



Central MS Continuum of Care

FY2025 Continuum of Care Funding

Competition

Policies and Procedures

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COC PROGRAM COMPETITION BACKGROUND

The U.S. Department of Housing and Urban Development (HUD) requires Continuums of Care (CoCs) to evaluate the performance of projects funded under the Continuum of Care Program and to design, operate, and follow a collaborative process for the development and submission of applications in response to each year's Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO). HUD requires CoCs to review all project applications submitted for inclusion in the CoC Application and to either accept and rank them or reject them based on objective, transparent, and publicly established criteria.

HUD's FY2025 CoC NOFO requires Collaborative Applicants to rank all new and renewal project applications, except CoC Planning and UFA Costs, in two tiers. **Tier 1 is defined as 30 percent of the CoC's Annual Renewal Demand (ARD)**, and Tier 2 includes the remainder of the ARD plus any eligible CoC Bonus and DV Bonus amounts. All accepted projects must be ranked according to local scoring results, alignment with HUD and CoC priorities, and overall system performance. HUD no longer uses any form of auto-renewal; all renewal projects must be submitted, scored, and ranked annually in accordance with the NOFO.

COC SCORING COMMITTEE

The Central MS CoC Scoring Committee is a volunteer panel that convenes annually to fulfill the Central MS CoC's responsibilities under the U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program. Working in collaboration with the CoC Lead Agency, the Scoring Committee develops and implements an objective, transparent, and performance-driven project review and ranking process. The Committee provides funding recommendations to non-conflicted CoC Board members, who approve the final ranking used in the CoC's Consolidated Application submitted to HUD.

Scoring Committee members must not be associated with agencies that receive or compete for CoC funding and are required to sign the CoC Conflict of Interest Form prior to participating in any funding-related activities. Members must recuse themselves from all discussions or decisions involving agencies with which they have a real or perceived conflict of interest.

The Scoring Committee independently reviews and evaluates all project applications—both new and renewal—using a scoring tool that is reviewed and approved annually. Consistent with the FY2025 CoC NOFO, the scoring tool incorporates:

- **At least 50% objective criteria**, such as cost effectiveness, data quality, and performance outcomes; and
- **At least 25% of total points** dedicated to HUD-required performance measures, including returns to homelessness, income growth from employment, and supportive services participation requirements.

The Committee assesses whether projects meet threshold compliance with HUD regulations, the HEARTH Act, the annual CoC Program NOFO, and the performance standards and priorities established by the Central MS CoC. Scoring results inform project ranking within Tier 1 and Tier 2, as well as recommendations for reallocation or corrective action when appropriate.

This Policies & Procedures manual outlines the processes developed by the Scoring Committee and CoC Lead Agency to guide the Central MS CoC's FY2025 CoC Program Competition, including:

- Conflict of Interest
- Project Ranking and Prioritization
- New Project Solicitation, Evaluation & Selection
- Renewal Project Evaluation
- Reallocation
- Appeals

CONFLICT OF INTEREST POLICY

A conflict of interest occurs when a CoC Scoring Committee member, CoC Board member, a member of their immediate family, or a business associate has a financial or other personal interest in any agency or program that applies for or receives Continuum of Care (CoC) Program funds. Such interests may include, but are not limited to, roles as an employee, owner, fiduciary, consultant, Board member, contractor, or supplier of goods or services.

Although HUD's CoC Program regulations do not define "immediate family," for the purposes of this policy it includes at minimum: a parent, spouse, domestic partner, child, or sibling. In accordance with 24 CFR 578.95 and the FY2025 CoC NOFO, individuals with a conflict of interest are prohibited from participating in discussions, scoring, ranking, decision-making, or any activity that could influence the award, denial, or ranking of CoC funds.

