

**Orange County
Continuum of Care (CoC)**

**FY2024
Agency Administrative Review for
CoC-Funded Agencies**

Released

June 11, 2024

**Agency Administrative Review
Submission Deadline**

July 1, 2024, at 5:00 p.m. (PDT)

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ORANGE COUNTY CONTINUUM OF CARE (CoC) FY2024 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 (Agency Administrative Review), 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) 2024 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 FY2024 CoC Program NOFO regulations along with agency and project performance on the past grant(s) to ensure a successful and competitive application is submitted to HUD. **Please note that renewal funding is not guaranteed upon submission of the FY2024 Agency Administrative Review or CoC Renewal Projects Application(s) to the County.**

For FY2024, the County, as the Collaborative Applicant for the Orange County CoC, is releasing the FY2024 Agency Administrative Review for completion prior to the full CoC Renewal Project Application. The FY2024 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 FY2024 CoC Program NOFO competition if the project:

- Has or will have an executed grant agreement with HUD by December 31, 2024, and have an expiration date in in calendar year 2024 (between January 1, 2024, and December 31, 2024),

- has been included on the Grant Inventory Worksheet (GIW),
- has met all performance spending and capacity requirements, and
- any other requirements outlined in the FY2024 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 FY2024 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 FY2024 CoC Application Renewal Project Evaluation Process based on FY2024 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 Renewal Project 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.

AGENCY ADMINISTRATIVE REVIEW PROCESS

The general purpose of the Agency Administrative Review process is to assess agencies' 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) 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](#) 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. The electronic submissions, must include a separate file for each Exhibit and Attachment and must be labeled accordingly.
2. Most recent documentation is submitted for each Exhibit and Attachment.
3. Do not leave any blank responses without an explanation (e.g., if the question is not applicable, indicate “N/A”).
4. All documents with a signature block must be digitally signed by the authorized representative(s), as listed in Exhibit 1, Agency Contacts. Digital/DocuSign signatures are acceptable.
5. All supporting documents must be included in the submission.
6. 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' Roster¹ 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 FY2024 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 FY2024 CoC NOFO.

¹ Under the HEARTH Act, each recipient or project sponsor is required to provide for the participation of not less than one individual with lived experience of homelessness on the board of directors or other equivalent policymaking entity of the recipient or project sponsor, to the extent that such entity considers and makes policy decisions regarding any project, supportive services, or assistance provided.

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

Board of Directors' Roster and Resolution (Attachment 1)

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act states that each CoC Program funding recipient or project sponsor is required to provide for the participation of not less than one homeless individual on the board of directors or other equivalent policymaking entity of the recipient or project sponsor, to the extent that such entity considers and makes policy decisions regarding any project, supportive services, or assistance provided. The Attachment should indicate that the board of directors includes at least one person with lived experience of homelessness. The board of directors' resolution portion of the attachment should clearly indicate that the agency is authorized to apply for renewal project funding as part of the FY2024 CoC Program NOFO competition. If an authorized representative or signatory is named in the board of directors' resolution, the authorized representative or signatory's name should align with the authorized representative indicated in Exhibit 1.

Organization's Code of Conduct (Attachment 4)

The Attachment evidences an agency's Code of Conduct as well as a print-out of a screenshot indicating the agency has submitted the Code of Conduct to HUD's Code of Conduct e-library. Code of Conduct policies submitted to HUD are no longer valid after seven (7) years. Code of Conduct policies submitted in 2017 and prior expired and have been removed from the HUD Code of Conduct e-library. The e-library update includes compliant policies sent to the AskGMO mailbox from October 1, 2023, through January 1, 2024. As such, agencies are encouraged to review HUD's Code of Conduct e-library and re-submit their Code of Conduct policies as needed. The Attachment instructions are included on the [FY2024 CoC NOFO webpage](#) for review.

Agency Certification for Renewal Projects (Exhibit 2)

The Orange County CoC is requiring agencies currently receiving CoC Program funding and interested in applying for funding for renewal projects in the FY2024 CoC Program NOFO to complete an Intent to

Renew Survey via SurveyMonkey and the FY2024 CoC Renewal Project Application. The County as the Collaborative Applicant aims 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 FY2024 CoC NOFO.

Terms and Conditions (Exhibit 3)

The Exhibit outlines the terms and conditions of the FY2024 CoC Renewal Project Application and the FY2024 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 submission is prior to the due date and time. The 2024 Agency Administrative Review for CoC- Funded Agencies, including all Exhibits and Attachments, must be submitted via Dropbox by 5:00 pm. PDT on July 1, 2024, to:

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

Option 2: Copy the Dropbox link to the files and paste it into an email to the above email addresses.

RIGHT OF ORANGE COUNTY CONTINUUM OF CARE TO WAIVE IRREGULARITIES

The Orange County CoC reserves the right to:

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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 FY2024 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 FY2024 CoC Renewal Project Application. Selection or rejection of a FY2024 CoC Renewal Project Application does not affect these rights.

FURTHER QUESTIONS AND ADDITIONAL RESOURCES

The County is available to answer questions on the FY2024 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 FY2024 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.