

Detroit Continuum of Care | Board of Directors

Working to Equitably End Homelessness in Detroit, Highland Park, & Hamtramck

Board Meeting Agenda | 5.6.24 | 2:00-4:30pm | Webinar: [Registration Link](#)

CoC Board Norms:

- Start and end on time.
- Come prepared.
- Focus on strategy and high-level goals.
- Be aware of different roles you're playing.
- Be solutions oriented.
- Avoid rabbit holes & use the parking lot.

CoC Board Draft Values:

- Homelessness should be rare, brief and non-recurring.
- Flexibility to respond to emerging ideas and challenges or try new and innovative ideas and projects.
- Racial equity as demonstrated through equitable outcomes
- Transparent decision that makes the greatest possible use of data.
- Collaboration and a cross-systems approach

Time	Agenda Item	Presenter	Committee <i>(see acronym list below)</i>	Attachment	Priority Assignments
Housekeeping & Agenda Setting					
2:00 PM	Welcome and Introductions	Candace Morgan	EC	--	Priority Code: T1- must discuss; T2- can discuss in email; T3- can move to future meeting
2:05 PM 5 min	Announcements <ul style="list-style-type: none"> - Results for Board rep for PEC - Results for CoC Board Officer Elections - Update for Board Members - GC Timeline Update 	Amanda Sternberg Chelsea Johnson	HAND	--	
2:10 PM 5 min	Consent Agenda - April Board Meeting Minutes (Action Item- VOTE)	Candace Morgan	EC	# 1	
Additional Information (No Immediate Action) ¹				# 2 – 3	
Tier 1 Priorities					
2:15 PM 20 min	Governance Charter Recommendations	John Allen	Guest	--	Tier 1
2:35 PM 15 mins	Governance Charter pt. 2	Tasha Gray	HAND	--	Tier 1
2:50 PM 30 mins	FY2024 CoC Renewal Project Evaluation Criteria (Action Item- VOTE)	Amanda Sternberg	HAND	--	Tier 1
3:20PM 15 mins	CoC Funding Appeals Policy Revisions (Action Item- VOTE)	Amanda Sternberg	HAND	--	Tier 1
3:35 PM 5 mins	Break (stay on Zoom, please 😊)				

¹ Additional Information from Housekeeping & Agenda – **Attachment 2:** CoC Board Attendance Tracking, **Attachment 3:** July Exec. Com. Minutes

3:40 PM 30 mins	Shelter Access (Action Item- VOTE)	Brenna Welch	WM		Tier 1
4:10 PM 10 mins	CAM Update	Tasha Gray	HAND		Tier 2
4:20 PM 10min	Public Comments			--	
4:30 PM	END				

Next Meeting: **October 3, 2022** | 2:00-4:30pm | Webinar (Until In-Person Meeting)

Key Committee Acronyms:

EC – Executive Committee – **Chair:** Candace Morgan | **Vice-Chair:** Dr. Gerald Curley | **Secretary:** Erica George | **At -Large:** Lydia Goddard & ReGina Hentz | **Staff:** Chelsea Johnson

DAG - Detroit Advisor's Group – **Chair:** Donna Price | **Staff:** Kaitie Giza

GRC - Grievance Review Committee – **Chair:** vacant | **Staff:** Jeremy Cugliari & Elise Grongstad

PSHRC – PSH Review Committee (formerly known as LIHTC) – **Chair:** Vacant | **Staff:** Elise Grongstad

VFPC – Values and Funding Priorities Committee – **Chair:** Vacant | **Staff:** Julia Janco, Elise Grongstad

GCRC – Governance Charter Review Committee – Ad hoc | **Staff:** vacant

YHC- Youth Homeless Committee – **Chair:** vacant | **Staff:** Meredith Baughman

YAB- Youth Action Board- **Chair:** Staff:

System Partner Acronyms:

CAM – Coordinated Access Model – Detroit's Coordinated Entry System (Managed by Southwest Solutions)

CoD – City of Detroit

HAND – Homeless Action Network of Detroit – Detroit's Collaborative Applicant, CoC Lead Agency, and HMIS Lead Agency

HMIS – Homeless Management Information System

VA – Veteran's Association

Additional Acronyms for Reference:

BNL = By-name List

CoC = Continuum of Care

CE = Coordinated Entry

CARES = Coronavirus Aid, Relief, and Economic Security Act

CDBG = Community Development Block Grant

CH = Chronically Homeless

CSH = Corporation for Supportive Housing

CY = Calendar Year

DV = Domestic Violence

ESG = Emergency Solutions Grant

ESP = Emergency Shelter Partnership

FY = Fiscal Year

HCV = Housing Choice Voucher

HMIS = Homelessness Management Information System

HUD = US Department of Housing & Urban Development

MI = Michigan

MSHDA = Michigan State Housing Development

Authority

PIT = Point in Time Count

P&P = Policies and Procedures

PSH = Permanent Supportive Housing

RFP = Request for Proposals

RRH = Rapid Re-Housing

SH = Supportive Housing

SPDAT = Service Prioritization Decision Assistance Tool

SPM = System Performance Measure

TA = Technical Assistance

TH = Transitional Housing

QR = Quarterly Report

YHDP= Youth Homelessness
Demonstration Project

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<u>Present Board Members</u>	<u>Absent Board Members</u>	<u>Excused Board Members</u>	<u>General Public</u>
Armani Arnold Taura Brown Chris Harthen Lori Kitchen-Buschel Lydia Goddard Tasha Gray Ari Ruttenberg Terra Linzner Julisa Abad Benne Baker Erica George Kiana Harrison Dr.G (Gerald Curley) Michelle Parker Tammy Black Courtney Smith ReGina Hentz Alan Rosetto		Candace Morgan Angel Reed	Chelsea Johnson Zoey Fudge Alan Haras Brenna Welch Deloris Cortez Meredith Baughman Sabrina Rudy Jasmine Donald Kimberly Benton Rebecca Tallarigo Kyla Cummings Clay Bell Eleanor Bradford Pamela Taylor Donna Price Torrey Henderson Kaitie Giza Jennifer Tuzinsky Daniel Carravallah Diandra Gourlay Charlotte Carrillo Shautoya Redding Sharon Matthews Edna T. Walker Zienab Fahs Ki-Jana Malone Ed Cieslak Audrey Jones

Detroit Continuum of Care | Board of Directors
Working to Equitably End Homelessness in Detroit, Highland Park, & Hamtramck
April 1, 2024 Continuum of Care Board Meeting

Welcome and Introductions:

Erica G. opened the meeting at 2:00 pm with introductions – utilizing the chat box.