Examples of common conflicts of interest include:

- A CoC Board member is employed by an agency that receives or is applying for CoC Program funds.
- The spouse or domestic partner of a Scoring Committee member provides consulting services to an applicant agency.
- A CoC Board member works for an entity that has an investment or financial stake in a CoC-funded project (e.g., capital funder, match provider, tax credit syndicator).
- The child of a CoC Board member receives services from a CoC-funded project.
- A CoC Board member receives rental assistance or housing through a CoC-funded project.
- A Scoring Committee member owns property that receives CoC-funded rental payments.
- The sibling of a CoC Board member owns a company that provides goods or services to a CoC-funded project.

Requirements

1. **Annual Disclosure:** All CoC Board members and Scoring Committee members must complete the CoC Conflict of Interest Disclosure Form at least annually. Scoring Committee members must complete this form prior to participating in any funding-related activity.
2. **Ongoing Disclosure:** If a conflict of interest arises at any point that was not previously disclosed, the individual must notify the CoC Lead Agency immediately.
3. **Recusal:** CoC Board members and Scoring Committee members with a conflict of interest must recuse themselves from all discussion, scoring, ranking, or decision-making related to the affected agency or project. Recusals must be documented in Scoring Committee and CoC Board records.
4. **Lead Agency Recusal:** The CoC Lead Agency must recuse itself from all discussion and decision-making related to projects for which it is the applicant or recipient (e.g., HMIS, Coordinated Entry, CoC Planning). Lead Agency staff may not score, recommend, or influence funding decisions involving their own projects.
5. **Transparency Requirement:** In alignment with the FY2025 CoC NOFO, all conflict of interest disclosures and recusals must be maintained by the CoC Lead Agency and made available for audit or HUD review.

PROJECT PRIORITIZATION & RANKING POLICY

1. Eligibility for Ranking:

To be eligible for prioritization and ranking, all new and renewal project applications must pass all components of the evaluation process, including:

- a. Meeting all HUD eligibility criteria under the CoC Program;
- b. Demonstrating compliance with the HEARTH Act and all CoC Program regulations; and
- c. Submitting complete application materials by all deadlines established by the Central MS CoC and HUD.

2. Alignment with HUD Priorities:

The CoC Scoring Committee will review HUD's policy priorities as outlined in the current year's CoC Program NOFO and other HUD guidance to ensure the local scoring and ranking process aligns with federal requirements. The Committee reserves the right to revise scoring or ranking procedures as needed to maintain competitiveness and compliance.

3. Ranking Methodology:

Projects will be ranked within Tier 1 and Tier 2 based on:

- Final scores from the Central MS CoC scoring tool;
- Project performance, compliance, and capacity as outlined in the CoC Application;
- Alignment with HUD priorities and HEARTH Act performance measures; and
- Local CoC priorities and identified system needs.

The Scoring Committee will also consider competitiveness within HUD's national competition.

4. Renewal Project Evaluation:

Renewal project scoring emphasizes outcomes consistent with HEARTH Act goals, HUD policy priorities, and CoC local priorities. Evaluation will use data from HMIS, Annual Performance Reports (APRs), eLOCCS, Sage, and other HUD or CoC reporting systems. In alignment with the FY2025 NOFO, at least **50% of scoring criteria are objective**, and at least **25%** evaluate HUD-required performance measures related to returns to homelessness, income, and supportive services participation.

5. New Project Evaluation:

All new project applications submitted for reallocated and/or bonus funds will be reviewed by the Scoring Committee to determine eligibility and competitiveness. Applicants will be notified of acceptance or rejection consistent with HUD's required timeline, which historically has been no less than 15 days prior to the CoC Application deadline.

6. New Project Competitiveness:

New project applications will be most competitive if they:

- Align with HUD policy priorities;
- Demonstrate strong organizational capacity to administer federal grants;
- Incorporate Housing First principles;
- Demonstrate fidelity to evidence-based or best-practice models; and
- Address local system needs and gaps.

7. Tier 1 Project Requirements:

In accordance with the FY2025 CoC NOFO, **Tier 1 equals 30% of the CoC's Annual Renewal Demand**

(ARD). Projects required by HEARTH Act and CoC regulations—including HMIS and SSO-Coordinated Entry—will be ranked in Tier 1 due to their system-level importance and federal mandate.

