

2022 INDIANA BALANCE OF STATE POLICIES AND PROCEDURES

Indiana Balance of State CoC

APPROVED 9.15.22

CoC Board Conflict of Interest Policy

All board of director's member for the Indiana Continuum of Care (CoC) are required to protect the integrity of the CoC to the end that there will be no conflict between CoC business operations (funding) and board member self-interest.

It is the policy of the Board of Directors that officers, and directors shall have the continuing affirmative duty to appropriately report any personal ownership, interest, or other relationship that might affect their ability to exercise impartial, ethical and business judgments in the area of their responsibilities. This policy shall be further subject to the following principles:

- 1) Officers and directors, of the CoC, shall conduct their responsibilities with respect to suppliers, customers and other persons doing, or seeking to do business with the CoC, in a completely impartial manner, without favor or preference, based upon any consideration other than the best interest of the CoC.
- 2) Officers and directors shall not seek or accept, directly or indirectly, any payments, fees, services, or loans from any business impacting the CoC. This does not, however, prohibit an officer or director from receiving compensation for services that such person may render, where services will not affect the impartial discharge of such person's duties or obligations to the organization.
- 3) Officers and directors shall not seek or accept for themselves, or any member of their families, from any person or business entity that does or seeks to do business with the CoC: any gifts, entertainment or other favors of a character that goes beyond common courtesies consistent with ethical and accepted business practices.
- 4) Directors who own, directly or indirectly, a significant financial interest in, or who manage or are employed by, any business entity that does or seeks to do business with the CoC, shall refrain from voting on any issue pertaining to that relationship.
- 5) Officers and directors shall not conduct business on behalf of the CoC with a relative or business entity with which they are associated, except where such dealings have been disclosed and specific approval and authorization have been given.
- 6) Directors and officers shall provide disclosure annually, or as changes arise, regarding their participating as a director, officer or employee of any other not-for-profit organization.
- 7) Directors and officers shall provide a disclosure statement annually, or as changes arise, regarding any potential conflict of interest. The Executive Committee of the board shall be responsible for oversight of all disclosures and/or failures to disclose and recommendation of appropriate actions to the Board of Directors.
- 8) Officers and directors who participate knowingly in activities that constitute a conflict of interest as described above, without proper reporting of the existence of such a conflict, may be subject to termination of their position on the board and/or any other sanctions which may be deemed appropriate.

Implementation of Policy

To implement the foregoing, the Board Chair of the CoC shall provide to each board of director annually a copy of the Conflict of Interest Policy and questionnaire as a means of disclosure of potential conflicts or to verify that the individual does not have any such connections or interests.

Regardless of provisions for an annual questionnaire, every employee and volunteer shall report any change in personal status that might be construed to be in conflict with the interests of the CoC. If the

Board Chair determines that any matter, situation, or connection so disclosed is contrary to the interest of the CoC, such conflict shall be eliminated within a reasonable time.

Indiana Balance of State CoC FY 2021 NOFA Competition Project Ranking and Reallocation Policy

Updated August 12, 2022

Purpose

On an annual basis, the Indiana Balance of State Continuum of Care is required to rate and rank all new and renewal projects submitted to HUD for funding in an order that reflects the CoC's needs and priorities. Additionally, HUD requires CoCs to review the performance of all funded projects and seek to reallocate funding away from low performing projects or those providing services that are of a lower priority in preventing and ending homelessness.

The Indiana Balance of State is seeking to accomplish the following in the rating and ranking and of projects:

- Incentivize all providers to focus on outcomes and to seek to achieve the performance targets specified by the CoC and to improve the performance of the CoC system.
- Encourage providers to adopt evidence-based practices including Housing First to more effectively employ CoC resources.
- Replace projects that are not high performing, cost-effective, or following evidence-based practices with new projects that follow CoC and HUD priorities.

Policy

Ranking:

All new and renewal projects will be ranked by the CoC. The primary factor controlling the ranking of projects will be the scores assigned to renewal and new projects. Scoring is based on project performance, grant management, community outcomes, serving people with greatest need and highest vulnerability, and adherence to policy priorities. Except as specified below, projects will be ranked in the NOFA competition by the scores assigned to renewal or new projects.

