

ANCHORAGE CONTINUUM OF CARE DRAFT POLICIES + PROCEDURES

Anchorage Coalition to End Homelessness

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Adapted from the Balance of State Policies written by Mary Elizabeth Rider.

The original policies were prepared for the Alaska Coalition on Housing and Homelessness (AKCH2) by Rider Consulting based on federal requirements and the two prior years' Balance of State Continuum of Care (CoC) processes with the Chair of AKCH2 and Alaska Housing Finance Corporation Planners. They are being adopted to meet the needs of the Anchorage CoC while remaining closely aligned with the State policies.

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Introduction

About the Anchorage Continuum of Care Program

In Alaska, there are two Continuum of Care (CoC) groups, Anchorage (AK-500) and Balance of State (AK-501). The Anchorage Coalition to End Homelessness (ACEH) General Membership serves as Anchorage's CoC. Many organizations participate in ACEH from many different sectors. The ACEH is overseen by an elected Board of Directors, who serve as the Anchorage CoC Board. The mission of ACEH is to advocate for and implement strategies to prevent homelessness and provide housing and work opportunities for all.

The MOA was the collaborative applicant for the Anchorage CoC from the inception of the program through the FY2012 grant year application. At that time, the Anchorage Coalition to End Homelessness took over both the oversight and collaborative applicant responsibilities. The MOA has retained the oversight of the Emergency Solutions Grant (ESG), Home Investment Partnerships Program (HOME) and Community Development Block Grant (CDBG) funding.

Overview of the Continuum of Care Process

The U.S. Department of Housing and Urban Development (HUD) funds homeless services nationally, requiring a Continuum of Care process. Annually, HUD releases a Notice of Funding Availability (NOFA) for renewal, new, and sometimes for bonus housing projects. The Continuum of Care requires a gaps assessment process, a community plan, and applications to HUD for funding.

Alaska is divided into two Continuums of Care: Anchorage and Balance of State. These policies govern the Anchorage Continuum of Care.

CoC Background

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act. Among other changes, the HEARTH Act consolidated the three separate McKinney-Vento homeless assistance programs (Supportive Housing Program, Shelter Plus Care program, and Section 8 Moderate Rehabilitation Single Room Occupancy program) into a single grant program known as the Continuum of Care (CoC) Program.

HUD published the Continuum of Care Program interim rule in the Federal Register on July 31, 2012. The rule is posted on HUD's website and governs the CoC Program.

The CoC Program is designed to assist individuals (including unaccompanied youth) and families experiencing homelessness, and to provide the services needed to help such individuals move into transitional and permanent housing, with the goal of long-term stability. The program promotes community-wide planning and strategic use of resources to address homelessness; improved coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improved data collection and performance measurement; and allows each community to tailor its program to the particular strengths and challenges within that community.

Each year, HUD awards CoC program funding competitively to nonprofit organizations, states, units of local government, and/or instrumentalities of state or local government collectively known as recipients. In turn, recipients may contract or subgrant with other organizations or government entities, known as subrecipients, to carry out the grant's day-to-day program operations.

In recent years, the HUD CoC program has shifted focus to emphasize permanent supportive housing and rapid re-housing for chronically homeless people. Transitional housing is still funded, but requires extra justification. HUD continues to offer occasional funding for bonus projects. In both 2014 and 2015, HUD offered the opportunity to fund new permanent supportive housing through a bonus.

Since 2001, HUD has required the use of a Homeless Management Information System (HMIS) to better serve individuals and monitor the performance of CoC recipients.

Key Continuum of Care Terms

Terminology used by HUD and the Anchorage CoC throughout the application process is very specific. Below is a partial glossary of terms.

APR is the Annual Performance Report that grantees submit to HUD.

<https://www.hudexchange.info/resources/documents/e-snaps-CoC-APR-Guidebook-for-CoC-Grant-Funded-Programs.pdf>

e-snaps is the electronic grant management system that applicants use to upload their project application to HUD for CoC funding.

<https://www.hudexchange.info/resource/2915/esnaps-features-and-functions/>

Grantees are individual agencies awarded funds directly from HUD through the Anchorage CoC process and use these resources to provide homeless services and assist individuals and families to move into transitional and permanent housing.

