County of Riverside Continuum of Care

2015 Continuum of Care Application
Renewal Project Evaluation Process

Rationale

HUD's Continuum of Care (CoC) homeless assistance programs serve as the largest single source of funding for homeless services in the County of Riverside. In the 2013-2014 NOFA, Riverside County received more than $8 million from HUD to support 31 projects for homeless individuals and families. HUD awards homeless assistance grants through an annual application process known as the CoC Program Competition.

HUD strongly encourages each CoC to implement a thorough review and oversight process at the local level for both new and renewal projects submitted to HUD-CoC Application Process.

In accordance with HUD's Homeless Policy and Program Priorities (as stated in the 2014 HUD CoC Program Application Notice of Funding Availability (NOFA), CoCs should continue to prioritize project applications that address these goals in the FY 2015 Application Process:

1. <u>Strategic Resource Allocation</u>. Each CoC must comprehensively review all existing projects within its geographic area, using CoC-approved scoring criteria and selection priorities, to determine the extent to which each project is still necessary and addresses the listed policy priorities. ***Funds for projects that are determined to be underperforming, obsolete, or ineffective should be reallocated to new projects that are based on proven or promising models.***

2. <u>Ending Chronic Homelessness</u>.

a. **Increasing Beds:** Consistent with the interim rule, the chronically homeless includes individuals and families who have a qualifying disabling condition who have been homeless and living in a place not meant for human habitation, emergency shelter, or safe haven for one year continuously or over a period of four occasions in the past 3 years. **It is important to point out that persons in transitional housing are not considered to be chronically homeless even if they met the criteria prior to entering the transitional housing program.**

b. **Targeting:** The chronically homeless should be given priority for non-dedicated PSH beds as vacancies become available through turnover. PSH renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry.

c. **Housing First** is a model of housing assistance that is offered without preconditions (such as sobriety or a minimum income threshold) or service participation requirements, and rapid placement and stabilization in permanent housing are primary goals. Research shows that it is effective for the chronically homeless with mental health and substance abuse disorders, resulting in fewer inpatient stays and less expensive interventions than other approaches. Permanent Supportive Housing projects should use a Housing First approach in the design of the program.

3. Removing Barriers to CoC Resources.

a. CoCs should review system and project level eligibility criteria for each CoC funded project to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families. These barriers may employment, income, sobriety, credit repair, etc.

b. *Centralized or Coordinated Entry System*: Centralized or coordinated entry/assessment is a key step in assessing the needs of the homeless requesting assistance and matching the needs of those households to the most appropriate housing and service options. The CoC Program interim rule requires the implementation of a centralized or coordinated assessment (now entry) system.

c. *Transitional Housing*: HUD is strongly encouraging CoCs and recipients to carefully review the transitional housing models within the geographic area for cost-effectiveness, performance, and for the number and type of criteria used to determine eligibility for the program and determine if rapid re-housing may be a better model for the CoC's geographic area.

d. *Prioritizing Households Most in Need:* CoCs should prioritize those who are identified as most in need (e.g., those who have been living on the street the longest, homeless households with children living in unsheltered situations, those that are considered most medically vulnerable) for placement into appropriate housing.

4. Maximizing the Use of Mainstream Resources.

a. HUD strongly encourages CoCs and project applicants to ensure that they are maximizing the use of all mainstream services available. While the CoC Program interim rule allows for the payment of certain supportive service costs, it is more efficient for CoCs to use mainstream resources where possible and use HUD funds for housing-related costs.

b. CoCs should be actively preparing for implementation of the Affordable Care Act by determining how these funds may be used by CoC Program recipients to serve the homeless. CoCs should also encourage project recipients to participate in enrollment and outreach activities to ensure eligible households take advantage of new healthcare options.

5. Building Partnerships.

a. CoCs should proactively seek to engage in partnerships with Public Housing Agencies (PHA). CoCs and PHAs are encouraged to read and use the following HUD Notice (PIH 2013-15) published June 10, 2013: Guidance on housing individuals and families experiencing homelessness through the Public Housing and Housing Choice Voucher Programs.

b. CoCs should assess the extent to which philanthropy plays a role within the community. CoCs and project recipients should consider how to engage with philanthropic organizations in a way to maximize resources and increase progress towards ending homelessness.

