

Amarillo Continuum of Care TX-611 Annual and Special CoC Consolidated Application

CoC **Policies and Procedures**



Background

The U.S. Department of Housing and Urban Development (HUD) holds an annual national grant competition for Homeless Assistance Program's Continuum of Care (CoC) Program authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act. In June 2022, HUD released a CoC Supplemental grant competition for allocation of recaptured funds, as authorized by Congress. These grant funds provide housing and services to individuals and families who are experiencing homelessness in City of Amarillo CoC TX-611. HUD requires that CoCs facilitate a local review process to review and accept all projects included in the CoC annual consolidated grant application.

In accordance with 24 CFR 578, CoCs must follow a collaborative process for the development of an application in response to a notice of funding availability (NOFO) issued by HUD. The CoC NOFO Collaborative Applicant facilitated the collaborative development of the local review process and scoring criteria in alignment with the Governance Charter. The Collaborative Applicant met, reviewed the prior year's process, and made recommendations to modify the competition process and scoring criteria. The CoC Board reviewed and approved the NOFO Collaborative Applicant's recommended changes to the local review process and scoring criteria, subject to necessary changes due to the NOFO.

At least three non-conflicted Monitoring, Scoring, and Ranking Committee Members will be recruited by the CoC Board. The panel will include at least one CoC Board member and a non-conflicted provider (ideally a provider with experience administering Federal, non-CoC grants). In addition, a Collaborative Applicant representative will attend panel meetings to act as a resource (leaving the room when a conflict requires it).

For purposes of the CoC Monitoring, Scoring, and Ranking Committee participation, conflict will not extend to a substantially independent program or arm of a CoC recipient, subrecipient, or applicant organization, so long as the program is controlled by an independent board and does not receive or directly benefit from CoC funding or the potential award of a CoC grant in the annual and Special competition, as applicable.

The Collaborative Applicant (City of Amarillo) for CoC TX-611 will collect and assemble application materials for the Monitoring, Scoring, and Ranking Committee and appeals materials, if any, for

the Appeal Panel.

Local Project Application Process

Declaration of Intent to Submit a New or Renewal Application or Reallocation Application

Organizations with currently funded CoC projects and those that plan to submit applications for new projects are requested to notify the CoC of the intent to either submit projects for renewal, to release project funds to CoC for reallocated funding applications, or for new projects if allowed by the NOFO. Notifications must be submitted by email to CoCTX611@amarillo.gov by the date indicated in the Local Process Timeline. Organizations that release funds from an existing project shall be given the right of first refusal for those funds if applying for a new eligible project. Otherwise, reallocation shall be based on standard competitive factors.

For the annual competition, submission of a Renewal Application is not a guarantee of Tier 1 priority ranking in the local CoC application. CoC Monitoring, Scoring, and Ranking Committee Members shall review all project applications using CoC-approved scoring criteria and selection priorities to determine ranking order. Only renewal projects verified and submitted in the current Grants Inventory Worksheet registration in e-snaps shall be considered for renewal funding.

During the 2026 NOFO Competition, the CoC is only accepting new project applications for the following project types:

- Transitional Housing (TH)
- Supportive Services Only – Standalone projects (SSO, SSO-CE)

Considering the possibility of reallocated funding and the availability of new or new bonus funding, the CoC welcomes New Project Applications from organizations, including faith-based organizations, that have not previously received CoC funding. The local NOFO will explicitly include an invitation for new applicants to apply, outlining all eligible project types and submission requirements for first-time applicants. Outreach for new project opportunities will be conducted through multiple platforms, including posting on the CoC website and CoC Facebook page, emailing the CoC membership list, distributing through the United Way Listserv, and publishing the local competition notice in the *Amarillo Globe-News* and *El Mensajero*. All outreach efforts will be coordinated to ensure broad communication of available funding opportunities.

Local Competition Deadlines

Local competition deadlines are established to ensure all project applications are finalized within the timeline outlined in the HUD NOFO. As part of the CoC application process, the implementation of deadlines that meet the standards for Project Applications shall be considered as part of scoring criteria for the CoC Collaborative Application.