Project Application: the term HUD uses for an individual project after it has been ranked by the Anchorage CoC Ranking Subcommittee. Agencies submit to apply for individual project funding through a separate portion of the application. The Project Application is completed only based on ranking of an Anchorage CoC Preliminary Application.

Sub-recipient refers to an organization that receives a CoC grant directly from the Alaska Housing Finance Corporation (AHFC). AHFC is the recipient of the grant and passes it through to a sub-recipient.

Continuum of Care: HUD's networks to allocate homeless grants. In Alaska, there are two CoCs: Anchorage and Alaska Balance-of-State.

Collaborative Applicant: For the purpose of submitting the annual CoC application, ACEH, as lead agency, is considered the collaborative applicant.

Homeless Management Information System (HMIS): Congressionally mandated for all programs funded through HUD homeless assistance grants to improve data collection and provide performance measurement.

HMIS Vendor: the software technology that functions as HMIS (Bowman Systems)

The Continuum of Care Application (previously called the Consolidated Application) describes all of the agencies and services available in a CoC's community, including those agencies that are not applying for HUD funding. For more information about the CoC Application, refer to the HUD Exchange.

Relevant Acronyms

ACEH	Anchorage Coalition to End Homelessness
AHAR	Annual Homeless Assistant Report
AHFC	Alaska Housing Finance Corporation
AKCH2	Alaska Coalition on Housing and Homelessness
APR	Annual Performance Report
CDBG	Community Development Block Grant
CoC	Continuum of Care
ESG	Emergency Shelter/ Solutions Grant
HIC	Housing Inventory Chart
HMIS	Homeless Management Information System
HOME	Home Investment Partnerships Program
HRE	Homelessness Resource Exchange
HUD	US. Department of Housing and Urban Development
MOA	Municipality of Anchorage
NOFA	Notice of Funding Availability
PHC	Project Homeless Connect
PIT	Point in Time [count]

Roles and Goals in the Anchorage CoC Program

In the Anchorage CoC program, three organizations work to ensure that HUD CoC funding is available for the community of Anchorage: The Alaska Housing Finance Corporation, the Homeless Management Information System administrator and the Anchorage Coalition to End Homelessness.

Alaska Housing Finance Corporation (AHFC)

Alaska Housing Finance Corporation (AHFC) is the state's housing finance and public housing authority. AHFC provides match to CoC funds, as well as additional funding through the Homeless Assistance Program, Special Needs Housing Grant program, tax credits, HUD vouchers, and other critical housing finance programs. AHFC also provides matching funds for the HMIS lead agency chosen by the Anchorage and Balance of State CoCs.

Homeless Management Information System (HMIS) Lead Agency

The Homeless Management Information System (HMIS) Lead is a single point-of-contact who is responsible for day-to-day operation of the HMIS data collection system. The statewide AK-HMIS Committee, a body of representatives from both of the state of Alaska's two Continua of Care (CoCs), designates the HMIS Lead Agency.

The Anchorage Coalition to End Homelessness (ACEH)

The Anchorage Coalition to End Homelessness (ACEH) is the collaborative applicant for the Anchorage CoC. According to the ACEH bylaws, the Coalition's purpose is as follows:

To bring together a coalition of nonprofit, private sector, government and community members who provide and/or are consumers of a continuum of care and support to prevent homelessness and to connect homeless individuals and families to safe, secure and affordable housing and to select a board to act on behalf of the coalition. All funds, whether income or principal, and whether acquired by gift or contribution or otherwise, shall be devoted to these purposes.

The Coalition manages the Anchorage CoC process by:

- Convening the Anchorage CoC Committee;
- Monitoring the HUD Notification of Funding Availability;
- Preparing the application and ensuring applicants have the information they need;
- Managing the ranking process;
- Monitoring and evaluating the performance of recipients and sub-recipients; and
- Designating the HMIS lead and monitoring its activity.

ACEH Consultation with ESG Recipients

Per 24 CFR 578.7(a)(8)&(9), and (c)(5), ACEH consults with ESG recipients to determine how to allocate ESG program funds each year and to develop policies related to operating procedures, HMIS data management, administration, and program performance. Resources will be allocated to projects likely to prevent or reduce homelessness.

