

**Responses to Comments on Draft Policies and Procedures**

**June 4, 2018**

The CoC released for public comment on May 9 six (6) policy documents related to the FY2018 CoC competition. Fourteen (14) comments were received by the commenting deadline of 12:00 PM on May 21. Following are the comments and responses developed by the Values & Funding Priorities Committee. Comments have been edited to preserve the anonymity.

<b>FY2018 Recommended Reallocation Policies</b>	
<b>COMMENT</b>	<b>RESPONSE</b>
<b>1)</b> In respect to the rationale given, it states that "All renewal projects may still be reallocated if they fail to meet performance expectations." Reallocation not only means shifting renewal project funds to new projects, but also moving projects from one agency to another? I guess I'm a little unclear about the definition and process of reallocation in regards to poor performance.	<b>1)</b> Thank you for your comment. Reallocation is the process by which a renewal project's CoC funding is reduced in part or in whole. That funding is then used to fund new projects. These new projects are applied for on a competitive basis.
<b>2)</b> Support	<b>2)</b> Thank you for your comment.
<b>3)</b> Under Recommendations: "Any renewal project that fails to meet the 70% scoring threshold and is not granted an appeal." Should that read "Any renewal project that fails to meet the 70% scoring threshold and is not granted a threshold waiver."	<b>3)</b> Thank you for your comment. This corrected language will be reflected in the final document.
<b>4)</b> [AGENCY NAME] has no comments on Reallocation Policies.	<b>4)</b> Thank you for your comment.
<b>5)</b> Under Rationale: "All renewal projects may still be reallocated if they fail to meet performance expectations." Does "performance expectations" refer to the "70% scoring threshold?"	<b>5)</b> Thank you for your comment.  Renewal projects may be reallocated if they fail to meet the 70% scoring threshold and are not granted a threshold waiver. Projects may also be reallocated at the discretion of the CoC board. The language in the policy will be clarified to reflect this.

<b>FY2018 Renewal Application Policies</b>	
<b>COMMENT</b>	<b>RESPONSE</b>
<b>1)</b> Support the additional and revised scoring criteria, just curious to better understand how the SSO items in component #9 will be measured. Also, in component #4, i'm curious to know what item E, "referrals to assigned bins" means as it was not explained further on page 9.  Also, as a terribly detailed side-note... on page 3 of the document, under "recommended changes include:" it looks like items 7 and 8 may have been reversed where item 7 refers to Component #8 but then discusses CAM and item 8 refers to component #9 but discusses PSH.	<b>1)</b> Thank you for your comment. Additional details on how these elements will be measured will be provided in the final FY2018 HUD Continuum of Care Funding Competition Renewal Application and Evaluation Policies.  Thank you for noticing this typo. It will be corrected in the final document.

### FY2018 Renewal Application Policies

COMMENT	RESPONSE
<p><b>2)</b> The policies should reflect the concern of specific situations which make it difficult to meet program quality measures. Each agency should have more ability to provide explanatory submissions in any area where a program may fall below stated measurements with a rubric by which those explanations can be considered in the scoring of rank. Often there are times where thresholds may not be met for a period of time but the reasoning is considered in the best interest of the continuum. This should be reflected in the process put forward. The policies should have some way of stating this explicitly so that there is an identified manner in which situations which have resulted in unmet measurements can be considered prior to any eligibility considerations.</p>	<p><b>2)</b> Thank you for your comment. The appeals process that is in place allows agencies the opportunity to provide explanation for any score received on any component of the application.</p> <p>Consideration is given to system-wide changes that may impact project performance for multiple projects across the board.</p>
<p><b>3)</b> Will utilization rates negatively affect the scores of new projects depending on your project start date?</p>	<p><b>3)</b> The FY2018 HUD Continuum of Care Funding Competition Renewal Application and Evaluation Policies and Procedures will clarify the applicability of the occupancy rate evaluation criteria for newer renewal projects.</p>

### FY2018 Ranking Policies

COMMENT	RESPONSE
<p><b>1)</b> Support</p>	<p><b>1)</b> Thank you for your comment.</p>
<p><b>2)</b> [AGENCY NAME] is concerned that ranking in submission should have more ability to provide explanatory submissions in any area where a program may fall below stated measurements with a rubric by which those explanations can be considered in the scoring of rank. Often there are times where thresholds may not be met for a period of time but the reasoning is considered in the best interest of the continuum. This should be reflected in the process put forward.</p>	<p><b>2)</b> Thank you for your comment. The appeals process that is in place allows agencies the opportunity to provide explanation for any score received on any component of the application.</p> <p>Consideration is given to system-wide changes that may impact project performance for multiple projects across the board.</p>
<p><b>3)</b> The criteria do not appear to make any provisions for ranking traditional SSOs. While it does not appear that any traditional SSOs will be permitted to apply next year (since there are no SSOs to renew), pending the outcome of planned appeals (which cannot be filed until the entire national HUD allocation process is completed including awards for Puerto Rico and the Virgin Islands), there could be as many as four groups awarded funding. Some provision should be made for this possibility. There should also be consideration given to a process which does not automatically provide lowest priority to all SSOs, which is effectively what happened last year. This is important because it</p>	<p><b>3)</b> Thank you for your comment. Since the HUD appeals process has not yet been finalized, the ranking policies will be amended to identify where renewal non-Coordinated Entry Supportive Services Only (SSO) projects will be ranked in the event that such projects are granted an appeal by HUD and therefore eligible for renewal in the FY2018 competition.</p> <p><i>This comment was initially submitted under a different policy, but has been categorized under ranking policies given the content of the comment.</i></p>

**FY2018 Ranking Policies**

COMMENT	RESPONSE
<p>appears that the work performed by these SSOs is not covered elsewhere and there are significant vulnerable sub-populations of the homeless (such as children, the elderly, and victims of domestic violence) that will not have access to these programs. When the ranking criteria were designed, apparently at the urging of HUD, they were largely based on efforts to house the chronically homeless, a difficult population to serve without intensive and expensive long-term rent payment support. As a result, the permanent supportive housing programs were considered more important since they were targeted to this population. However, at no point does it appear that there was ever any analysis of the impact of totally eliminating essential services for other (much larger and also vulnerable) populations of the homeless. We do not need to be increasing the numbers of the chronically homeless because there are no services available to intervene to prevent a first or second episode of homelessness, especially when those one-time services are more cost efficient. The devastating effect of a single episode of homelessness on families with children or other vulnerable populations has been well documented. The failure to address this group in our CoC is a significant omission. We recognize that this was a decision of HUD and not of our CoC which recommended funding for four SSOs. However, providing a bottom priority for this category of service, provided HUD with an opportunity to permanently eliminate this critical part of Detroit's continuum in defiance of deference to local decision-making.</p>	

**Detroit CoC Funding Appeals Process Policy and Procedures**

COMMENT	RESPONSE
1) Support	1) Thank you for your comment.

**Detroit CoC Funding Application Review and Ranking Process**

COMMENT	RESPONSE
1) Support	1) Thank you for your comment.

**Recommendations for Transitional Housing for FY2018 Competition**

COMMENT	RESPONSE
1) Support this - looking forward to creating better, more coordinated process for TH beds.	1) Thank you for your comment.