Project Application Submittal

All project applications are required to be submitted to the CoC TX611 on e-snaps by the local application deadline. A physical copy of the e-snaps application with additional required documentation must be delivered to the Collaborative Applicant at the City of Amarillo Community Development Department by the competition deadline. See the Local Process Timeline for specific deadlines for new and renewal projects. Any corrections to e-snaps project applications for HUD must be completed by the deadline indicated in the Local Process.

CoC Notification to Project Applicants

15 days prior to the submission deadline, the CoC will notify, in writing, all project applicants who submitted their project applications to the CoC by the CoC – established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC. Project applicants that submitted project applications that were rejected shall be notified of the reason for the rejection and may submit a request for reconsideration for inclusion in the current funding cycle. In addition, an applicant may appeal if the Monitoring, Scoring and Ranking Committee recommends a renewal project for full or partial reallocation or for Tier 2. The appeals process is outlined in the *Appeals Policies* below.

Competition e-snaps Submission

After the local review process has been finalized, all projects accepted for inclusion in the CoC Annual Consolidated or Special Unsheltered CoC Application must submit a final online e-snaps project application to the CoC, according to the Local Process Timeline deadline.

Local Project Review and Ranking Process

The CoC Program Competition is administered under the CoC Program Interim Rule.

Scoring criteria and scoring tools have been developed to measure performance and capacity based on the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Performance Measures, in compliance with CoC Interim Rule and HUD identified priorities. The scoring criteria found in the Scoring Tools and these policies detail how the CoC Monitoring, Scoring, and Ranking Committee Members shall evaluate projects for the funding year, determine inclusion in the CoC Annual Consolidated or Special Unsheltered CoC Application and rank the CoC projects.

Updated review and ranking processes for the FY2026 CoC NOFO local competition will:

- Ensure objective factors account for at least 50% of total available points.
- Ensure System Performance Measures (SPMs) account for at least 25% of total available points.
- Evaluate projects based on required service participation.
- Evaluate housing projects based on returns to homelessness, employment income, and supportive service participation requirements.

- Evaluate applicants' financial stability, organizational capacity, performance history, audit findings, and public complaints.
- Evaluate Transitional Housing (TH) projects on the extent to which the proposed program meets HUD's 20-hour per week participant engagement requirement, except for participants age 62 or older or those who meet the definition of an "individual with handicaps" under [24 CFR 8.3](#).
- Ensure Transitional Housing (TH) project evaluations consider individualized service planning designed to support participant engagement, self-sufficiency, and successful transitions to permanent housing.
- Ensure Supportive Services Only (SSO) project evaluations consider the provision of coordinated services that address barriers to housing stability and promote treatment engagement, employment, self-sufficiency, and successful transitions to permanent housing.
- Ensure Street Outreach (SSO) project evaluations consider demonstrated coordination with, or a plan to coordinate with, law enforcement, first responders, and other public safety partners.

The review and ranking process will proceed as follows:

1. A Technical Assistance (TA) Workshop to release information about the CoC NOFO Application, open to all prospective applicants, will be held at a date to be determined based on NOFO release. This workshop will include navigation and submissions in e-snaps.
2. All applicants will submit a letter of intent to apply for CoC funding to CoCTX611@amarillo.gov by the deadline set in the published NOFO timeline.
3. All applicants will prepare and submit project application materials.
 - a. **Late Applications.** Applications received after the deadline will receive zero points in the scoring process. Since no new information may be evaluated during the appeal. The scoring and ranking committee won't evaluate any late content.
4. A Technical Assistance (TA) Workshop will be held by the Collaborative Applicant for all prospective applicants the day before the CoC Application deadline to offer any additional assistance to applicants.
5. Renewal projects may voluntarily reallocate part or all of their funding. Low-performing projects are encouraged to reallocate, and potential applicants are encouraged to apply for new projects through reallocation.
6. Collaborative Applicant staff will review all project applications to ensure they satisfy the threshold requirements established by HUD in the FY2026 CoC Program NOFO and the CoC's Local Competition. Threshold requirements are identified in the applicable Local Competition Scoring Tool and must be satisfied before an application is eligible for scoring. Failure to satisfy any applicable threshold

requirement will result in the application being deemed ineligible for further consideration in the local competition.

