Fiscal Year 2026 (FY26) Continuum of Care (CoC) Local Competition Policies and Procedures

These policies and procedures take effect upon Executive Committee approval and apply to the FY26 CoC Local Competition for Our Path Home, Boise City/Ada County Continuum of Care ID-500, only.

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Accompanying FY26 CoC Local Competition materials posted online include:

- Renewal Rating Tool
- Transition Performance Tool
- New Non-DV Rating Tool
- New DV Rating Tool
- New Non-DV Project Application
- New DV Project Application

Reallocation and Reduction Policy

This policy establishes the rules for reallocating or reducing renewal projects during the FY26 CoC Local Competition to ensure full compliance with:

- FY26 CoC NOFO
- 24 CFR Part 578
- OPH Executive Committee FY26 directives

Reallocation Policy

Renewal grants expiring in CY27 are eligible for reallocation, a process where CoCs can shift funds in whole or in part from eligible renewal projects, under NOFO Section II.G.4. This reallocation policy defines how and when OPH will shift funds from one project to another.

HUD Reallocation Requirement

HUD's FY26 NOFO set Tier 1 at 60% and created a TH/SSO set-aside to meet their priority for developing new TH/SSO projects. In light of this, the following reallocation policy ensures the CoC will be well positioned to meet new federal priorities to compete for funding:

- PSH projects may submit as renewal projects
- All RRH projects are subject to mandatory reallocation, and projects eligible for a transition grant can reapply for a Transitional Housing (TH) project in the amount of their Annual Renewal Amount (ARA)

Project Underspending

Renewal projects that were underspending may be subject to reallocation as follows:

- Renewal projects that returned 5% or more of award funding to HUD in the prior year must:
    - Submit a justification letter
    - Demonstrate corrective action and improved spend-down plans

If justification is insufficient, a proportionate percentage of the award may be reallocated.

Local Reallocation Thresholds

Renewal projects may be reallocated for compliance or performance issues, including:

- Poor Utilization – Most recent Annual Performance Report (APR) shows less than 90% average utilization rate
- Insufficient Services - Projects that do not include service participation requirements in their program design based on individual need and evidenced in an occupancy agreement or equivalent document
- HMIS or data quality problems – HMIS participation (unless a victim service provider) and data quality at or above 90%
- Award Management – Any HUD/CoC monitoring findings that are unresolved, lack of quarterly funding draws from eLOCCS, consistently late APR submissions, or compliance/audit issues with overdue or unsatisfactory response

Reduction Policy

Reductions are made to individual project funding to preserve project integrity while minimizing disruption to participants. This reduction policy describes how OPH will apply funding cuts to individual projects.

A project may receive a partial reduction when:

- Underspending persists and corrective action submitted is insufficient
- Local reallocations thresholds are not met
- Project performance has declined based on HMIS data reviewed during local competition
- Project funding is more than needed based on outcomes
- The project application is ranked low

Reallocation and Reduction Process

All reallocations and reductions require Executive Committee approval. Providers will receive written notice of both mandatory reallocations and project reductions.

Reallocated funds will be used for eligible new projects in the following order:

- Transition Grants from renewal project applicants for Transitional Housing (TH)
- All other eligible project applicant types as outlined in the ranking policy

Ranking Policy and Procedures

This policy governs how OPH (ID-500) ranks all project applications in the FY26 CoC Competition. It incorporates:

- FY26 HUD CoC NOFO requirements
- HUD Goals and Objectives (adopted by OPH)
- FY26 Executive Committee directives for local priorities

Ranking and Executive Committee Roles

The Executive Committee will designate a Ranking Committee (RC) to review, rate, and rank project applications submitted through the FY26 Local CoC Competition. The RC will review applications and, in accordance with the ranking policy, will provide a rating and ranking recommendation to the OPH Executive Committee.

