by HUD (e.g., survivors of domestic violence).

Homeless Management Information System (HMIS): A centralized database used by CoC-funded programs to collect client data, track performance, and evaluate outcomes. Victim service providers use comparable databases to protect client confidentiality while maintaining consistent data collection.

Local Priorities: Goals established annually by the CoC Steering Committee based on local data, gaps analyses, and community needs. These priorities ensure the funding process effectively addresses regional and population-specific gaps in service.

Performance Monitoring: Ongoing evaluation of CoC-funded projects based on HUD performance measures, local data, and grant compliance. Projects failing to meet benchmarks may face reallocation or require additional oversight.

Rank and Review Panel: A neutral group of 5-15 community members unaffiliated with any CoC applicant organizations. Panel members score, rank, and prioritize project applications using CoC-approved tools and criteria. The panel receives training on HUD requirements, local priorities, and system performance.

Reallocation: The process of redistributing CoC funding from underperforming projects to new or expanded projects. Reallocation can be voluntary (initiated by an agency) or involuntary (initiated by the CoC based on performance and community needs). Reallocation ensures funds are used for high-impact programs that align with CoC and HUD priorities.

System Performance Measures (SPM): Metrics required by HUD to evaluate CoC effectiveness. These include reducing the length of time people remain homeless, increasing exits to permanent housing, and minimizing returns to homelessness. SPM data informs funding decisions and local strategies.

Tiers: HUD organizes project funding into two categories:

- **Tier 1:** Represents 30% of the CoC's ARD and is prioritized for funding by HUD. Projects in Tier 1 are considered high-performing and essential.
- **Tier 2:** Represents the remaining ARD and any CoC Bonus projects and DV Bonus. Tier 2 projects face more competitive funding criteria and may not be funded depending on HUD's final decisions.

3. Roles and Responsibilities

This section outlines the roles and responsibilities of key stakeholders in the CoC competition process, ensuring clarity, accountability, and alignment with HUD and CoC priorities.

Kansas Statewide Homeless Coalition (KSHC) – Collaborative Applicant
As the Collaborative Applicant for the KS-507 Balance of State CoC, KSHC is responsible for:

- Managing the HUD CoC application process, including the Consolidated Application and the local competition for project applications.
- Publicizing HUD's Notice of Funding Opportunity (NOFO) and the local competition timeline through multiple channels, including the KSHC website, social media, and direct communication with CoC members.
- Ensuring that the Rank and Review process adheres to HUD requirements and CoC priorities.
- Conducting technical reviews of all project applications to ensure they meet HUD's threshold requirements before submission to the Rank and Review Panel.
- Training the Rank and Review Panel on CoC scoring criteria, local priorities, and HUD's funding priorities.
- Monitoring agency participation in CoC-required activities, including meetings, committee work, and Coordinated Entry compliance.
- Tracking performance of CoC-funded projects using metrics such as APRs, HMIS data, and HUD System Performance Measures.

Performance & Compliance Committee
The Performance & Compliance Committee plays a key role in ensuring transparency, accountability, and adherence to CoC policies. Responsibilities include:

- Recommending qualified, neutral individuals to serve on the Rank and Review Panel for Steering Committee approval.
- Developing and annually reviewing CoC competition policies, scoring tools, and other CoC NOFO related documents to align with HUD priorities and local needs.
- Evaluating participation compliance for all CoC applicants based on attendance, HMIS/CES involvement, committee contributions and monitoring results.
- Advising on reallocation decisions based on performance or financial data and local priorities.

Rank and Review Panel
The Rank and Review Panel is composed of impartial community members who are knowledgeable about CoC programs but have no direct connection to applicant organizations. Responsibilities include:

- Scoring, ranking, and prioritizing project applications using CoC-approved tools and criteria.
- Attending training sessions conducted by KSHC to understand HUD requirements, CoC priorities, and scoring methodologies.
- Using data from HMIS scorecards, performance reports, and local gap analyses to inform decisions.
- Collaborating to ensure rankings reflect HUD and local priorities.

KS BoS CoC Steering Committee
The Steering Committee provides oversight and final approval for key decisions in the CoC competition. Responsibilities include:

- Approving policies, procedures, and scoring tools recommended by the Performance & Compliance Committee.
- Approving the composition of the Rank and Review Panel and ensuring its neutrality.
- Reviewing and approving the final project rankings and prioritizations submitted by the Rank and Review Panel.
- Adjudicating appeals related to funding decisions in accordance with CoC policies.

4. CoC Membership Requirements

To be eligible for Continuum of Care (CoC) funding through KS-507, agencies must demonstrate active participation and engagement in the CoC's governance and collaborative planning processes. The following requirements define Active Membership Status and are necessary to remain in good standing for purposes of local competition and funding eligibility.

CoC Membership Application
Agencies must have a completed and current CoC Membership Application on file with the Kansas Statewide Homeless Coalition (KSHC), which serves as the Collaborative Applicant and CoC Lead Agency.

Attendance & Representation Requirements

- Attend at least 80% of CoC Membership meetings (10 out of 12 scheduled annually).
- Attend Regional Planning meetings as required in their region's approved Regional Plan.

Representation: Each agency may designate one or more staff members to represent it. Attendance is credited to the agency regardless of which representative attends, provided they have a CoC member application on file.

Good Standing
Agencies must be in good standing with the CoC. Good standing means:

- Compliance with HUD CoC Program regulations (24 CFR part 578), CoC Written Standards, HMIS and CES Policies and Procedures as applicable.
- No unresolved audit/monitoring findings or issues of non-compliance.
    - Agencies with findings or issues of non-compliance may still be considered in good standing if they have an accepted corrective action plan in place and are

making documented progress toward resolution and are not under suspension or debarment from HUD funding.

5. CoC Participation Requirements for CoC Program Applicants

Organizations seeking funding under HUD's Continuum of Care (CoC) Program through the annual Notice of Funding Opportunity (NOFO) must meet the following participation requirements. Each CoC Program grant is governed by the specific NOFO under which it was awarded; therefore, participation obligations are both general and NOFO-specific.

Renewal project applicants are expected to actively fulfill these requirements as part of their continued participation in the CoC. New project applicants must commit to meeting these requirements as a condition of funding.

A. Coordinated Entry System (CES) Participation

- All projects must participate in the CoC's Coordinated Entry System in accordance with 24 CFR 578.7(a)(8) and the CES Policies and Procedures.
- Participation in scheduled Regional Coordinated Entry Case Conference meetings as outlined in each region's Regional Plan.
- Projects must receive referrals through the CES in accordance with CES Policies and Procedures. The rate of referral acceptance and eligibility criteria must be consistent with the CoC's CES Policies and Procedures.

B. Homeless Management Information System (HMIS) Participation

- Projects must actively use the CoC's designated HMIS or, for Victim Service Providers (VSPs), a comparable database, per 24 CFR 578.7(b) and 578.57, and the HMIS Policies and Procedures.
- Enter client-level data into HMIS (or a comparable database for victim service providers).
- Complete all required HMIS trainings
- Participation includes maintaining accurate, complete, and timely data, and contributing to HUD-required performance reports.