7. Monitoring, Scoring, and Ranking Committee Members will be oriented to the process and will receive applications, project performance data, and scoring materials.
8. Monitoring, Scoring, and Ranking Committee Members will review and tentatively score the applications prior to their first meeting in a scoring spreadsheet provided by CoC TX-611.
 - a. New housing projects, first-time renewals, transition housing projects, and renewals after transition that do not have a full year of relevant performance data will be scored using the New/Transition Scoring Tool. Any other housing projects without a full year of data for the evaluation year will also be scored using the New/Transition Scoring Tool.
 - b. All new projects, including new expansion projects, will also be scored using the New/Transition scoring tool. However, a new expansion project will not be ranked above the renewal project that it proposes to expand. If a new expansion project receives a higher score than the associated renewal project, it will be ranked directly below the renewal project.
 - c. All other renewal housing projects will be scored using the Renewal Scoring Tool.
 - d. To enhance system performance by preventing returns to homelessness and promoting housing stability and retention, renewal housing projects that meet two out of three key *Outcomes Standards* may be ranked above any new projects that have not demonstrated their ability to better enhance system performance, even if the new project scores above the renewal project.

Key Outcomes Standards include:

- Earn 50% or more of the available points in the “Program Effectiveness” measure of the CoC approved Renewal Scoring Tool.
 - Earn 50% or more of the available points in the “Performance and Monitoring” measure of the CoC approved Renewal Scoring Tool.
 - Earn 50% or more of the available points in the “Performance Measures” measure in the approved CoC Renewal Scoring and Ranking Tool.
- e. The HEARTH Act requires that all communities have an HMIS and collect information from their CoC and ESG-funded projects. HMIS and CE renewal projects will be prioritized for Tier 1 placement due to their critical role in system performance.
9. The Monitoring, Scoring, and Ranking Committee will meet to jointly discuss each application and individually score applications. Applicants may be requested to address questions from the committee.

- a. The committee will create a list guided by the scores that the Panel has already assigned, by these policies, and by strategic considerations using HUD's 2026 new funding process.

HUD's New Funding Process

After funding Tier 1, HUD will check to see whether it has funded \$104,000,000 in **new** Domestic Violence Bonus projects. If it has not, it will fund **new** Domestic Violence Bonus projects in Tier 2. After this allocation, HUD will fund its Set Aside for \$1,300,000,000 of **new** Transitional Housing and Supportive Services Only projects in Tier 2. If there is not \$1,300,000,000 in Transitional Housing and Supportive Services Only projects in Tier 2 then HUD will fund other new project types. It is unlikely that any renewal project funding will be allocated in Tier 2. Therefore, all renewal projects that are Priority Projects (see below) for the CoC will be ranked in Tier 1 and only new projects should be ranked in Tier 2, unless the CoC must rank renewal projects in Tier 2 due to not having enough new project applications or because listing those renewal projects on the Priority Listing will help the CoC obtain points on the national application.

TIER 1

In prior competitions, most projects are included in Tier 1, which previously included roughly 90-100% of the funding available to the CoC. **However, this year, the CoC can only put 60% of its Annual Renewal Demand in Tier 1.** Projects that are ranked in Tier 1 are expected to receive federal funding unless the government shuts down or the project is deemed legally ineligible by HUD. Due to the 60% ARD and the Set Aside for new projects only in Tier 2, only CoC Priority Projects will be ranked in Tier 1. These projects are:

- Unscored HMIS projects, including expansions
- Unscored Coordinated Entry System project
- Scored Permanent Supportive Housing Projects

Scored Permanent Supportive Housing Projects

Scored Permanent Supportive Housing Projects are determined using the below prioritization and ranked in Tier 1 in order of score utilizing the renewal scoring tool:

- Permanent Supportive Housing projects that meet HUD's thresholds.
- Permanent Supportive Housing projects with a Leasing or Rental Assistance Line Item.
- Permanent Supportive Housing projects that serve a general population (no specific disability or subpopulation requirements).

- Permanent Supportive Housing in Underserved Areas.

Permanent Housing renewal projects that are not placed in Tier 1 will be reallocated, unless the CoC must include renewal projects in Tier 2 due to a lack of new project applications. These projects will be placed in Tier 2 at the discretion of the Review and Rank Panel, using strategic considerations related to HUD's priorities and national application scoring.

