

Orange County Continuum of Care

FY2023 Agency Administrative Review for CoC Funded-Agencies

Released

June 16, 2023

Agency Administrative Review
Submission Deadline

July 10, 2023, at 12:00 p.m. (PDT)

TABLE OF CONTENTS

Introduction.....3

Renewal Eligibility3

Application Review Process4

Agency Administrative Review Process4

Required Documents for the Agency Administrative Review6

Project Renewal Application(s) Process.....6

Brief Overview of Required Documents7

Review, Scoring And Selection Process.....8

Submission8

Right of Orange County Continuum of Care to Waive Irregularities.....8

Further Questions and Additional Resources9

Additional Information.....9

ORANGE COUNTY CONTINUUM OF CARE (CoC) FY2023 AGENCY ADMINISTRATIVE REVIEW FOR CoC-FUNDED AGENCIES

INTRODUCTION

On an annual basis, the U.S. Department of Housing and Urban Development (HUD) provides funding for homeless service programs authorized under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act through a Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO) process. To submit an application to HUD for renewal funding, all agencies must submit a local Intent to Renew Survey, Agency Administrative Review for CoC-Funded Agencies, and CoC Renewal Project Application(s) to the Orange County CoC for evaluation to determine renewal status. The evaluation process helps to ensure a high standard of quality for renewal applicants and may also be used to make funding reallocation decisions at the local level. All renewal projects are currently under review for inclusion in the fiscal year (FY) 2023 CoC Application. If the CoC Board reallocates any projects or portion of a project, the agencies will be notified.

The County of Orange's (County) Office of Care Coordination as the Collaborative Applicant for the Orange County CoC facilitates this local renewal process in collaboration with the CoC Board. In Orange County, the CoC Board is the group of community stakeholders that sets local priorities for the CoC Program NOFO funding. The CoC Board and the CoC NOFO Ad Hoc, in collaboration with County, will evaluate FY2023 CoC Program NOFO regulations along with agency and project performance on the past grant(s) to ensure successful and competitive application is submitted to HUD. **Please note that renewal funding is not guaranteed upon submission of the FY2023 CoC Renewal Projects Application(s) to the County.**

For FY2023, the County, as the Collaborative Applicant for the Orange County CoC, is releasing the FY2023 Agency Administrative Review for CoC-Funded Agencies (Agency Administrative Review) for completion prior to the full CoC Renewal Project Application. The FY2023 CoC Program NOFO is expected to be released by HUD in late Spring or early Summer, which will inform the requirements for CoC Renewal Project application process.

RENEWAL ELIGIBILITY

An agency and its related renewal project(s) may not be recommended for renewal by the Orange County CoC if:

- It has a history of past and/or current contract non-compliance with HUD,
- a termination for cause by any other funding source,
- disallowed cost with the CoC Program or any other funding sources,
- significant financial audit findings, capacity concerns, and/or
- low project performance.

A project is considered eligible for renewal in the FY 2023 CoC Program NOFO competition if the project:

- has or will have an executed grant agreement with HUD by December 31, 2023, and have an expiration date in in calendar year 2023 (between January 1, 2023, and December 31, 2023),
- has been included on the Grant Inventory Worksheet (GIW),
- has met all performance spending and capacity requirements, and
- any other requirements outlined in the FY 2023 CoC Program NOFO.

APPLICATION REVIEW PROCESS

The Orange County CoC will complete its evaluation of agencies and renewal projects through a three-step process which will support with determining which agencies and projects are eligible to submit an application in the FY 2023 CoC Program NOFO:

1. Intent to Renew Survey
2. Agency Administrative Review
3. Renewal Project Application

At the completion of the Intent to Renew Survey, Agency Administrative Review and the Renewal Project Application, the Orange County CoC, CoC Board and CoC NOFO Ad Hoc will establish the FY 2023 CoC Application Renewal Project Evaluation Process based on FY 2023 CoC Program NOFO requirements and project priorities. A copy of these policies will be distributed to the agencies. Additionally, all agencies will be notified of their project(s) rank and scores through a Project Priority Listing after it has been evaluated and approved by County, the CoC NOFO Ad Hoc, and the CoC Board.