8. New Renewal Projects:

Projects renewing for the first time or that have not yet completed a full operating year will be placed in Tier 1 to maintain project continuity and stability.

9. Lead Agency Recusal:

The CoC Lead Agency will not participate in any discussions, scoring, or deliberations related to prioritization or funding decisions that may affect projects for which it is the applicant or recipient.

10. Public Posting Requirement:

In alignment with the FY2025 NOFO, the CoC will publicly post all ranking and prioritization decisions, scoring tools, and competition materials on its website prior to submission to HUD.

NEW PROJECT SOLICITATION, EVALUATION & SELECTION

HUD's FY2025 CoC Program NOFO allows CoCs to apply for new projects created through Reallocation, CoC Bonus funding, and the Domestic Violence (DV) Bonus. Eligible new project types include Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), Joint Transitional Housing/Permanent Housing-Rapid Rehousing (Joint TH/RRH), Supportive Services Only (including Coordinated Entry and Street Outreach), and HMIS expansion. DV Bonus funds may be used for RRH, Joint TH/RRH, and SSO projects serving survivors of domestic violence, dating violence, sexual assault, or stalking.

1) New Project Evaluation and Scoring Process

- a) **The CoC will conduct a local competition for all new projects** as required by HUD.
- b) The local competition will include:
 - i. The Collaborative Applicant (Mississippi Housing Partnership) will release a Request for Proposals (RFP) and distribute it widely through email notices, the CoC website, community partners, and public posting methods.
 - ii. To be considered, applicants must submit all required materials by the deadline established by the CoC. Required materials may include the most recent audit, proof of active SAM registration, and agency documentation specified in the RFP.
- c) Applications will be submitted to Mississippi Housing Partnership, which will receive and log applications, distribute them to the CoC Scoring Committee, and provide technical assistance where appropriate.
- d) Mississippi Housing Partnership will conduct an initial eligibility review to determine whether applications meet basic RFP and HUD requirements. All applications—eligible and ineligible—will be forwarded to the CoC Scoring Committee with notes regarding eligibility findings.
- e) **All eligible applications will be independently reviewed and scored by the CoC Scoring Committee** using the Board-approved scoring tool.
- f) The Scoring Committee will meet to review scoring results and select new project applications for inclusion in the CoC Priority Listing. Applicants will be notified in writing whether their project was accepted or rejected, and rejected applicants will receive the reason(s) for non-selection.
- g) The Scoring Committee will forward its recommendations to the CoC Board for review and final decision-making. Recommendations will include which projects should be included in the CoC Priority Listing and where they should be ranked.
- h) Applicants whose projects are not selected may submit an appeal in accordance with the CoC's Appeals Policy.

2) New Project Evaluation Factors

In accordance with the FY2025 CoC NOFO, new project applications will be evaluated using a scoring tool that incorporates both objective and qualitative criteria. At least **50%** of scoring must be based on objective measures, and at least **25%** must evaluate HUD-required performance indicators.

Evaluation factors include, but are not limited to:

- i. The extent to which the project fills a gap or meets an unmet need within Central MS' homeless response system;
- ii. The strength of the organizational and management plan to operate the proposed project;
- iii. Evidence of organizational capacity to operate the project type using best practices and Housing First principles;
- iv. Organizational capacity to successfully administer federal grants, including fiscal management and compliance;
- v. The project's capacity to quickly move participants into permanent housing and maintain high housing stability;
- vi. Additional criteria listed in the RFP, including alignment with HUD policy priorities and local CoC system gaps.

Minimum HUD Scoring Requirements (FY2025):

All new projects must meet HUD minimum scoring thresholds to be included in the CoC Priority Listing, including:

- HMIS: **≥ 3 out of 4 points**
- Coordinated Entry (SSO-CE): **≥ 3 out of 4 points**
- Permanent Supportive Housing (PSH): **≥ 4 out of 6 points**
- SSO-Street Outreach: **≥ 5 out of 6 points**
- CoC Planning (if applicable): **≥ 3 out of 5 points**

Projects that do not meet minimum HUD scoring thresholds **cannot** be included in the Priority Listing.