C. Performance Monitoring and Evaluation

- Funded projects must participate in CoC-led monitoring activities, including performance reviews, data quality assessments, quarterly financial reviews and technical assistance processes.

Note: Certain additional participation expectations may vary depending on the NOFO under which a project is funded. Applicants are responsible for ensuring compliance with the requirements outlined in the specific NOFO applicable to their grant(s).

6. Application Process for Project Funding

The Kansas Statewide Homeless Coalition (KSHC), as the Collaborative Applicant for the Kansas Balance of State Continuum of Care (CoC), coordinates the local competition process for HUD's annual Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO).

The application process ensures a structured and transparent submission of project proposals. Requirements and procedures vary for new and renewal applications but adhere to HUD and CoC standards.

A. Public Notification and Timeline

KSHC will issue a public notification announcing the opening of the local CoC Program competition. This notice will be posted on the KSHC website/social media and emailed through regional and statewide stakeholder networks. The announcement will include:

- A detailed competition timeline
- Submission deadlines
- Training/technical assistance opportunities

The competition timeline will identify all critical deadlines, including those related to application submission, project review, notification of selection status, appeals, and final submission to HUD via e-snaps.

B. Local CoC Competition Overview

The Kansas Statewide Homeless Coalition (KSHC), serving as the Collaborative Applicant for the Kansas Balance of State Continuum of Care (CoC), administers the local competition for HUD Continuum of Care (CoC) Program funding on an annual basis. The purpose of this process is to review, evaluate, and prioritize project applications in accordance with HUD requirements and community goals to prevent and end homelessness.

The local competition is conducted in compliance with the CoC Program Interim Rule (24 CFR part 578), the annual HUD Notice of Funding Opportunity (NOFO), and the policies and procedures approved by the CoC Steering Committee. The CoC Steering Committee provides governance oversight, including the review and approval of competition policies, scoring tools, reallocation decisions, and the final project rankings submitted to HUD.

Phases of the Local Competition

The local competition includes the following key phases, which are implemented annually in alignment with the HUD NOFO and CoC-adopted policy framework:

- **Release of Local Competition Materials**
  Upon publication of the HUD NOFO, KSHC releases a public notice announcing the start of the local competition. The notice is accompanied by a full competition timeline, application instructions, threshold and scoring criteria, and any required local forms. All materials are posted on the KSHC website and distributed to stakeholders across the CoC.

- **Letter of Intent Submission**

  To facilitate strategic planning and targeted technical assistance under the restructured FY2025 NOFO, all entities interested in submitting any type of project—renewal, new (including reallocation, CoC Bonus, or DV Bonus), transition, or consolidation—must submit a Letter of Intent (LOI) by the date specified in the competition timeline. The LOI is not a full application and is not scored. It is used solely to gather preliminary information on applicant interest, project types, and potential reallocation strategies. KSHC will use the LOIs to tailor technical assistance and assess capacity needs across the KS Bos CoC geography. Submission of an LOI is a prerequisite to access technical support and proceed to the Local Application stage.

- **Local Application Submission and Threshold Pre-Screening**
  All prospective applicants are required to submit a Local Application by the deadline specified in the competition timeline. The Local Application serves as a preliminary threshold screening tool. It allows KSHC to confirm basic project eligibility, proposed scope, and alignment with HUD and CoC priorities. Only applicants that submit a complete and timely Local Application may proceed to the full application stage. Threshold criteria is outlined in the Threshold section.

- **Scoring and Evaluation**
  Applications that pass threshold review are evaluated by an impartial Review Panel using scoring criteria approved by the CoC Steering Committee. Scores are used to inform the subsequent ranking process and are outlined in the Scoring section.

- **Project Ranking and Tiering**
  Based on scoring results, projects are ranked in priority order and assigned to HUD-designated funding tiers. The Rank and Review Panel prepares the Priority Listing for submission in accordance with HUD requirements and available funding.

- **Applicant Notification and Appeals**
  All applicants receive written notification of their project's status (e.g. accepted, conditionally accepted, ranked, or rejected). Applicants are provided information on appeal procedures, as outlined by the Appeals section.

- **Full Application Period**
  Applicants whose Local Applications have been accepted and added to the Priority Listing are invited to submit complete project applications in HUD's e-snaps system, along with any local supplemental materials. The application period has a clearly defined opening and closing date. KSHC provides technical assistance and ongoing communication throughout this period.

- **Final Submission to HUD**
  Accepted and ranked project applications are entered into HUD's e-snaps system and submitted along with the CoC Application and Priority Listing by the deadline established in the NOFO. Only projects that complete all local competition requirements are included in the final submission.

For detailed procedures related to threshold review, scoring methodology, project ranking, and the appeals process, refer to the corresponding sections of this document. These sections provide the full criteria, decision-making protocols, and requirements governing each phase of the local competition.

C. HUD's Role in the Project Selection

HUD reviews and scores the Consolidated Application submitted by each CoC, which includes the CoC Application, the Priority Listing, and individual project applications submitted through e-snaps. Project applications are evaluated based on their tier placement, eligibility, alignment with HUD priorities, and the overall CoC Application score.

While the local CoC competition determines which projects are included in the Priority Listing, HUD retains authority over final funding decisions. HUD does not review or fund any project application that is not submitted by the CoC. Final project funding is subject to HUD's national review process and availability of funds.

D. Post-Submission and HUD Award Process

After the CoC submits the Consolidated Application:

- **Tier 1 Project Selection**
  HUD will fund all Tier 1 projects that pass project eligibility and quality threshold reviews. Tier 1 includes up to 30 percent of the CoC's Annual Renewal Demand (ARD) and is not subject to CoC Merit Review scoring. However, projects may still be rejected if they fail threshold criteria or are found to conflict with statutory or policy prohibitions outlined in the NOFO.

- **HUD Reviews CoC Application and Project Listings**
  HUD evaluates the full Consolidated Application, including the CoC Application and Priority Listing. While the CoC Application receives a Merit Review score, project-level funding decisions are driven primarily by individual project quality, ranking, tier placement, and alignment with HUD priorities.

- **Merit Review and Tier 2 Scoring**
  HUD assigns each Tier 2 project a score of up to 100 points based on: (1) the CoC's Merit Review score (up to 50 points), (2) the project's relative position in Tier 2 (up to 40 points), and (3) whether the project includes required service participation (up to 10 points). These scores determine which Tier 2 projects receive funding.

- **Clarifications and Technical Corrections (if requested)**
  HUD may contact the Collaborative Applicant to request clarification or corrections related to project applications or the CoC Application prior to award announcements. These communications typically occur via e-snaps or email.

- **HUD Issues Award Announcements**
  HUD publicly announces CoC Program awards through a national press release and by posting award details on HUD Exchange. Notifications are also sent directly to Collaborative Applicants and project recipients.

- **Grant Agreements Executed**
  After awards are announced, HUD issues Grant Agreements to each awarded recipient. Projects must complete and return signed agreements within HUD's designated timeframe to secure funding.

- **Project Start-Up and Reporting Requirements Begin**
  Once the Grant Agreement is executed, recipients begin grant start-up procedures and must comply with all HUD CoC Program requirements, including HMIS participation, performance measurement, and financial reporting.