Agencies that fail to submit the Project Renewal Application will forfeit their project(s) funding and their funds will be reallocated. Consequently, the Orange County CoC will prepare policies, funding priorities and conduct a Request for Proposal (RFP) to reallocate funding for projects that are **not** eligible to be renewed.

The Orange County CoC will also utilize the Homeless Management Information System (HMIS) to review data concerning individuals and families experiencing homelessness or chronic homelessness that is collected by CoC funded projects seeking to renew funding. The HMIS data tracks the progress of CoC funded programs in meeting CoC and project-specific performance goals, to support communitywide planning, and to identify resources to address homelessness. The data in HMIS will be used to evaluate project performance for Renewal Projects. The performance measures and thresholds for the Permanent Supportive Housing, Rapid Rehousing and Joint Transitional Housing and Permanent Housing – Rapid Rehousing (Joint TH/PH-RRH) renewal projects will be presented to the CoC Board for approval and inclusion in the FY 2023 CoC Program NOFO Rating and Ranking process. CoCs need high-quality HMIS data to complete the homelessness components of the Consolidated Plan and to meet HUD reporting requirements, such as the required Point In Time (PIT) Count, Annual Performance Report (APR) and Longitudinal Systems Analysis (LSA). Finally, HMIS data is essential to documenting a CoC's qualifications as a high-performing community.

AGENCY ADMINISTRATIVE REVIEW PROCESS

The general purpose of the Agency Administrative Review process is to assess agency's capacity to administer CoC homeless service projects while complying with HUD requirements and to ensure that agencies can meet the threshold requirements to proceed with the Renewal Project Application process. The results of the Agency Administrative Review process will be presented to the CoC NOFO Ad Hoc and the CoC Board for final approval. If an agency is submitting one or more Renewal Project Applications,

the agency will need to submit the needed documents to complete the Agency Administrative Review only once. The findings of the Agency Administrative Review may be utilized and referenced during future components of the CoC local competition process in the event the Orange County CoC releases an RFP for Bonus Funding and/or reallocated funding.

The Agency Administrative Review process will also include a comprehensive review of the following:

1. Technical Requirements
2. Document Presentation Requirements
3. Timeliness
4. Intent to Renew Survey

Additionally, the County reserves the right to administratively disqualify or penalize any agency and/or Renewal Project Application that does not comply with the Technical Requirements, Document Presentation Requirements, and timeliness requirements.

Technical Requirements

1. One (1) printed original with signatures. The printed original must be in a binder with clearly labeled section tab dividers for all exhibits, attachments, and required documents.
2. One (1) electronic copy submitted via Dropbox. Exhibits and attachments, and other required documents are to be organized and separated per Document Presentation requirements.
 - Note: Do not submit all Exhibits and Attachments as one condensed file. Each Exhibit and Attachment should be labeled as a separate file.
 - DropBox Instructions:
 - i. Create a DropBox account.
 - ii. Click [here](https://learn.dropbox.com/self-guided-learning/dropbox-fundamentals-course/how-to-use-dropbox) to view instructions on how to use Dropbox or visit <https://learn.dropbox.com/self-guided-learning/dropbox-fundamentals-course/how-to-use-dropbox>
 - iii. Option 1: Share files via Dropbox link to the following email addresses:
 1. CareCoordination@ocgov.com
 2. felicia.boehringer@ocgov.com
 3. sarah.jones@ocgov.com
 - iv. Option 2: Copy the Dropbox link to the files and paste it into an email to the above email addresses.

Document Presentation Requirements

1. Clearly identify submittal as the original on the cover page of the submittal.
2. Tab Dividers will be clearly labeled between each exhibit and attachment.
3. All Exhibits and Attachments will be numbered separately within tab dividers, in accordance with the Supporting Documents Checklist. For electronic submissions, each Exhibit and Attachment should be a separate file and labeled accordingly.
4. Most recent documentation is submitted for each Exhibit and Attachment.
5. Do not leave any blank responses without an explanation (e.g., if the question is not applicable, indicate "N/A").
6. All documents with a signature block must be signed by the authorized representative(s).
7. All supporting documents must be included in the submission.
8. All supporting documents must be legible.