RENEWAL PROJECT EVALUATION

To be considered for inclusion in the Central MS Continuum of Care's (CoC) FY2025 Consolidated Application, organizations wishing to renew existing CoC Program-funded projects must follow the local FY2025 Renewal Project Evaluation and Scoring Process outlined below. Only projects with grant terms expiring between **January 1, 2026 and December 31, 2026** are eligible for renewal in accordance with the FY2025 CoC Program NOFO.

1) Renewal Project Evaluation and Scoring Process

a) Renewal Application Submission:

Agencies must submit a complete renewal application package by the deadline established by the CoC Lead Agency. Renewal applications must include, at minimum:

- CoC Grantee Certification Form
- Renewal Project Application
- Required performance data for the CoC-designated reporting period (e.g., HMIS APR)
- Organizational audit(s) and monitoring materials
- Any documents specified in the RFP

b) Application Components and Data Requirements:

- i. Each renewal project will be evaluated using scoring metrics specific to its project type (e.g., RRH, PSH, HMIS, SSO).
 - ii. If a project has not operated for a full program year (based on eLOCCS operating start date), the project will not be evaluated on performance outcomes but must still meet threshold requirements.
 - iii. Applicants must submit performance data from HMIS APRs run by the CoC Lead Agency for the most recent 12-month reporting period designated for the FY2025 competition.
- Applicants are expected to maintain accurate, complete HMIS data year-round.
 - The CoC may provide a designated data clean-up window; data cannot be altered after this period.

c) Initial Threshold Review:

Applications are submitted to Mississippi Housing Partnership, the Collaborative Applicant. The Lead Agency will review each renewal application for threshold compliance, including organizational eligibility, audit status, expenditure history, and alignment with CoC Program requirements. Renewal applications that fail threshold will be forwarded to the Scoring Committee with documented concerns.

d) Independent Scoring:

All renewal applications that meet threshold are independently reviewed and scored by the CoC Scoring Committee using the standardized scoring tool approved annually.

- In alignment with the FY2025 NOFO, **at least 50% of scoring criteria will be objective**, and **at least 25%** will evaluate the required HUD performance measures related to returns to homelessness, income, and supportive services participation.

e) Performance Review and Reallocation Consideration:

The Scoring Committee will evaluate performance data, financials, compliance history, outcomes from prior Corrective Action Plans, and alignment with HUD and CoC priorities. Projects that demonstrate persistent concerns or failure to meet minimum renewal standards may be recommended for reallocation in accordance with the CoC's Reallocation Policy.

f) Corrective Action Plans (CAP):

Projects scoring poorly, or with performance, compliance, or data quality concerns, may be placed on a CAP. The Committee will review the results of any prior CAPs to determine whether expectations were met.

g) Special Considerations (HMIS & CE):

HMIS and Coordinated Entry (CE) renewal projects will be evaluated and scored; however, because these components are federally required for CoC compliance and system performance, they will be ranked in **Tier 1**.

h) Recommendation and Approval:

The Scoring Committee forwards renewal scores, reallocation recommendations, and ranking recommendations for both new and renewal projects to non-conflicted CoC Board members for final decision-making.

i) Notification and Posting:

Applicants are notified of their renewal scores and ranking via email. Renewal scoring results and the final Priority Listing will be publicly posted on the CoC website in accordance with FY2025 NOFO requirements.

j) Appeals:

Renewal applicants may appeal scoring or ranking decisions in accordance with the CoC's Appeals Policy.