7. Threshold Review

Threshold criteria represent the minimum eligibility and compliance requirements that must be met in order for a project to advance in the local Continuum of Care (CoC) Program competition. Threshold review is conducted during the Local Application phase and is required for all applicants (new, renewal, reallocation, or expansion).

All submitted Local Applications will be assessed against the threshold criteria established by the Kansas Balance of State CoC and the U.S. Department of Housing and Urban Development (HUD). If an applicant fails to meet one or more threshold requirements, the Local Application will be automatically denied and the applicant will not be invited to submit a full application. There is no second-stage threshold review for disqualified Local Applications.

For new projects only, additional HUD-mandated project quality scoring thresholds apply. These are based on the project type as outlined in Section V.B.2 of the FY2025 CoC NOFO. Projects that do not meet the minimum required points for their project type during initial review will be disqualified by HUD.

Applicants must meet all threshold requirements to proceed to full project application submission. Failure to meet any of the following will result in disqualification from the FY2025 KS BoS CoC local competition:

Active CoC Participant
The applicant actively participates in CoC planning and coordination efforts, including relevant workgroups, trainings, or regional meetings in accordance with CoC policies, CoC governance charters, and committee charters.

Coordinated Entry Participation
The project must participate in the Kansas Balance of State CoC's Coordinated Entry system as per the CES Policies and Procedures.

E-LOCCS (Electronic Line of Credit Control System)

- **Existing CoC Grantees:** Must submit documentation verifying current and active access to HUD's eLOCCS system for two users. This includes a screen capture or official documentation showing that the organization's eLOCCS account is active.
- **New Applicants or First-Time CoC Program Applicants:** Must submit documentation that they have initiated the eLOCCS registration process or a signed statement of intent to register for eLOCCS access if selected for funding.

Final submission of an approved eLOCCS access form (HUD-27054) and establishment of the account is required by HUD prior to grant agreement execution. Failure to complete eLOCCS registration in a timely manner may result in HUD withholding or rescinding the award. Applicants are strongly encouraged to begin the registration process early if they do not already have eLOCCS access.

E-SNAPS

The applicant demonstrates the ability to submit and manage applications in HUD's e-snaps system through at least two registered user accounts.

Financial and Management Capacity
The applicant demonstrates the ability to manage federal funds responsibly, including financial infrastructure, internal controls, and/or past grant management.

HMIS Participation
All projects must participate in the CoC's HMIS system/comparable database for VSPs and meet HUD HMIS data standards.

Match (Documented)
The applicant provides documentation of the required 25% cash or in-kind match for all eligible costs, in accordance with 24 CFR §578.73.

No Debarments and/or Suspensions
The applicant is not debarred or suspended from receiving federal funds and certifies compliance with applicable federal grant regulations.

No Outstanding Delinquent Federal Debts
The applicant must not have unresolved or delinquent debts owed to federal agencies.

Organizational Type Eligibility
The applicant is an eligible entity under HUD CoC Program regulations, such as a nonprofit organization, unit of local government, or public agency.

Population Served
The proposed project must serve an eligible population as defined in the CoC Program Interim Rule (24 CFR part 578), consistent with the selected project type.

Prohibited Activities and Eligibility Certifications
The applicant must certify that it does not and will not:

- Engage in or facilitate racial preferences or other forms of illegal discrimination, including the use of proxies for race;

- Implement or support policies or practices that use a definition of sex other than binary (i.e., male and female);

- Operates drug injection sites or "safe consumption sites," knowingly distributes drug paraphernalia on or off of property under their control, permits the use or distribution of illicit drugs on property under their control, or conducts any of these activities under the pretext of "harm reduction."

Any applicant that engages in any of the above activities will be deemed ineligible for funding under this NOFO, in accordance with the project eligibility criteria outlined in Section V.A.4 of FR-6900-N-25.

Program Type Eligibility
The proposed project must be an eligible project type under the CoC Program, as defined in 24 CFR part 578 and the applicable HUD NOFO.

- For FY2025, the CoC may not exceed 30 percent of its Annual Renewal Demand (ARD) on permanent housing projects, including permanent supportive housing (PSH), rapid re-housing (RRH), and Joint TH/PH-RRH projects. Projects proposing a permanent housing component will be accepted, reviewed, and ranked through the standard process. However, if the CoC exceeds this cap at the time of project selection, additional PH

projects will not be submitted to HUD. See the **Ranking and Tier Placement** section for details on how PH Cap-Excluded projects are identified and handled.

Prohibition Against Lobbying Activities

The applicant certifies compliance with federal restrictions on the use of funds for lobbying, in accordance with 24 CFR §578.95 and 2 CFR part 200.

Resolution of Civil Rights Matters

The applicant must not have unresolved civil rights violations, and must certify compliance with applicable nondiscrimination and equal opportunity requirements.

SAM Registration

The applicant must have an active registration in the System for Award Management (SAM.gov) with no exclusions or flags.

NOFO Mandatory Trainings

All applicants are required to complete mandatory NOFO trainings as determined by the CoC Collaborative Applicant. These may include: NOFO 101 (overview of this year's CoC NOFO and the local competition), a New Applicant Training for agencies submitting new or reallocated projects, and a Renewal Applicant Training for agencies with existing grants. Attendance at applicable sessions is a threshold requirement for application eligibility. The CoC Collaborative Applicant may decide not to require meetings if time is limited, requirements will be listed in the NOFO schedule.

8. Scoring and Evaluation Criteria for Renewal/Expansion Projects

The scoring and evaluation process ensures project applications are assessed transparently and consistently, with an emphasis on alignment with HUD and CoC priorities, local needs, and system performance improvements. The KS BoS CoC Steering Committee reserves the right to modify the local project scoring criteria prior to the local application deadline should HUD release additional guidance or updates to the Project Application that materially alter expectations, scoring emphasis, or project type requirements.

Renewal Scoring Summary

Criterion	Maximum Points
A. Objective Criteria and Performance Measures	
1. Length of Stay	5 points
2. Exits to Permanent Housing	5 points
3. Returns to Homelessness	5 points
4. Increased Earned Income for Stayers	6 points
5. Increased Non-Employment Income for Stayers	5 points
6. Increased Earned Income for Leavers	6 points
7. Increased Non-Earned Income for Leavers	5 points
8. Maintained Earned Income for Stayers	5 points
9. Maintained Non-Employment Income for Stayers	5 points
10. Maintained Earned Income for Leavers	5 points
11. Maintained Non-Earned Income for Leavers	5 points
12. % of participants with a disabling condition	1 point
13. % of participants entering project from place not meant for habitation	3 point
12. Coordinated Entry Participation	5 points
13. HMIS Data Quality	5 points
14. Program Cost Effectiveness	5 points
15. Grant Spenddown	5 points
	Subtotal: 80
B. Required Services and Participation	
1. Supportive Services Provision	10 points
2. Service Participation Requirement	10 points
3. Participant Engagement and Retention	10 points
	Subtotal: 30
F. Coordination	
1. Leveraging Housing Resources/Partnerships	5 points
2. Leveraging Healthcare and Mainstream Resources/Partnerships	5 points
3. Street Outreach Implementation and Encampment Reduction	5 points
4. Involvement of individuals with lived experience of homelessness	2 points
5. Cooperation with Law Enforcement/Public Safety Organization	2 points
6. Coordination with Planning Efforts to Prevent Homelessness from Public Systems	2 points
7. Collaboration Related to Children and Youth	2 points
8. Coordination with Veteran Organizations	2 points
9. Coordination with Victim Service Providers	2 points
10. Partnering with Public Housing Agencies	2 points
11. CoC Participation	1 point
	Subtotal: 30
Bonus Points	
J. Transition/Reallocation	5 points
Opportunity Zones	1 point
Verification of Immigration Status using SAVE	1 point
Total Points:	140 points + 7 points