If the Agency Administrative Review submittal does not meet the Technical Requirements and/or Document Presentation Requirements, the overall score of the Agency Administrative Review will be negatively impacted. The following is a list of the possible reductions an Agency may receive in their overall submittal of the Agency Administrative Review.

- Two (2) points reduction for late submittals
- One (1) point reduction for not meeting the Technical Requirements
- One (1) point reduction for not meeting the Document Presentation Requirements
- One (1) point reduction for each incomplete or missing exhibit

REQUIRED DOCUMENTS FOR THE AGENCY ADMINISTRATIVE REVIEW

Please complete all the required forms listed below as part of the Agency Administrative Review. If an agency is submitting one or more Renewal Project Applications, the agency will need to submit the needed documents to complete the Agency Administrative Review only once.

- **Exhibit 1: Agency Information Form**
 - **Attachment 1:** Board of Directors' Roster and Resolution
 - **Attachment 2:** Organizational Chart
 - **Attachment 3:** State Certificate of Status
 - **Attachment 4:** Organization's Code of Conduct
 - **Attachment 5:** 501(c)3 certification
 - **Attachment 6:** Two most recent single audits, previously known as the OMB Circular A-133 audit, if applicable
 - **Attachment 7:** Two most recent agency financial audits by a certified public accountant (CPA):
 - On a separate document on agency letterheads and with the Board president's signature, discuss any findings from the audits and actions your agency has taken with associated dates or plans to address any concerns.
 - **Attachment 8:** Line of Credit Control System (LOCCS) screenshot for current year
 - **Attachment 9:** Most recent HUD Monitoring Letter and clearance letter for all renewal projects, if applicable
- **Exhibit 2:** Agency Certification for Renewal Projects
- **Exhibit 3:** Terms and Conditions
- **Exhibit 4:** Orange County Continuum of Care Participation

PROJECT RENEWAL APPLICATION(S) PROCESS

The local CoC Program Competition process consists of all HUD required processes and documentation as well as local completion factors and the completion of an electronic application in the e-snaps system.

Project Eligibility Thresholds

The County and HUD will review all agencies and the renewal projects to determine if they meet the following project eligibility threshold requirements on a pass/fail standard. If the applicable standards are not met for a project, the project will be rejected.

1. The project requesting renewal funding through its previously approved grant application has no issues or concerns related to monitoring findings and/or results from investigations by HUD's Office of Inspector General, the agency routinely draws down funds from eLOCCS at least once per quarter and meets Annual Performance Report (APR) submissions deadlines.
2. Agency and potential subrecipients must meet the eligibility requirements of the CoC Program as described in the Act and the Rule and provide evidence of eligibility required in the application.
3. Agency and potential subrecipients demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds.
4. Project application must submit the required certifications specified in the FY2023 CoC NOFO via e-snaps.
5. The population to be served must meet program eligibility requirements as described in the Act, the Rule, and Section II.B.11.f of the FY2023 CoC NOFO.
6. Renewal project must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that meets the needs of the local HMIS.

Project Quality Threshold

The County and HUD will review all agencies to determine if they meet the following project quality threshold requirements as CoC-Funded agencies All renewal projects must meet all the following criteria:

1. Agency and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded under the CoC Program, as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings.
2. Agency must demonstrate they will be able to meet all timeliness standards per 24 CFR 578.85 for the renewal project. Agency must demonstrate that they have met all renewal project threshold requirements of this NOFO.

BRIEF OVERVIEW OF REQUIRED DOCUMENTS

Agency Certification for Renewal Projects (Exhibit 2)

The Orange County Continuum of Care (CoC) is requiring agencies currently receiving CoC Program funding and interested in applying for funding for renewal projects in the FY2023 CoC Program Notice of Funding Opportunity (NOFO) to complete an Intent to Renew Survey via SurveyMonkey and the FY2023 CoC Renewal Project Application. Given the expedited timeline for the FY2023 COC NOFO, the County as the Collaborative Applicant aimed to streamline the local competition process and reduce the administrative burden on agencies with CoC Renewal Projects. The completion of the Exhibit will aim to certify that the Agency meets the threshold requirements and is an eligible applicant under the FY2023 CoC NOFO.