6. Other Priority Populations:

a. Veterans: CoC Program funded projects should, to the extent possible, prioritize veterans who are ineligible for VA services and their families. CoCs should work closely with the local

Department of Veterans Affairs (VA), and coordinate CoC resources with VA-funded housing and services (e.g., HUD-VASH, Supportive Services for Veteran Families (SSVF)).

b. Homeless Youth: CoCs should be able to identify and describe the needs of homeless youth within the geographic area and the current programs designed to serve this population, including performance.

Evaluation Process

The following are preliminary recommendations for the 2015 County of Riverside Continuum of Care Application Renewal Project Evaluation Process. These recommendations are subject to change based on the release of the final 2015 CoC NOFA Application by HUD and other requirements by the BOG/CoC.

Projects are eligible for renewal for FY 2015 NOFA if they are currently operating and have a signed grant agreement with HUD that will expire during the period beginning January 1, 2015 and ending December 31, 2016.

Permanent Housing (PH)

All PH providers should have the option to submit a project application for renewal if the project(s) meet or exceed project quality goals established by HUD and CoC guidelines which include the following:

- at least 80 percent of project participants either remained in permanent housing;

- at least 20 percent or more of project participants have employment income (or other sources such as SSI and/or SSDI, for those who are not employable);

- at least 54 percent of project participants increased their income from sources other than employment in a given operating year;

- at least 56 percent of project participants obtained mainstream benefits; and

- at least 60 percent and housing of the project participants came from the street or other locations not meant for human habitation, emergency shelters, or safe havens.

In addition, PSH providers should provide a response to the questions below:

- Does your program implement a housing first approach?
- Does your program fill vacant beds with only chronically homeless persons? If not, please explain.

PH providers who are not able to meet all goals may be considered low performing.
As such, projects:

- not meeting two of the goals may be placed in Tier 2;
- not meeting three of these goals may be reallocated through Request for Proposal process.

Transitional Housing (TH)

As noted in the 2013-2014 CoC NOFA, HUD recognizes that transitional housing can be an effective tool in many communities for addressing the needs of specific subpopulations–such as homeless youth, domestic violence survivors, and the homeless with substance abuse issues. However, recent research shows that transitional housing is generally more expensive than other housing models serving similar populations, it is often more service-intensive than most homeless households need, and that the criteria for entry into many transitional housing programs are so rigorous that transitional housing beds are under-utilized because homeless households cannot overcome the barriers to entry. HUD is strongly encouraging CoCs and recipients to carefully review the transitional housing models within the geographic area for cost-effectiveness, performance, and for the number and type of criteria used to determine eligibility for the program and determine if rapid re-housing may be a better model for the CoC's geographic area.

All TH providers should have the option to submit a project application for renewal if the project(s) meet or exceed project quality goals established by HUD and CoC guidelines which include the following:

- at least 80 percent of project exited from transitional housing to permanent housing;

- at least 20 percent or more of project participants have employment income (or other sources such as SSI and/or SSDI, for those who are not employable);

- at least 54 percent of project participants increased their income from sources other than employment in a given operating year;

- at least 56 percent of project participants obtained mainstream benefits; and

TH providers who are not able to meet all goals may be considered low performing.
As such, projects:

- not meeting two of the goals may be placed in Tier 2;
- not meeting three of these goals may be reallocated through Request for Proposal process.

Project Renewal Thresholds

Renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards or they will be rejected from consideration for funding (please refer to the 2015 Renewal Applicants' Letter of Intent for more detail on the performance standards. When considering renewal projects for award, the CoC will review information from Annual Performance Reports (APRs) from the most current grant year end; fund expenditures, match and leverage, monitoring reports and performance standards on prior grants, and will assess projects using the following criteria on a pass/fail basis:

(1) Whether the project applicant's performance met the plans and goals established in the initial application as amended;

(2) Whether the project applicant demonstrated all timeliness standards for grants being renewed, including that standard for the expenditure of grant funds have been met;

(3) The project applicant's performance in assisting program participants to achieve and maintain independent living and record of success,

(4) Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site.

