

FY 2026

**[Milwaukee Continuum of Care, application
Reallocation, Rating & Ranking process policy]**

Throughout the year, Milwaukee Continuum of Care (CoC) Lead Applicant will work with each provider funded by HUD's Continuum of Care Program Notice of Funding Opportunity (NOFO) in a Technical Assistance role (*see attached CoC TA Policy & Procedure*). Once the NOFO is released, the Milwaukee CoC Lead Applicant will coordinate and carry out all the activities needed to successfully submit an application on behalf of the coalition. The NOFO timeline published by the Lead Applicant, eligibility requirements for project applications, funding priorities for the Milwaukee COC, project scoring criteria and specific dates for actions described in this policy and procedure are subject to change bi-annually, depending on HUD's requirements as outlined in the NOFO. If change is identified, scoring tools will be finalized with feedback from NOFO workgroup and Lived Experience Workgroup then presented to the board of directors for review and **formal approval by vote**. The board of directors may initiate additional revisions to the scoring tools and accompanying policy and procedure as necessitated by new information about HUD priorities or process requirements contained in the NOFO. The NOFO timeline guiding the full Milwaukee COC consolidated application process will be published on the Milwaukee COC's website, Facebook, and e-newsletter.

All applicants complete their application materials by a deadline announced by the Milwaukee COC Lead Applicant in a timeline circulated within four weeks of the NOFO release. Applications for Milwaukee COC projects are referred to as **"Intent to Apply"**. The Intent to Apply forms will also be published on the Milwaukee COC website, Facebook page and e-newsletter. The Lead Applicant will review each project that is submitted for funding, via "Intent to Apply" form to ensure that it meets all NOFO requirements. The Lead Applicant will ensure that the housing being offered will be appropriate, that the project applicant plans to serve all eligible households, NOFO Requirements are met and that the budget does not contain any requests for ineligible costs. Any late Intent to Apply form for a **renewal** project received by a deadline as listed on the Milwaukee COC NOFO timeline will receive a 2-point penalty score reduction. **Late applications for new/bonus projects received after this deadline will not be accepted.** Incomplete renewal project applications must be corrected before HUD submission.

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Non-conflicted Milwaukee COC board of directors' members are recruited and oriented to the local review and ranking process. The Milwaukee COC observes conflicts of interest via written record on a Conflict of Interest form all board members are required to sign annually. The board of directors NOFO Review Panel (hereafter known as the "panel") must:

- Consist of 3 to 5 board members knowledgeable about homelessness and housing in the community and broadly representative of the relevant sectors, subpopulations, and geographic areas.
- Be "neutral" meaning they are not employees, volunteers, staff, Board members, receive services from or otherwise have a business or personal conflict of interest with the applicant organizations;
- Be familiar with housing and homelessness within Milwaukee County; and
- Be willing to review projects with the best interest of homeless persons in mind

To serve on the panel, board members must:

- Have a current signed statement declaring that they have no conflict of interest
- Be able to dedicate time for application review and panel meetings scheduled by the Milwaukee COC Lead Applicant

The Milwaukee COC Lead Applicant will receive all local application and scoring materials, review each submission, score each program's Intent to Apply, and submit all Intents to apply and scoring materials to the Panel for advanced review prior to an in-person panel meeting. The panel will meet to review and discuss Intents to Apply and project scoring sheets. The Lead Applicant will notify applicants of the outcome of their applications by a deadline published in the NOFO timeline. The **entire** board of directors will convene for a special NOFO meeting to discuss and vote on the Milwaukee COC's project ranking, decision to reallocate projects, and acceptance of all projects. A final ranked list for Board vote is determined through the following actions:

- A ranked list is prepared based on a compilation of competitive Milwaukee COC renewal project raw scores for each application.
- The applications that do not meet threshold requirements will not be accepted* in the ranked list, including:
 - Applicants out of compliance with monitoring or HUD findings will not be accepted
 - Applicants that do not agree to local requirements and established priorities and HUD standards in responses in question will not be accepted

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- Applications providing responses that are not allowable according to the CoC Program Interim Rule or the CoC Program Competition NOFO will not be accepted
- Applications with missing attachments or that do not answer required questions will not be accepted
- Applicants that do not agree to use Coordinated Entry for all its referrals will not be accepted
- Applications that do not meet match requirements will not be accepted

***Renewals not accepted are then subject to reallocation**

Voluntary Reallocation of Projects

The annual Milwaukee COC Program Competition Notice of Funding Opportunity (NOFO) dictates what types of projects may be created through reallocation in each competition. Generally, HUD will direct Milwaukee COCs in the NOFO or in other preceding releases of information that they will no longer continue to fund certain project types. In instances when it is apparent projects will lose Milwaukee COC funding in the next year's competition on the basis of their project type alone, the Milwaukee COC Leadership and Board should be notified, and the NOFO Workgroup should be the venue for planning strategic voluntary reallocation of funding to best meet current needs of the Milwaukee COC, while being mindful of the need to prevent displacement and returns to homelessness from clients served by these existing projects. In the event that their project type is anticipated to no longer be eligible for renewal funding, Milwaukee COC Lead Applicant will formally notify affected recipients immediately. The Milwaukee COC Lead Applicant will also indicate that the project type is ineligible for renewal funding in Intent to Apply forms following confirmation from the NOFO that a given project type is no longer eligible for funding.

