

Marin County Continuum of Care

HUD CONTINUUM OF CARE PROGRAM

2022 Program Evaluation Scoring Policies

LOCAL COMPETITION INFORMATION

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2022 LOCAL COMMUNITY REVIEW PROCESS

Review and Rank: Background

The Department of Housing and Urban Development's annual Continuum of Care funding competition requires local Continuums of Care to evaluate local projects for funding determinations. This process must be a fair and impartial review, ranking, and selection of projects with representation and input from diverse parties. In addition, all projects must have the opportunity to appeal the ranking determinations. Finally, the CoC must adopt a Priority Listing of projects submitted as part of the CoC Application.

The County of Marin, Department of Health & Human Services, is the designated Lead for the Continuum of Care (CoC) and acts as the Collaborative Applicant for the annual consolidated application to the U.S. Department of Housing and Urban Development (HUD). The CoC has created this review process to ensure projects are fairly and impartially reviewed and ranked per HUD policies. The CoC approved the review process on June 22, 2022.

The Project Review Panel

The Marin CoC utilizes a Project Review Panel to review, rank, and select projects based on the CoC Program purpose and requirements and to help ensure projects are aligned with HEARTH Act goals. The Panel provides constructive feedback to applicants on project improvement and performance.

Project Review Panel members are selected from the Homeless Policy Steering Committee and other community stakeholders, and are approved by the Homeless Policy Steering Committee (HPSC). To serve, a panel member must be:

- Non-conflicted, meaning that they are not employees or staff of and do not otherwise have a business or personal conflict of interest with the applicant organizations;
- Familiar with housing and homeless needs within the Continuum of Care; and
- Willing to review projects with the best interest of persons experiencing homelessness in mind.

The Project Review Panel must consist of no less than three members. The HPSC may select additional members within its discretion, and/or alternates to serve in the event of a conflict, illness, or other unforeseen circumstance which prevents a member from serving on the Project Review Panel.

New Project Review Panel Member Selection

The Homeless Policy Steering Committee (HPSC) and CoC staff will be responsible for identifying additional Panel members. Please note:

- HPSC members and CoC staff will both have the opportunity to nominate potential Project Review Panel members that meet the membership qualifications.
- If more than one potential member is identified, HPSC will conduct a vote to select the new Project Review Panel member. In the event that only one potential member is identified, HPSC will hold a vote to approve that nomination.

Overview of the Review and Rank Process

Preparation for Review and Rank

Prior to the review and rank session, the Collaborative Applicant will work with Homebase, the facilitators of the CoC Program Local Competition, to develop the scoring tools and competition policies which will be used during the competition. The scoring tools and Review and Rank policies will be evaluated by community stakeholders at the CoC Scoring Tools Meeting(s), the CoC Bidders Conference/TA Workshop, and/or at the HPSC convenings, and requested changes implemented. The tools and policies will then be presented to the CoC membership for comment and approval.

Project Information Submission

Renewal Projects will be required to submit two types of information as part of the Review and Rank process: an Annual Performance Report and a Local Application. The APR will match the information requested by the Department of Housing and Urban Development, but will be generated utilizing HMIS data for a uniform time frame.

Renewal Project Applicants will have the opportunity to review their APR and make changes in their HMIS data to ensure accuracy. If the information is accurate, the project will approve the APR. If the information is not accurate, the project will be able to make a second round of changes. The reviewed APR data will be input into the project's CoC Competition report using Homebase's Program Evaluation and Scoring Tool (PRESTO), which is an online database that takes the performance data for each project and creates a report that the Review Panel will use to compare and score projects.

The Local Application asks projects to expand upon the objective data contained within the APR through subjective narratives. The Review Panel will examine the subjective responses to determine if, in its discretion, a deviation from the scaled scores is appropriate and to score the questions that require information directly from the applicants' narrative answers.

Homebase will incorporate the narratives into the PRESTO report for each Renewal and New project, and all Project Applicants will review their compiled PRESTO report prior to its submission to the Review Panel. Any changes to the PRESTO report will be limited to formatting and calculation modifications to Local Application responses and exported APR data. The corrected APR data and Local Application responses are final after the submission deadline and the project will not be allowed to make changes to the APR data or the content of responses after

the creation of the Final PRESTO Report for the project even if the project identifies inaccurate information in the APR due to project/agency error.