There are two categories of projects that will not be ranked according to performance scores:

- Projects that are essential to the operation of the CoC. This includes funding for HMIS and Coordinated Entry. These are unique projects focused on CoC operations and that cannot be readily evaluated or compared to other CoC funded projects. Failure to renew this funding would have negative consequences for the CoC and jeopardize future funding opportunities.
- First time renewal of newly funded grants. HUD requires newly funded one-year project grants to be renewed in the competition. In most instances, these projects will not be able to report on a full year's worth of operations in the APR.¹

The two project types identified above will not be assigned scores. These projects will be ranked by the CoC to assure – to the maximum extent possible – that they will be funded in the competition. Since the

¹ DV Bonus Projects were operated under a different administrative entity, and will complete their first cycle under IHCD's oversight. They will be ranked in accordance with policy by performance in the FY2023 Competition.

2021 competition has sufficient funding for all of the CoCs renewal demand to be in Tier 1, it is expected that all of these projects will receive renewal funding.

All other CoC projects will be ranked according to scores:

- Renewal projects will be ranked according to renewal project score. Renewal projects were scored on a 100-point scale with bonus points available to allow some grants to score over 100 points. When multiple projects are under a single renewal grant, the grant with the highest score will serve to inform the ranking for the entire grant.
- New projects will be ranked according to scores given. New projects are not eligible for bonus points and their maximum score is 100 points.
- In the event that there is a tie score between a renewal and a new project, the renewal will be ranked ahead of the new. In the event of a tie between two renewal or new projects, the project serving the most participants will be ranked highest.

DV Bonus

As in prior competitions, applicants may apply for projects under the Domestic Violence Bonus (DV Bonus). These are separate resources dedicated to serving those who are survivors of domestic violence, dating violence or stalking. All projects seeking funding under this bonus must follow Housing First. Eligible project types that may only serve DV survivors include:

- Rapid rehousing for families and individuals
- Joint TH-Rapid rehousing for families and individuals.

These projects are scored separately by HUD based on: the overall CoC score, need for the project, and experience of the provider. Multiple projects may be submitted for rapid rehousing or the joint component up to the total allowable for DV bonus funding to the CoC.

Reallocation

Current CoC grantees may elect to reallocate some or all of the funding associated with their project. These reallocated projects will be scored as new projects and ranked according to score the same as all new and renewal projects.

- CoC grantees in good standing (no outstanding HUD or IHEDA monitoring findings and no open audit findings) may voluntarily reallocate their funding and will not have to compete with other organizations for that funding. The reallocated project, will, however, have to compete for ranking with other new and renewal projects. In the 2021 competition these projects will be submitted as Transition Applications.
- Voluntary reallocation/transition projects will receive **15 bonus points** in the internal competition.

Minimum Score for Automatic Renewal

The minimum score for automatic renewal of CoC funded projects is 65% of the highest scoring project.

- If the highest scoring project receives a score of 100, then all projects scoring below 65 will be reallocated unless a Project Improvement Plan has been submitted and approved by the

Resources and Funding Committee. For example, should the highest scoring project receive a score of 90, then the minimum acceptable score would be 58.5.

- The Project Improvement Plan must specify how the project will improve performance and meet standards in the upcoming year. If the Resources and Funding Committee accepts the Project Improvement Plan, the grantee will be allowed to apply for renewal funding.

Applicants for Funding

Any eligible applicant for CoC funds can apply for new projects from the bonus pool or the uncommitted reallocation pool. Eligible applicants include not-for-profit corporations and agencies of government. Nonprofit organizations must have supporting documentation.

The CoC will only rank new projects for which there is sufficient funding in the bonus, DV bonus, or reallocation pool to fully fund the project.

Policy on Expenditure of Grant Funds

Funds unexpended at the completion of the grant term are recaptured by HUD. In some instances, these funds are then allocated to other CoCs or in other cases are returned to the federal treasury. The Indiana Balance of State seeks to minimize this recapture of funding and to the maximum extent possible ensure that homeless assistance funding allocated to Indiana is used to support homeless people in the state.

Under expenditure policy

It is the policy of the Indiana Balance of State that CoC funds granted to an applicant agency will either be fully expended to assist eligible homeless people or the CoC will recapture the unspent funding and add it to the pool of resources available for reallocation.

Indiana Balance of State CoC grantees that expend less than 75% of their funding in the most recent completed grant year for all projects will see their grant reduced by a minimum of 10%; those who expended below 50% will be reduced by 25%. This process will continue in future competitions with the thresholds for repurposing increasing until all grantees are expending at least 90% of grant funds.²

The scoring criteria for new and renewal applications are attached to this document.

