

Continuum of Care Written Standard for Rankings & Ratings Protocol NY-513

I. Purpose & Process

FLACRA is the designated U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Collaborative Applicant for Ontario, Seneca, Yates, and Wayne Counties. Through this designation, FLACRA is required to establish protocols for the (CoC) Notice of Funding Opportunity (NOFO), which includes a transparent framework for its annual scoring, ranking, and approval process. To best serve our community members with effective projects, those that most closely align with HUD and CoC priorities will be prioritized for funding. This document will be reviewed and approved by FLACRA staff, its Board of Directors, and the CoC Board of Directors as outlined below.

The CoC Board of Directors consists only of non-conflicted CoC Members (i.e., does not receive CoC funding). Please see Appendix A for a list of the CoC Board Members. The duties include reviewing and ranking all applications to the HUD CoC NOFO. The Board also works with People with Lived Experience and Expertise to obtain their feedback on community priorities and application questions.

The CoC's Program Monitoring Committee, is tasked with conducting an annual on-site monitoring visit to each HUD CoC-funded project. FLACRA and Wayne County Community Action Program (CAP) conduct site visits for one another. Projects are evaluated for performance, achieving the outcomes specified in the grant application through the review of participant files, policies and procedures, data quality, Coordinated Entry usage, and case management entries. Additional documents, such as homeless and/or disability documentation, housing inspection forms, and rent calculations, are also reviewed. The plan is to grow this committee to include additional community members.

Approximately 1-2 Committee members attend site visits. Committee members may speak with project staff if they have questions or need to find specific documents, etc. Site visits occur annually following the end of the program's contract year, so they can review the project's Annual Performance Report (APR) to have a point of reference to evaluate performance.

Committee members calculate their scores for the section(s) of the monitoring report that they were assigned and are provided to FLACRA staff. Once all scores are tabulated, FLACRA will send a copy of the completed Monitoring form to the Committee Members for their feedback. At the conclusion of the process, the Committee refers to the relevant agency staff any competitive project requiring improvement.

FLACRA and Wayne County CAP staff provide performance improvement support to projects referred to staff by the Committee. After an appropriate time, as agreed upon by the Committee, the Committee conducts a performance review of each project that has received performance improvement support.

The Committee refers to the Board of Directors any project that has received performance improvement support but has not shown an improvement. The Committee will include its recommendations with a referral to the CoC Board.

This process is consistent with HUD regulations through 24 CFR 578.7(a) that “The Continuum must: Consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers; and evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report to HUD.”

Monitoring, application review, and ranking inform HUD’s CoC program about which projects are high-performing, effective, and deserve to receive annual funding in order to best serve the homeless population in Ontario, Seneca, Wayne, and Yates counties.

II. New Project Application Process

Annually, FLACRA issues new applications for agencies seeking HUD CoC funding. Applications are publicly distributed through a local RFP process and are advertised on the Finger Lakes Housing Consortium, FLACRA’s listserv, social media and the CoC’s website. Application instructions are also distributed alongside the applications. The application instructions include all relevant due dates, threshold requirements, submission protocol, and attachment requirements.

New funding can be created in two ways: through bonus funding issued by HUD during the CoC competition, which is communicated by HUD and FLACRA (amounts, eligible priorities, etc.), and through current CoC funding that has been reallocated from a current project, which will add funding for any new and eligible projects. This will be further discussed in this document.

New funding applications also encompass expansion applications for existing CoC projects. Only projects that scored in Tier 1 in the previous year’s competition are eligible to apply for an expansion of the existing project. Projects that had a significant finding during CoC annual monitoring are ineligible to submit expansion applications. Significant findings include a history of unspent funds and/or misuse of funds, non-compliance in serving the target population, significant data errors, and unwillingness to accept technical assistance from the CoC.

Applications are split into three sections: threshold requirements, program design narrative, and performance measures. Projects and agencies must meet threshold requirements to be considered in the funding competition. Program design and performance measures will be used to determine ranking in the funding competition.

III. Renewal Project Application Process

Renewal projects are scored according to the rubric described in the renewal application. Renewal projects are scored on HUD compliance, CoC compliance, program narratives, performance measures, and monitoring scores.

Much of the information in the renewal application is reported to HUD on the Annual Performance Report (APR), during project monitoring by CoC staff and CoC Board, or is otherwise available through HMIS. Projects serving domestic violence survivors are asked to submit data in a CSV from their comparable database for the renewal process. *As of June 2026, the CoC does not have a DV CoC-funded agency.

Projects that have been operational for less than an entire program year will receive full points for performance measures.

The CoC-funded projects' monitoring scores are compiled into a Scoring Report by CoC staff and made available to all funded projects as soon as the funding competition opens. Monitoring scores are a combination of information received from annual monitoring site visits and projects' APRs.

The Scoring Report will be released to all funded projects at the same time as the new application. Projects will have until the application due date to review and dispute or accept the Scoring Report and respond to narrative questions.

If a project seeks to dispute the competition report, project representatives can give written or verbal justification of the dispute to the CoC Board, which will then vote to accept or reject the dispute.

