

**Orange County  
Continuum of Care  
Homeless Assistance Programs**

**Agency Administrative Review  
For All CoC Funded Projects**

**2019 Renewal Application**

**Released**

Thursday, May 02, 2019

**Agency Administrative Review**

**Submission Deadline**

Friday, May 17, 2019 at 3:00 pm PST

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# ORANGE COUNTY CONTINUUM OF CARE

## 2019 RENEWAL APPLICATION

### AGENCY ADMINISTRATIVE REVIEW

#### INTRODUCTION

On an annual basis, the US Department of Housing and Urban Development (HUD) provides funding for homeless programs authorized under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act through a Continuum of Care (CoC) Notice of Funding Availability (NOFA) process. In order to submit an application to HUD for renewal funding, all projects must submit a local Agency Administrative Review (AAR) 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. After the local Agency Administrative Review application submission process, successful renewal applicants may be invited to submit a Local Letter of Intent.

In Orange County, the Continuum of Care Board (CoC Board) is the group of community stakeholders that sets local priorities for the NOFA funding. The CoC Board and the CoC NOFA AdHoc Committee, in collaboration with Orange County Staff, will evaluate 2019 NOFA regulations along with agency and project performance on the past grant(s) to ensure successful execution going forward. **Please note that renewal funding is not guaranteed upon submission of the Agency Administrative Review to the County.**

#### RENEWAL ELIGIBILITY

A project is considered eligible for renewal in the 2019 NOFA competition if the current contract with HUD expires in calendar year 2020, has been included on the Grant Inventory Worksheet (GIW) or other process for verifying renewals as required by HUD, has met all performance spending and capacity requirements, and any other requirements outlined in the 2019 NOFA.

An agency may not be recommended for renewal by the Orange County CoC if it has history of past or current contract non-compliance with HUD, a termination for cause by any other funding source, disallowed cost with the CoC or any other funding sources, financial audit findings, capacity concerns, and/or low project performance. Additionally, as the Collaborative Applicant, the County reserves the right to administratively disqualify or penalize any application that does not comply with the Technical and Document Presentation Requirements.

#### 2019 AGENCY APPLICATION PROCESS

The Orange County CoC will begin its evaluation of renewal projects through a four step process: Agency Administrative Review, local Letter of Intent, Agency Presentations, and Project Performance Evaluation to determine which agencies and projects are eligible to submit an application in the 2019 NOFA.

Agencies that fail the Agency Administrative Review process will forfeit their project funding and their funds will be reallocated. Consequently, the Orange County CoC will prepare policies and conduct a

Request for Proposal (RFP) to reallocate funding for projects that are not eligible to proceed the Letter of Intent and Agency Presentations.

At the completion of the Agency Administrative Review, the Letter of Intent, and Agency Presentations processes, the Orange County CoC (and relevant committees or ad-hoc) will establish the 2019 CoC Application Renewal Project Evaluation Process based on 2019 NOFA requirements and project priorities. A copy of these policies will be distributed to the agencies. Additionally, all agencies will be notified of their project rank and scores through a Project Priority List after it has been evaluated and approved by County staff, the CoC Ad Hoc Committee, and the CoC Board.

In addition to serving as the initial step in the CoC annual funding process, CoC renewal agencies complete *Exhibit 4: Letter of Interest for New Projects* to indicate their interest in participating in a Request for Proposal (RFP) for new projects, if one is released. If there is a RFP opportunity, those who indicated interest on Exhibit 4 will be notified of the next steps. There will also be an opportunity for non-CoC funded agencies to participate in the RFP, however this step is required for agencies in the renewal process.

## **AGENCY ADMINISTRATIVE REVIEW PROCESS**

The general purpose of the Agency Administrative Review process is to 1) assess agency's capacity to administer CoC homeless projects while complying with HUD requirements; 2) determine which agencies are eligible to proceed to the Letter of Intent and Agency Presentations; and 3) identify the amount of funds to be reallocated and how these funds will be reallocated. The results of the Agency Administrative Review process will be presented to the CoC NOFA Ad Hoc Committee for recommendation and the CoC Board for final approval.

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

1. Technical Requirements
2. Document Presentation Requirements
3. Review of Unspent Funds for Reallocation

## **TECHNICAL REQUIREMENTS FOR PREPARING THE AGENCY ADMINISTRATIVE REVIEW PACKET**

1. One (1) printed original with signatures and one (1) complete copy. Both must be in binders with clearly labeled section tab dividers for all exhibits, attachments, and required documents.
2. One (1) electronic copy on a USB flash drive with completed Agency Administrative Review submittal. Exhibits and attachments, and other required documents are to be organized and separated per Document Presentation requirements.