Executive Committee Report & Announcements

Summary –

- The announcement shared outcomes from the latest CoC Board Chair Elections along with updates regarding the CoC Board membership.
 - Congratulations are extended to Candace Morgan, elected as the Chair for the CoC Board. Having previously served as the co-chair, Candace brings valuable experience to her new role, ensuring continuity in the CoC's mission.
 - Regrettably, Sarah Rennie, formerly holding one of the MAL seats, and Tania James, appointed to represent the DWHIN seat, have resigned from the CoC Board. The CoC extends their best wishes to Sarah and Tania for success in their future endeavors.

Consent Agenda

March Board Meeting Minutes

Board Vote

- The floor was open for questions. None were asked.
- Approval of the March CoC Board Meeting minutes was motioned by Dr. Gerald Curley and seconded by Terra L. The vote passed.

CoC board representative to Performance and Evaluation Committee

Summary –

- At the last meeting of the CoC Board of Directors, it was shared by Amanda Sternberg that there are current vacancies on the Performance and Evaluation Committee, including one for the CoC Board representative. Sarah Rennie previously held this seat but has since resigned from the board. Consequently, there is a need to fill that vacancy.
- Opportunities were provided via email for board members to express their interest in serving on the committee. In early to mid-March, emails were sent out to board members to indicate their desire to serve in this capacity.
- It should also be noted that there is an available seat for individuals with lived experience. Efforts are underway to identify the best way to fill these seats on the committee.
 - In addition to the vacancies, there are other positions that need to be filled, such as seats for the Cam Lead Agency and various work groups focusing on specific populations such as street outreach, emergency shelter, veterans, and youth. These vacancies are currently unfilled, and the process for filling them typically involves appointment or voting by the respective entity or sector they represent.
- In early to mid-March, emails were sent out to identify candidates for the CoC Board seat, resulting in the identification of several candidates. The candidates include Lydia Garter, Terry Linzer, and Alan Rosetta. (FYI: During the meeting, Terra L. opted to withdraw her interest since another individual already occupies a seat representing the city.)
- Furthermore, the CoC Board was asked to vote to identify the representative who will sit on the Performance and Evaluation Committee. The results of that vote will be shared soon.

Board Vote

Summary-

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Erica G. motioned to vote for identifying the interested individuals to hold a seat on the PEC Committee, and Alan R. seconded the motion. The results will be shared soon.

CAM GC Guiding Document

Summary –

- Since 2022, the CAM Transition Team has been overseeing the transition to the new CAM Lead Agency and collaborating with implementing partners in the post-transition phase. Recognizing the need for a more structured approach, they have decided to phase out the CAM Transition Committee and relaunch the CAM Governance Committee with a more focused membership. This transition involves refining the committee's purpose, membership structure, and responsibilities.
- The CAM Transition Team, comprised of members from the CAM Governance Committee and additional stakeholders, has been working closely with the Detroit Advisors Group and implementing partners to gather feedback and design guiding documents for the relaunch of the CAM Governance Committee. Several adjustments have been made to accommodate the evolving needs post-transition, including the addition of newly appointed seats to ensure representation from various agencies and sectors involved in CAM operations.
- The proposed guiding documents outline the purpose and responsibilities of the CAM Governance Committee, emphasizing its role in providing oversight, guidance, and accountability for CAM operations. Key responsibilities include updating policies and procedures, reviewing performance reports, and making recommendations for system improvements. The committee will also prioritize the inclusion of people with lived experiences of homelessness in decision-making processes.
- Membership on the CAM Governance Committee will consist of elected voting members, appointed representatives, and non-voting stakeholders. Modifications have been made to ensure diverse representation, with new seats added for individuals with lived experience, young adults, and representatives from the domestic violence sector and the community at large.
- Additionally, adjustments have been made to streamline the committee's structure and ensure effective decision-making processes. Non-voting seats for the CAM Lead Agency, Cam implementing Agency, and CoC lead agencies are being removed to optimize efficiency.
- Looking ahead, the CAM Transition Team plans to recruit representatives for the CAM Governance Committee, with work groups voting on their respective representatives in the coming months. The goal is to convene the first CAM Governance Committee meeting on May 1st, pending approval of the proposed guiding documents by the CoC Board. The vote for the CoC Board representative can either take place during the main meeting or via email, with the aim of ensuring timely participation in the committee's activities.

Vote Topic

- The approval for the CAM Governance Guiding document was motioned by Erica G. and seconded by Alan R. The vote passed.

Shelter Prioritization/Access Changes

Summary –

- On January 20th, 2024, the CAM Transition Team introduced a new shelter access model aimed at streamlining referrals based on need and risk assessment. This model involves households experiencing housing insecurity contacting CAM through designated access points, where they are assessed and prioritized based on factors such as unsheltered status, domestic violence (DV) involvement, wellness score, and length of time on the waiting list. After collecting daily bed vacancies, CAM publishes a reservation list for eligible households, reaching out to them for confirmation by 2 PM. However, same-day shelter referrals are unlikely due to logistical constraints.
- Data from January to March 2024 reflects improvements in bed utilization and call volumes. Despite warmer weather possibly impacting shelter demand, there has been a decrease in bed utilization rates. Additionally, average daily call volumes have decreased by 14% since December. Further analysis reveals trends in intakes by day and demographics of individuals seeking shelter, with a focus on singles, families, and youth. The average

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number of days on the prioritization list before receiving a referral has decreased by 36%, indicating enhanced efficiency in the referral process. However, challenges remain in contacting and engaging with youth clients, with 70% not responding to initial communications.

- Recognizing these challenges, the CAM Transition Team implemented enhancements, including mass text messages for bed offers and improved coordination with youth service providers. These efforts have led to a significant decrease in beds remaining unfilled at the end of the day. Additionally, the team proposed a shelter transfer policy to accommodate client preferences and program transitions without affecting overall bed availability. Seeking continuous feedback, they request a 30-day extension for the shelter prioritization pilot to gather community input through various channels, including meetings, focus groups, and surveys.

Vote Topic

- The approval to extend the Shelter Prioritization/Access Pilot for another month, which will be presented to the Board on 05/06/24 was motioned by Lori B. and supported by Dr. Gerald C. The vote passed.