9. Additional Threshold Requirements for New Projects

Beginning in FY2025, HUD requires that new project applications meet minimum scoring thresholds by project type as part of the project quality review process outlined in Section V.B.2 of the FY2025 CoC Program NOFO (FR-6900-N-25). These thresholds are mandatory and apply to all new project applications submitted under this competition.

These applications will not be ranked, recommended for funding, or included in the CoC Application submission to HUD.

The following minimum point thresholds apply to each project type:

- **Transitional Housing (TH):** Must receive at least 7 out of 10 points.
- **Supportive Services Only (SSO) – Standalone Projects:** Must receive at least 4 out of 5 points.
- **Supportive Services Only – Street Outreach:** Must receive at least 5 out of 6 points.
- **Permanent Housing (including PSH and RRH):** Must receive at least 6 out of 8 points.

Applicants are strongly advised to review HUD's rating factors for their project type and ensure applications clearly demonstrate alignment with HUD expectations.

New Transitional Projects	
7 out of 10 points	
2 points	Demonstrate that the project will provide and/or partner with other organizations to provide eligible supportive services that are necessary to assist program participants to obtain and maintain housing.
1 point	The applicant has prior experience operating transitional housing or other projects that have successfully helped homeless individuals and families exit homelessness within 24 months.
1 point	The applicant has previously operated or currently operates transitional housing or another homelessness project, or has a plan in place to ensure, that at least 50 percent of participants exit to permanent housing within 24 months and at least 50 percent of participants exit with employment income as reflected in HMIS or another data system used by the applicant.
1 point	The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP.
2 points	Demonstrate that the proposed project will require program participants to take part in supportive services (e.g. case management, employment training, substance use treatment, etc) in line with 24 CFR 578.75(h) by attaching a supportive service agreement (contract, occupancy agreement, lease, or equivalent).
2 points	Demonstrate that the proposed project will provide 40 hours per week of customized services for each participant (e.g. case management, employment training, substance use treatment, etc.). The 40 hours per week may be reduced proportionately for participants who are employed. The 40 hours per week does not apply to participants over age 62 or who have a physical disability/impairment or a developmental disability (24 CFR 582.5) not including substance use disorder.
1 point	Demonstrate the average cost per household served for the project is reasonable, consistent with 2 CFR 200.404.

New Supportive Services Only (SSO) Standalone	
4 out of the 5 points	
1 point	The Supportive Services project is necessary to assist people in exiting homelessness and increasing self-sufficiency and the Recipient will conduct an annual assessment of the service needs of the program participants.
2 points	The proposed project has a strategy for providing supportive services to eligible program participants including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services.
1 point	The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP.
1 point	The services provided are cost-effective consistent with 2 CFR 200.404.

New Supportive Services Only (SSO) Street Outreach

	5 out of the 6 points
1 point	The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP.
2 points	The proposed project has a strategy for providing supportive services to eligible program participants including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services.
1 point	Demonstrate that the applicant has a history of partnering with first responders and law enforcement to engage people living in places not meant for human habitation to access emergency shelter, treatment programs, reunification with family, transitional housing or independent living. The applicant must cooperate, assist, and not interfere or impede with law enforcement to enforce local laws such as public camping and public drug use laws.
1 point	The applicant has experience providing outreach services consistent with the activity description at 24 CFR 578.53(e)(13) and has demonstrated effectiveness at helping people successfully exit from places not meant for human habitation to emergency shelter, treatment programs, transitional housing or permanent housing programs.
1 point	The services provided are cost-effective consistent with 2 CFR 200.404.

New Permanent Housing: Permanent Supportive Housing (PH-PSH)	
4 out of the 6 points	
1 point	The type of housing proposed, including the number and configuration of units, will fit the needs of the program participants.
1 point	The type of supportive services and assistance that will be offered to program participants will ensure that the participant is able to successfully obtain and retain permanent housing and in a manner that fits their needs (e.g. transportation, safety planning, enhanced case management). If the applicant is proposing to expand an existing PH project, it must demonstrate how they are expanding supportive services to program participants, including where appropriate, on-site supportive services.
1 point	The project will be designed to serve elderly individuals and/or individuals with a physical disability/impairment or a developmental disability (24 CFR 582.5) not including substance use disorder. The units will prioritize these populations.
1 point	Demonstrate that the proposed project will require program participants to take part in supportive services (e.g. case management, life skills, substance use treatment) in line with 24 CFR 578.75(h) by attaching a supportive service agreement (contract, occupancy agreement, lease, or equivalent).
1 point	The average cost per household served is reasonable, consistent with 2 CFR 200.404, meaning that the costs for housing and services provided by the project are consistent with the population the project plans to serve.
1 point	The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP.

New Permanent Housing: Rapid Rehousing (PH-RRH)	
6 out of the 8 points	
1 point	The provision of tenant-based rental assistance will help individuals and families achieve self-sufficiency within 3 months or up to 24 months.
1 point	The type of supportive services and assistance that will be offered to program participants (e.g., case management, substance use treatment, mental health treatment, and employment assistance) will ensure that the participant is able to successfully obtain self-sufficiency and exit homelessness.
1 point	The applicant has previously operated homelessness projects where outcomes for employment income were improved compared to the average project in the CoC.
1 point	Demonstrate that the proposed project will require program participants to take part in supportive services (e.g. case management, employment training, substance use treatment) in line with 24 CFR 578.75(h) by attaching a supportive service agreement (contract, occupancy agreement, lease, or equivalent).
1 point	The average cost per household served is reasonable, consistent with 2 CFR 200.404, meaning that the costs for housing and services provided by the project are consistent with the population the project plans to serve.
1 point	The project will be supplemented with resources from other public or private sources, that may include mainstream health, social, and employment programs such as Medicare, Medicaid, SSI, and SNAP.

10. Scoring Criteria for New Projects

The KS BoS CoC Steering Committee reserves the right to modify the local project scoring criteria prior to the local application deadline should HUD release additional guidance or updates to the Project Application that materially alter expectations, scoring emphasis, or project type requirements.