IV. Review & Selection Process

The CoC Board reviews and scores all renewal and new applications. The CoC Board is given a detailed rubric and reports scores through email. Scores are compiled and reviewed in a CoC Board meeting to ensure accuracy and limit discrepancies between reviewers.

Projects that fail to meet threshold requirements as outlined in the local application will be held out of the competition. These projects may request that the CoC provide them with technical assistance to assist in improving their application for future competitions. This process ensures that organizations that may lack the current capacity to receive a federal grant can build their capacity for a future year.

All renewal projects will be selected to move forward in the competition, unless subject to reallocation. The reallocation process can be found in Section V.

All projects will receive written notice of the outcome of the initial review process and the justification of the decision by email, when possible, no later than 15 days before the CoC Program Competition application submission deadline.

V. Reallocation protocol

Per the CoC Program, "Reallocation is a process that the CoC uses to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD" that will better address the needs of the homeless. Conversely, reallocation can reduce or eliminate funding from existing renewal projects. The CoC Board, comprised of a non-conflicted group (i.e., unfunded) of the CoC, makes final reallocation decisions based on the following:

- Project has not expended 100% of grant funds for two or more consecutive years
 - Unspent funds are reallocated for new projects
- A project voluntarily decides not to renew its project

- A project voluntarily requests its existing program(s) funding to be reallocated to create a new project that meets community needs.
- A program has a history of not meeting performance measures and has not followed through a performance improvement plan. This may include both outcome measures and utilization.
- A project that has deficiencies in the ongoing operation of the programs.
- Projects have been in the bottom 40% of CoC Ranking (i.e., Tier 2 for FY26) due to low performance for two or more consecutive years, as evidenced by the project's Annual Performance Report, performance measures, and CoC Ranking Process.
- An agency does not complete the local renewal application process.

VI. Ranking Protocol

A project ranking list is generated using scores outlined in Sections IV and V of this Ranking Protocol, in alignment with HUD and local CoC priorities. Projects that have passed threshold requirements and have been selected for funding are ranked based on application score and local priority. They will then be placed into Tier 1 until all Tier 1 funds are allocated. The remaining projects selected for funding will be ranked and placed into Tier 2 until all Tier 2 funds are allocated.

In the event of a tie for project ranking, the CoC Board will base decisions on HUD and community-wide priorities regarding target population, past project performance, and the overall quality of the local application.

The Planning Grant is not ranked in the NOFO process. HMIS Grants will not be scored and protected due to the necessity of the projects to the operation of the CoC and will be ranked in Tier 1. They are, however, monitored by the Project Monitoring Committee and reviewed for usage of funds, project efficacy, and written standards, current and upheld.

Once the Board has ranked applicants' renewal applications, the preliminary ranking will be emailed to all member agencies, with specific scoring forwarded to the related applicant. If there are no successful appeals, the preliminary ranking becomes the final ranking.

Tier 1 and Tier 2 structures will be reviewed with the CoC Board of Directors. Recommendations of the Board will be voted on no later than 15 days prior to the CoC submission deadline.

The final Consolidated Application, which includes the Project Priority List and the Collaborative Application, will be posted publicly no later than 48 hours prior to its submission.

An applicant may challenge the Board's recommendation by emailing the Co-Chair of the CoC Board, Bob Doeblin, with a Notice of Appeal as outlined in section VII.

VII. Appeals Process

An applicant must submit a request for an appeal in writing to the Board within three days of notification regarding their project. Possible grounds for appeal are: the applicant was denied the right to participate in or eliminated from the local application process; the applicant believes that decisions made regarding

their ranking, amount of awarded funding, or elimination of their program were unsubstantiated based on project performance or other factors that can be documented. Decisions made regarding applications that were not submitted by the deadline(s) or were incomplete cannot be appealed.

The total score for the application is provided to the Applicant at the time of award notification. At no time during the appeals process will the scores of individual reviewers be discussed. At all points during the Appeal process, the discussion will be respectful and fact-based.

The Appeal Process will be a discussion between the Applicant and the CoC Board. The applicant will present their case, which will be followed by questions and discussion. The intended goal of this phase is to reach an agreement on a resolution of all appealable issues presented.

If Applicant is still not in agreement with the results of the discussion, they should review the HUD NOFO and follow instructions on how and on what grounds they can make an appeal to HUD. Should the project decide to pursue a formal appeal to HUD, the applicant will be referred to page 116 of the FY2026 NOFO to follow HUD's appeals process and how to submit a solo application outside of the CoC.

NOTE: Appeals will only be considered in cases where applicants have concerns specific to the review process and scoring of their application. Appeals specific to the ranking or funding recommendation 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 in the application cannot be appealed.

Appendix A

CoC Board of Directors Listing

Soldier On
City of Geneva Police Department
Wayne County Sheriffs Department
Ithaca Neighborhood Housing Services (INHS)
Ontario County Department of Social Services
Geneva Housing Authority
Lakeview Health Services
Safe Harbors of the Finger Lakes