Anchorage Continuum of Care Committee

One of the key functions of the Anchorage Coalition to End Homelessness is to establish and maintain a knowledgeable and representative CoC Committee to advance goals related to Anchorage. Local non-profits, businesses, and governments are not required to receive Continuum of Care funding to participate in the Anchorage Continuum of Care. Everyone who has knowledge of, and interest in, assisting homeless people may be part of the Anchorage CoC. The ACEH CoC Committee operates as the official “Continuum of Care” (CoC) for the Anchorage geography (a.k.a. Alaska-500) under HUD regulations outlined in 24 CFR 578.

The ACEH’s bylaws set in place the Committee membership and responsibilities, restated below.

The Continuum of Care Committee will comprise of members from the nonprofit, private and government sector and the general community who are representative of the homeless and housing services within Anchorage. Examples are, but not limited to, homeless shelters, victim services, faith-based, state and local governments, school districts, hospitals, universities, law enforcement, veterans, and homeless or formerly homeless persons. This committee is responsible for ensuring that the Corporation complies with the HUD regulations pertaining to the operation of a CoC. All CoC Committee Members shall be appointed by the board and may include the Corporation’s directors, members as well as non-members.

In accordance with 24 CFR 578, the Anchorage CoC Committee must:

1. Hold at least two meetings of the full membership per year;

2. Issue a public invitation to join the Anchorage CoC Committee at least once each year;
3. Establish and periodically review written policies and procedures for:
 - a. Selection and operation of an HMIS;
 - b. Selection of a lead agency/collaborative applicant to facilitate annual submission to HUD of the CoC funding application;
 - c. Evaluation of program outcomes among CoC and ESG recipients; and
4. Identification and/or prioritization of projects for CoC funding.
5. Review the Anchorage Community Plan to Prevent and End Homelessness as it relates to the CoC geography and make an annual determination of unmet need.

The CoC Committee meets monthly to ensure the CoC is progressing on any goals set forth in the community application. The Committee also reports to the CoC/ACEH Board monthly and to the CoC/ACEH general membership at bi-monthly meetings.

In the event ACEH is unable to organize or operate as its own formal CoC, the procedures identified for the Alaska CoC Committee may be applied among the members of the ACEH CoC Committee from the Balance of State Alaska Coalition.

Anchorage CoC Committee Responsibilities

To Operate the Continuum of Care

- The Committee leads, develops, follows, and updates a governance charter annually.
- The Committee holds meetings of the full membership, with published agendas, at least semi-annually.
- The Committee makes decisions as a board of the whole.

Records Retention

The Coalition maintains all records pertaining to Anchorage CoC, on the ACEH website, including:

1. Evidence that the Committee members meet HUD requirements
2. Published agendas
3. Meeting minutes
4. An approved governance charter
5. A written process for selecting Committee members
6. Monitoring reports of recipients and sub-recipients
7. Evidence they have prepared the CoC application for funds as regulated by HUD

When CoC funds are used for acquisition, new construction, or rehabilitation of a new project site, records are retained until 15 years after the date the site is first occupied. All other records are maintained for no less than seven years.

Subcommittees and Workgroups

The Committee chair appoints ad hoc subcommittees as needed.

RANKING SUBCOMMITTEE

Each year, a subcommittee is convened to rank applications. The Ranking Subcommittee is comprised of Anchorage CoC members and others appointed to review the proposals. The subcommittee uses the Anchorage CoC prioritization process described below in the “Preliminary Application” section. This subcommittee is quickly created each year and disbands following completion of the ranking process. Current CoC grantees and new CoC funding applicants are not eligible to be on the subcommittee; this includes grantees under monitoring. As a result, grantees must wait one year after being awarded funding to participate on the subcommittee.

The ranking process can take up to twelve hours of proposal review and committee decision-making. The process usually occurs in the late fall. Project applicants are allowed an optional presentation to the ranking sub-committee on their application.

Monitor and evaluate performance of Anchorage CoC recipients and sub-recipients

In 2015, the Coalition will review program performance and consult with recipients and sub-recipients to establish performance targets appropriate for population and program type, monitor recipient and sub-recipient performance, evaluate outcomes, and counsel poor performers.

Establish and operate a coordinated entry system

The Coalition is required to establish and operate a centralized or coordinated entry system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services.