The Executive Committee is the final decision maker. The Executive Committee will:

- Review the RC rating and ranking recommendation
- Approve final project selection for the CoC Priority Listing, including ranking to establish Tier 1 and Tier 2 placement
- Apply Conflict of Interest (COI) rules required by 578.95

Project Review and Rating

All project applications, including CoC and DV Bonus project applications, will be rated by the RC. The only project that will not be rated, per the FY26 NOFO, is the CoC Planning application. All projects must submit a complete application and meet threshold criteria to be rated.

Threshold Requirements

All projects must meet the threshold and quality criteria outlined in the FY26 NOFO and any local threshold criteria outlined in FY26 CoC Local Competition application materials. Applications that do not, after review, meet threshold criteria below on pass/fail basis will not be rated or ranked. Projects that meet threshold requirements will be assessed using objective criteria and reviewed using OPH's standardized rating and ranking tools that demonstrate the degree to which projects will improve system performance.

Match Requirement

HUD requires all CoC-funded projects to provide match to at least 25% of all eligible costs except leasing. Match may either be cash or in-kind and must be committed at the time of application. Match must be available during the project operating year and documented with a formal match commitment letter from the contributing organization. Match is required for all new and renewal projects.

Examples of match include:

- Cash from public or private sources
- Staff time paid with non-HUD funds
- Donated services such as behavioral health, healthcare, or employment support
- Volunteer hours valued in accordance with HUD rules
- Donated supplies, space, or equipment
- Program income, if properly documented

Rating Tools

Projects will be rated using the ***Renewal Rating Tool***, ***Transition Performance Tool***, and a ***New Project Rating Tool.*** The FY26 CoC Local Competition Rating Tools rely heavily on objective criteria and system performance measures to score project applications. The includes an assessment of an applicant's performance and alignment with FY26 NOFO priorities.

RC members will review all project application materials, including *e-snaps* applications if made available by HUD in time for the local competition, to get a rating score.

If e-snaps applications are not yet available, Project Applicants may submit documents for narrative responses to rating factors (Word or PDF), a budget (Excel or PDF), and confirm in

your email submission the applicant's ability to submit all forms/assurances/certifications in e-snaps by the deadline (if selected as the final applicant).

Scoring will be based on the project type as follows:

- ***Renewal Rating Tool*** - Renewal grants will turn in a renewal grant application, that will be reviewed using a 100-point scale outlined in the ***Renewal Rating Tool***, that relies on past project/award performance and a complementary narrative application.
- ***Transition Performance Tool*** – Transition Grant applicants will be reviewed using two tools:
    - Transition grants will turn in a transition grant performance report, that will be reviewed using a 100-point scale outlined in the ***Transition Performance Tool***, that relies on past project/award performance and a complementary narrative application about the transition plan.
        - *If the project achieves a score of 70 or higher, their application may be automatically ranked above all other new projects.*
        - *If the project scored less than 70, their application will be subject to be ranked below other new projects.*
    - Transition Grant applicants will also turn in a ***New Project Rating Tool***, which will be scored on a 100-point narrative application.
        - The new project application review will primarily be used to ensure the proposed transition from one component to another is feasible and in alignment with the FY25 NOFO requirements and priorities.
- ***New Project Rating Tool*** - New project applications are similarly scored on a 100-point application.

The ratings awarded by each RC member will be compiled to provide an average rating for each project application.

Ranking and Tier Placement

All project applications, including CoC and DV Bonus project applications, will be ranked by the RC. The only project that will not be ranked, per the FY26 NOFO, is the CoC Planning application.

Projects will be ranked as follows:

- Tier 1: Renewal projects will be automatically placed in Tier 1 except in those cases wherein a renewal project does not minimally score a 70 on the ***Renewal Rating Tool***.
    - *Renewal projects that score below 70 can still be ranked and may rank above new projects at the discretion of the RC and Executive Committee if deemed to be system-essential project(s).*
- Tier 2: All New Projects will be placed in Tier 2 as follows:
    - Transition Grant(s) will automatically be ranked above other new projects in Tier 2, except in those cases wherein the Transition Grant project does not minimally score a 70 on the ***Transition Performance Tool***.
        - *Transitional Grant(s) submitting as new projects that score below 70 can still be ranked and may rank above all other new projects at the discretion of the RC and Executive Committee if a determination is made that the Transition Grant will meet the HUD/OPH priorities more effectively than a higher scoring project application.*

- All other new projects in order of the score received on the ***New Project Rating Tool***, ties broken alphabetically.
  - *Project ranking can vary upon RC recommendation and Executive Committee approval, if a determination is made that the new project will meet the HUD/OPH priorities more effectively than a higher scoring project application.*

Applicant Rights, Grievance and Appeals Process

This policy outlines applicant rights, the local grievance/appeal process, and a HUD appeal process (Solo Applicant).