² Projects that did not spend their required threshold amounts in the FY2019 period (most recent completed period for all projects) due to COVID-19 will have the opportunity to submit a justification to the Funding & Resources committee for their consideration.

Internal Renewal Program Application Scoring Criteria and Instructions:

The following is the list of sections that are completed by renewal project applicants using the “Internal Renewal Program Application” (IRPA) form. In 2022, this form was complete by projects using the JotForm system. Renewal project application was released June 1, 2022 and due June 22, 2022. IRPAs were reviewed by non-conflicted individuals in July. Renewal projects were notified of their scores August 22, 2022. Projects could appeal their score in accordance with the Appeals Policy.

General Information	Scoring Criteria
Please review for completion only. Note on your score sheet if there are any application answers left blank.	Not scored, review only

Eligibility, Requirements and Threshold	Scoring Criteria
<p><i>Eligibility questions are threshold for projects:</i></p> <p>SAM registration- YES</p> <p>Secretary of State registration- YES</p> <p>Outstanding federal delinquent debt- NO (if yes is selected, sub answers should also be “yes”)</p> <p>Federally debarred contract- NO</p> <p>Project meets HUD requirements for renewal- YES</p> <p>Participants meet HUD eligibility for the project type- YES</p> <p><i>Federal Requirements are threshold for projects:</i></p> <p>Education requirements- YES</p> <p>Designated staff for education- YES (and attached policy)</p> <p>Non-compliance with education- NO</p> <p>Drug-free workplace- YES</p> <p>Lobbying- NO</p> <p>Civil rights, fair housing and equal opportunity- YES</p> <p>Title V properties- NO</p> <p>Housing Quality Standards (HQS)- YES</p> <p>Lead-based paint- YES</p> <p>All questions that do not match should have a rationale provided for why in the narrative section at the end of this section.</p>	<p>Not scored, review only for alignment with threshold answers listed in left column.</p> <p><i>IHCDA Staff: If project did not attach their education policies please make note of that in the score sheet notes section.</i></p>

Coordinated Entry Questions- 20 point max	Scoring Criteria
1. What is the percentage of your participants that are being assessed using the CoC adopted assessment tool prior to entering the program (during calendar year 2020)?	100% assessed prior to entry = 10 points 90-99% assessed prior to entry = 5 points >90% assessed prior to entry = 0 points
2. How many households that were referred through coordinated entry were admitted into the project in 2020?	95% or above = 10 points 90-94% = 5 points >90% = 0 points

Housing First Questions (please note, not all “yes” answers equal a point)- 15 point max	Scoring Criteria
1. Low Barrier access:	
a. Will/Does the project require clients to pass a background screening prior to project entry (excluding sexual offender/predator check)?	Yes = 0 points No = 1 points
b. Will/Does the project require all persons with specified criminal convictions on a blanket basis to be excluded from admission (excluding registered sexual offender/predator, and background screening imposed by other funders)?	Yes = 0 points No = 1 points
c. Will/Does the project require participants to be clean and sober for a specified period prior to project entry as a condition for admission?	Yes = 0 points No = 1 points
d. Will/Does the project serve individuals and families regardless of sexual orientation, family composition, or marital status and are transgendered persons served according to the gender with which they identify?	Yes = 1 points No = 0 points
e. Will/Does the project expedite the admission process including assisting in assembling necessary documents to support the application for admission?	Yes = 1 points No = 0 points