CoC Board Officer Elections

Summary –

- The CoC Board Officers' Elections were held at this meeting for the Board to elect the vice chair and fill one of the At-Large seats. The candidates were Dr. Gerald Curley for vice chair and Lydia Goddard for the At-Large seat. Each candidate was given an opportunity to give a brief campaign speech. Moreover, the results will be shared by the end of the week.

Overview of Committees pt 2.

- This was Part 1 of an overview of the CoC Committees. The CoC comprises 9 Committees in total, with 8 out of 9 currently active.
- The following Committees presented:
 - Veterans Leadership
 - PSH Review
 - Youth Homelessness
 - VFP (will be rescheduled)
- For more details on the CoC Committees, please review the March Board Packet and accompanying slides.

Public Comments

- The floor was open for public comments. No comments were made.

Erica G. closed the meeting at 4:30pm. The next CoC Board meeting will be on Monday, May 6, 2024 from 2 – 4:30pm. Location will continue to be virtual.

Executive Committee

APRIL 10, 2024 | 4-5 PM |

MINUTES

Attendance

Attendees: Candace M, Terra L. Terra L., Elise G., Amanda S., ReGina H., John A., Kiana H., Chelsea J., Dr. Gerald C., Erica G., Lydia G., John A.

Excused: Tasha G.

Time	Item & Notes	Presenter/ Facilitator	Supporting Materials
4:00- 4:05pm	Welcome	Candace M.	
4:05- 4:50	<p>Review Recommendations/ Working Session</p> <ul style="list-style-type: none">The suggestion was made to utilize this week's Executive Board meeting for reviewing government charter suggestions and recommendations from John. This decision was driven by the time-sensitive nature of the governance charter. Recent conversations with HAND and the EC underscored the importance of addressing additional elements of the charter, notably the board application. Despite the cancellation of the Special Board meeting, the intention remains to use this time effectively by hearing John's recommendations and discussing key topics like the code of conduct and the board application.The meeting was structured as a working session to ensure clarity in preparations for the May board meeting, where John will attend to present his recommendations.The EC and some staff members from HAND reviewed John recommendations and had time to workshop them.<ul style="list-style-type: none">There was ambivalence amongst the group, so it was suggested to continue working on the recommendations and adding comments and feedback outside of the meeting.	Candace M./ John A.	
4:50- 5:00pm	<p>Wrap Up/Next Steps</p> <ul style="list-style-type: none">The next steps are to work outside of the meeting, incorporate feedback, and be prepared to discuss it at the next EC meeting. Additionally, John will attend the EC meeting on 04/24 and the May Board Meeting to present the recommendations. The recommendations will also go to the GCRC after they are finalized.	Candace M.	

Executive Committee

APRIL 24, 2024 | 4-5 PM |

MINUTES

Attendance

Attendees: Candace M. Tasha G. Dr. Gerald C. Terra L. Elise G. Chelsea J. Amanda S. Erica G. Lydia G. Kiana H. John A.

Excused: ReGina H.

Time	Item& Notes	Presenter/ Facilitator	Supporting Materials
4:00- 4:05pm	Welcome	Candace	
4:05- 4:10pm	Review Minutes <ul style="list-style-type: none">The EC reviewed the minutes from the previous meeting.	Candace	[insert mins link]
4:10- 4:20pm	New business <ul style="list-style-type: none">EC overview<ul style="list-style-type: none">The Board officers were advised to schedule a meeting to prepare for the upcoming EC meetings. Chelsea requested that Amy share information about the meeting flow. During the forthcoming sessions, the EC will focus on drafting a workplan to pinpoint key issues impacting the CoC and funding. They also requested that any necessary recaps or areas requiring further attention be shared with the group	Candace	
4:20- 4:40pm	Old Business <ul style="list-style-type: none">Recommendations<ul style="list-style-type: none">John offered feedback on various aspects including the Board Agreement, COI, Board Norms/Values, Governance Charter, and Code of Conduct. It was suggested that during the next Board Meeting, they could further refine the values, which will subsequently be submitted to the Board for voting. It was observed that the draft values for the Board Code of Conduct are not yet finalized and may need to be reconsidered or transformed into guiding principles while crafting more traditional values. Additionally, it was recommended that the values and norms be revisited at each Board meeting.It was suggested that the edits be presented to ensure the Board's full comprehension. Lydia motioned to remove	Candace/ John	[Link to GC with J.A. edits]

	<p>"independent member" from the COI, noting its applicability to nonprofit organizations, which the CoC is not. Candace seconded the motion, and it passed by vote.</p> <ul style="list-style-type: none"> • Additionally, an attorney recommended seeking assistance to review the overall style of the documents and ensure a consistent format throughout for improved organization. 		
4:40-4:45pm	<p>May CoC Board Agenda</p> <ul style="list-style-type: none"> • Chelsea went over the May Board agenda. 	Chelsea	[BM Agenda]
4:45-5:00pm	<p>Announcements/ Recap</p> <ul style="list-style-type: none"> • The next step is to present this information to the Board. The changes to the Governance Charter will be presented to the GCRC for potential adoption or inclusion in the public comment to be released. The remaining documents can be approved by the Board separately from the Governance Charter. 	Candace	



Recommended FY2024 Renewal Project Evaluation and Scoring Criteria
May 6, 2024

➤ **The CoC board is asked to approve the recommended FY2024 renewal project evaluation and scoring criteria for CoC projects.**

The development of the recommended scoring criteria for renewal projects included a public comment period, with responses to the comments reviewed and approved by the Values & Funding Priorities committees. Comments received, and responses to those comments, may be found [here](#). A timeline of the process of developing the evaluation and scoring criteria may be found [here](#).

New or Modified Scoring Criteria

The most significant changes to the renewal application policies are modifications made from last year’s evaluation criteria and the addition of two new evaluation criteria. These changes are summarized below. The full evaluation and scoring criteria for all renewal projects is [here](#).

Time Period Under Review

The evaluation criteria for the FY2024 CoC competition is calendar year 2023 (1/1/2023 – 12/31/2023).

MODIFIED Scoring Criteria				
	Project Type	Evaluation Criteria	Max Point Value	Change and Rationale
Housing Performance & Quality	PSH, RRH, TH, and TH-RRH	2B: Utilization Rates	10	<ul style="list-style-type: none"> Scoring scale changed so that performance rate less than 80% will earn 0 points (up from 75% last year). Increasing the scoring scale is in alignment with a recommendation made by a consultant several years ago but was not immediately implemented due to pandemic-related challenges. Fully utilizing all available resources is key to ending homelessness in our community.
	PSH, RRH	2C: Length of time from referral to housing move in	10	<ul style="list-style-type: none"> Scoring scale updated to reflect 2023 average length of time data. Projects would be able to earn points if they earned 0 points on this component last year and would otherwise earn 0 points this year but demonstrated at least a 10% improvement over the past two years. Moving people into housing quickly is vital to our system’s success to end homelessness. Awarding points for improvement provides an incentive for continual improvement.