Threshold Determination

HUD requires all renewal projects to meet or exceed a performance threshold; demonstrate applicant capacity and eligibility; and show project eligibility. Homebase will conduct this threshold review to ensure projects are compliant with HUD policies and will not be at risk of being rejected by HUD as ineligible projects. Threshold criteria are outlined on the scoring tool, but include:

- The agency running the project must be eligible to receive HUD funding;
- The project must serve an eligible population for its program type;
- The project must participate in the Homeless Management Information System (HMIS), or a separate comparable database if the project is operated by a victim service provider;
- The project must participate in Coordinated Entry or state it will participate in Coordinated Entry;
- The project budget must reflect spending on eligible costs;
- The program must adopt a Housing First model, eliminating barriers to housing;
- The project must comply with Fair Housing and demonstrate a commitment to facilitating and/or attending trainings on Fair Housing and the Equal Access Rule.

Homebase will notify the Project Review Panel if a project fails to meet threshold requirements, which could put CoC funding at risk. The Project Review Panel will consider that information and determine whether the program should or should not be recommended for funding.

The Project Review Panel evaluates the following:

- Applicant's eligibility;
- Applicant's and its employees' and partners' demonstrated ability (i.e., homelessness knowledge and experience) to carry out the project and specific activities proposed;
- Current or past McKinney-Vento Act project recipients' timeliness standards, serious unresolved HUD monitoring findings, and outstanding audit finding of a material nature regarding the administration of the project;
- Grant compliance;
- Project effectiveness and quality; and
- Project's alignment with HEARTH Act performance goals and community priorities.

HUD also requires the community to report on whether and how it systematically analyzes existing projects' reported performance (via Annual Performance Reports submitted to HUD) on specific areas to improve project performance.

Review and Rank Panel Scoring Session

Project Review Panel members will score renewal projects using the 2022 Renewal Scoring Tool. Each Panel member's assigned scores are averaged together to create the project's final score. Generally, the Project Review Panel evaluates the following:

- Applicant's and its employees' and partners' demonstrated ability (i.e., homelessness knowledge and experience) to carry out the project and specific activities proposed;
- Current or past McKinney-Vento Act project recipients' timeliness standards, serious unresolved HUD monitoring findings, and outstanding audit finding of a material nature regarding the administration of the project;¹
- Grant compliance;
- Project effectiveness and quality; and
- Project's alignment with HEARTH Act performance goals and community plans.

All projects are ranked and placed into either Tier 1 or Tier 2 based on their score, per HUD requirements.

New projects that have less than one year of operating data will not be scored as part of the Review and Rank. However, their program design will be evaluated by the panel and general comments regarding program performance will be made.

The Project Review Panel will conduct interviews during the Review and Rank. Applicants are required to have a staff member attend the Review and Rank in person. This staff member will generally describe the project to the Project Review Panel and will answer any questions the Panel may have.

¹ Scoring guidelines for "severity of audit findings" shall be based on the presence of the following indicators:

- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
- Audit finding(s) for which a response is overdue or unsatisfactory;
- History of inadequate financial management accounting practices;
- Evidence of untimely expenditures on prior award;
- History of other major capacity issues that have significantly affected the operation of the project and its performance;
- History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and
- History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds with statutorily established frameworks.

2022 Continuum of Care Competition

Funding Priorities

In order to promote system performance by preventing returns to homelessness and promoting housing stability and retention, the Homeless Policy Steering Committee (HPSC) has determined that renewal projects with a strong track record of performance, as demonstrated through their APRs and other data, may be prioritized above any new projects that have not demonstrated their ability to better enhance system performance. Performance requirements for this purpose are projects that 1) meet HUD guidelines for Housing First; 2) maintain at least an 80% occupancy rate (unless they do not yet have performance data for a full year of operation, in which case occupancy rate may not yet have achieved 80%) and 3) participate in the Homeless Management Information System or comparable database, if a DV services provider.

Reallocation of Funds

HUD allows CoCs to reallocate funds from non- and/or under-performing projects, including those who repeatedly leave funds undrawn from their completed grant, to high priority community needs that also align with HUD priorities and goals. Reallocation involves taking funds in whole or part from existing eligible renewal projects and using them to create one or more new projects. Projects that haven't fully drawn down most recently completed grants may be considered to be under-performing.

HUD allows CoCs to use the reallocation process to create:

1. New permanent supportive housing projects where 100 percent of the beds are dedicated to chronically homeless individuals and families or DedicatedPLUS populations.
2. New rapid re-housing to serve homeless individuals and families, including unaccompanied youth
3. Joint TH and PH-RRH component projects, which will include transitional housing and permanent housing-rapid rehousing in a single project to serve individuals and families experiencing homelessness, including victims of domestic violence
4. New dedicated Homeless Management Information System (HMIS) project (can only be carried out by the HMIS lead)
5. New Supportive Services Only (SSO) project to develop or operate a centralized or coordinated entry system

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.