New Project Scoring Summary

Criterion	Maximum Points
A. Experience	
1. Population Served and Housing	15 points
2. Federal Grant Management	5 points
3. Leadership and Board with Lived Experience	3 points
4. Participant Feedback Practices	2 points

	Subtotal: 25
B. Project Design	
1. Target Population and Needs Alignment	5 points
2. Scale of Reach or Units	5 points
3. Plan for Rapid Implementation	5 points
	Subtotal: 15
C. Supportive Services and Participant Engagement	
1. Supportive Services Provision	5 points
2. Service Participation Requirement	5 points
3. Participant Engagement and Retention	5 points
	Subtotal: 15
D. Outcomes and Performance Measures	
1. Permanent Housing Exits	5 points
2. Returns to Homelessness	5 points
3. Increased Earned Income	5 points
4. Increased Non-Employment Income	5 points
5. Length of Program Participation	5 points
6. Commitment to HMIS and Data Quality	5 points
7. Commitment to Coordinated Entry	5 points
8. Program Cost Effectiveness	5 points
	Subtotal: 40
E. Financial Capacity	
1. Audit	5 points
2. Match Commitment	5 points
3. Detailed Budget	5 points
	Subtotal: 15
F. Coordination	
1. Leveraging Housing Resources/Partnerships	5 points
2. Leveraging Healthcare and Mainstream Resources/Partnerships	5 points
3. Street Outreach Implementation and Encampment Reduction	5 points
4. Involvement of individuals with lived experience of homelessness	2 points
5. Cooperation with Law Enforcement/Public Safety Organization	2 points
6. Coordination with Planning Efforts to Prevent Homelessness from Public Systems	2 points
7. Collaboration Related to Children and Youth	2 points
8. Coordination with Veteran Organizations	2 points
9. Coordination with Victim Service Providers	2 points
10. Partnering with Public Housing Agencies	2 points
11. CoC Participation	1 point
	Subtotal: 30
Bonus Points	
Opportunity Zones	1 point
Verification of Immigration Status using SAVE	1 point
Total Points:	140 points + 2 bonus points

11. Local Application & Preliminary Scoring

All renewal and new applicants must submit a Local Application as the first required step in the local competition process. The Local Application is used to collect core project information, assess threshold eligibility, and automate scoring using the approved criteria in scoring section of this policy.

All project types subject to HUD ranking must complete a Local Application. This includes:

- CoC Renewal Projects including DV Renewal
- New Projects created through Reallocation, CoC Bonus, or DV Bonus
- DV Bonus and DV Reallocation Projects

CoC Planning and UFA Cost projects are exempt from local ranking and are not required to submit a Local Application. YHDP Renewal and YHDP Replacement projects are not applicable to the KS BoS CoC, as the CoC has not previously received a YHDP award and the FY2025 NOFO does not permit new YHDP projects.

The Local Application must be submitted through the designated electronic form provided by KSHC. Required elements include:

- Project type and funding request
- Target population(s) and geographic service area
- Alignment with CoC priorities and Regional Plan needs
- Responses to each scoring criterion included in this policy

Applicants must provide documentation or narrative justification for each scoring item, as specified in the Local Application form. Applications are scored based on applicant responses aligned to the criteria defined in this policy. Preliminary scores are assigned automatically based on submitted responses.

The Rank and Review Panel is responsible for validating all responses and supporting documentation. Panel members may:

- Adjust scores when submitted materials and/or narratives do not adequately support the applicant's claims or fail to meet the defined criteria.
- Review and verify all threshold requirements (e.g., project eligibility, target population, use of HMIS or comparable database, etc.).
- Reject applications that do not meet threshold eligibility, including cases where the applicant indicated compliance but submitted documentation or responses that do not substantiate the claim. Threshold determinations are based on verified information, not self-attestations. All threshold failures will be documented with written justification in the official scoring record.

12. Ranking and Tier Placement

The Ranking and Tier Placement process organizes project applications in priority order based on scores generated through the Local Application process and validated by the Rank and Review Panel. This process ensures alignment with the Continuum of Care's (CoC) priorities, funding availability, and HUD's CoC Program requirements. Projects are assigned to HUD's Tier 1 and Tier 2 funding categories to maximize the CoC's competitiveness in the national competition.

Rank and Review Panel Role

The Kansas Statewide Homeless Coalition (KSHC) staff and the Performance & Compliance Committee recommend members to serve on the Rank and Review Panel. Final approval is made by the CoC Steering Committee. The Panel consists of individuals who are knowledgeable in homelessness services and the CoC Program but unaffiliated with any applicant organizations.

The Rank and Review Panel receives all Local Application responses, documentation, and preliminary scores. It reviews applicant-submitted materials, validates the accuracy of responses, and adjusts scores where necessary to ensure consistency with the scoring criteria established in this policy. Recommended rankings are determined through a motion and majority. The Rank and Review Panel submits its recommended ranking and tier placement to the CoC Steering Committee for approval.

HUD Tiering Framework

Tier 1: Represents up to 30% of the CoC's Annual Renewal Demand (ARD). Projects in Tier 1 are prioritized for funding and considered essential to the CoC's system of care.

Tier 2: Comprises the remaining portion of the ARD, 70%, plus any bonus projects. Tier 2 projects are awarded at HUD's discretion based on the CoC Application score and project-level criteria outlined in the NOFO.

Bonus Funds:

- *CoC Bonus Projects:* Projects requesting CoC Bonus funds must be ranked and included within the CoC's Priority Listing (Tier 1 or Tier 2). CoC Bonus funds are capped at up to 20% of the Final Pro Rata Need (FPRN) and can be used to create new Permanent Housing (PH-PSH, PH-RRH), Transitional Housing (TH), Supportive Services Only (SSO), SSO-Coordinated Entry, or Dedicated HMIS projects. All CoC Bonus projects must meet HUD's project eligibility and quality thresholds and will count toward the CoC's Tier 1 and Tier 2 limits.

- *Domestic Violence (DV) Bonus Projects:* DV Bonus projects must also be included on the CoC Priority Listing are subject to the same Tier 1 and Tier 2 competition process as all other projects. DV Bonus projects must be 100% dedicated to serving survivors of domestic violence, dating violence, sexual assault, or stalking who meet the HUD definition of homelessness. If a DV Bonus project is selected by HUD, it will be funded from the DV Bonus pool. If it is not selected, it will not be funded under that category and will not be considered for CoC Bonus or other sources.

Local Priority Considerations

The CoC sets local funding priorities each year using systemwide and regional data.

- **Gaps Analysis Report:** Combines Housing Inventory Count (HIC), Point-in-Time (PIT), Coordinated Entry (CES), HMIS APRs, and HDX System Performance Measures (SPMs) to identify unmet needs.

- **Project Type Prioritization:** Projects addressing identified gaps may receive priority in scoring and ranking.

- **Regional Prioritization:** Each region develops a Regional Plan that evaluates funding, inventory, and needs. Regional priorities are integrated into CoC-wide ranking to ensure equitable distribution of resources.

This process ensures funding decisions are transparent, data-driven, and responsive to both systemwide and local needs.

Ranking Considerations

- **Thresholds:** Projects that do not pass threshold will not be scored or ranked on the priority list.

- **System Operations Projects:** The primary renewal projects for HMIS and the Coordinated Entry System (CES) are considered essential to CoC operations and will be automatically ranked first and second in Tier 1. These projects will not be scored or compared to housing projects. Any additional projects (including DV and SNOFO) of HMIS or CES will be ranked at the bottom of the priority listing.