MODIFIED Scoring Criteria				
	Project Type	Evaluation Criteria	Max Point Value	Change and Rationale
	PSH, RRH, TH, and TH-RRH	2D: Returns to Homelessness	5	<ul style="list-style-type: none"> Projects would be able to earn points if they earned 0 points on this component last year and would otherwise earn 0 points this year but demonstrated at least a 3% improvement over the past two years. Aligns with HUD’s System Performance Measure; is a measure of project quality. Awarding points for improvement provides an incentive for continual improvement.
Financial Performance	All Projects	3A: Spending Rates	8	<ul style="list-style-type: none"> Increased the scoring scale for the percentage of funds to be expended to earn full points. Aligns with a decision made in 2023 competition to increase scale in the 2024 competition.
HMIS Participation	PSH, RRH, TH-RRH, TH, CE-SSO	4A: Attendance at HMIS agency administrator meetings	3	<ul style="list-style-type: none"> Scoring scale changed to align with number of meetings held in 2023. Holds agencies accountable for meeting attendance.
	PSH, RRH, TH-RRH, TH, CE-SSO	4B: Data Quality and Completeness	10	<ul style="list-style-type: none"> Adds additional data element of Veteran Status to be reviewed for errors (in addition to nine other data elements, including Race and Ethnicity which have been combined into one). These are all important parts of client’s HMIS record for which accurate data is needed.
	PSH, RRH	4F: Accurate Reporting for Quarterly PIT Count/Housing Move-In-Date Audit for CoC funded project	3	<ul style="list-style-type: none"> Element was scored for the first time in 2023. Based on provider feedback, the scoring scale has been changed for both components from an “all or nothing” scale to a scale where some points may be earned even if there were some errors. Evaluates provider compliance with data entry and reporting requirements.
	Agencies with non-CoC PSH or RRH only	4G: Accurate Reporting for Quarterly PIT Count/Housing	2	<ul style="list-style-type: none"> Accurate PIT data not only demonstrates an agency is following data entry protocol,

MODIFIED Scoring Criteria				
	Project Type	Evaluation Criteria	Max Point Value	Change and Rationale
		Move-In-Date Audit for non-CoC funded PSH or RRH project		but also points to quality of overall program management.
Inclusion of PWLEH	All Projects	5B: Meaningful Participation of PWLEH: Persons Served	5	<ul style="list-style-type: none"> This was a scored question in 2023 (one question, worth 6 points). Based on input from the Detroit Advisors Group, recommend splitting the one question into two, in order to ask more specific information. Overall, the total point value is also increased (from 6 to 10 overall)
	All Projects	5C: Meaningful Participation of PWLEH: Staff and Board	5	

NEW Scoring Criteria				
	Project Type	Evaluation Criteria	Max Point Value	Addition and Rationale
CoC Participation	All Projects	6A: Participation in January 2024 Unsheltered PIT	2	<ul style="list-style-type: none"> Scored component re-incorporated to align with the competition of an unsheltered PIT in Jan 2024. Incentivizes agencies to participate in the unsheltered PIT.
Bonus Points	All Projects	11: Bonus Points for timely submission of HMIS Quarterly Audits	3 (bonus points)	<ul style="list-style-type: none"> Rewards agencies that complied with HMIS instructions regarding submission of quarterly audits Timely submission of HMIS Quarterly Audits is key to ensuring accurate project and system-wide data May become a scored component in a future competitions.

No changes are recommended to the following scoring criteria		
Income & Employment		
Project Type	Evaluation Criteria	Max Point Value
PSH, RRH, TH, TH-RRH	1A: Leavers with Cash Income	5 (PSH) 7 (RRH, TH, TH-RRH)
PSH, RRH, TH, TH-RRH	1B: Leavers with non-Cash Benefits	5
PSH, RRH, TH, TH-RRH	1C: Leavers with Earned Income (Employment)	3 (PSH) 5 (RRH, TH, TH-RRH)
PSH, RRH, TH, TH-RRH	1D: Increases in Total Cash Income for Leavers & Stayers	2 (PSH) 3 (RRH, TH, TH-RRH)

No changes are recommended to the following scoring criteria

PSH	1E: Stayers with Health Insurance	2
Housing Performance & Quality		
Project Type	Evaluation Criteria	Max Point Value
PSH	2A: Retention in Permanent Housing	25
RRH, TH, TH-RRH	2A: Exit to Permanent Housing	25
PSH	2E: Service staff and program availability	3
PSH	2F: Facilitation and tracking of referrals	2
Financial Performance		
Project Type	Evaluation Criteria	Max Point Value
All projects	3B: Outstanding/Unresolved Audit or Monitoring Findings	Up to -10
HMIS Participation		
Project Type	Evaluation Criteria	Max Point Value
PSH, RRH, TH-RRH, TH, CE-SSO	4C: Accurate Recording of Annual Assessment	1
PSH, RRH, TH-RRH, TH, CE-SSO	4D: Known Destination Rates	3
PSH, RRH, TH-RRH, TH, CE-SSO	4E: Timely HIC submission	5
Inclusion of Persons with Lived Experience		
Project Type	Evaluation Criteria	Max Point Value
All projects	5A: Consumer participation in board /equivalent	2
All projects	5D: Substantiated Grievances	Negative points
CAM Participation		
Project Type	Evaluation Criteria	Max Point Value
PSH, RRH, TH-RRH, TH, CE-SSO	7A: Referral Outcome Reporting for CoC funded projects	2
PSH, RRH, TH-RRH, TH, CE-SSO	7B: Referral Outcome Reporting Non-CoC projects	2
PSH, RRH, TH-RRH, TH	7C: New client entries	2
PSH, RRH, TH-RRH	7D: Housing move-in date completion	4
HMIS	7F – 7G: HMIS support of CAM	6
CAM Lead Agency/Implementing Partner		
Project Type	Evaluation Criteria	Max Point Value
CE-SSO	8A: PSH Packet Submission for Completed Navigation Appointments	8
CE-SSO	8B: Accurate Submission of PSH packets	8
CE-SSO	8C: Accurate Submission of HCV Applications	8
CE-SSO	8D: Client Satisfaction with Navigation	4
Domestic Violence (DV) Projects Only		
DV Projects Only	9: Increasing Participant Safety	4
HMIS Lead Agency Only		
Project Type	Evaluation Criteria	Max Point Value
HMIS	10: Proportional Score from 2023 CoC Application	70

