

## **Comments Received to Recommended Changes to Detroit CoC Funding Appeals Policy**

April 25, 2024

Recommended changes to the [Detroit CoC Funding Appeals Policy](#) were released for public comment on March 27, 2024. Comments were received through April 17, 2024. Following are the comments received as of the deadline, with responses to those comments. These responses have been approved by the Values and Funding Priorities Committee.

*Comments may have been edited for clarity.*

<b>Comment</b>	<b>Response</b>
<p data-bbox="155 509 611 537"><u>Composition of Appeals Committee</u></p> <p data-bbox="155 581 915 716">1) To be eligible to serve on the appeals committee, a prospective member must have been responsible for program and/or fiscal administration of HUD CoC funds for a minimum of three years within the last five years.</p> <p data-bbox="155 1078 831 1143">2) CoC board members are not eligible to serve on the appeals committee.</p>	<p data-bbox="953 509 1335 537">Thank you for your comments.</p> <p data-bbox="953 581 1881 862">1) The Appeals Policy states the committee will include people who have experience with (among others) CoC funding and process, homelessness programming and funding, and program evaluation. All participants on the Appeals Committee are oriented to the CoC funding and appeals process prior to their review of any appeal documentation. Additionally, over the past year the CoC has taken intentional steps to include persons with lived experience of homelessness in various aspects of our project review process, including the review of appeals.</p> <p data-bbox="953 899 1843 1003">To maintain accessible participation on the Appeals Committee, at this time, the CoC will not require committee members to have the recommended length of experience.</p> <p data-bbox="953 1078 1877 1360">2) The Appeals Policy states the committee will include people who have experience with (among others) CoC funding and process, homelessness programming and funding, and program evaluation. Additionally, CoC board members are required to serve on at least one committee in the CoC. Participation on the Appeals Committee is one way in which a board member can meet that expectation. While CoC board members may, and at times do, serve on the Appeals Committee, the Appeals Committee as a whole is not solely comprised of CoC Board members.</p>

Comment	Response
<p>3) Committee members must recuse themselves from evaluating an appeal from their current organization or an organization for which they were employed within the past five years.</p>	<p>Additionally, all Appeals Committee members are required to sign a Conflict of Interest disclosure statement prior to receiving any materials to review. Any Appeals Committee member with a conflict is recused accordingly.</p> <p>At this time, CoC board members will retain the ability to serve on the Appeals Committee.</p> <p>3) Individuals on the Appeals Committee are required to sign a Conflict of Interest disclosure each year and disclose if they are currently employed or where employed within the last six months by any agencies under review. In these instances, the individual will be recused from the appeals review process entirely. The CoC will consider if this time frame should be extended to the prior 12 months, rather than six months. If needed, the Conflict of Interest disclosure will be updated accordingly.</p>
<p><u>Threshold waiver appeals and reallocation appeals</u></p> <p>The scope of the Appeals Committee review must be limited to the merits of the appeal that was submitted to address the specific reason that the project did not meet threshold.</p>	<p>Thank you for your comment.</p> <p>The Appeals Policy states that Appeals Committee members will “review appeals material submitted by the applicant” and “participate in a group discussion about the appeal”. Additionally, the Appeals Policy states that staff from the Collaborative Applicant will:</p> <ul style="list-style-type: none"> <li>• Provide background information to Appeals Committee on score received by project under appeal.</li> <li>• 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).</li> <li>• 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.</li> </ul>

Comment	Response
	It is determined that this existing language in the Appeals Policy is sufficient and addresses the comment made.
<p data-bbox="155 302 756 326"><u>Project budget reduction by appeals committee</u></p> <p data-bbox="155 367 869 464">This option would only apply to projects whose financial performance was the sole reason that the project did not meet threshold.</p>	<p data-bbox="957 302 1318 326">Thank you for your comment.</p> <p data-bbox="957 367 1875 609">HUD encourages CoCs to reallocate (ie, reduce the budgets of renewal projects) if projects do not meet CoC-established performance expectations, which could include performance factors other than financial performance. The Detroit CoC will continue to retain its ability to reallocate project funding in instances where projects do not meet the established performance threshold, regardless of the reason for the project falling below threshold (financial or otherwise).</p>