2022 INDIANA BALANCE OF STATE POLICIES AND PROCEDURES

f. Does the project actively participate in coordinated entry including attendance at meetings and case conferencing and, if applicable, are all new project entrants being referred through coordinated entry?	Yes = 1 points No = 0 points
2. Housing Retention	
a. Will/Does the project terminate participants for failure to participate in treatment or support services including case management?	Yes = 0 points No = 1 points
b. Will/Does the project terminate participants solely for engaging in substance use?	Yes = 0 points No = 1 points
c. Will/Does the project require participants to obtain earned or benefit income as a condition of remaining in the project?	Yes = 0 points No = 1 points
d. Will/Does the project make all efforts to avoid discharging participants into homelessness including referral back to coordinated entry for those who cannot remain in the project?	Yes = 1 points No = 0 points
e. Will/Do project participants be held to standards/behaviors not found in mainstream leases (such as not being allowed visitors, curfews, required to do chores, or not be allowed to have alcoholic beverages in their unit)?	Yes = 0 points No = 1 points
3. Participant engagement	
a. Will/Does the project provide participant choice in accessing services and are efforts made to connect participants to community-based services?	Yes = 1 points No = 0 points
b. Will/Does the project provide regular opportunities for program participants to provide input on project policies and operations?	Yes = 1 points No = 0 points
c. Will/Does the project employ Person Centered Planning as a guiding principle of the service planning process? (Person Centered Planning focuses on the individual what he or she would like to accomplish in terms of relationships, community participation, achieving control over their lives, and developing the skills and resources needed to accomplish those goals.)	Yes = 1 points No = 0 points

d. Are/Will the project staffed be trained in clinical and non-clinical strategies to support participant engagement including harm reduction, motivational interviewing, trauma informed approaches, and strength based?	Yes = 1 points No = 0 points
TOTAL SCORE: Tally the points based on the scoring criteria column.	Max score is 15 points

Performance Measures: this section uses HMIS data that the projects pull themselves to fill in charts that calculate percentages. Data is reviewed prior to notifying projects of their score. Questions that had any calculation errors are recalculated.	Scoring Criteria
1) Based on the APR, what is the percentage of data elements for participants that are missing or null?	For all project types: <ul style="list-style-type: none"> ▪ Average is 95% and above = 10 points ▪ Average is 90-94% = 5 points ▪ Average is below 89% = 0
2) What is the percentage of exits to permanent housing or remaining in permanent housing?	For RRH / TH-RRH: <ul style="list-style-type: none"> ▪ 90% or greater exiting to PH = 10 points ▪ 85-89% = 5 points ▪ >85% = 0 points For PSH: <ul style="list-style-type: none"> ▪ 95% or greater exiting or remaining in PH= 10 points ▪ 90-94% = 5 points ▪ >90% = 0 points
3) What is the percentage of households that exit to homelessness or unknown	For all project types: <ul style="list-style-type: none"> ▪ 5% or fewer exit to homelessness or unknown = 10 points ▪ 8% or fewer return to homelessness or unknown = 5 points ▪ >8%= 0 points
4) What is the percentage of adult participants who maintain or increased their total income?	<ul style="list-style-type: none"> ▪ At least 25% of adult participants gain or maintain their total cash income (earned and benefit) from program entry to exit or

	at re-verification for households continuing in program = 5 points
5) Utilization Rate	90% and above on average for the four PIT dates in APR = 10 points; 85-89% = 5 points; <85% = 0 points
6) Use of HUD Resources <i>This information should align with what is submitted in the HUD close-out report.</i>	95% or more of HUD funds expended in last grant cycle = 10 points; 90% or more of HUD funds expended in last grant = 5 points; <90% = 0 points
7) Compliance with expenditure requirements. <ul style="list-style-type: none"> a. For organizations that are sub-recipients to IHCD, has your organization submitted monthly claims by the 20th of each month for reimbursement and not submitted drawdown requests seeking multiple months of funding? b. For organizations that are direct recipients of HUD grants, have you submitted ELOCCS drawdowns no less frequently than quarterly? 	Projects will either select yes/no for Option A or Option B. 10 points max received on this question. If yes = 10 points No = 0 points If yes = 10 points No = 0 points

Bonus Question- 25-point max	Scoring Criteria
1. Training In the previous calendar year (2021), did employees of this project: <ul style="list-style-type: none"> ▪ Attend Spring Development Day ▪ Attend other Training related to Housing First or Evidence-Based Practices that support housing stability. ▪ Participate in at least one other IHCD or HUD offered training (webinar, local training) ▪ Participate in at least one other IHCD training (webinar, local training) 	Attended all 4: 5 points Attended at least 3 of 4: 3 points Attended at least 2 of 4: 1 point Attended fewer than 2: 0 points
2. Compliance In the previous calendar years (2019 and 2020), did the agency: <ul style="list-style-type: none"> ▪ Submit signed agreements in a timely manner ▪ Submit required documentation (match letter, homeless representation, board resolutions) in a timely manner ▪ Submit required close-out reports by the deadline 	Yes to all 5: 5 points Yes to 4 of 5: 3 points Yes to at least 2 of 5: 1 point