Informational Only Questions: Not scored in 2024, but may become a scored component in the future.
Agencies will be asked to provide the number of people who faced eviction/termination and who had eviction/termination prevented
Agencies will be asked to provide their client to case manager ratio.
Agencies will be asked to describe how services are provided within a project, to get a better understanding of a project’s service provision. This question is a modification of a question asked in 2023 about the provision of in-person services.
Agencies will be asked to describe their internal process for responding to client grievances and provide a copy of their grievance procedure.
PSH providers will be asked to describe their process for determining when to return a match to CAM, primary reasons for match returns, and challenges they encounter resulting in the need for the match to be returned.
Providers will be asked to describe how they ensure housing units people move into pass Housing Quality Standard (HQS) initial inspections and annual inspections. This is a new informational only question this year.

Scored Criteria Removed for 2024 for CAM Lead Agency and Implementing Partner:

- For CHS (CAM Implementing Partner): For the 2024 competition, CHS will not be evaluated on compliance with CE data standards, as the performance on this component is also dependent upon the CAM Lead Agency entering data in an accurate and timely fashion. Since the beginning of the CAM Transition in late 2022, some elements of the accuracy and timeliness of this data entry have declined, which are factors outside of CHS’s control. Therefore, CHS will not be scored on this component in the 2024 competition. This will likely be reincorporated as a scored component in future competitions.
- HAND assumed the role of the CAM Lead Agency as of 9/1/2023. The CAM Lead Agency CE-SSO renewal grant was submitted by HAND for renewal in 2023 as a “first time renewal”.
- The following scored criteria, used in prior years to evaluate the CAM Lead agency, will be removed again for the 2024 competition, in keeping with established protocol that projects being submitted for renewal with less than 12 months of operation are not evaluated on a full complement of criteria. It is anticipated these scored components will return as evaluation criteria for the new CAM Lead Agency in a future competition:
 - Client satisfaction with Access Points & Navigation
 - Accurate submission of PSH Packets
 - Accurate submission of HCV applications to MSHDA portal
 - Timeliness of referrals to PSH, RRH, and TH vacancies
 - Compliance with PSH Prioritization Policies
 - Data reporting to CoC Board
- Provision of training to participating agencies: Removed in recognition that the need for CAM lead and participating agencies to respond to the pandemic may have impacted ability for these trainings to be provided.

Upon approval, these scoring criteria will be presented to CoC agencies and reviewed according to this [timeline](#).

Acronyms			
CE	Coordinated Entry (ie, CAM)	RRH	Rapid Rehousing
CE-SSO	Coordinated Entry Supportive Services Only	TH	Transitional Housing
HMIS	Homeless Management Information System	TH-RRH	Transitional Housing- Rapid Rehousing
PIT	Point-in-Time Count	VFP	Values & Funding Priorities Committee
PSH	Permanent Supportive Housing		
PWLEH	Persons with Lived Experience of Homelessness		

Recommended Revisions to Detroit CoC Funding Appeals Policy and Process

May 6, 2024

➤ **The Detroit CoC Board is asked to vote to approve the following revisions to the Detroit CoC Funding Appeals Policy and Process.**

Several revisions are recommended to the CoC’s funding appeals policy and process. These recommended revisions have been vetted and approved by the Values and Funding Priorities Committee.

This policy went out for public comment in March 2024. Several comments were received, the responses to which may be found [here](#).

Recommended changes to this policy are noted in red font. Rationale for proposed changes are given in an accompanying note.

The most significant recommended changes to this policy are in the following sections:

- V.D: Appeal CoC Board Decision to Reallocate Renewal Project For Reasons Other Than Project Below Threshold
- X.B: Threshold Waiver Appeals
- X.C: Reallocation Appeals

Policy Title	Detroit CoC Funding Appeals Policy & Process
Date Developed/Revised	March 2012; September 2013; August 4, 2014; June 1, 2015; June 6, 2016; April 2018; April 2019; March 2020, July 2022, date
Date Adopted by CoC Board of Directors	10/7/2013; 8/4/2014; 6/1/2015; 6/6/2016; 6/4/2018; 5/6/2019; 6/3/2020, 7/11/2022; DATE
Signed (CoC Board Chair)	

I. Policy Applies To

The following policy applies to all recipient ~~and/or sub-recipient~~ organizations that receive HUD Continuum of Care (CoC) funding in the Detroit CoC.

Commented [AS1]: Rationale for striking this language: Appeals will only be received by recipient organizations (not subrecipient organizations). Striking this language so as to not have conflicting language in the policy.

II. Background

The Collaborative Applicant for the Continuum of Care in Detroit, Hamtramck, and Highland Park, is responsible for leading the process of applying for Continuum of Care funding from the Department of Housing and Urban Development (HUD) on an annual basis. In accordance with the Detroit CoC Governance Charter, the Homeless Action Network of Detroit (HAND) has been designated as the Collaborative Applicant. In carrying out these responsibilities, HAND, in conjunction with the Values & Funding Priorities Committee will develop the process by which projects seeking renewal funding are evaluated and ranked in a priority listing for funding. The policies are approved by the Continuum of Care Board.

This policy describes instances in which an ~~applicant agency~~ may appeal a funding decision made by the CoC board.

Commented [AS2]: Changing word “agency” to “applicant” in several places throughout for greater consistency in language.

III. Evaluation and Ranking

All CoC funded projects seeking renewal funding in the Continuum of Care competition will be reviewed and scored by the Collaborative Applicant on a number of components which may include – but not be limited to – program performance, HMIS data, and CoC participation. The details of the scoring components, and the values of those components, will be specified yearly in the “Renewal Application Policies and Procedures” document.

A renewal project will be placed on the project priority **ranking** list in accordance with ranking policies if it meets one of the following criteria:

1. Project has a final score of at least 70%; OR
2. Project has a final score of less than 70% of the total points possible but has been granted a threshold waiver by the Appeals Committee.

Projects that score less than 70% and are not granted a threshold waiver from the Appeals Committee will not be placed on the project priority **ranking** list and will not be submitted to HUD for renewal funding. The funding available from these projects will be reallocated to a new project(s).