The project renewal thresholds to be certified by each project by completing the 2015 Renewal Applicants Letter of Intent (LOI) and reviewed on a pass/fail basis in this process based on the following performance measures:

I. HUD APR Performance Results

The Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program interim rule states that HUD may terminate the renewal of any grant and require the recipient to repay the renewal grant if the recipient fails to submit a HUD Annual Performance Report (APR) within 90 days of the end of the program year or if the recipient submits an APR that HUD deems unacceptable or shows noncompliance with the requirements of the grant and this part. The recipient's submission of the APR helps HUD review whether the recipient is carrying out the project in the manner proposed in the application. Recipients agree to submit an APR as a condition of their grant agreement. This requirement allows HUD to ensure that recipients submit APRs on grant agreements that have expired as a condition of receiving approval for a new grant agreement for the renewal project.

- *Did your agency submit a HUD Annual Performance Report (APR) for this project within 90 days of the end of the last program year?* ☐ Yes ☐ No
- *If so, for what time period?*_____ (**note:** this will be the time period for the renewal project's threshold review.

Performance Measures

HUD states that CoCs must clearly demonstrate project participants' success in remaining in permanent supportive housing as reported in 12 month period for all APRs from all CoC-funded permanent supportive housing projects within the CoC. HUD's national goal is **at least 80 percent** of participants remain in CoC-funded permanent housing or exited to permanent housing (subsidized or unsubsidized)

HUD also states that CoCs must clearly demonstrate the overall percentage of program participants obtaining employment income. The overall percentage of program participants obtaining employment income must meet HUD's national goal of **at least 20 percent** or higher and the program participants with other income should be **at least 54 percent** as reported in a 12 month period for all project APRs or the CoC must show an increase from the previous year to the current year.

All PH project application for renewal must meet or exceed project quality goals established by HUD and CoC guidelines. According to your most recent APR:

For Permanent Housing

1. What was the % of persons who remained in the permanent housing project as of the end of the operating year or exited to permanent housing (subsidized or unsubsidized)? _____

    If the percentage was lower than 80%, please explain why.
    This is a new project and has not started yet: □
    This is not applicable to this project: □

2. What was the % of persons age 18 through 61 who maintained or increased their earned income as of the end of the operating year or project exit?_____

    If the percentage was lower than 20%, please explain why.

    This is a new project and has not started yet: □
    This is not applicable to this project: □

3. What was the % of persons age 18 and older who maintained or increased their total income (from all sources) as of the end of the operating year or project exit? _____

    If the percentage was lower than 54%, please explain why.

    This is a new project and has not started yet: □
    This is not applicable to this project: □

4. What was the percentage of project participants obtained mainstream benefits (non-cash benefits)? _____

    If the percentage was lower than 56%, please explain why.

    This is a new project and has not started yet: □
    This is not applicable to this project: □

5. What percentage of project participants came from the street or other locations not meant for human habitation, emergency shelters, or safe havens? _____

    If the percentage was lower than 60%, please explain why.

    This is a new project and has not started yet: □
    This is not applicable to this project: □

In addition, PH providers should provide a response to the questions below:

- Does your program implement a housing first approach? _____

- Does your program fill vacant beds with only chronically homeless persons? _____

If not, please explain.

This is a new project and has not started yet: □
This is not applicable to this project: □

For Transitional Housing

1. What was the percentage of persons who exited to permanent housing (subsidized or un-subsidized) during the operating year _____

   If the percentage was lower than 80%, please explain why.

2. What was the % of persons age 18 through 61 who increased their earned income as of the end of the operating year or project exit? _____

   If the percentage was lower than the 20%, please explain why.

3. The % of persons age 18 and older who increased their total income (from all sources) as of the end of the operating year or project exit._____

   If the percentage was lower than the 54%, please explain why.

II. Financial Reporting and Claims Submission

The County of Riverside DPSS is on record as the applicant and grantee for the HUD CoC Homeless Program grant funds. As such, the Riverside County DPSS is responsible for ensuring that the funds received by Sub recipients are utilized according to federal law and policy, and that goals established in the Project Application, Technical Submission, and Contract are being met

A renewal project's demonstrated ability to drawdown and spend grant funds timely will be a factor in evaluating performance of each grant. HUD will recapture grant funds remaining unspent at the end of the previous grant period when it renews a grant.

1. Are your monthly claims submitted timely (i.e. by the end of the month following the service month)?

   □ Yes
   □ No
   If the answer is no, please explain your response.