2) Renewal Project Evaluation Factors

Renewal projects will be evaluated based on the following factors:

i. Threshold Requirements

Renewal applicants must:

- Meet all submission deadlines
- Submit complete and accurate application materials
- Provide a clean audit or sufficient corrective action plan

- Demonstrate appropriate utilization of prior year funds (no more than 0.25% recaptured unless justified)
- Submit monitoring documentation for the past two years
- Comply with all HEARTH Act and CoC Program regulations
- Serve eligible households in accordance with project type eligibility

Failure to meet threshold may result in reallocation or placement on a Corrective Action Plan.

ii. Performance Evaluation

Performance factors include:

- Exits to permanent housing
- Housing stability
- Reduction in returns to homelessness
- Income growth (earned and non-earned)
- HMIS data quality, completeness, and timeliness
- Compliance with Housing First principles
- Fiscal management and expenditure rates
- Prior year HUD monitoring results
- Use of technical assistance when required

Projects renewing for the first time with less than one year of data will be reviewed for progress toward full implementation and automatically ranked in Tier 1.

REALLOCATION POLICY

I. Purpose and Context

Reallocation is a HUD-authorized process under the HEARTH Act and 24 CFR 578 that allows Continuums of Care (CoCs) to shift funds from existing renewal projects to new projects that better support system performance, community need, and HUD funding priorities.

Effective use of funds is essential to addressing homelessness within the Central MS CoC. HUD evaluates the effectiveness of renewal projects using a range of data sources, including the Electronic Line of Credit Control System (eLOCCS), Annual Performance Reports (APRs), HUD Field Office monitoring, project audits, fund recapture history, performance against goals stated in the original application, and timely draws and expenditure patterns.

HUD's threshold standards also examine an applicant's capacity for managing federal funds, including:

- Timeliness and accuracy of drawdowns
- Financial and accounting practices
- Serving eligible clients
- Avoiding ineligible expenditure
- Spending full award amounts within the required timeframe
- Absence of unresolved audit findings or project mismanagement

This policy outlines how the Central MS CoC will initiate, assess, and implement reallocation **before, during, and outside of** the annual CoC Program Competition, consistent with the FY2025 HUD NOFO and the CoC's FY25 Reallocation Protocol.

II. Reallocation Categories

Reallocation may occur in three forms:

1. Voluntary Reallocation

A renewal project applicant may voluntarily choose to reallocate some or all of its CoC funding.

Reasons may include:

- Ongoing performance challenges
- Chronic underspending
- Organizational restructuring
- The desire to shift to a different, more effective project model

Agencies may engage the Collaborative Applicant or indicate voluntary reallocation through the Intent to Submit process.

2. NOFO-Driven Strategic Reallocation

The CoC has the discretion—per HUD's FY2025 NOFO—to strategically reallocate funds to align with:

- Federal priorities
- Newly eligible project types
- Funding shifts required or incentivized by HUD
- Local system gaps and performance challenges

No renewal project is exempt from strategic reallocation when federal priorities change, and the CoC may reallocate in whole or in part to maintain competitiveness.

3. Involuntary Reallocation

Involuntary reallocation occurs when a project:

- Fails threshold review (organizational or project-level)
- Repeatedly underspends across multiple years
- Fails to meet the Performance Improvement Plan (PIP) requirements
- Shows evidence of mismanagement
- Has significant unresolved HUD monitoring findings
- No longer meets a system need

The FY2025 NOFO emphasizes that CoCs must “take action against poor performers,” making involuntary reallocation a required system accountability tool.

III. Performance Review & Monitoring

The CoC maintains an ongoing practice of performance monitoring that includes:

- Regular agency self-evaluation
- Annual monitoring visits
- Review of APRs, expenditures, drawdowns, and audit results
- Data quality assessments from HMIS
- Corrective actions when deficiencies are identified

Monitoring findings and the agency’s response are considered when evaluating reallocation decisions.