## **DOCUMENT PRESENTATION REQUIREMENTS**

1. Clearly identify which version is the original and which is the copy on the cover page of the submittal.
2. Tab Dividers will be clearly labeled between each exhibit and attachment.
3. All sections will be numbered separately within tab dividers, in accordance with the Supporting Documents Checklist.
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 officer(s).

7. All supporting documents must be included in the submission.
8. All supporting documents must be legible.

In the event that 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.

- 1-point reduction for late applications
- 1-point reduction for not meeting the Technical Requirements
- 1-point reduction for not meeting the Document Presentation Requirements
- 1-point reduction for each incomplete or missing exhibit

### REALLOCATION OF UNSPENT FUNDS

Reallocation is a process allowed by HUD that allows the CoC to improve its effectiveness by strategically aligning limited funding to housing the homeless and prioritizing the chronically homeless. CoC's are not only encouraged, but also expected to modify their systems to serve the individuals and families with the highest needs. It is also a local process to reallocate funding from poor performing projects that do not achieve CoC system objectives and goals.

Consequently, funding for 1) projects that are not eligible to proceed to the LOI; AND 2) project funds that are unspent from previous years; AND 3) low performing projects, may be reallocated.

To assess the level and extent of unspent funds, the Orange County CoC, in collaboration with 2-1-1 Orange County (211OC) and HUD, will be evaluating any unspent funds from agencies for the last three completed (3) grants (Exhibit 3: Financial Assessment) and evaluating project information for the current grant in the Line of Credit Control System (LOCCS) and last three (3) completed grants as indicated in the HUD closeout notices.

### EVALUATION OF APPLICATION COMPONENTS

Each project will be rated and ranked per the CoC Board approved policy, HUD requirements, and guidelines from the 2019 NOFA<sup>1</sup>.

The following application components will be utilized in the scoring process:

1. Agency Administrative Review
2. Project Submittal in e-snaps
3. Project Performance
4. Project Data Quality
5. Participation in Local Continuum of Care
6. Housing First Model/Low Barrier Implementation
7. Unspent Funds
8. Project Cost Efficiencies
9. Coordinated Entry System Participation
10. Bed Utilization Rate
11. Other local priorities, as approved by the CoC Board

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<sup>1</sup> HUD requires that all CoC project applications be scored and ranked.

## 12. Other HUD requirements, as required by 2019 NOFA

### HMIS

The HEARTH Act, enacted into law on May 20, 2009, requires that all communities have a Homeless Management Information System (HMIS) with the capacity to collect required data concerning individuals and families experiencing homelessness. The HEARTH Act also codifies into law certain data collection requirements integral to HMIS. With the enactment of the HEARTH Act, HMIS participation became a statutory requirement for recipients and sub-recipients of CoC Program and Emergency Solutions Grant (ESG) funds.

HUD expects CoCs to use HMIS data to track their progress in meeting CoC and project-specific performance goals, to support community-wide planning, and to identify how best to direct resources to prevent and end homelessness. 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)<sup>2</sup>. Finally, HMIS data is essential to documenting a CoC's qualifications as a high-performing community.

## REQUIRED DOCUMENTS THAT MUST BE COMPLETED FOR THE AGENCY

### ADMINISTRATIVE REVIEW

Please complete all of the required forms listed below in your assigned USB.

- Exhibit 1: Lead Agency Information Form
  - Attachment 1: Organizational Chart
  - Attachment 2: Board of Directors' Roster<sup>3</sup> and Resolution
  - Attachment 3: State Certificate of Status
  - Attachment 4: Organization's Code of Conduct
  - Attachment 5: 501(c)3 certification
  - Attachment 6: Most recent HUD Monitoring Letter and clearance letter for all HUD projects (if applicable)
- Exhibit 2: Terms and Conditions<sup>4</sup>
- Exhibit 3: Financial Assessment
  - Attachment 7: A-133 form, if applicable<sup>5</sup>
  - Attachment 8: Two most recent agency financial audits by a certified CPA
  - Attachment 9: Line of Credit Control System (LOCCS) screenshot for current year
  - Attachment 10: Close-out letters from HUD for three (3) years (per CoC project)
- Exhibit 4: Letter of Interest to Participate in Request for Proposal for New Projects

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<sup>2</sup> Previously the Annual Homeless Assessment Report (AHAR). For more information visit:

<https://files.hudexchange.info/resources/documents/From-AHAR-to-LSA-Understanding-the-FY18-Changes.pdf>

<sup>3</sup> Under the HEARTH Act, each 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.