<ul style="list-style-type: none"> Adhere to the terms of their grant agreement and all incorporated plans and attachments in the most recently completed year 	<p>Yes to 1 or fewer: 0 points</p>
<p>3. Collaboration</p> <p>In the previous calendar years (2019 and 2020), did the agency:</p> <ul style="list-style-type: none"> Participate in Regional Council meetings Participate effectively in Coordinated Entry Participate on a regional committee, a Balance of State committee or an IHCD working group In 2020 and 2021 did the agency engage in efforts to address the COVID-19 pandemic, mitigate the impact on people experiencing homelessness, and/or support vaccination efforts? 	<p>Yes to all 4: 5 points</p> <p>Yes to 3 of 4: 3 points</p> <p>Yes to at least 2 of 4: 1 point</p> <p>Yes to 1 or fewer: 0 points</p>
<p>4. Prevent, prepare for, and respond to COVID-19 Pandemic. In a narrative below please indicate:</p> <ul style="list-style-type: none"> Ways in which the COVID-19 pandemic impacted your agency's ability to carry out the CoC project and achieve intended outcomes. Ways in which your agency has been involved in responding to the pandemic including taking actions to limit exposure to and impact virus on participants and proactively assisting participants in securing vaccinations 	<p>Assess the extent to which agency provides concrete examples of how it was impacted by COVID-19 such as staff absences, inability to locate units and secure landlord participation due to COVID, etc. Reviewers can provide up to <u>5 points</u> based on concrete examples in response.</p> <p>Assess the extent to which the agency has engaged in direct actions to limit participant's exposure to the COVID virus and specific actions agency has taken to assist participants in access vaccinations. Reviewers can provide up to <u>5 points</u> based on concrete examples in response.</p>

Penalties	Scoring Criteria
<p>Was the application received after 5 PM on Wednesday, June 22, 2022</p>	<p>Yes= (-10 points) No= 0</p>
<p>Does the application of substantial deficiencies? Substantially deficient applications are characterized by multiple errors, significant information not provided, or inaccurate information provided.</p>	<p>Yes= (-10 points) No= 0</p>

New Project Scoring Criteria

RATING FACTOR	POINTS AWARDED		MAX POINT VALUE
Increasing Permanent Housing and Threshold			
A. Project Component: points awarded if the project is either a rapid rehousing project, supportive housing project, or if the expansion or renewal project increases units (this will be clarified in the Budget under Rental Assistance). Max score is 4 points, projects that are PSH and expand units only receive points for the new units 1x.			4
B. Housing First: project is awarded points for select the "yes" option based on the Housing First questions point ranges. 8 points= 15 "yes" answers/all yes; 6 points= 12-14 "yes" answers; 4 points= 9-11 "yes"; 2 points= 6-8 "yes"; 0 points= 5 or fewer "yes" answers.			8
C. Project did not skip any questions, especially providing UEI #, confirmed eligibility for CoC funds (nonprofit, government or tribal entity), project does not have unresolved HUD findings, and agrees to follow Written Standards and use HMIS).			Must be "yes"
Subtotal	0		12

Experience			
<p>A. Federal funds experience: 1 point for satisfactorily detailing the agency's: 1) Experience/expertise with renting units, operating rental assistance, and providing supportive services like the activities proposed in the applications.</p> <p>2) Working with and addressing the needs of unsheltered homeless individuals or rural communities and those experiencing homelessness and supporting individuals and families to attain housing and meet their service needs.</p> <p>3) The project design has assessed the barriers to accessing the project, especially among populations experiencing high rates of homelessness in the community, and the steps taken to eliminate those barriers.</p> <p>4) Specifically describe your experience with the Housing First model, serving populations with the severe service needs and with delivering or securing Medicaid funded and other mainstream services for participants in the agency's programs.</p>			4
<p>B. Leveraging funds: 1 point if the applicant describes that they have, or a partner has, experience with leveraging federal, state, or local funding</p>			1
<p>C. Organizational management structure: 1) 1 point if applicant describes their organizational structure 2) 1 point if their description includes the internal and external controls and financial accounting system</p>			2
<p>D. Monitoring findings: 1 point if the organization DOES NOT have any monitoring OR audit findings</p>			1
<p>D. Returned funds: 1) 2 points if agency has not had a grant previously 2) 1 point if they have not returned funds in the last 2 years 3) 1 point if they submitted claims to IHCDA on-time OR met federal draw requirements</p>			1
<p>E: Utilization: 1) 3 points if ES/TH/SH beds in project was at or above 75% utilization on 1/26/22 2) 3 points if RRH, TH-RRH or PSH project was at or above 90% utilization on 1/26/22. 0 points if projects do not have data or were below the percentages listed.</p>			3
Subtotal	0		12
Project Description			