IV. Submission of Appeal

Appeals will only be accepted from recipient organizations. Appeals submitted by sub-recipient organizations will not be considered.

V. Types of Appeals

There are several types of appeals that a project applicant may submit. An applicant may submit any or all the following types of appeals for one project. The types of appeals are:

A. Calculations Appeal

An applicant may appeal the score or performance rate earned by demonstrating an error was made in calculating the score or performance rate on any of the evaluation components in the renewal project application. When appealing a calculation error, the project applicant must demonstrate that a calculation error was made, and additionally demonstrate what the correct calculation should be. Proposed corrections must be based on the data originally submitted to the Collaborative Applicant with the renewal applications. Applicants may not submit changed or corrected data after the initial submission to the Collaborative Applicant. Projects should refer to the self-scoring tools provided with the yearly application materials for details on how the performance rates were calculated.

For the purposes of this policy, a “calculation error” is defined as error made in addition, subtraction, division, multiplication or other mathematical operation.

B. Timely Material Submission Appeal

At times, renewal project applications may be scored on the extent to which required materials are submitted on time and in the required format. If the score of a project application is impacted due to late or incomplete submission of required materials, the applicant may submit an appeal if it disagrees that required materials were not submitted on time or in the format required. In the appeal, the applicant must demonstrate it submitted the required materials in the timeframe and format required.

Commented [AS3]: Adding word “ranking” to be consistent with other language used to describe this list. Update throughout.

C. Appeal for Threshold Waiver

A project that earns less than 70% of the total points possible – either before or after any calculation corrections are made – may appeal for a waiver of the threshold requirement that a project earn at least 70% in order to be placed on the project priority ranking list. This appeal for a waiver is the applicant’s opportunity to provide additional rationale, in a narrative format, as to why the project should continue to be considered for funding. This waiver request only applies to projects that have an overall score of less than 70%, because without this waiver the project would not be placed on the project priority ranking listing and would not be submitted to HUD.

D. Appeal CoC Board Decision to Reallocate Renewal Project For Reasons Other Than Project Below Threshold

~~In each funding competition,~~ The Detroit CoC board may decide to reallocate a renewal project in part or in whole. Such decisions will be made in accordance with HUD’s policies and procedures and in accordance with the CoC’s funding priorities.

“Reallocation” means that a renewal project will have its budget reduced either in part or be reallocated in whole. Projects that are reallocated in part may be submitted for renewal for the remaining portion of its budget, provided it meets the criteria for renewal. Projects that are reallocated in whole will not be submitted for renewal funding. Funds made available from the reallocated projects will be used to fund new project(s). Reallocation does not apply to new projects, nor does it apply to CoC planning grants. The CoC board determines reallocation strategies annually.

~~An applicant may appeal any decision made by the CoC board to reallocate a project in part or in whole. The CoC board may decide to reallocate a project for reasons other than the project falling below the scoring threshold. Such a decision may be made outside of the annual renewal project application scoring process. make reallocation decisions either prior to or after the renewal project review and scoring process.~~

~~When the CoC Board decides to reallocate a project for reasons other than the project falling below the scoring threshold, this decision may be appealed as described in Section X.C. below.~~

~~Regardless of when a reallocation decision is made, the applicant may appeal this decision.~~ The appeal for a change in the board’s decision to reallocate a project is the applicant’s opportunity to provide rationale, in a narrative format, as to why the project should continue to receive funding and how the project aligns with HUD’s and the CoC’s priorities.

VI. Content of Appeals

The source of data for evaluating projects for continued HUD CoC funding is the data submitted in the project’s APR, other HMIS data, or other records. The sources of data used to evaluate projects is given in the “Self-Scoring Tools”. It is expected that organizations have reviewed this data prior to submission. Therefore, applicants that submit an appeal may not appeal based on having initially submitted incomplete or inaccurate data to the Collaborative Applicant. Any appeal that is submitted in which the only rationale or evidence given is based on corrected data will be rejected and the project’s original performance rate will stand.

Commented [AS4]: This section has been changed to clarify when an applicant may appeal a reallocation decision.

VII. Appealing Placement on Project Priority Ranking List

Projects will be placed on the project priority **ranking** list in accordance with the ranking policies based on the final calculated performance rate. The final performance rate will be either the performance rate initially calculated, or re-calculated if needed based on any appeal made. Placement on the project priority **ranking** list, however, does not guarantee funding, as the ultimate funding decisions are made by HUD.

Organizations may not appeal the placement of the project on the project priority ranking list, whether the project is placed into Tier 1 or Tier 2. All project rankings are final and cannot be appealed.

VIII. New Project Application Appeals

Due to the competitive nature of applying for new project funding, there is no appeals process for projects that are not selected for new project funding. The decision of the CoC board on which new project(s) to be submitted to HUD for new project funding is final. See policy titled "Detroit CoC Funding Application Review and Ranking Policies and Procedures" for details on the new project application, review, and decision-making process.

IX. Composition of Appeals Committee

The Collaborative Applicant will invite individuals to participate on the Appeals Committee. Individuals that have served on the committee in the past may serve the following or subsequent years. The Appeals Committee will be composed of individuals who have knowledge and experience in any (but not necessarily all) of the following:

- Continuum of Care funding and process
- Homelessness programming
- Homelessness funding (which may include private and/or public funding sources)
- Program evaluation
- Performance monitoring
- Grant writing
- Fund development
- Fund distribution

The Appeals Committee will be composed of **5 to 7 members. All attempts will be made to ensure an odd number of people present reviewing appeals. at least 5, but no more than 7, members.** A sub-set of the Appeals Committee, composed of at least 3 members, may be tasked with reviewing calculations or timely material submission appeals. The staff of the Collaborative Applicant will have the autonomy to decide if a sub-set of the Appeals Committee is appropriate to review calculations or timely material submission appeals. Members of the appeals committee must not be employed by, or on the board of directors, of a Detroit CoC-funded agency. The Appeals Committee is a sub-committee of the Values & Funding Priorities Committee; therefore, at least one person from the Values & Funding Priorities Committee will also sit on the Appeals Committee to enhance communication between the two committees.

Communication amongst the Appeals Committee members and Collaborative Applicant agency staff regarding the above may be conducted either in person, via email, via conference call, or **via other on-line communication means.**

Commented [A55]: Clarifying language. Goal to have odd number of members to avoid ties in decision making process.

X. Role of Appeals Committee

The role the Appeals Committee will vary depending upon the type of appeal under consideration.