Terms and Conditions (Exhibit 3)

The Exhibit outlines the terms and conditions of the FY2023 CoC Renewal Project Application and the FY2023 CoC Program, as well as outlines the applicant agency's understanding of the Orange County CoC's requirements if and when the proposed project is awarded by HUD. The Exhibit is to be signed by the person preparing application and by the Chief Executive Officer or Executive Director of the agency.

Orange County Continuum of Care Participation (Exhibit 4)

The Exhibit captures information related to the applicant agency's participation and involvement in the Orange County CoC and overall engagement in the homeless service system, including HMIS and CES requirements.

REVIEW, SCORING AND SELECTION PROCESS

Review Process

Agencies seeking to renew funding for CoC Projects must submit materials as described in this solicitation. Agency Administrative Review submissions that are late, incomplete, or substantially deficient may not be advanced to the CoC Renewal Project Application process. All applications will be reviewed to ensure they meet HUD threshold requirements and project quality threshold standards. Any correctable deficiencies will be identified, and selected applicants will have the opportunity to submit corrected documents before the final CoC application is submitted to HUD.

SUBMISSION

It is the sole responsibility of the Agency to ensure that delivery is made prior to the due date and time. The 2023 Agency Administrative Review for CoC- Funded Agencies, including all Exhibits and Attachments, must be hand delivered by 12:00 pm. PDT on July 10, 2023, and also printed binder submissions to:

County of Orange
Office of Care Coordination
Attention: Felicia Boehringer
601 N. Ross St., 5th Floor
Santa Ana, CA 92701
(714) 834-4454
felicia.boehringer@ocgov.com

RIGHT OF ORANGE COUNTY CONTINUUM OF CARE TO WAIVE IRREGULARITIES

The Orange County CoC reserves the right to:

1. Withdraw this solicitation at any time without prior notice and, furthermore, makes no representation that any contract will occur and that funds will be awarded by HUD to any respondent to this solicitation.
2. Waive any irregularities in the FY2023 CoC Renewal Project Application process and to reject any and all submissions not in the best interest of the CoC.
3. To request additional information and material. In addition, based on updates and information released by HUD, it may require and warrant the request of supplemental material.

4. Not renewed projects that have exhibited serious capacity issues in prior grants, including performance and financial problems, HMIS participation, or unresolved monitoring issues, or based on the best interest of the entire CoC Application. HUD will review applications and make the final funding decision.
5. Retain all submitted FY2023 CoC Renewal Project Application. Selection or rejection of a FY2023 CoC Renewal Project Application does not affect these rights.

FURTHER QUESTIONS AND ADDITIONAL RESOURCES

The County is available to answer questions on the FY 2023 CoC Agency Administrative Review for CoC-Funded Agencies, submission deadlines, process, training desired, or to provide copies of Agency Administrative Review materials specific to the Orange County CoC. For further questions or technical assistance, please email the Office of Care Coordination at CareCoordination@ocgov.com and Carbon Copy (Cc) Felicia Boehringer (felicia.boehringer@ocgov.com) and Sarah Jones (sarah.jones@ocgov.com).

Specific questions regarding your HUD grant amount, HUD guidelines etc. should be directed to your local HUD field office representative. **Please DO NOT contact the HUD field office regarding Orange County's local application deadlines or process**, as the County's Office of Care Coordination is available to answer those questions.

ADDITIONAL INFORMATION

Agencies will be required to comply with terms set forth by the CoC and HUD. In addition, all applicants are strongly advised to review all applicable terms, conditions, and federal requirements. It is strongly recommended that agencies obtain, and review information related to the CoC Program, the CoC Interim Rule, and the HEARTH Act Regulations, along with any other related documents prior to completion of this FY2023 CoC Agency Administrative Review for CoC-Funded Agencies. In addition, HUD will provide updates via their website at https://www.hud.gov/program_offices/comm_planning/coc/competition.