Establish and maintain standards for Anchorage CoC assistance

Prioritization for all transitional, rapid re-housing, and permanent supportive housing for the Anchorage CoC is based on the results of local needs assessments and their relation to the federal plan; the Alaska Council on the Homeless 10-year plan to end homelessness; and local homeless services plans.

Homeless Management Information System (HMIS)

The Coalition designates the HMIS lead for the Continuum of Care. This may be set in contract or memorandum of agreement. The contract or memorandum of agreement addresses privacy, security, data quality, training for HMIS users, and HUD compliance. The Coalition periodically reviews the performance of the HMIS vendor. Without prejudice, the Coalition regularly goes to bid for HMIS Leads. The Coalition ensures consistent participation of recipients and sub-recipients in the HMIS and reporting from the HMIS to recipients and sub-recipients. The Committee works with domestic violence programs to secure centralized data as appropriate to the needs of victims of domestic violence and related crimes.

Anchorage CoC plan

On behalf of the Anchorage CoC, the ACEH coordinates the implementation of a housing and service system to meet the needs of the homeless individuals and families. This system includes:

1. Outreach, engagement, and assessment;

2. Shelter, housing, and supportive services; and
3. Prevention strategies.

ACEH works with the Alaska Council on the Homelessness and uses the state's Alaska Council on the Homeless 10-year Plan, which links to each of the state's homeless coalition plans.

Planning for and conducting an annual point in time count

The Anchorage Coalition to End Homelessness works with the Alaska Housing Finance Corporation, the HMIS lead agency, and all local homeless coalitions in Alaska to encourage and perform a Point In Time count in late January of each year. Point In Time counts are often paired with Project Homeless Connect activities.

Conducting an annual gaps analysis of homeless needs and services

The Coalition provides information necessary to complete consolidated plans and consults with state and local government Emergency Shelter Grant (ESG) program recipients on the plan for allocating ESG program funds and reporting performance.

Code of Conduct and Conflict of Interest

Anchorage CoC Committee members represent the Committee and take that as their primary purpose as Committee members. Board members connected to agencies receiving CoC funding must recuse themselves from any specific project evaluation or funding prioritization activities. The Anchorage CoC Committee uses the statewide Coalition's most recently adopted or revised version of the conflict of interest policy, restated below.

A Director shall notify the Board of Directors of any potential conflict of interest and shall recuse himself/herself from any matter affecting an entity in which that Director may have a substantial financial interest. A Director may recuse himself/herself for any self-identified or otherwise questioned conflict of interest. In lieu of self-recusal, a Director may request a determination from the board if he or she believes a potential conflict of interest may exist. If a Director disagrees with a questioned conflict of interest, any Director may request a determination from the board. A simple majority of the board shall decide if a Director will be recused from a matter.

Anti-Discrimination Policies

The federal Fair Housing Act prohibits housing discrimination based on race, color, national origin, religion, sex, disability, and familial status (i.e., presence of children under the age of 18 in the household or pregnancy). Housing discrimination against people with HIV/AIDS and people perceived to have HIV/AIDS is also illegal under the Fair Housing Act's prohibition of disability discrimination. On September 21, 2016, HUD published a final rule in the Federal Register entitled Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs. Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD). This rule builds upon HUD's February 2012 final rule entitled Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identify (2012 Equal Access Rule), to ensure that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.

The final rule requires recipients and subrecipients of HUD's Community Planning

Department (CPD) funding, as well as owners, operators, and managers of shelters, and other buildings and facilities; and providers of services funded in whole or in part by any CPD program to grant equal access to such facilities, and other buildings and facilities, benefits, accommodations and services to individuals in accordance with the individual's gender identity, and in a manner, that affords equal access to the individual's family. HUD enforces regulation that ensures its programs are open to all eligible individuals regardless of actual or perceived sexual orientation or gender identity. To protect the privacy, health, safety and security of all individuals, the Anchorage CoC fully adopts and implements the related HUD anti-discrimination policies.