IV. Annual Reallocation Process During the CoC Competition

Step 1 — Renewal Project Review

During the annual competition, the CoC evaluates each renewal project’s:

- Performance outcomes
- Fiscal accountability and expenditure rates
- Audit and monitoring history
- Alignment with HUD and CoC priorities
- Threshold compliance
- Ability to meet HEARTH Act standards and FY25 NOFO expectations

Step 2 — Identification of Projects for Reallocation

The Scoring Committee reviews renewal project results and identifies projects that:

- Fail threshold
- Have chronic performance issues
- No longer align with system needs or HUD priorities
- Have persistent underspending

The Committee submits a written list of recommended reallocation(s) to the CoC Board, with explanations for each recommendation.

Step 3 — CoC Board Deliberation & Decision

The CoC Board will:

1. Review Scoring Committee recommendations
2. Vote on whether to fully or partially reallocate funds
3. Document recusals per the Conflict of Interest Policy
4. Determine the reallocation amount
5. Document decisions in meeting minutes

Votes may occur via in-person meeting, virtual meeting, email, or electronic survey due to HUD deadlines.

V. Use of Reallocated Funds

The CoC Board may determine that:

Option A: Reallocated funds return to the same agency for a new eligible project

or

Option B: Funds are released competitively through the new project RFP process

If the funds return to the original agency, the agency must submit a new project application under the same deadlines and standards that apply to all new projects.

VI. Recusal Requirements

- The CoC Lead Agency must recuse itself from any reallocation discussions or decisions affecting its own CoC-funded projects.
- Any CoC Board member or Scoring Committee member with a conflict (per the CoC Conflict of Interest Policy) must recuse themselves from deliberation and voting.

VII. Appeal Rights

Any renewal project subject to reallocation—voluntary or involuntary—has the right to appeal the decision in accordance with the CoC’s Appeals Policy.

APPEALS

Under 24 CFR 578.9, Continuums of Care (CoCs) must design, operate, and follow a collaborative and transparent process for developing and submitting the annual CoC Program Application in response to HUD's Notice of Funding Opportunity (NOFO). As the Collaborative Applicant for the Central MS Continuum of Care (MS-500), Mississippi Housing Partnership (MHP) is responsible for implementing the FY2025 appeals procedure.

The purpose of this Appeals Policy is to resolve disputes between applicant organizations and the Central MS CoC in a manner that is fair, timely, and consistent with HUD requirements. The appeals process must proceed quickly to ensure an efficient competition process and must not delay the CoC's timely submission of its Consolidated Application.

I. Eligible Appeals

The following entities may file an appeal:

A. Renewal Applicants May Appeal:

1. **Scoring errors** (mathematical or factual)
2. **Reallocation decisions** (partial or full)
3. **Improper application of CoC or HUD rules**, including the misapplication of objective scoring criteria or threshold requirements

B. New Applicants May Appeal Only if Rejected

Rejected new project applicants may appeal only if they provide a **factual rebuttal** of the reasons for rejection included in the CoC's notification letter.

C. Appeals May Not Challenge

- HUD scoring criteria
- HUD threshold standards
- Tier 1 size (mandated at 30% of ARD for FY2025)
- Decisions required to comply with HUD priorities
- The competitive scoring results of other applicants

(Unless the appellant claims the CoC misapplied its own policies.)

II. Required Documentation and Filing Deadline

To be considered, all appeals must:

1. Be submitted **in writing** within **three (3) business days** of the applicant receiving notice of the decision being appealed;
2. Be emailed to:
 - **CoC Lead Agency (Mississippi Housing Partnership) – timcollins11@comcast.net**
 - **CoC Board Chair – chair@centralmscoc.org**
3. Include:
 - Project name
 - Project type

- Project classification (renewal, bonus, reallocation, DV Bonus, etc.)
- Detailed justification for the appeal
- All supporting documentation

Upon receipt, the CoC Lead Agency will notify all CoC project applicants that an appeal has been filed.

III. Appeal Review Process

1. Conflict Check:

Appeals will be reviewed only by **non-conflicted** CoC Board members, consistent with the CoC Conflict of Interest Policy.

2. Review Window:

The CoC Board has **seven (7) business days** from receipt of the appeal to review documentation, request clarifications if needed, and render a written decision.