- **Renewal Projects with Limited Operating Data**: Projects without 12 full months of operating data (e.g., first-time renewals or expansions) will be evaluated using the full local project scoring tool. Performance measures requiring a full year of data will be marked "Not Applicable" and excluded from scoring unless at least 9 months of reliable data is available—if so, the project may be scored using that data. Historically, these projects were designated as "Protected Projects" and received special consideration during the local competition. However, under the FY2025 NOFO, HUD requires fully competitive ranking of all projects, and only 30 percent of the CoC's Annual Renewal Demand is protected in Tier 1. As a result, projects with limited data are no longer automatically protected and will not be guaranteed placement in Tier 1. They must compete alongside all other projects for available funding.

  To ensure fair evaluation, if a project has a high number of "Not Applicable" scoring elements, its total possible points will be adjusted. The project's raw score will be converted to a percentage of the applicable points, and then recalculated on the full 140-point scale to allow direct comparison across all projects.

  ### Example: Adjusted Scoring for Limited Data

  A project is evaluated using a scoring tool worth 140 total points. Due to limited data, 40 points are marked Not Applicable, leaving 100 applicable points. The project earns 60 out of those 100 points.

  Adjusted Score:

  $$\text{Adjusted Score} = (\frac{60}{100}) \times 140 = 84$$

  The adjusted score of 84 is used in ranking and funding decisions to ensure transparency and comparability. Projects in this category must still submit a complete Local Application and include a narrative update on implementation, expenditure status, housing outcomes to date, drawdown rate, and any relevant HUD amendments or reallocation plans. For transparency, these will be identified as "Limited Data - Project."

- **Score-Based Ranking:** All eligible projects are initially ranked based on the total score derived from their responses in the Local Application, which uses an automated scoring framework. Applicants must provide accurate, verifiable information in the Local Application, and may be required to submit supporting documentation or narrative as specified. The Rank and Review Panel will review all scores and may adjust them if submitted responses are found to be inaccurate, inconsistent, or unsupported by verifiable material. Final ranking reflects both the Local Application score and any necessary adjustments made through this review process.

- **Permanent Housing Cap:** In accordance with the FY2025 NOFO, no more than 30 percent of the CoC's Annual Renewal Demand (ARD) may be allocated to Permanent Housing (PH) projects, including PSH, RRH, and Joint TH-RRH. All eligible projects will be scored and ranked through the standard process. However, once the total PH funding meets the 30 percent PH cap **(Add the Actual Amount),** any additional PH projects, starting with the lowest-scoring, will be removed from the Priority Listing,

regardless of their rank. These projects will not be submitted to HUD. Projects excluded for this reason will be labeled "PH Cap-Excluded" on the Priority Listing to distinguish them from projects rejected for other reasons. This designation indicates that the project was otherwise eligible and competitively ranked but could not be included due to HUD's permanent housing cap. The Collaborative Applicant will monitor PH totals throughout the competition and may encourage reallocation, transition or rescoping prior to final submission.

- o Partially fund the project up to the PH cap and exclude the remainder;
- o Rescope the project in collaboration with the applicant to reduce its PH component;
- o Reallocate the non-submittable portion into a non-PH project type, if eligible;
- o Transition the project into a different eligible component (e.g., SSO or TH) if programmatically appropriate and compliant with HUD transition rules.
- o Coordinate with the other PH applicants to determine if they can reallocate enough so that the agency could be fully funded within the 30% PH CAP.

- **Funding Allocation:** Projects are funded in rank order until all available CoC Program funds are allocated. If funding is not sufficient to fully fund a project, that project may be partially funded at the Tier 1 and Tier 2 boundary, subject to HUD approval. Projects ranked below the available funding threshold may not receive partial or full funding. Final award decisions for Tier 2 projects are made by HUD based on national competition results.

Tie-Breaking Criteria:

In the event that two or more projects receive the same score, the CoC will apply the following tie-breaking criteria in order until the tie is resolved:

a) **Priority Populations** – Preference for projects serving HUD priority populations.

b) **Identified Gaps** – Preference for projects that address unmet needs identified in the CoC's Gaps Analysis Report or Regional Plans.

c) **Equitable Geographic Distribution** – Preference for projects located in, or serving, regions of the CoC that are under-resourced compared to their documented need.

d) **Cost Effectiveness** –

- o For **renewals**: lower cost per permanent housing exit or retention.
- o For **new projects**: lower projected cost per household to be served.

e) **Households to Be Served** – Preference for the project proposing to serve the greater number of unduplicated households over the grant term.

f) **Final Resolution** – If a tie still remains, the CoC will use a random selection process documented by the Rank and Review Panel.

13. Reallocation of Funds

Reallocation is a strategic mechanism used by the CoC to align limited resources with evolving system needs, performance outcomes, and HUD priorities. It enables the creation of new projects that address identified gaps and support evidence-based solutions. Project applicants may elect to voluntarily reallocate part or all of their funding when doing so better supports their

organizational goals or the CoC's strategic direction. In some cases, the CoC Lead and the Performance and Compliance committee may recommend reallocation based on data-informed review of project performance, capacity, or alignment with local and federal objectives. All reallocation decisions are made with the intent to strengthen the overall effectiveness and impact of the CoC's homeless response system.

Voluntary Reallocation:

- Project applicants may choose to voluntarily reallocate part or all of their renewal project funding during the local CoC competition.

- Applicants should indicate their intent to voluntarily reallocate funds directly in the Local Application.

- Voluntarily reallocated funds may be made available for new projects through reallocation funding in accordance with HUD's NOFO requirements.

- Projects choosing to reallocate voluntarily are encouraged to consult with the CoC Lead early in the process to discuss options, technical assistance, and potential future project opportunities.

Involuntary Reallocation:

- The CoC may initiate reallocation of part or all of a renewal project's funding based on performance, CoC monitoring results, compliance, historical funding spend down, system alignment, or funding priorities.

- Projects that will be flagged for review by the Rank and Review for reallocation:
  - Expends less than 90% of its awarded funds over two operating years.
  - A Monitoring with findings with no evidence of progress fulfilling the Corrective Action Plan.

- Involuntary reallocation may be considered when:
  - Non-compliance with HUD or CoC policies and procedures as determined by Monitoring.
  - Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon.
  - Audit finding(s) for which a response is overdue or unsatisfactory.
  - History of inadequate financial management accounting practices.
  - Evidence of untimely expenditures on prior award.
  - History of other major capacity issues that have significantly impacted the operation of the project and its performance.
  - Timeliness in drawing down funds and reimbursing subrecipients for eligible costs as applicable.
  - The project no longer aligns with the strategic direction or priorities of the CoC or HUD.
  - Other factors determined in the competition's priorities.

- Projects flagged for reallocation are reviewed by the Rank and Review Panel, which provides recommendations to the CoC Steering Committee.
- All renewal projects are reviewed using standardized criteria through the local competition process.
- Agencies may appeal reallocation decisions through the established appeals process.