Individuals served through CoC funded programs will have full and equal access to housing and services:

- Housing and services will be made available without regard to actual or perceived sexual orientation, gender identity or marital status.
- Sexual orientation or gender identity cannot be used to determine eligibility or to make housing available.
- Lesbian, gay, bisexual and transgender people are guaranteed equal access to HUD's housing and shelters (as according to the 2012 published Equal Access Rule).
- There are no requirements for individuals to prove gender identity to access housing and services.
- In single-sex facilities, individuals will be placed, served and accommodated in accordance with their gender identity.
- Individuals will not be subjected to questioning or asked to provide anatomical information, documentation, physical or medical evidence of their gender identity.
- When projects serve any families with children, they must serve all families with children including families composed of all composition types including: single dad, single mom, same-sex couples, opposite-sex couples, multi-generational and non-romantic groups who present for services as families (for more information <https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/>)

CoC and ESG affiliated programs are required to comply fully with the above mentioned policies and any new HUD anti-discrimination policies that may develop.

This includes:

- Establishing and enforcing program-wide anti-discrimination policies that are compliant with the Fair Housing Act, Equal Access Rule, Gender Identity Rule and LGBT Final Rule. This policy should include how to address program specific challenges with enforcing these policies and client grievance processes. For example, in shelters where individuals who have lived through trauma may have concerns about a new resident's gender identity. The program policies should proactively detail how the organization will respond in accordance with HUD's anti-discrimination policies.
- Establishing policies for individuals to express concerns or report violations.
- All employees will complete mandatory yearly anti-discrimination training that covers the Fair Housing Act, Equal Access Rule, Gender Identity Rule and LGBT Final Rule (provided by grantees internally or through participation in CoC facilitated training)
- Posting the Notice on Equal Access Rights in programs <https://www.hudexchange.info/resources/documents/Notice-on-Equal-Access-Rights.pdf>
- Individuals who express concerns must be advised that they can report their concerns to their local HUD office as explained on the Notice of Equal Access Rights.

Roles of Anchorage CoC grantees, sub-recipients, applicants, and members

Grantees, sub-recipients, and applicants

All agencies that have received Anchorage CoC funds or those interested in future competitions must fully participate with Alaska Housing Finance Corporation, the Anchorage Coalition to End Homelessness, and provide data through the HMIS system in order to be eligible.

In order to be eligible to apply for CoC funds, an applicant must agree to fully participate in the Anchorage Coordinated Entry System, including participating in data-sharing and receiving referrals from the system. Any applicant that does not, or cannot, agree to fully participate in the Coordinated Entry System will have their application rejected. In the event that a renewal applicant declines to fully participate in Coordinated Entry, their funding will be re-allocated or their grant transferred to an applicant that agrees to fully participate in the Coordinated Entry System.

All agencies that receive Anchorage CoC funds or are interested in receiving funding are responsible for ensuring that they are eligible and understand the CoC Notice of Funding Availability, completing the Anchorage CoC preliminary application including the leveraging chart, participating in negotiations following ranking, completing the project application form, completing an e-snaps application after Anchorage CoC Committee authorization, and applying for matching funds (if applicable).

ACEH will provide orientation on the program and ranking process, including thresholds, HUD priorities, working with local, state and federal plans, and e-snaps.

In addition, renewing grantees and new applicants must:

- Have or obtain a DUNS number
- Be knowledgeable about the HUD CoC program, using HUD application submission training modules at the HUD Homelessness Resource Exchange (HRE) website
- Complete the leverage chart, demonstrating proof of match
- Provide Anchorage CoC with documentation of site readiness for review (when applicable)
- If applying for transitional housing, provide Anchorage CoC with description of why transitional housing is a better fit in your community than permanent housing with transitional services
- Complete agency project application in a timely manner for Anchorage CoC review
- Enter information into e-snaps after authorization by the Anchorage CoC Committee. If e-snaps information is entered incorrectly, the application may be rejected and funds re-allocated.

Prospective applicants

Organizations that have not previously applied for and received funding through the Anchorage CoC are strongly encouraged to study the process for at least one year before applying.

Prospective applicants should shadow the application process. Participating in the ranking
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subcommittee is a good way to learn process, priorities, and decision-making from your peers.

Anchorage CoC members

Agencies that do not receive Anchorage CoC funds but that provide housing, homeless services, or are engaged in prevention activities are considered part of the Anchorage Continuum of Care and are included in planning, coordinating, and implementing a housing and service delivery system that meets the needs of the homeless population and subpopulations in the Anchorage.