<p>A. Description: 1) 1 point if the narrative describes the entire scope of the proposed project, 2) 1 point for identifying the community(ies) and/or county(ies) served, 3) 1 point for how the project will address housing disparity issues, 4) 1 point for providing a clear picture of the services provided to participants, 5) 1 point for describing implementation of HMIS including projected outcome(s), and 6) 1 point for describing any coordination with other source(s)/partner(s) especially healthcare (including mental health and substance abuse) and Medicaid.</p>			6
<p>B. Rapid implementation: 1) 1 point for projects that will have staff hired and project expenses within 6 months 2) 1 point for project being leased or at capacity within 12 months</p>			2
Subtotal	0		8
SUPPORTIVE SERVICES			
<p>A. Providing services to obtain and maintain housing: 1) Up to 2 points for narrative that describes services designed to obtain and ensure successful retention in housing, making sure that the explanation of services enhances what was described in your project description. Provide information on the specific plan to ensure program participants will be individually assisted in identifying and connecting to the benefits they may be entitled (Medicare/Medicaid, SSI, SNAP, workforce, education). 2) Up to 2 points for narrative that describes working with and addressing identified housing and service needs. Specifically describe your experience with the Housing First model, serving populations with the highest needs to obtain and maintain housing. This would include providing services (transportation, safety planning, case management) and by partnering with outreach or other service providers to connect to clients prior to housing and support a successful transition to permanent housing. 3) Up to 2 points for narrative that describes how program participants are assisted in identifying housing and are supported in their transition to housing, including assessing participants housing needs and preferences, helping them understand lease and tenancy obligations, helping obtain required documents for housing, providing transportation to units, and meeting with landlords.</p>			6
<p>B. Services integrate with health, access to substance abuse treatment, increase income: 1) 1 point if narrative describes coordination between healthcare entity 2) 1 point if narrative describes coordination with mainstream benefit/income 3) 1 point if agency completes the supportive services chart</p>			3
<p>C. Transportation, assistance with mainstream benefits, access to SSI/SSDI and SOAR training: 1) 1 point for completing the chart 2) 1 point for each box selected on the services detail chart.</p>			5
Subtotal	0		14
Performance Measures			
<p>A. Length of time homeless: 3 points if the agency can track length of time from enrollment to move-in, 0 if no</p>			3

B. Tracking and participant rate of increase income: 3 points if they can track income and changes in income, 0 points if no. 5 points if narrative describes their participants do increase income, 2 points if the narrative describes maintaining income/benefits. 0 points if participants do not maintain or increase income/benefits.			8
C. Tracking and participant rate of retention of permanent housing: 4 points if the agency can track the retention of housing, 0 if no. 5 points if 70% of more of participants have obtained and maintained housing, 2 if less than 70% have, 0 if no participants have obtained or maintained housing.			9
Subtotal	0		20
Representation and Equity			
A. Representative of the community served: 1 point if the organization has board and agency diversity in areas of race, socio-economic status, lived experience, LGBTQ+, age, and/or populations impacted by homelessness in their community. 0 if no			1
C. Lived experience representation: 1) 1 point if there is at least 1 person with lived experience on the board or staff 2) 2 points if anyone with lived experience has had a recent experience in the last 3 years.			3
B. Client feedback: 1) 1 point if the agency has a client/resident grievance procedure 2) 1 point if the agency uses other ways to obtain client feedback.			2
D. Stability for those at highest risk of returns to homelessness: 1) 1 point if the agency describes regional disparities in housing outcomes. 2) 2 points if agency describes how their knowledge is impacting the plan for services, including staff training			3
Subtotal	0		9
Housing and Healthcare			
A. The project has healthcare and housing partnerships documented: 1) 10 points if project can meet 25% leverage in PSH or RRH with letter(s) attached AND 25% leverage in healthcare with letter(s) attached. 2) 5 points if project can meet 25% leverage in PSH or RRH OR if project can meet 25% leverage in healthcare with letter(s) attached. 3) 3 points if project does not have documentation attached but is working to obtain documentation. 5) 0 points if the project cannot document the partnerships			10
Subtotal	0		10
Units and Budgets Information			
A. Supportive services 1) 2 points if project includes any dollars for services 2) 1 point if project correctly indicates staffing charges (title, salary and number of FTEs) *if applicable.			3