The Lead Applicant will invite all Milwaukee COC recipients to communicate that they want to voluntarily reallocate funding by a deadline. Should a Milwaukee COC recipient wish to reallocate their own funding voluntarily, the funding available will be included in the Intent to Apply. Lead Applicant will then open a competitive application process for this funding.

During the grant year, in the event a project finds itself unable to perform the actions and provide outcomes outlined in its application, that project is strongly encouraged to notify the Lead Applicant and begin the Voluntary Reallocation process. Milwaukee COC Leadership and Board will be notified, and Lead Applicant will facilitate discussions with project measures needed to protect the well-being of clients served by said project during the transfer of funds to another Milwaukee COC provider.

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Required Reallocation of Projects

In the event Milwaukee COC decides to reallocate a project, Milwaukee COC will immediately notify said project and begin the process (outlined at the end of this paragraph). The type of project the reallocated funds should be prioritized for is based on community needs and priorities set by Milwaukee COC along with an objective to allocate Milwaukee COC funding for the highest performing projects. The Milwaukee COC will reference program outcome history and inability to improve over time in response to direction from the Milwaukee COC Lead Applicant and board of directors as grounds for a required reallocation. **Mandatory reallocation is justified when corrective action or formal recommendations from the Milwaukee COC for performance improvement in the first NOFO cycle of poor performance** (trend of low utilization, low successful exits, incomplete grant spending, nonadherence to local housing priorities, and other scoring thresholds in the NOFO Scoring Tool) **do not yield a significant trend of improvement in the following NOFO grant cycle (currently every other year) for a renewal applicant.** The Milwaukee COC board of directors will have oversight over the fulfillment of corrective action plans administered for the poorest performing project(s). During its standard Technical Assistance process, Lead Applicant looks at performance expectations of all Milwaukee COC-funded projects (focus areas include Milwaukee COC participation, Milwaukee COC compliance, data-driven performance evaluation criteria, unit utilization, program administration including financial management and adherence to local housing priorities). **When** a project is identified as at-risk of reallocation, Milwaukee COC will follow the process outlined below.;

- Lead Applicant notifies local HUD office and Milwaukee COC Board of Directors of intent to initiate improvement action plan;
- Lead Applicant will develop an **improvement** action plan with project based on areas of significantly poor performance;
 - At any time during this plan, project may appeal to the Lead Applicant and Board, then:
 - If approved, the project will no longer be considered at-risk for that grant cycle, or;
 - If denied, the improvement action plan will continue;
- If the project adheres to the plan/shows improvement, the project will no longer be considered “at-risk” for that grant cycle.
- If project does not show improvement or participate with the improvement plan, Lead Applicant presents reallocation proposal to the Board for approval;
 - Project can appeal to the Board during this time (this is the final time an appeal will be considered), and:
 - If approved, the improvement plan will be extended and/or altered depending on recommendations from the Board, or;
 - If denied, the reallocation process continues from here;
- An RFP is posted for Milwaukee COC members to apply for the reallocated program and funding;

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- Lead works with former grantee and new grantee in order to ensure smooth transition for program participants;

The Milwaukee COC Reallocation Process, while independent of HUD TA and improvement plans, will work in tandem with local HUD office in the event they implement any type of corrective action for a project. This is to avoid redundancy and undue burden upon said project. In the event a project is notified by the local HUD office it will be undergoing some type of improvement/corrective action plan, it is the expectation of the project to notify Milwaukee COC Lead Applicant to ensure proper communication between all potentially affected parties.

Project Rating

Renewal projects will be assessed on performance outcomes related to unit utilization, permanent housing stability, compliance with HUD requirements, income growth, financial performance, Milwaukee COC participation, local housing priorities, serving vulnerable populations, and data quality. Renewal projects are evaluated holistically through a renewal project scoring tool, subject to revision each year based on the content of the NOFO and observed changes in performance of all projects calling for changes in scoring thresholds.

During NOFO grant cycles in which HUD solicits Bonus Projects, these **“Intents to Apply”** will be assessed based on vulnerability factors of population served, experience serving the subpopulation, experience with the activity, project budget, adherence to local housing priorities, financial management, community priorities and need, improving housing stability of project participants, Milwaukee COC participation. If accepted, bonus projects are placed in their **own** ranking category after all renewals have been ranked. These applications are submitted in eSnaps with the collaborative application. HUD then decides whether or not that bonus project will be funded. If funded, each new project enters a demonstration period (1) and will be ranked in the middle with Admin recipients (CE, HMIS) for the following NOFO. After this period, the bonus project is subject to the standard renewal ranking and scoring process.

Board of Directors Recusal

The board of directors is responsible for ultimately determining, by vote, the evaluation criteria, ranking, corrective action plan compliance, and governance for the Milwaukee COC. Board members who are conflicted, meaning they are employed by/serve on the board of directors for/volunteer for/receive services from a Milwaukee COC funded agency will recuse themselves (not participate in or influence) from Milwaukee COC project ranking or reallocation discussions due to their participation or influence constituting a conflict of interest – see [24 CFR § 578.95](#). Milwaukee COC board of directors’ recusal also calls for board members whose agencies receive Milwaukee COC funding to abstain from voting on ranking and reallocation of Milwaukee COC projects. However, board members responsible for projects that are subject to reallocation will be invited by the Board Chair to provide the board with their own insight into their performance and input into the determination of partial versus full Milwaukee COC grant reallocations.