Preparing the Application for HUD Continuum of Care Funds

The HUD Continuum of Care Program promotes community-wide commitment to the goal of ending homelessness; provides funding for efforts to quickly re-house homeless individuals and families to minimize trauma and dislocation; promotes access to and effective utilization of mainstream programs; and optimizes self-sufficiency among individuals and families experiencing homelessness.

Full details on the program, including program eligibility requirements, program laws, regulations, and notices, training materials and resources, and news and announcements can be found on the HUD Exchange at <https://www.hudexchange.info/coc/>.

Summary of Anchorage CoC Application Steps

To see an outline of the Anchorage CoC Application process and recommended steps, see the timeline in Appendix A. The timeline will likely need to be adjusted annually to align with the NOFA.

The Anchorage CoC Application

Portions of the application are prepared by ACEH as well as individual applicants.

Letter of Intent to Apply

Following HUD's announcement of the CoC Registration process, ACEH will request letters of intent to apply for funds. New applicants, renewal grantees and sub-recipients should all submit a letter stating their intent and the funds that they expect to request. This information may lead to additional availability for other organizations. ACEH will remind potential and current applicants of the letter of intent before the request, and follow up with renewal grantees and sub-recipients that do not respond.

Immediately following the NOFA release, another letter of intent may be solicited for prospective new projects.

Preliminary Application

After HUD releases a Notice of Funding Availability (NOFA), the ACEH and Anchorage CoC Committee look for changes in HUD priorities or funding opportunities. Generally, HUD prioritizes services to chronically homeless, permanent supportive housing, and rapid re-housing. Sometimes HUD offers a bonus opportunity to develop a new project. Each year, HUD sets a limit for which the Anchorage CoC is eligible to apply. There are often more requests than funding available.

The Anchorage CoC Preliminary Application is adapted accordingly, and released on the ACEH website and via email to advocates, organizations that serve homeless people, current recipients, and potential recipients. The application focuses on the agency project application, described below. The application includes the questions that are asked by HUD in the electronic submission program, e-snaps.

Preliminary Application Ranking

Ranking mirrors the HUD CoC criteria and the priorities of the Anchorage Community Plan to Prevent and End Homelessness. Project ranking makes a priority of serving the chronically homeless in all CoC Program-funded permanent supportive housing, not just those units that are dedicated to that population.

- **Multi-year renewal applications.** Ranking for renewals includes their performance as per their Annual Performance Report (APR), which is the data they report to HUD through e-snaps.
- **First-year renewal applications** may not have APR data to report. If the grant has been executed within less than 12 months, the new preliminary application ranking emphasizes the progress in opening the project in the first year of activity. First-year preliminary applications allow for more detailed explanations because there is no APR data. Supporting documentation is required.
- **New preliminary applications** are ranked on their potential to meet the standards established by the Committee, be successful in managing a housing project, and in securing and implementing HUD funding and match. New applications should allow for more detailed explanations because there is no APR data. They must respond to threshold questions. Supporting documentation is required.
- **Bonus projects** are ranked similarly to new preliminary applications, when bonus opportunities are offered by HUD.
- **Under-performing projects.** Funds for projects that are determined to be underperforming, obsolete, or ineffective are reallocated to new projects that are based on proven or promising models. If a project is not meeting reporting requirements, not being used, not meeting community need, or not expending funds in a timely manner, it will likely be considered under-performing.

Problems in the Preliminary Application

Applications are reviewed for completeness, accuracy, and length. The Anchorage CoC Committee views problems in preliminary applications as a signal that the applicant may not be prepared to complete the entire HUD process, and tries to assist applicants to be successful. The following process is used if an applicant submits an incomplete, inaccurate, or over-length proposal:

- a. The applicant is contacted upon completion of the review of their application with a written Notice of Curable Deficiencies.
- b. The applicant must correct the application in the time period given in the Notice of Curable Deficiencies.
- c. If problems with a preliminary application are not repaired within the time period in the Notice of Curable Deficiencies, the application is declined for ranking.

In general, corrections that are needed due to calculation errors, typos and technical adjustments in the preliminary application are acceptable, while changes to the narrative and application content are not permitted after the application deadline.

Ranking Strategy

Following ranking, the subcommittee takes into consideration Tier 1 and Tier 2 allocation. Funding limits for Tier 1 and 2 are determined by HUD with projects ranked in Tier 1 considered to be top priority program applications most likely to be funded. The strategy is based on the most likely success for HUD funding. The ranking process considers project quality, cost, performance, use of other mainstream resources, alignment with local priorities. The application criteria and scoring may be updated annually to include new information from HUD contained within the NOFA and Continuum of Care application.