A. Calculation Appeals and/or Timely Material Submission Appeals

Collaborative Applicant agency staff will present to the Appeals Committee, or a sub-set of the Committee, the appeal submitted and the need for calculation review or review of submission of required materials. The Appeals Committee, or the sub-set of the Committee will review the information submitted with the appeal. Following this review, a recommendation will be made to the full Appeals Committee as to whether a project's performance rate (score) needs to be corrected based on any corrected calculations or based on evidence that required materials were submitted on time and in the format required. The Appeals Committee will then decide based on the recommendation to either change or not change a project's performance rate. The Appeals Committee will not be making a recommendation or decision as to where on the project priority **ranking** list the project should be ranked. The placement of the project on the project priority **ranking** list will be determined by the ranking policies.

For calculation and/or timely material submission appeals, the Appeals Committee will carry out the following activities:

- Review appeals material submitted by applicant.
- Determine if a calculation error was made in calculating the project performance rate, and if so, present the corrected performance rate.
- Determine if the **applicant agency** did submit required materials on time and in the format required.

If the Appeals Committee agrees that a performance rate was initially calculated incorrectly, and that the appealing applicant demonstrated a corrected performance rate, the Appeals Committee may make the decision to grant the project the corrected performance rate. The project will then be ranked according to the corrected performance rate.

If the Appeals Committee determines that the initial project performance rate had been correctly calculated, and that the appealing applicant was not able to substantiate the need for a corrected calculation, the Committee may make the decision to rank the project according to the initial performance rate as had been calculated by Collaborative Applicant staff.

B. Threshold Waiver Appeals ~~and Reallocation Appeals~~

Collaborative Applicant agency staff will present to the full Appeals Committee the materials submitted by the project applicant seeking a threshold waiver ~~or appealing a reallocation decision~~. The Appeals Committee will carry out the following activities:

- Review appeals material submitted by applicant.
- Participate in a group discussion about the appeal.
- Develop a recommendation for the project being appealed.

The Appeals Committee will make recommendations on threshold waiver requests ~~or reallocation decisions~~. Upon review of the appeal, the Appeals Committee will make one of the following recommendations to the CoC Board of Directors:

Commented [AS6]: Striking throughout this section any reference to reallocation appeals, as reallocation appeals is given its own section below.

1. **Appeal is denied:** Project should not be considered for renewal funding and should not be placed on the project priority ranking list. The funding available from projects not placed on the project ranking list, and consequently not submitted for renewal, will be reallocated to a new project(s). ~~If the appeal under consideration was a reallocation appeal, this recommendation of the Appeals Committee, if affirmed by the CoC Board, will be the final decision and no further appeal will be allowed.~~
2. **Appeal is granted with no further condition:** Project should be placed on the project priority ranking list in accordance with ranking priorities for the full amount of its current award.
3. **Appeal is granted with condition:** Project should be placed on the project priority ranking list in accordance with ranking priorities for the amount of its current award, with the condition that, if funded, the project must submit to a plan of correction/technical assistance over the course of the following year, with stipulation that the project may remain at risk of not being considered for future funding if there is a lack of progress on any corrective action plan developed.
4. **Project is recommended to be submitted for renewal with a reduced budget (ie, partial reallocation) with conditions:** The Appeals Committee may recommend to the CoC Board that the project be submitted for renewal funding in accordance with the ranking policies at a reduced budget amount. The project would be submitted at that reduced amount with the condition that, if funded, the project must submit to a plan of correction/technical assistance over the course of the following year, with the stipulation that the project may remain at risk of not being considered for future funding if there is a lack of progress on an corrective action plan developed. The funds reduced would then be reallocated to a new project(s). ~~If the appeal under consideration was a reallocation appeal, this recommendation of the Appeals Committee, if affirmed by the CoC Board, will be the final decision and no further appeal will be allowed.~~

In considering Threshold Waiver Appeals, the Appeals Committee may offer the appealing applicant an opportunity to present before the Committee additional details on their appeal. If this opportunity is offered to one appealing applicant, it must be offered to all appealing applicants.

If the Appeals Committee recommends reallocating a project’s budget, the Committee must have at least 75% of the committee members voting in favor of that recommendation.

The CoC Board will vote on the recommendation made by the Appeals Committee for projects that fell below threshold. This vote of the CoC Board, including any votes to reallocate a project in part or in whole due to the project falling below threshold, will be the final decision and no further appeal from the applicant will be considered.

Appealing applicants, their representatives or advocates, will not be allowed to present verbal or written statements regarding their appeal at the Board meeting where the Appeals Committee recommendation will be voted on.

The Appeals Committee will not be making a recommendation as to where on the project priority ranking list the project should be ranked. The placement of the project on the project priority ranking list will be determined by the ranking priorities.

C. Reallocation Appeals

The CoC Board may decide to reallocate a renewal project for reasons other than the project falling below the scoring threshold (Section V.D.). In these instances, once the applicant receives notice of that reallocation decision, the appeals process will be as follows.

Commented [AS7]: Adding language on the Appeals Committee ability to speak directly with the applicant undergoing the appeal, and ensuring that this process is applied fairly to all applicants that were under threshold.

Commented [AS8]: Because there are significant ramifications to cutting a project’s funding, and because there is not an additional appeals process after this one, recommend a high percentage of committee members needing to be in agreement.

Commented [AS9]: This language is new, and a departure from how the policy was previously written. With this new language, once the board votes to approve the Appeals Committee reallocation recommendation when a project falls below threshold, that board decision will be final. There will be no “secondary” appeal of that decision.

Commented [AS10]: Adding this language to ensure a fair process for all appealing applicants.

Commented [AS11]: This entire section is new. This section provides more clarity and detail to how a reallocation decision may be appealed when the board decides to reallocate a project for reasons other than the project falling below threshold.

Collaborative Applicant agency staff will present to the full Appeals Committee the materials submitted by the project applicant seeking appealing a reallocation decision. The Appeals Committee will carry out the following activities:

- Review appeals material submitted by applicant.
- Participate in a group discussion about the appeal.
- Decide whether to uphold, modify, or reverse the Board's relocation decision.
- Report to the CoC Board the decision made

In considering Reallocation Appeals, the Appeals Committee may offer the appealing applicant an opportunity to present before the Committee additional details on their appeal. If this opportunity is offered to one appealing applicant, it must be offered to all appealing applicants.