3. Documentation:

The review process, including recusals and the final decision, will be fully documented in CoC Board records.

4. Timeliness:

To ensure timely submission of the Consolidated Application, Board deliberations may take place electronically via email, video conference, or other online voting platforms.

5. Final Local Decision:

The decision of the non-conflicted CoC Board members is **final at the local level**.

IV. Right to Appeal to HUD

If the applicant is not satisfied with the final decision of the Central MS CoC Board, the applicant may pursue an appeal directly with HUD in accordance with the procedures described in the FY2025 CoC Program NOFO.

CORRECTIVE ACTION PLAN

The purpose of a Corrective Action Plan (CAP) is to identify specific performance or compliance issues that require improvement and to establish a structured, measurable plan to resolve them. CAPs support accountability, performance improvement, and alignment with HUD's expectations for effective and timely use of CoC Program funds.

The CAP process is an integral component of the CoC's performance monitoring system and may occur **during the annual CoC Program Competition or at any time during the operating year** when performance, fiscal, or compliance concerns are identified.

I. When a CAP May Be Issued

A project may be placed on a CAP when the CoC identifies issues such as:

- Performance outcomes below HUD or CoC standards
- Data quality issues in HMIS
- Late or inaccurate expenditure of CoC funds
- Drawdown delays or chronic underspending
- Failure to serve eligible participants as required by project type
- Unresolved monitoring or audit findings
- Concerns regarding Housing First implementation
- Failure to meet goals established in a prior CAP or Performance Improvement Plan (PIP)

The CoC Scoring Committee determines which projects will be placed on a CAP after reviewing performance during the annual competition or based on performance monitoring results throughout the year.

II. CAP Process

When a project is placed on a CAP, the agency is responsible for implementing corrective measures. Mississippi Housing Partnership, as the CoC Lead Agency, is responsible for developing, issuing, and monitoring the CAP.

1. Written Notification

Agencies will be notified in writing that they have been placed on CAP. Notification will include:

- Reason(s) for CAP placement
- Summary of performance concerns
- Next steps in the CAP process

2. CAP Development

Mississippi Housing Partnership will develop a written CAP and provide it to the agency. The CAP will include:

a. Identified Issues

- Clearly defined performance or compliance issues
- b. Corrective Goals**
 - Specific, measurable goals to resolve each issue
 - Alignment with HUD expectations for performance, timeliness, and compliance
- c. Corrective Actions**
 - Detailed description of activities required to address issues
 - Required documentation
 - Monitoring requirements and check-in frequency
- d. Timelines**
 - Deadlines for completion of required actions
 - Milestones for intermediate progress
- e. Responsible Parties**
 - Staff or leadership accountable for implementing actions

3. CAP Review Meeting

Mississippi Housing Partnership will meet with agency leadership to:

- Review CAP expectations
- Clarify corrective actions
- Establish final timelines
- Answer questions

4. Technical Assistance

Mississippi Housing Partnership may provide or coordinate technical assistance, including referral to HUD TA resources as needed.

5. CAP Execution & Monitoring

- The agency must fully implement the CAP by the established deadlines.
- Mississippi Housing Partnership will conduct regular check-ins to assess progress, review documentation, and provide feedback.
- All CAP documentation will be maintained in CoC records.

6. Completion & Verification

Once corrective actions have been completed, the CAP must be signed by an authorized representative of the agency and the CoC Lead Agency, signaling completion.

III. Use of CAP Results in CoC Competition

During the subsequent CoC Program Competition:

- The Scoring Committee will review the agency's performance under the CAP.
- Successful completion of the CAP will be considered in scoring and ranking decisions.
- Failure to meet CAP requirements may result in:
 - Lower ranking
 - Placement on a Performance Improvement Plan (PIP)
 - **Recommendation for involuntary reallocation**

The CAP is a critical component of system accountability and ensures that CoC Program funds are used effectively to address homelessness.