In the event a project is ranked in such a way that it straddles Tier 1 and Tier 2, the Ranking Committee will 1) contact applicants whose projects have the option of straddling Tier 1 and Tier 2 to confirm the project would still be viable with only Tier 1 funding, and 2) prioritize high performing projects for inclusion in Tier 1. If an applicant's project straddles Tier 1 and Tier 2 and could still be viable, in the sole opinion of the applicant, and that applicant agrees to the straddle, the Ranking Committee will split the project accordingly. The Anchorage CoC prioritizes the HMIS project and the Coordinated Entry project as the Tier 1 rank 1 and rank 2 projects each year. These two projects represent CoC-wide and community-wide infrastructure support.

Problems with e-snaps

Should e-snaps be incorrectly completed, or not submitted in a timely manner, the entire Anchorage CoC application is jeopardized. Therefore, the Anchorage CoC Ranking Committee may reallocate funding among other applicants when programs do not correctly complete their e-snaps submission on time.

Appeals Process

The Anchorage CoC's appeals process is based on the Virginia Balance of State policies and procedures.

APPEAL TIMELINE

- Applicants will receive a summary of the ranking process by the date outlined by the Continuum of Care (CoC) upon NOFA release.
- Agencies that wish to appeal must notify the ACEH Executive Director in writing via email no later than 24 hours after the initial ranking results are released.
- Appeals are due at the close of business two days from when the ranking notifications is released.
- If an appeal is received the CoC Review Committee will make a technical review and recommendation to the ACEH Board.
- The ACEH Board will review and make a final determination on the appeal, in a meeting open to the public.
 - Board participation is contingent on the ACEH Conflict of Interest policy. Applying agencies or review committee participants would need to be recused.
- The ACEH Board will make a determination within two business days after the close of appeals and notify applicants of the appeal outcome.

APPEAL REQUIREMENTS

- An authorized representative from the applicant agency must submit the appeal.
- The appeal should be sent to the CoC Review Committee through the Anchorage Anchorage Coalition to End Homelessness: Continuum of Care Policies and Procedures

- Coalition to End Homelessness.
- Appeals must state the following:
 - The agency name and authorized official
 - project name
 - reason for appeal, including a reference to specific deficiencies, errors, etc.
 - agency point of contact
- Additional documentation may be requested during an appeal review.
- Applicants should note that the committee will not use the appeals process as an opportunity to reconsider funding decisions without a clear explanation of problems with the grant application in relation to the review by the ranking committee. Grounds for an appeal include:
 - Decisions in conflict with the NOFA and community priorities
 - Calculation Errors

The Community Application

In order to apply for funding under the CoC Competitive Program, agencies are part of one comprehensive community application. Each CoC consolidates community-wide information into a community application for the annual application submission to HUD. In the Anchorage CoC application, the “CoC Community” means the entire Municipality of Anchorage (MOA).

The community application describes all of the agencies and services available in a CoC’s community, including those agencies that are not applying for HUD funding.

The community application includes:

- An outline of the CoC’s goals and priorities,
- A housing and services inventory,
- Data on how many and what types of people are homeless,
- Information on which community partners are participating in the process, and
- How local programs are performing. For more information about Exhibit One, refer to the HUD Exchange.

The Project Application

Agencies apply for individual project funding through a separate portion of the application. The Project Application is completed only based on ranking of an Anchorage CoC Preliminary Application.

Although the project application is separate, whether or not a project is funded is dependent on the CoC’s community application score.