2022 INDIANA BALANCE OF STATE POLICIES AND PROCEDURES

B. Match information: 1) 1 point for completing the match budget section 2) 4 points if the match budget section is 25% of the total requested budget amount. 0 if it is not			5
C. Cost effectiveness: 1) 5 points if the cost of the project is within 10% of the average new project cost for that project type (match not included). If only project of its type, then 3 points. If greater than 10% then 0 points.			5
Subtotal	0		13
Project submitted application complete and on-time (including all attachments)			2
TOTAL SCORE	0		100

APPEALS POLICY AND PROCEDURES FOR THE INDIANA BALANCE OF STATE COC PROGRAM COMPETITIVE APPLICATION PROCESS

Effective Date: June 25, 2017 (reviewed August 12, 2022)

Purpose

The purpose of the appeals procedure is to settle disagreements between an applicant and/or grantee and the Indiana Balance of State Continuum of Care (BOS CoC) quickly and fairly. Where the appeal arises because of a project applicant objecting to actions and/or decisions taken by the Resource and Funding Committee or the full Indiana Balance of State Continuum of Care Board (CoC Board), the appeal process must proceed as expeditiously as possible to assure an equitable and efficient Continuum of Care Program Consolidated Application (CoC Application) process. To reach this goal, the BOS CoC Board shall establish an Appeal Subcommittee to review, respond to and adjudicate appeals. The Board vests in this Subcommittee the authority to make all decisions concerning appeals and its decisions are final.

Policy

Criteria for an Appeal

An appeal may be filed by any CoC funded renewal project or any agency applying for a new project that claims it has been adversely affected by:

1. Improper application or interpretation of HUD or CoC rules and regulations concerning participation of the appellant in the CoC Application process, or
2. Disparity in the application of HUD or CoC rules, regulations and procedures regarding the participation of the appellant in the CoC Application process.

Appeals may be made whenever a decision has been made that may have an adverse effect on an applicant. This includes the score received by a renewal or new project application, a reduction in grant amount of renewal grants, or the ranking in the project priority list of new and renewal applications.

Procedures

Overview

The appeals process is a two-step process: First, IHCD, acting as the Collaborative Applicant for the Indiana Balance of State Continuum of Care, will conduct an informal review on behalf of the CoC Appeals Committee to settle technical and/or procedural matters expeditiously. The Collaborative Applicant's role is to prepare an annual CoC Application for the CoC Board. In this role, the Collaborative Applicant will resolve technical matters during the informal review process. If the informal review of the appeal does not satisfy the concerns of the appellant, the matter will advance to a formal appeal process conducted by the Indiana Balance of State Appeals Committee.

Informal Review

To be considered for an informal review, an applicant must submit an appeal in writing based on one of the two criteria listed above to [enter email address] with the phrase "Informal Review" in the subject line no later than five (5) business days after the event that caused the appeal. The events that can cause an appeal include any decision made by the CoC Board or relevant committee that will impact the score of

renewal or new applications or the ranking of projects in the project priority list. The 5 business days for filing an appeal start on receipt of a scoring or ranking decision from the CoC.

The Collaborative Applicant will respond within five (5) business days of receipt of the appeal request.

Formal Appeals Procedure

If the informal review fails to resolve the matter, the applicant/grantee may then pursue a formal Appeal with the IN-BOS Appeals Committee. The following steps must be followed in the order given. An applicant organization may not omit a step.

Step 1

In order to be considered, an appeal must be filed in writing with the IN-BOS CoC within five (5) business days of the response to the informal review and submitted to [enter email] with the term "Appeal" in the subject line. The appeal must be based on one of the two criteria for an appeal and include facts that support the appeal.

The IN-BOS Appeals Committee has five (5) business days from receipt of the appeal to investigate, contact the applicant/grantee if necessary and respond in writing.

Step 2

If the applicant organization is not satisfied with the determination of the IN-BOS Appeals Committee, the applicant organization can appeal directly to HUD pursuant to the current NOFA for the CoC Program.