   This is a new project and has not started yet: □
   This is not applicable to this project: □

2. Has the project returned any funds in the last 3 years?

Year	Amount Returned	Reason for Return
2013		
2012		
2011		

This is a new project and has not started yet: □
This is not applicable to this project: □

3. Cost effectiveness

HUD states that the project must be cost-effective and not deviate substantially from the norm in that locale for the type of activity including case management and other supportive services.

Is your project cost-effective concerning case management and other supportive services?

□ Yes   □ No

Please explain your response.

This is a new project and has not started yet: □
This is not applicable to this project: □

III. HMIS Participation and Data Quality

The Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program interim rule places a high emphasis on having a functioning and comprehensive HMIS in the CoC jurisdiction as it is critical to gathering unduplicated, aggregated data on homelessness in the community for both the CoC and ESG Programs.

1. Does this project provide client level data to HMIS?   □ Yes □ No

This is a new project and has not started yet: □
This is not applicable to this project: □

2. If the project is providing participant data in the HMIS – indicate the total number of participants served by the project, and the total number of clients reported in the HMIS.

Total number of participants served by the project: _____
Total number of clients reported in the HMIS: _____

This is a new project and has not started yet: □
This is not applicable to this project: □

3. If the project is not providing participant data in the HMIS – indicate reason(s) for non-participation. Cite specific law.

☐ Federal law prohibits   ☐ State law prohibits
☐ New project not yet in operation   ☐ Other (please specify prohibition)

This is a new project and has not started yet: ☐
This is not applicable to this project: ☐

4. For those participant records that were reported in the HMIS, indicate the percentage of values that were missing ("Null or Missing Values") and/or unknown ("Don't Know or Refused"). If there were no unknown values, note a "0" value.

  * Indicate the percentage of unduplicated client records with null or missing values during the last 10 days of January 2015:

Universal Data Element	Records with no values (%)	Records where value is refused or unknown (%)
* Social Security Number		
* Date of Birth		
* Race		
* Ethnicity		
* Gender		
* Veteran Status		
* Disabling Condition		
* Residence Prior to Program Entry		
* Entry Date		
* Exit Date		
* Destination		
* Length of Time on Street, ES or SH		

This is a new project and has not started yet: ☐
This is not applicable to this project: ☐

5. Point-in-Time Count of Households Served on the Last Wednesday in

	HH with Children	HH w/o Children	HH w/ Children Only	Total
January (2015				
April (2015				
July (2014)				
October (2014				

This is a new project and has not started yet: □
This is not applicable to this project: □

IV. Independent Audit

Please submit your organization's most recent audits for the last two years (conducted within the last three years) by a certified CPA, including the management letter with this LOI.

V. Match

Match must equal 25 percent of the total grant request including Admin costs but excluding leasing costs (i.e., any funds identified for Leased Units and Leased Structures). Match must be met on an annual basis. HUD requires match letters to be submitted with the e-snaps application. Match contributions can be cash, in-kind, or a combination of the two; and, match must be used for an eligible cost as set forth in Subpart D of CoC Program interim rule. For an in-kind match, the recipient may use the value of property, equipment, goods, or services contributed to the project, provided that, if the recipient or sub recipient had to pay for such items with grant funds, the costs would have been eligible. If third party services are to be used as match, the third party service provider that will deliver the services must enter into a memorandum of understanding (MOU) before the grant is executed documenting that the third part will provide such services and value towards the project.

- Will your agency be able to provide the match requirement for your renewal project?

  ☐ Yes ☐ No

VI. Leveraging

HUD Continuum of Care Homeless program funding is limited and can provide only a portion of the resources needed to successfully address the needs of homeless families and individuals. HUD encourages applicants to use supplemental resources, including state and local appropriated funds, to address homeless needs. Leveraging includes all funds, resources, and/or services that the applicant can secure on all cash matching behalf of the client being served by the proposed project. Leveraging includes any other services, supplies, equipment, space, etc. that are provided by sources other than the CoC.

- Will your agency be able to provide the leveraging requirement (up to 150%) for your renewal project?

  ☐ Yes ☐ No

VII. HUD and CoC Monitoring Findings

HUD requires that CoCs review any monitoring findings.

6. Has your agency received an audit finding on your most recent A-133 or Single Audit?

☐ Yes ☐ No

If Yes, please explain the finding.