Applicant Rights

All applicants participating in the OPH CoC competition for the FY26 NOFO have the following rights.

Right to Transparent & Public Information

Applicants are entitled to access to all publicly posted competition materials, including:

- FY26 CoC NOFO timeline and deadlines
- Local ranking policy inclusive of project review, rating, and ranking criteria
- Local reallocation and reduction policies
- All materials will be posted at: https://www.ourpathhome.org/fund/coc-competition/

Right to a Fair and Consistent Review

- All applications will be evaluated using the published FY26 OPH materials.
- Ranking decisions consider both:
  - Project score.
  - FY26 HUD and CoC system priorities (e.g., Tier 1 60%, TH/SSO Set-Aside, NOFO requirements).
- System-wide federal requirements cannot be changed or appealed at the local level.

Right to Notification

Applicants will receive written notification of:

- Project Rating
- Ranking
- Inclusion or exclusion from the final local priority listing (accepted or rejected)
- Any reallocations or reductions affecting their project
- Tier placement

Right to Grieve and Appeal

Applicants may file a grievance if they believe that:

- FY26 CoC Local Competition rules were not applied consistently
- A rating or ranking error occurred
- A Conflict of Interest (COI) affected review, rating, or ranking

A grievance cannot overturn:

- FY26 NOFO requirements
- HUD scoring policies
- HUD project eligibility rules
- Executive Committee decisions made in accordance with published local policies

Right to an Impartial Review

- Any individual with a COI must be removed from:
  - Reviewing and Rating
  - Making decisions about the applicant's project
- All COI determinations are documented.

Grievance & Appeal Process

The Our Path Home Executive Committee will consider any grievances using the following process.

Local Grievance Process

Grievances must be submitted in writing to the Collaborative Applicant (the City of Boise) by emailing info@ourpathhome.org within 24 hours of the project applicants' formal notification of their applicant's status as accepted and ranked, rejected, or reduced on the CoC Priority Listing.
The grievance must include the nature of the grievance, including an explanation of how the organization perceived it was unfairly treated. The grievance should also include a reasonable and fair proposed solution to address the grievance.

The grievance will be reviewed by the Executive Committee Chair or other Officer without any COI. The review may include:

- Examination of project scoring.
- Validation of ranking integrity.
- Review of documented procedures.

The reviewer will provide a written response within 24 hours, which will document the outcome of the grievance. If no appeal is submitted within the appeal window, the grievance is considered resolved.

Local Appeal Process

If the applicant disagrees with the outcome of a grievance:

- A written appeal may be submitted within 24 business hours of receiving the response to the grievance.
- Appeals are reviewed by the Steering Committee (excluding any members with a COI).
- The Steering Committee will provide written response to the appeal within two (2) business days, beginning on the first business day after the grievance was submitted.

This is the end of the local grievance and appeal process.

HUD Appeal Process

Project applicants who attempted to participate in the local process may appeal the local CoC competition decision to HUD as set forth in 24 CFR 578 if they believe it was denied the right to participate in a reasonable manner. They may submit an application to the Secretary for a grant as a solo applicant, which can be funded upon determination of the Secretary that they attempted to participate in a reasonable manner but were not permitted.

To apply as a solo applicant, the project applicant must submit a Solo Applicant Project Application in *e-snaps* by the application submission deadline of August 26, 2026, at 8:00 PM EST. Additionally, the solo applicant, Collaborative Applicant, and HUD must follow the process outlined in FY26 NOFO.