Prior to reviewing and ranking renewal permanent housing projects based on their data, the Competition Facilitator, Collaborative Applicant, and non-conflicted CoC Chair will utilize the above prioritization to determine which Permanent Supportive Housing projects will be included within Tier 1 to be ranked utilizing data and the renewal scoring tool. Permanent Housing projects that are not being placed in Tier 1 will be alerted as soon as possible so they have an opportunity to apply for a new or transition project in the local competition.

Even if Permanent Housing projects are included in Tier 1, partial reallocations may occur based on current and historical grant spend and utilization data. Low grant spend or utilization that occurred within the first year of a project or the first year of an expansion of the project do not count towards a historical grant spend problem and will not be considered as a reason for partial reallocation.

TIER 2

Some projects will be ranked in "Tier 2" which is equal to the difference between Tier 1 and the CoC Annual Renewal Demand plus the amount available for the Bonus and DV Bonus amounts. This means that the community would like those projects to receive funding, but that it is unclear whether HUD will allocate enough money to the community to fund those projects. Projects that are ranked toward the top of Tier 2 are somewhat more likely to receive funding than projects at the bottom of Tier 2. The CoC will align its new project scoring tool to HUD's priorities to make Tier 2 projects competitive for the national funding competition in which they will be competing for funds.

HUD's new funding process prioritizes new project applications for Tier 2 by using a new project Set Aside for Transitional Housing and Supportive Services Only projects. The community prioritization for Tier 2 is as follows:

- Scored New Supportive Services Only and Transitional Housing projects (including Domestic Violence Bonus) projects. *These projects will be ranked in Tier 2 based on their score and utilizing the Panel discretion described below.*

If renewal projects are included in Tier 2, they will be ranked below new project applications due to the new project Set Aside. The Review and Rank Panel has discretion

to prioritize new Transitional Housing projects over all other scored projects in Tier 2 due to the CoC's need for additional housing.

The Review and Rank Panel may determine not to place a new project on the Priority Listing for reasons other than its project score. Projects may not be placed on the Priority Listing if:

- They do not meet threshold factors;
 - They otherwise are non-compliant with HUD regulations, policies, or HUD AAQ responses (example (not all-inclusive) is: if a nonprofit applies for a TBRA TH project without a unit of local government administering the TBRA);
 - Multiple projects apply for a similar SSO-Standalone project (with the same focus) and the community does not need multiple projects that meet that need (e.g., if multiple projects apply for SSO Standalone Benefits Access projects, the Panel may choose to only put the highest scoring Benefits Access project on the Priority Listing and not fund a second Benefits Access project, even if it scores higher than other new project applications).
- b. Ranked list(s) will be prepared based on raw scores, then translated to a tiered list as outlined above for the annual competition process.
- c. The Panel will consider reallocating renewal projects – see *Reallocation* below. In the event that the Monitoring, Scoring, and Ranking Committee identifies a renewal project(s) whose funding should not be renewed or should be decreased, the Panel will determine whether any new proposed projects should be awarded and will proceed with reallocation – see *Reallocation* below.
10. Panel releases scoring results to applicants with reminder of appeals process – see *Appeals* below. CoC TX-611 will distribute a summary of general panel feedback on select scoring factors.
11. Appellate hearings will be held, if requested, and results will be distributed.
12. The Executive Board representative will consider and modify/approve the Priority List of Projects, which is then included in the CoC's Consolidated NOFO Application. The Priority List will only be modified if it is to meet the CoC Policy.
13. CoC's Consolidated NOFO Application is made available for public review and reference on the CoC website.
14. Annual process debriefs are held with Monitoring, Scoring, and Ranking Committee Members, project applicants, and the Collaborative Applicant. This information will support the NOFO Collaborative Applicant in making recommendations for improvement for the next annual or Special competition.

Reallocation

Reallocation only applies to the annual competition NOFO. HUD expects CoCs to reallocate funds from non- and/or under-performing projects to projects addressing higher priority community needs that align with HUD priorities and goals. Reallocation involves using funds in whole or in part from existing eligible renewal projects, including first-time renewals, to create one or more new projects.

HUD expects that CoCs will use performance data to decide how to best use the resources available to end homelessness within the community. CoCs should reallocate funds to new projects whenever reallocation would reduce homelessness. Communities should use CoC approved scoring criteria and selection priorities to determine the extent to which each project is still necessary and address the policy priorities listed in the NOFO. Recent NOFOs have stated that HUD would prioritize those CoCs that have demonstrated a capacity to reallocate funding from lower performing projects to higher performing projects through the local selection process.