This is a new project and has not started yet: ☐
This is not applicable to this project: ☐

7. Has your agency received a fiscal monitoring finding on your most recent DPSS monitoring?

☐ Yes ☐ No

If Yes, please explain the finding.

This is a new project and has not started yet: ☐
This is not applicable to this project: ☐

VIII. Clients Survey/Feedback

HUD encourages client surveys particularly exit surveys.

- Does your renewal program conduct exit surveys or interviews with clients?   Yes ☐ No

  In no, please explain why.

  This is a new project and has not started yet: ☐
  This is not applicable to this project: ☐

IX.   Fiscal and Program Issues

- Does your organization currently have any unresolved fiscal, reporting, or program issues with any of its funding sources? ☐ Yes ☐ No

   If yes, please explain.

  This is a new project and has not started yet: ☐
  This is not applicable to this project: ☐

- Have any funds been returned to any funders within the last 24 months? □ Yes □No

  If yes, please explain.

  This is a new project and has not started yet: □
  This is not applicable to this project: □

X. Housing Quality Standards

All housing leased with CoC funds or where rental assistance payments are made with CoC funds must meet applicable Housing Quality Standards (HQS).

- Does your project meet applicable Housing Quality Standards
  □ Yes □ No

  Please briefly explain your inspection process for HQS.

  This is a new project and has not started yet: □
  This is not applicable to this project: □

XI. Review CoC Membership Involvement

HUD states that a successful CoC will have involvement from a variety of organizations representing the public and private sectors, as well as interested individuals within the CoC jurisdiction(s). These organizations should have an active role in the CoC.

- Describe what local Continuum of Care committees, subcommittees, and/or working groups that your agency participates in on a regular basis. Please include the names and titles of those participating as well as their level of involvement/participation.

  This is a new project and has not started yet: □
  This is not applicable to this project: □

XII. Participation in Centralized/Coordinated Entry System

The CoC program interim rule requires CoCs to use a coordinated entry system, including a standardized assessment tool. The coordinated assessment (entry) is intended to prioritize resources for those with the greatest need, match people with the services that are most likely to help them exit homelessness, reduce the time it takes for clients to access services, and ensure that limited resources are allocated efficiently.

- Are you a current participant or do you agree to participate in the CoC's coordinated entry/assessment system?

Exhibit 3
HEARTH Act Compliance

This section of the LOI asks questions of all renewal projects to ensure compliance with the requirements of the HEARTH Act. (Please note, this section does not encompass all changes under the HEARTH Act and it is recommended that all projects should review the Act in its entirety).

I. **Participation of Homeless Individuals**

(1) Each recipient and sub recipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or sub recipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or sub recipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

(2) Each recipient and sub recipient of assistance under this part must, to the maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.

- Does your agency provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or sub recipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or sub recipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions? ☐ Yes ☐No

  If not, please provide an action plan/timeline on when your agency will be compliant with this requirement.

  This is a new project and has not started yet: ☐

  This is not applicable to this project: ☐

- Does your agency, to the maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project? ☐ Yes ☐No

  If not, please provide an action plan/timeline on when your agency will be compliant with this requirement.

  This is a new project and has not started yet: ☐

  This is not applicable to this project: ☐

II. Families with children Under age 18

Does the project accept all families with children under age 18 without regard to the age of any child? In general, under the HEARTH Act, any project sponsor receiving funds to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18.

Note there is an exception outlined in the Act: Project sponsors of transitional housing receiving funds may target transitional housing resources to families with children of a specific age only if the project sponsor: (1) operates a transitional housing program that has a primary purpose of implementing evidence based practice that requires that housing units be targeted to families with children in a specific age group; and (2) provides assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured.

☐ Yes. Project certifies that is accepts all families with children under age 18 without regard to the age of any child.

☐ No. Project does not comply with this requirement. A narrative is attached explaining how the project will comply with this HEARTH Act requirement.

☐ No. Project does not comply with this requirement but qualifies for an exception because it is implementing an evidence based practice that requires housing units targeted to families with children in a specific age group. A narrative is attached explaining how the project will comply with the exception, including identification of the evidenced based practice being utilized.

☐ N/A. Project does not serve families.

☐ N/A. Project is new and has not started yet.

III. Transitional Housing Lease Agreement

Transitional housing means housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary. The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended.