<sup>4</sup> The release of information document will allow the Orange County CoC to share information with 211OC, HUD and other applicable third party entities.

<sup>5</sup> Include A-133 form, if applicable (agency receives more than \$750,000 in federal funding during a fiscal year).

## SUBMITTAL REQUIREMENTS

Please review the key dates and deadlines of the Agency Administrative Review process:

### AGENCY ADMINISTRATIVE REVIEW TIMELINE AND DUE DATES<sup>6</sup>

	Dates
Release of Agency Administrative Review (AAR)	May 02, 2019
Acknowledgment of Receipt of AAR (24 hours from release)	May 03, 2019
Deadline for Agency Administrative Review	May 17, 2019 by 3:00 pm PST
Grace Period for Submittal of AAR	May 17, 2019 from 3:00 pm to 4:00 pm PST
Agency Administrative Review Late Submittal with Penalty	May 17, 2019 after 4:00 pm PST

The Agency Administrative Review is due on Friday, May 17, 2019 at 3:00 pm PST. There will be a one hour grace period for agencies to submit the AAR in the instance that they encounter a delay due to circumstances beyond their control.

The Agency Administrative Review will be considered late and penalized with a one (1) point reduction from the overall Agency Administrative Review score if submitted after 4:00 pm PST.

The Agency Administrative Review will not be accepted after the end of business day on May 17, 2019. 2-1-1 Orange County (211OC) regular hours of operation at Monday through Friday from 8:00am to 5:00pm.

### AGENCY ADMINISTRATIVE REVIEW SUBMISSION

Renewal applicants are required to complete this Agency Administrative Review by answering all questions and providing the required documentation. Renewal applicants passing the AAR will be recommended for submission of their application in e-snaps and inclusion in the NOFA competition.

The AAR must be time-stamped on the cover page of the original and copies by 211OC staff. It is the sole responsibility of the Respondent to ensure that delivery is made prior to the Due Date and Time. Delivery receipts are available upon request.

The Agency Administrative Review submittals, including all Exhibits and Attachments, must be **hand delivered** by 3:00 pm PST on May 17, 2019 to:

2-1-1 Orange County  
Attention: Chris Powell and  
Christy Doorbetakis  
1505 E. 17th Street, Suite 108  
Santa Ana, CA 92705

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<sup>6</sup> Dates are subject to change.

**If your agency meets the requirements under the Agency Administrative Review and is recommended for renewal and inclusion in the 2019 HUD CoC application, your agency will be notified to proceed with the Letter of Intent application and Agency Presentation process.**

### RIGHT OF ORANGE COUNTY CONTINUUM OF CARE TO WAIVE IRREGULARITIES

The Orange County Continuum of Care reserves the right to:

1. Withdraw this solicitation at any time without prior notice and, furthermore, makes no representation that any contract occur and that funds will be awarded by HUD to any respondent to this solicitation.
2. Waive any irregularities in the AAR process and to reject any and all submissions not in the best interest of the Continuum of Care.
3. Request additional information and material. In addition, once released, the application from HUD may require and warrant the request of supplemental material.
4. Not renew grants 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 Agency Administrative Reviews. Selection or rejection of an AAR does not affect these rights.

### FURTHER QUESTIONS AND ADDITIONAL RESOURCES

211OC is available to answer questions on the Agency Administrative Review, application deadlines, process, training, or to provide copies of application materials. For further questions or technical assistance, please contact 211OC.

211OC Staff Person	Phone	Email
Christopher Powell	(714) 589-2349	cpowell@211oc.org
Christy Doorbetakis	(714) 589-2344	christyd@211oc.org

Specific questions regarding your HUD grant amount, HUD guidelines and etc. should be directed to your local HUD field office representative. **Please DO NOT contact the HUD office regarding Orange County's local application deadlines or process**, as 211OC 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 you obtain and review information related to the Continuum of Care Program, the CoC Interim Rule, and the HEARTH Act Regulations, along with any other related documents prior to completion of this Agency Administrative Review. In addition, HUD will provide updates via their website at <https://www.hudexchange.info/>.