The Appeals Committee will decide on reallocation appeals. Upon review of the appeal, the Appeals Committee will make one of the following decisions:

1. **Uphold the Board's Reallocation Decision:** The Appeals Committee may decide to uphold the Board's reallocation decision as it stands.
2. **Modify the Board's Reallocation Decision to a Lesser Degree:** The Appeals Committee may decide to modify the Board's reallocation decision so that a lesser amount of the project be reallocated. For example, if the Board decide to reallocate 100% of a project's budget, the Appeals Committee may decide to reallocate only 50% of the budget. The Appeals Committee may not decide to reallocate a greater proportion of a project budget than what the Board decided.
3. **Reverse the Board's Decision in its Entirety:** The Appeals Committee may decide to reverse the Board's reallocation decision in its entirety, and allow the project to retain 100% of its budget.

All votes of the Appeals Committee on reallocation appeals must pass with at least 75% of the Appeals Committee members voting in favor of the decision. The decision made by the Appeals Committee under this section will be final and no further appeal from the applicant will be considered.

Commented [AS12]: Because there are significant ramifications to cutting a project's funding, and because there is not an additional appeals process after this one, recommend a high percentage of committee members needing to be in agreement.

XI. Role of Collaborative Applicant Agency Staff with Appeals Committee

Collaborative Applicant agency staff will carry out the following activities with the Appeals Committee:

- Recruit volunteers to take part in the Appeals Committee who have the knowledge/experience as described above.
- Provide background information to Appeals Committee on score received by project under appeal.
- If necessary, provide general background information on the applicant and project filing the appeal. The content of this information will consist of the description of the applicant and project provided by the applicant in its application to the CoC and information that is otherwise publicly available about the applicant or project (ie, via the applicant's website, brochures, etc).
- Guide and facilitate the discussion process with the Appeals Committee. Staff will offer input only to help clarify or guide the conversations; no opinions on the applicant or project will be offered in the conversation with the Appeals Committee.
- Staff will take notes during the conversations with the Appeals Committee. If communications amongst the Appeals Committee members is conducted via email, the emails will be retained as records of the Appeals process.

XII. Role of CoC Board

Continuum of Care (CoC) Board members will be recused from the discussion and decision making on the appeals in accordance with the Conflict of Interest policy in the Detroit CoC Governance Charter. All CoC Board members' Conflict of Interest statements will be reviewed prior to discussion on appeals to ensure members with disclosed conflicts are recused from discussions.

Any CoC Board member who is not otherwise recused will be expected to participate in the review and decision making on appeals. A quorum will be a majority or 51% of the Board members eligible to review the appeals. A quorum must be present in order for voting on the appeals to occur.

The Board will conduct the following activities:

- Review the decision made by the Appeals Committee regarding calculation errors and vote to approve or not approve the decision(s).
- Review and discuss the recommendations made by the Appeals Committee on threshold waiver appeals and vote to accept or reject the recommendations.
- Review and discuss the recommendations made by the Appeals Committee on reallocation appeals and vote to accept or reject the recommendations.
- Voting may occur in the following ways: via a voice vote in person, voice vote over the phone, ~~or~~ in writing via email, **or via another electronic means (ex – meeting polls, on-line form, etc).**
- Decisions will be made by a simple majority vote.
- If the Board votes to reject a recommendation made by the Appeals Committee, the Board will be responsible for developing its own decision on action to be taken with the project in question.

Commented [AS13]: Language added to align with current practice.

The decisions made by the Board will be final.

XIII. Role of Collaborative Applicant Agency Staff with the CoC Board

Collaborative Applicant agency staff will carry out the following activities with the CoC Board:

- Staff will present the recommendations of the Appeals Committee to the CoC Board.
- Staff will guide and facilitate the discussion with the CoC Board, including offering additional background information and/or clarification as needed.
- Staff may provide input on recommendations during discussions with the CoC Board, however, staff will not offer an opinion on the recommendation being made.
- Staff will take notes.
- CoC board members who are also staff or board members of the Collaborative Applicant agency may participate in, and vote, in the appeals discussion, **provided there is no other conflict per the CoC's conflict of interest policy.**

Commented [AS14]: Language added for clarification.

XIV. Notification of Appeals Decision

Applicants will be informed of the decision of the Appeals Committee, and any additional instructions, in writing through letter or email within 5 business days of the decision.

XV. Conflict of Interest

All members of the Appeals Committee will be required to sign the same Conflict of Interest Disclosure statement as the CoC Lead Agency staff and CoC Board of Directors. This Conflict of Interest Disclosure statement is attached.

In the case that Collaborative Applicant agency staff receive information of a real or potential conflict of interest, such information will be investigated and appropriate action will be taken.

XVI. Notification of Appeal Process & Submission of Appeals

Collaborative Applicant staff will notify applicants via email of their project’s initial project performance. This notification will also include details on how an applicant may submit an appeal, and the timeline in which the appeal is to be submitted. The specifics on submitting the appeals (deadlines, method, contact person, timeline for making decisions) will be specified on a yearly basis. Applicants will be given at least 5 business days from when they receive notice of their ability to appeal to submit their appeal from the time they are notified of their eligibility to appeal. Depending on the timeline for the CoC competition, additional time may be given. An applicant that does not submit an appeal by the stated deadline will be considered to not be appealing and therefore that project will automatically be ranked according to the initial score received.

XVII. Appeals for Projects Currently Under Technical Assistance

An applicant that has a project that is subject to CoC-recognized technical assistance, or that is under a Corrective Action Plan at the time of application for renewal funding will still be able to submit an appeal as outlined in this document.

XVIII. HUD Appeal Process

The Detroit CoC Board is responsible for making decisions on which new and renewal projects are submitted to HUD each year as part of the annual CoC competition. The ultimate decision in whether a project is funded is made by HUD.

The HEARTH Act, in 24 CFR §578.35, and the annual Notices of Funding **Availability Opportunity (NOFA NOFO)**, provide information regarding the situations in which an **applicant agency** may submit an appeal directly to HUD. Agencies may appeal directly to HUD if they meet the criteria set forth in 24 CFR §578.35. The submission of an appeal to HUD, in accordance with HUD’s policies and procedures, is the final recourse that may be taken for the project.

Commented [AS15]: Updating language

XIX. Exceptions and Changes to Policy

The CoC reserves the right to make an exception to this policy and procedures based on communication from HUD that impact the Continuum of Care’s ability to carry out the policy and procedures as described above. The CoC also reserves the right to amend this policy on an annual basis based on any of the following: changes in HUD policy, changes in the Continuum of Care policy related to project evaluation processes, and/or changes to project funding priorities.