- Do program participants have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended?   ☐ Yes ☐ No

  If no, please explain why.

  This is a new project and has not started yet: ☐

This is not applicable to this project: ☐

IV. Discrimination Policy

Federal and California State laws note that discrimination can be based on race, color, national origin or gender. Discrimination can also be based on age, religion, disability, familial status or sexual orientation.

Does your program deny services to potential recipients based on any of the following:

- Age   ☐ Yes ☐ No
- Color   ☐ Yes ☐ No
- Disability   ☐ Yes ☐ No
- Familial Status   ☐ Yes ☐ No
- Gender   ☐ Yes ☐ No
- Marital Status   ☐ Yes ☐ No
- National Origin   ☐ Yes ☐ No
- Race   ☐ Yes ☐ No
- Religion   ☐ Yes ☐ No
- Sexual Orientation   ☐ Yes ☐ No

If you answered "yes" to any of the above, please explain why.

V. Faith-based Activities

- Does your proposed renewal program use direct program funds to support or engage in any explicitly religious activities, including activities that involve overt religious content, such as worship, religious instruction, or proselytization, or any manner prohibited by law?
  ☐ Yes ☐ No

VI. § 578.95 Conflicts of Interest

Please read and initial to signify understanding and compliance.

(a) Procurement. For the procurement of property (goods, supplies, or equipment) and services, the recipient and its sub recipients must comply with the codes of conduct and conflict-of-interest requirements under 24 CFR 85.36 (for governments) and 24 CFR 84.42 (for private nonprofit organizations). **Initial _____**

(b) Continuum of Care board members. No Continuum of Care board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.

(c) Organizational conflict. An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or sub recipient is

unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this part, or when a covered person's, as in paragraph (d)(1) of this section, objectivity in performing work with respect to any activity assisted under this part is or might be otherwise impaired. Such an organizational conflict would arise when a board member of an applicant participates in decision of the applicant concerning the award of a grant, or provision of other financial benefits, to the organization that such member represents. It would also arise when an employee of a recipient or sub recipient participates in making rent reasonableness determinations under § 578.49(b)(2) and § 578.51(g) and housing quality inspections of property under § 578.75(b) that the recipient, sub recipient, or related entity owns. **Initial** _____

(d) Other conflicts. For all other transactions and activities, the following restrictions apply:
(1) No covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its sub recipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure. **Initial** _____

Selection Process

The CoC reserves the right to reduce or reject a funding request from the project applicant. The renewal project selection process consists of the following steps:

Step 1: Interested agencies must submit a Letter of Intent (LOI) to Renew for each project eligible for renewal. The Collaborative Applicant will conduct threshold review and prepare LOI Summary Sheet. The LOI includes the following:

- HUD's established goals through the Annual Performance Review (APR) results
- Timely and accurate submission of claims
- Unspent funds for the last three years
- Cost effectiveness
- Match and leverage HUD regulatory requirements
- HMIS participation status – data quality, accuracy and timeliness
- Bed utilization rate
- CoC membership involvement
- Monitoring findings – HUD and CoC
- Client survey/feedback

Step 2. The LOI Summary Sheet will be reviewed by the Review and Selection Committee. The Committee will be made up of five to seven members of the CoC who do not have a conflict of interest. Members will consist of representatives from public and private organizations. One member will be a consumer representative which may include a homeless or formerly homeless person. All decisions made will be reached through consensus (general agreement).

Step 3: The Committee will determine what projects are renewed and ranked within the Priority Listing. The Committee will make its recommendations known to the CoC which may accept or revise the recommendations. The CoC/Committee may also include additional requirements as part of the evaluation.

Step 4: Recommended agencies will be required to complete a HUD Project Application for each project in e-snaps. The County of Riverside DPSS – Homeless Programs Unit staff will assist agencies with the application process and review each application prior to submitting to HUD.

Step 5: Applicants not selected for renewal funding will receive written notification within 10 business days. Applicants will be notified in writing about the process to appeal any decisions.

CoC Transparency

To ensure transparency and fairness, this process will be 1) publically announced by the CoC; 2) described and distributed in writing to the entire CoC; 3) reviewed by the entire membership of the CoC during a designated meeting; 4) recorded in the minutes of the designated meeting including all decisions made concerning the review and ranking; and 5) minutes will be distributed to the entire CoC.