Only eligible renewal projects that have previously been renewed under the CoC Program will be considered for reallocation. When considering reallocation, the Monitoring, Scoring, and Ranking Committee will:

- Consider unspent funds and the ability to cut grants without cutting service/housing levels; specifically, if a program has 10 percent or greater of HUD funds remaining at the end of the program year;
- Consider history of reallocation (e.g., if a grant was reduced one year, this will not be apparent in spending the following year);
- Consider the project's performance;
 - The CoC will work with projects that scored low in the most recent local review process. The CoC will assess the project and set up goals and objectives to bring a failing project up to standards.
 - If the project continues to underperform and cannot meet the stated objectives and goals and has established a 3-year trend of having 10 percent or greater of HUD funds remaining at the end of the program year, then that project will be recommended for reallocation in the next HUD CoC NOFO process.
- Consider the project's ability to meet financial management standards;
 - The CoC will work with grantees that have had HUD or CoC Monitoring findings that call into question the project's ability to meet financial management standards. The CoC will assess the project and set up goals and objectives to bring a failing project up to standards and will provide technical assistance to address the findings.

- If the project cannot meet the stated objectives and goals or cannot address HUD or CoC findings, then that project will be recommended for reallocation in the next HUD CoC NOFO process;
- Consider specific new permanent supportive housing or rapid rehousing project(s) and specific renewal project(s) at risk of not being funded;
- Consider alternative funding sources available to support either new or renewal project(s) at risk of not being funding;
- Consider renewal HUD “covenant” concerns related to grant funds for acquisition, rehabilitation, or new construction;
- Consider impact on system performance and the CoC’s Consolidated Application score; and
- Consider the impact on the community in light of community needs.

The impact of this policy is that high-scoring projects may be reallocated if these considerations warrant that decision.

Appeals

For the annual CoC Competition, the CoC Monitoring, Scoring, and Ranking Committee reviews all applications and ranks them, creating funding recommendations to HUD. 15 days prior to the submission deadline, the CoC will notify, in writing, all project applicants who submitted their project applications to the CoC by the CoC – established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC. Applicants may appeal the decision by following the process set forth below. All appeals must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed.

Who May Appeal

An agency may appeal a rank assigned to a project by the Monitoring, Scoring, and Ranking Committee (including exclusion from the Priority List) if the ranking:

- Makes it likely to result in the project not being funded, in whole or in part;
- Reduced or eliminated a renewal project through reallocation; or
- Places the project in Tier 2.

Basis for Appeal

An appeal must relate to specific scoring factors and the number of points awarded to the project by the Monitoring, Scoring, and Ranking Committee.

Initiating a Formal Appeal

Any agency desiring to appeal must contact CoC TX-611 at CoCTX611@amarillo.gov and the CoC chair to state its intent to appeal the Monitoring, Scoring, and Ranking Committee’s

decision regarding their rank or exclusion from the Priority List by the date and time indicated in the Local Process Timeline.

If an agency states its intent to appeal as per the Local Process Timeline, other agencies whose rank may be affected will be notified as a courtesy at that time. Such agencies will then be eligible to appeal on the usual basis for appeal by the appeals deadline indicated in the Local Process Timeline. In other words, such agencies may file a Formal Appeal within the original appeals timeline – they may not appeal after the appeals process is complete.

The Formal Appeal must consist of a short, clear, written statement (no longer than two pages) of the agency's appeal of the Monitoring, Scoring, and Ranking Committee's decision. The statement can be in the form of a letter, a memo, or an email transmittal. The Formal Appeal must be transmitted to CoC TX-611 at CoCTX611@amarillo.gov.

The Formal Appeal must be emailed or delivered so that it is received by the date and time indicated in the Local Process Timeline.

Members of the Appeal Panel

A three-member Appeal Panel will be selected from the CoC Board or its designees. Appeal Panel Members will not have a conflict of interest with any of the agencies or parties applying for CoC Program funding as defined by the existing Monitoring, Scoring, and Ranking Committee's conflict of interest rules. Voting members of the Appeal Panel shall not serve simultaneously on the Monitoring, Scoring, and Ranking Committee; however, a Monitoring, Scoring, and Ranking Committee Member and a staff person of the Collaborative Applicant will attend the Appeal Panel meeting to inform discussion.