Application Withdrawal:

Project applicants may voluntarily withdraw their Local Application from the local Continuum of Care (CoC) competition at any time prior to the day before the Rank and Review Panel convenes, without penalty.

All withdrawals must be submitted in writing via email and sent directly to the CoC Collaborative Applicant representative. Verbal withdrawals will not be accepted. The deadline for withdrawal will be clearly published in the annual Local Competition Timeline.

After this deadline, applicants who choose to withdraw or fail to submit a complete application will be required to participate in one or more Technical Assistance (TA) sessions with the CoC Collaborative Applicant prior to the next annual competition cycle in order to be considered eligible to reapply. The deadline for completing TA will be no later than 30 days prior to the opening of the next local competition cycle, unless otherwise specified by the CoC Collaborative Applicant. These sessions are intended to ensure the applicant is fully informed of program requirements, local competition expectations, and opportunities for project alignment with HUD and CoC priorities.

Post-Ranking Application Withdrawal

If a project applicant withdraws their application after the Rank and Review Panel has finalized the Priority Listing, or fails to submit a complete application for e-snaps following notification of inclusion on the Priority List, the CoC Steering Committee may implement one or more of the following actions to adjust the Priority Listing and reallocate the available funds:

a) **Advance Projects on the Priority Listing**
   If a project is withdrawn after ranking, all lower-ranked projects may be moved up one or more positions on the Priority Listing to fill the vacancy. This may result in projects being shifted from Tier 2 to Tier 1, depending on the size and position of the withdrawn project.

b) **Reallocate Funds to Expansion Projects**
   If any ranked projects have been submitted as expansion projects, the CoC may increase the funding amount recommended for those projects, provided the increase does not exceed eligible limits and aligns with HUD's reallocation and expansion guidance.

c) **Reconsider Previously Unfunded Projects**
   The CoC may re-evaluate one or more previously unranked or rejected projects, particularly if they were eligible and scored competitively, for potential inclusion on the Priority List using the newly available funds.

d) **Increase Funding for Under-Requested Renewal Projects**
   If a renewal project on the Priority Listing requested less than its full eligible renewal amount, the CoC may increase its funding using amounts made available by a withdrawn project. This option is only allowed if the project is already on the Priority Listing, the

new amount does not exceed the maximum eligible amount listed in the HUD Grant Inventory Worksheet (GIW), and the change does not require a new application.

e) **Submit a New Reallocation Project**
If the withdrawal creates a significant funding gap, and time permits before the e-snaps deadline, the CoC may open a limited, expedited call for reallocation projects, restricted to eligible project types. This option depends on NOFO timelines and capacity.

f) **Enhance System-Level Projects (e.g., HMIS or CE)**
The CoC may increase the funding level of CoC-wide projects such as HMIS or Coordinated Entry (CE), if these were underfunded relative to documented needs, and if allowable under the NOFO.

All such adjustments must occur prior to final submission of the Priority Listing in e-snaps and will be documented in the local competition record. The CoC Collaborative Applicant, in consultation with the CoC Steering Committee, will ensure any changes remain consistent with HUD NOFO requirements, maintain the integrity of the original scoring process, and are transparently communicated to all stakeholders.

14. Transition Grants

The FY2025 CoC NOFO introduces Transition Grants as a tool to help CoCs realign their project portfolio. A Transition Grant allows an existing renewal project to change from one eligible component type to another for a one-year period. The project being transitioned must be fully eliminated, and the new project must meet all threshold and quality requirements.

This option supports shifts toward HUD's priorities, including service-intensive Transitional Housing (TH) and Supportive Services Only (SSO) projects. It also helps CoCs comply with the new cap limiting Permanent Housing (PH), including PSH, RRH, and Joint TH-RRH, to no more than 30 percent of ARD.

Requirements

- Only renewal projects with executed grant agreements expiring in Calendar Year 2026 are eligible.
- The same recipient must apply for the Transition Grant as is listed on the eliminated grant.
- The new project must use a different program component and must meet HUD's eligibility and quality thresholds.
- The full amount of funding from the eliminated project(s) must be used. Partial reallocations cannot be used to create a Transition Grant.

Applicants must clearly identify the project as a Transition Grant in e-snaps and describe the component change, rationale, and expected benefits. The KS BoS CoC will assess each transition request for alignment with system needs, performance goals, and HUD policy priorities.

15. Consolidated Projects

Consolidated Projects allow eligible renewal projects operated by the same recipient to be combined into a single application. This option is designed to streamline administration and simplify grant management for projects with similar characteristics.

Requirements

- Only renewal projects are eligible for consolidation.
- All projects must be operated by the same recipient.
- Each project must individually meet HUD's project eligibility and quality thresholds.
- Projects should have the same component type and serve similar populations.
- The CoC must identify the surviving project in the application and provide clear documentation for HUD review.

Recipients interested in consolidation must notify the CoC Lead before the local application deadline and submit a justification. The CoC will evaluate the request based on alignment of project design, populations served, and administrative efficiency. Approved consolidations will be documented in the CoC Priority Listing and submitted in accordance with HUD requirements.

16. Appeals Process

The Appeals Process provides applicants with a fair opportunity to challenge funding decisions or ranking outcomes when they believe a mistake or policy violation has occurred. Appeals are reviewed impartially to ensure transparency and accountability.

Eligibility for Appeals:
Applicants may appeal if they believe a decision violated federal guidelines, CoC policies, or the integrity of the Rank and Review process. Valid appeal grounds include:

1. Violation of HUD or CoC policies during the review, ranking, or scoring process.

2. Errors in participation points

3. Inaccurate application of CoC's scoring tools or criteria as outlined in the KS BoS CoC NOFO Policies.

Appeals will not be considered for:

- Thresholds not met by the applicant, including not attending mandatory NOFO trainings.

- Errors or omissions by the applicant, such as late submissions or incomplete applications.

- Disputes over a project's position within the Tier 1 and Tier 2 ranking structure.

- Data discrepancies originating from HMIS, APRs, or comparable databases unless proven to result from a system error.

Appeal Submission Requirements:

- Appeals must be submitted in writing within three (3) business days of receiving notification of the funding decision.

- Appeals must be submitted on agency letterhead and must not exceed two pages. The appeal should clearly state:

  o The reason for the appeal.

- o The specific policy or guideline believed to have been violated.
- o Supporting evidence or documentation.

Appeal Review Process:

1. **Initial Review:**
   - o Appeals are submitted to the Collaborative Applicant (KSHC) via email (seggert@kshomeless.com) as specified in the NOFO timeline.
   - o KSHC staff verifies that the appeal meets eligibility criteria.

2. **Appeals Subcommittee Evaluation:**
   - o The Appeals Subcommittee, composed of two non-conflicted Steering Committee members, three Performance & Compliance Committee members, and two Rank and Review Panel members, reviews eligible appeals.
   - o Subcommittee members affiliated with the appellant agency or competing applicants must recuse themselves.

3. **Decision and Notification:**
   - o The Appeals Subcommittee makes a recommendation to the Steering Committee for final approval.
   - o Steering Committee members representing funded agencies will recuse themselves from the discussion and vote.
   - o The Steering Committee's decision is shared with the appellant agency via email and posted publicly.
   - o Agencies whose rank may be affected will be notified as a courtesy.

