GRAND RAPIDS/WYOMING/KENT COUNTY CONTINUUM OF CARE - MI 506

Funding Appeal Policy and Process

BACKGROUND

The Kent Homelessness Coalition, also known as the Grand Rapids/Wyoming/Kent County Continuum of Care (CoC) – MI 506 entity and here forward referenced as the Coalition, is committed to ensuring homelessness is rare, brief, and non-recurring across Kent County. A powerful tool for this is the appropriation of public funds to permanent housing and homeless response system projects. One such tool is the Continuum of Care Program Competition of the U.S. Department of Housing and Urban Development (HUD).

Each year, the Coalition and its partner agencies must apply to HUD for CoC Program funding to support our area's homeless response system. Through this process, known as the CoC Program Competition, local applications are solicited, evaluated, and recommended for inclusion in the Coalition's application to HUD. Additional funding opportunities include the appropriation of Michigan State Housing Development Authority (MSHDA) Emergency Solutions Grant (ESG) funds.

FUNDING REVIEW

The Coalition's Funding Review Committee is comprised of community members who represent systems that fund or interface with the homeless response system, are knowledgeable about homelessness and housing, and are without conflicts of interest. The Coalition Funding Review Committee is charged with preparing funding recommendations for Steering Council consideration.

ELIGIBLE APPEALS

An appeal can only be made by an applicant regarding its own application. If the applicant organization or their project fail to meet funder thresholds, appeals will not be considered. All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed. Appeals may be made for the following reasons:

1) The applicant believes their application was incorrectly scored (scoring error or oversight of information within the application) and should have received a higher score that would change the funding recommendation for their project; and/or
2) The applicant believes there may be an improper application or interpretation of HUD or CoC rules and regulations concerning participation of the appellant in the application process.

APPEALS PANEL COMPOSITION

CoC Program Competition

The Appeals Panel will consist of one Funding Review Committee member, one Steering Council member, and recruited members (minimum of three) from Continuums of Care outside of Kent County. Appeals Panel members shall have one vote. The meeting of the Panel will be facilitated by Coalition staff. All members of the Appeals Panel will be required to sign the same Conflict of Interest Disclosure Statement as Steering Council and Funding Review Committee members. In accordance with standards set by the CoC Program Interim Rule 578.95(b) and the US Code of Federal Regulations, Title 24-Housing and Urban Development 583.330 (e), Appeals Panel members will not be permitted to have real or perceived conflicts of interest with any agencies applying in the current round of funding. Appeals Panel members will disclose any potential conflict of interest and the remaining Appeals Panel members will vote to confirm if a conflict of interest is present. If, by majority vote, it is determined a conflict is present, the Panel member will remove themselves from the meeting.

Other Funding Sources

Unless otherwise specified by the funding regulations, the Appeals Panel for non-HUD affiliated applications will consist of a minimum of two Funding Review Committee members and three Steering Council members. At least one member should have lived experience of homelessness. Appeals Panel members shall have one vote. The meeting of the Panel will be facilitated by Coalition staff. All members of the Appeals Panel will be required to sign the same Conflict of Interest Disclosure Statement as Steering Council and Funding Review Committee members. In accordance with standards set by the CoC Program Interim Rule 578.95(b) and the US Code of Federal Regulations, Title 24-Housing and Urban Development 583.330 (e), Appeals Panel members will not be permitted to have real or perceived conflicts of interest with any agencies applying in the current round of funding. Appeals Panel members will disclose any potential conflict of interest and the remaining Appeals Panel members will vote to confirm if a conflict of interest is present. If, by majority vote, it is determined a conflict is present, the Panel member will remove themselves from the meeting.

APPEALS PROCESS AND TIMELINE

CoC Program Competition

- All applicants will be notified in writing via email outside of *e-snaps,* HUD's online application site, of Funding Review Committee recommendations. This will include whether and how their project(s) is recommended to be placed in the Project Priority Listing submitted to HUD.
- Appeals, as outlined in the RFQ and/or funding process guidelines, shall be submitted in writing via email to Coalition staff within five business days following the announcement of funding recommendations. The date will be stated on the funding application timeline provided with the initial funding application.
- The Appeals Panel will convene within ten days following the deadline for filing appeals, subject to Notice of Funding Opportunity (NOFO) timeline constraints, to review written appeals and all pertinent application materials.
- Coalition staff will notify applicants of Appeals Panel decisions in writing via email within two business days.
- If an applicant's appeal is denied by the Appeals Panel and they wish to pursue the appeal further, the appeal may be advanced to the Steering Council. Applicants wishing to further pursue an

appeal shall notify Coalition staff in writing via email within two business days of receiving the Appeals Panel's decision.

- The final recommended Project Priority Listing will be submitted to Steering Council for consideration and approval prior to submission of the CoC Consolidated Application. Any appeals submitted for further consideration will be reviewed at this time. The decision made by Steering Council shall be final.

Other Funding Sources

Unless otherwise specified by the funding regulations, the below timeline will be utilized.

- All applicants will be notified in writing via email of Funding Review Committee recommendations.
- Appeals, as outlined in the RFQ and/or funding process guidelines, shall be submitted in writing via email to Coalition staff within two business days following the announcement of funding recommendations. The date will be stated on the funding application timeline provided with the initial funding application.
- The Appeals Panel will convene within five days following the deadline for filing appeals, subject to funding timeline constraints, to review written appeals and all pertinent application materials.
- Coalition staff will notify applicants of Appeals Panel decisions in writing via email within two business days.
- If an applicant's appeal is denied by the Appeals Panel and they wish to pursue the appeal further, the appeal may be advanced to the Steering Council. Applicants wishing to further pursue an appeal shall notify Coalition staff in writing via email within two business day of receiving the Appeals Panel's decision.
- The final funding recommendation will be submitted to Steering Council for consideration and approval. Any appeals submitted for further consideration will be reviewed at this time. The decision made by Steering Council shall be final.

APPEALS TO HUD (CoC Program Competition Only)

Once Steering Council approves funding recommendations, appeals may be made directly to HUD. Appeals to HUD may be made by solo applicants who, "…were denied the right to participate in a reasonable manner" (Notice CPD-14-01, 24 CFR Part 578) and their project is not included in the Project Priority Listing submitted by the Coalition to HUD in the CoC Consolidated Application. To appeal to HUD, applicants must submit their project application in *e-snaps* by the deadline listed in HUD's NOFO for the respective application round.

Approved by Steering Council: May 20, 2022