The Formal Appeal Process

The Appeal Panel will meet (by telephone or video conference or in person) with a representative(s) of the party making the appeal to discuss the issue(s) at an Appeal Hearing on the date indicated in the Local Process Timeline. The Panel will then deliberate. ***Please note that the Appeals Process may result in an upward or downward change in a project's ranking.***

The Appeal Panel will inform appealing agencies of its decision by 12:00pm (noon) on the date indicated in the Local Process Timeline.

Strategic Allocation of CoC Funding

The CoC is committed to using Continuum of Care Program funding efficiently and strategically as a component of the community's broader continuum of homeless housing and services, to maximize availability of high performing programs to end homelessness.

Following the Appeal Panel, the Collaborative Applicant will convene to review the Appeal Panel Priority List for the annual CoC Competition and may make recommendations to the CoC Board regarding changes to the ranking of projects in Tier 2, as applicable. Recommendations may address ranking only; recommendations regarding reallocation developed by the Monitoring, Scoring, and Ranking Committee and sustained by the Appeal Panel may not be considered or

modified by the Collaborative Applicant after appeals are complete.

In recommending changes to the ranking of Tier 2 projects, the NOFO Collaborative Applicant may consider the following:

- The project's ability to continue operations by accessing alternative sources of funding that are available if HUD CoC Program funding is not awarded; and
- The impact on the CoC's bed or unit inventory and overall resources to address homelessness if a project is not awarded CoC funding. Information will be provided regarding number of beds and units, amount of grant request, operating year dates, population served, and current unit utilization rate.

CoC TX-611 will develop a process for providing information about projects to the Collaborative Applicant and guidelines for participation by applicants.

Any Collaborative Applicant recommendations to the CoC Board must be either:

- Consensus recommendations, or
- Recommendations based on a vote of at least 60% of the Collaborative Applicant members in attendance, in which case the vote must be recorded and given to the CoC Board alongside the recommendation of the voting majority as well as the grounds for opposition.

The Executive Board representative will approve the final project list for submission. The decision of the CoC Executive Board representative will be final.

Continuum of Care Program Statutory and Regulatory Requirements

The CoC Program Interim Rule at 24 CFR part 578 outlines the requirements with which projects awarded funds through the competition must comply. To be eligible for funding under this NOFO, project applicants must meet all statutory and regulatory requirements in the CoC Program Interim Rule. Project applicants can obtain a copy of the Act and the CoC Program Interim Rule on the HUD Exchange website <https://www.hudexchange.info/> or by contacting the NOFO Information Center at 1-800-HUD-8929 (483-8929).

Organizations awarded CoC funds within the CoC shall individually enter into a grant agreement with HUD.

Conflict of Interest Policy

No member of the Review Panel may have a conflict of interest in creating the recommended Priority List. Monitor, Scoring and Ranking Committee Members will be asked to sign a statement declaring that they do not have a conflict of interest.

A conflict of interest exists if:

1. Panelist or a member of their immediate family (such as parent, sibling, child, niece/nephew, or person with whom they cohabit) is now, has been within the last year,

or has a current agreement to serve in the future as a Board member, staff member, or paid consultant of an organization making a proposal for funding;

2. Panelist is currently employed by or sits on the Board of Directors for an organization that has a contractual relationship with any entity making a proposal for funding or has had one within the past year. However, no conflict exists under this provision if the panelist's employer, or the organization on whose Board the panelist serve, is a funding entity or if the contractual relationship in place is not impacted by the proposals being made; or,
3. Any other circumstances exist which impede the panelist's ability to objectively, fairly, and impartially review and rank the proposal for funding.

Exception: Panelist may serve on a panel if they are no longer affiliated with an organization making a proposal for funding, AND the potential conflict has been waived through public notice to the CoC with no opposition raised within the period listed in that public notice.

If the Board or committee has reasonable cause to believe a CoC Board or committee member has failed to disclose actual or possible conflicts of interest, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged failure to disclose. If the CoC Board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action which could include ensuring the individual with the association abstains from voting or serving on a committee with governing board delegated powers up to dismissal of the individual from board or committee membership.