Timeline for Appeals:

- Appeals are reviewed and resolved within five (5) business days of submission to minimize delays in the CoC competition process.

Further Appeal Options:

- If an agency believes the local process denied them reasonable participation, they may submit a Solo Application to HUD as outlined in the NOFO.
- Appeals to HUD must follow the federal appeals process described in 24 CFR 578.35 and 578.35(b)(3).

17. Final Approval and Publication

The final approval and publication process ensures that project rankings and funding recommendations are formally approved, communicated to applicants, and made publicly accessible. This process upholds transparency, accountability, and compliance with HUD and CoC requirements.

Approval Process:

1. **Submission to Steering Committee:**

- o The Rank and Review Panel submits the prioritized project rankings, including Tier 1 and Tier 2 placements, to the Steering Committee for review.
- o The Steering Committee evaluates the recommendations to ensure compliance with CoC policies, HUD priorities, and local competition requirements.
- o Steering Committee members affiliated with any applicant agencies recuse themselves from discussions and decisions to prevent conflicts of interest.

2. **Final Approval:**
   - o The Steering Committee approves the final rankings and funding recommendations.
   - o If modifications are required, the Rank and Review Panel may be asked to reconvene to address specific concerns before final approval is granted.

Notification of Applicants:

1. Applicants are notified of their ranking and tier placement via email within one business day of Steering Committee approval.
2. Notifications include:
   - o The project's final score and tier placement.
   - o Instructions for accessing the appeals process.

Public Disclosure:

1. The approved project rankings, including Tier 1 and Tier 2 placements, are published on the KSHC website.
2. The Collaborative Applicant ensures that the public disclosure meets all HUD requirements, including timely communication and accessibility.

HUD Submission:

1. The Collaborative Applicant compiles the CoC's Consolidated Application, which includes:
   - o The CoC Application.
   - o The Project Priority Listing with approved rankings.
   - o Project applications submitted by individual applicants.
2. The completed application is submitted to HUD through e-snaps by the established NOFO deadline.

Timeline for Final Approval and Publication:

- The Rank and Review Panel submits recommendations to the Steering Committee at least two weeks before the HUD submission deadline.

18. Training and Guidance for Rank and Review Panel

The Rank and Review Panel plays a critical role in ensuring a fair and objective evaluation of project applications. Comprehensive training and ongoing guidance are provided to panel members to support consistent, informed decision-making.

A. **Orientation:**

    a. Panel members attend an orientation session conducted by KSHC staff to review their roles, responsibilities, and expectations.

    b. Orientation includes an overview of the CoC competition process, HUD funding priorities, and the CoC's priorities.

B. **Scoring Tool and Process Review:**

    a. Panel members are trained on the scoring matrix, evaluation criteria, and the mechanics of the ranking and tier placement process.

    b. Example projects or scenarios may be used for calibration to ensure consistent scoring across the panel.

C. **Data and Context Review:**

    a. KSHC provides panel members with HMIS data, project narratives, and pre-populated scorecards for all renewal projects.

    b. Local needs assessments and gaps analyses are shared to provide context for evaluating new and expansion projects.

Ongoing Guidance:

- Panel members can request clarification or additional resources from KSHC staff throughout the evaluation process.
- Staff provide updates on any procedural or policy changes impacting scoring or ranking.

Conflict of Interest Management:

- Panel members must disclose any conflicts of interest prior to scoring and recuse themselves from evaluating affected applications.

19. Technical Assistance

Technical Assistance (TA) will focus on clarifying HUD and CoC requirements, explaining local competition policies, supporting applicants with e-snaps navigation, and responding to process-related questions. To maintain fairness and transparency in the competition, TA will not include:

- Drafting, editing, or reviewing narrative responses for applicants.
- Completing or submitting applications in e-snaps or any other HUD system on behalf of applicants.
- Developing project design or budgets for applicants.
- Providing individualized scoring guidance or predictions of how a project will rank.
- Assisting with correcting project performance data (e.g., APRs, HMIS data quality).
- Securing letters of support, MOUs, or other attachments required for the application.
- Providing feedback on draft applications beyond clarifying policy or regulatory requirements.
- Advocating for or against any applicant in the scoring, ranking, or review process.
- Offering legal advice or interpreting laws/regulations beyond HUD-published guidance.

- Customizing TA for one agency that is not available equally to all applicants.

All applicants are required to attend the NOFO training, which covers HUD requirements, local policies, and application procedures. To ensure transparency, written FAQs will be published and updated regularly. In addition, office hours will be offered for one-on-one consultations to address specific technical or procedural questions.

20. Policy Review and Amendment

The CoC's policies are reviewed annually to ensure alignment with HUD requirements, CoC priorities, and evolving local needs. Regular updates ensure transparency, accountability, and compliance.

Annual Review Process:

1. **Policy Evaluation:**
   o The Performance & Compliance Committee reviews all policies, scoring tools, and procedures used in the CoC competition.
   o Feedback from applicants, rank and review members, and CoC stakeholders is considered to improve policies.

2. **Revisions and Approval:**
   o Proposed revisions are submitted to the Steering Committee for review and approval.
   o Updates are designed to address changes in HUD NOFO requirements, local priorities, or lessons learned from the prior competition cycle.

Stakeholder Communication:

- Revisions to policies and procedures are communicated to CoC members and stakeholders in advance of the next competition cycle and as needed.
- Updated policies are published on the KSHC website and included in all training materials for applicants and Rank and Review Panel members.

Ad Hoc Updates:

- In the event of significant changes to HUD requirements, CoC priorities or NOFO expectations, policies may be updated outside the annual review schedule.
- Stakeholders are notified promptly of any interim updates.

21. Conflict of Interest Policy

To ensure transparency, integrity, and fairness in Continuum of Care (CoC) operations and funding decisions, all individuals and organizations involved in the CoC Program process must adhere to the following conflict of interest standards.

A conflict of interest exists when a person in a position to influence a decision has a financial interest, fiduciary duty, organizational affiliation, or personal relationship that could compromise or appear to compromise their objectivity or ability to act in the best interests of the CoC.

This applies to:
- CoC Program project applicants and subrecipients;
- Members of the Performance and Compliance Committee;
- Members of the CoC Steering Committee;
- Staff and representatives of the CoC Collaborative Applicant.

All individuals involved in reviewing, scoring, ranking, recommending, or approving CoC Program projects must recuse themselves from any discussion or decision-making where a conflict of interest exists or may reasonably be perceived. This includes, but is not limited to, participating in scoring or ranking projects submitted by an organization with which the individual is affiliated. Affiliations that require recusal include employment, board membership, consultant relationships, close personal or family ties, or any other financial interest in an applicant organization.

The CoC will document recusals and ensure that no individual with a conflict influences funding recommendations or policy decisions. Failure to disclose a conflict of interest or comply with recusal requirements may result in removal from the relevant committee or disqualification from participation in the funding process.

This section is intended to ensure compliance with HUD regulations at 24 CFR Part 578, support equitable decision-making, and maintain community trust in the CoC's governance and funding processes.