Appendix 1: Timeline of CoC Activities

When	Actions and Related Steps	Who	Status
Annual Timeline			
Ongoing	Recruit potential Anchorage CoC applicants.		
	Research and track funding opportunities.		
	Monitor and confirm Coalition/Committee priorities.		
	Send email reminders to membership about upcoming deadlines: 2 weeks, 1 week, 2 days, 1 day away.		
Quarterly	Secure and analyze Alaska Housing Finance Corporation (AHFC) and Department of Housing and Urban Development (HUD) data on how grant funds were used.		
Quarterly	Assess grantee performance.		
Spring	Collect and analyze Point-In-Time Count and Project Homeless Connect data.		
Spring	Review and analyze Coalition data and stakeholder input to develop recommendations for CoC priority adjustment.		
Spring	Conduct CoC annual meeting to review and finalize priority adjustment recommendations for upcoming year.		
Summer	Conduct mandatory applicant pre-application meeting and training. - Training objectives include a detailed overview of the CoC process, anticipated timeframes, and ranking process. - Ensure accurate contact list for CoC applicants.		
Summer	Request letter of interest (LOI) with anticipated funding need from all renewal applicants. If LOI express less need than prior years, planning can begin for reallocation projects.		
Summer	Send email reminder to membership re: impending Notice of Funding Availability (NOFA) release, ways to prepare and need for Ranking Sub-Committee participants. Correspondence should include details on each of these items including: "How to Prepare for the NOFA Release" and "Ranking Sub-Committee Eligibility, and Roles and Responsibilities".		
Summer	Recruit "Ranking Sub-Committee" members. - Invite previous year's Ranking Sub-Committee members to participate. - Respond to any interested members that result from email correspondence (see above). NOTE: Be clear - Ranking Sub-Committee cannot be current applicants.		

When	Actions and Related Steps	Who	
HUD CoC Notice of Funding Availability (NOFA) Timeline			
HUD releases CoC NOFA	Some specifics related to timeline will be dictated by HUD application and Anchorage CoC will follow those guidelines and post them on our website.		
Week following NOFA release	Confirm or adjust current CoC process.		
	Create two new applications, one for renewals and one for new projects.		
	Hold CoC meeting to set meeting schedule, define timelines and discuss NOFA.		
	Prepare an application Gant chart with timelines and activities for easy monitoring.		
	Post timeline and applications on the ACEH website.		
	If extra funding is anticipated, email membership and post on website so programs can prepare for opportunity.		
	Notify membership of NOFA, timelines, and guidelines for submissions. Stress deadlines are firm and instructions need to be followed. Applicants must read NOFA.		
	Provide copy of the e-snaps information to applicants, when available.		
	If Bonus Project is available, notify ACEH Membership and CoC email group.		
	Conduct Ranking Sub-Committee teleconference to explain process, timeframes, and expectations. Determine two members to do APR data. Confirm no conflicts of interest.		
Weeks following NOFA release	Ongoing meetings following schedule to complete Community Application (if applicable)		
	Assign leads for various portions of the Community Application		
	Weekly meetings to assure Community Application includes accurate information that positions Anchorage to receive the highest CoC score possible		
	Regularly monitor HUD guidance per NOFA and applications to ensure we are up to date on information		
NOFA Guidance for Project Application Submission	CoC project applications due.		

Weeks following project application deadline	Initiate project ranking process: convene ranking sub-committee (RSC) to review ranking guidelines. (RSC Meeting #1)		
	Ranking sub-committee independently reviews and scores project applications.		
	Ranking sub-committee meets in-person to receive any applicant presentations and to finalize ranking, and discuss specific funding strategies if needed, including defining the distribution of Tier 1 vs. Tier 2 funding (RSC Meeting #2)		
	Negotiate and follow up with applicants if needed for final submission, including notification to any denied applicants.		
	Share ranking results with project applicants. Email out to membership and post to the ACEH website.		
	Collect and process any and all appeals, using the process defined in the Policies and Procedures.		
Project Application Deadline as dictated by HUD	Project applications completed and uploaded into E-Snaps		
Anchorage CoC application	Create list of tasks and assignments for the CoC collaborative application, including but not limited to pre-populating and scoring Annual Performance Report (APR) data, completing the grant inventory worksheet and completing certificates of consistency.		
	Pre-populate and score APR data and determine admin cost percentages.	Ranking Committee	
	Complete grant inventory worksheet.	AHFC	
One week prior to HUD deadline for CoC collaborative application	Complete certificates of consistency.		
	Review application to ensure complete before submission to HUD. Account for time to contact HUD for technical assistance.		
	Submit application.		
One week following HUD application deadline	Debrief process. Discuss what went well, what needs improvement for following year's process.		
	Provide feedback to applicants regarding how to strengthen applications.		
	Discuss any needed updates to the Policies and Procedures or Written Standards documents.		