The Homeless Policy Steering Committee (HPSC) will provide guidance on the priorities of the Continuum of Care. This guidance will be established prior to the Continuum of Care Competition. The Project Review Panel may make reallocation suggestions based on the policy goals of the HPSC. Projects which no longer meet the priority goals of the Continuum of Care, or the policy priorities of the Department of Housing and Urban Development, may be subject to reallocation.

In general, the Homeless Policy Steering Committee has identified the need for permanent housing options within Marin County. Lowest performing projects may be reallocated to support new permanent supportive housing or rapid re-housing projects that emphasize serving the Chronically Homeless. The HPSC also recognizes the need for an efficient Coordinated Entry system and recommends reallocation of poorly performing projects to support Coordinated Entry.

Reallocation and Bonus funds are available sources of funding for HMIS and Coordinated Entry projects. Coordinated Entry projects are the only SSO projects eligible to receive DV-Bonus funding.

Voluntary Reallocation of Non-Permanent Housing Projects

In order to encourage projects to voluntarily align themselves with HEARTH Act goals and local priorities regarding housing and service provision, existing non-permanent housing projects that voluntarily wish to convert their project to permanent housing or another eligible new project type as defined by HUD in the Continuum of Care Competition Notice of Funding Available will be given priority in accessing the funds reallocated from their existing project.

Any such converting project may request reallocation and submit a new project application. If the converting project was preliminarily scored by the Project Review Panel on the basis of a renewal application, and the Panel determines the new project application to be of reasonable quality, then the new project will assume the preliminary score given the renewal application and be scored and placed into the tiered structure accordingly.

Supplemental Project Funding

In some circumstances there may be an opportunity after the application deadline for programs to submit application materials for additional funding. The Homeless Policy Steering Committee, through staff, will issue a Supplemental Project Application when:

1. After receiving all project applications it appears there is additional funding available;
or,

2. After conducting the threshold review of the submitted project applications it appears there is additional funding available; or,
3. After conducting the review and rank, the Panel has recommended a program for reallocation and thus those funds are available.

In the event that Supplemental Applications are required, HPSC will:

- Email the CoC and other interested parties (all homeless service and housing providers in the CoC area) with specifics regarding how much money is available and which type of programs qualify.
- The Collaborative Applicant will provide technical assistance and guidance, as needed, to ensure applicants understand the funding requirements.
- Any additional applications for these funds will be due as soon as possible after this email is distributed, as determined by the NOFO submission deadline.
- The Review and Rank Panel will reconvene either via telephone, video conference, or in person depending on availability and convenience to evaluate the project.

For this type of process, the timeline will be extremely short and may make an application burdensome; however, expanding another application, applying in collaboration, and a community consensus on how to spend the funds are all viable options.

Appeals Panel Details

The Review and Rank Panel reviews all applications and ranks them for funding recommendations to HUD. Applicants may appeal the decision by following the process set forth below.

Appeal Panel Membership

A 3-member Appeal Panel will be selected and those members can come from non-profits, foundations, consumers, government, private agencies, and similar organizations. Appeal Panel members must be:

- Non-conflicted, meaning that they are not employees or staff of and do not otherwise have a business or personal conflict of interest with the applicant organizations; and
- Familiar with housing and homeless needs within the Continuum of Care.

The Appeal Panel will be selected by the neutral facilitator of the Review and Rank process.

Who May Appeal

A project may appeal if:

- The Review and Rank panel recommends the project for full or partial reallocation
- The project is placed in Tier 2.

If the project was submitted by a collaboration of agencies, only one joint appeal may be made.

What May Be Appealed

Appeals may be made on the following bases:

- Inaccuracy in information provided to the Review and Rank Panel (by entities other than the applicant) resulting in a reduced score
- A failure to follow the review and rank process resulting in a reduced score
- A conflict of interest that resulted in a significant disadvantage to the appealing applicant

NOTE: Appeals based on policy considerations, funding priorities, or other subjective criteria will not be considered and are not eligible.

Appeal Process

Any Project Applicant seeking to appeal must adhere to the included timeline. Failure to meet a deadline in the timeline voids the Project Applicant's appeal.

- Project Applicants will have 24 hours after the issuance of the Recommended Preliminary Priority Listing to provide notice of intent to appeal to the neutral facilitator (Homebase). This notice must include:
 - A statement as to why the project is eligible to appeal.
 - The basis for the appeal
 - A brief statement of the facts upon which the Project Applicant bases its appeal. These facts need not be complete, but must give Homebase a sufficient understanding for the basis of the appeal.
- Homebase will contact the appealing Project Applicant in an attempt to clarify the scoring decision and determine if the appeal can be resolved without requiring a formal hearing.
- If a resolution is not possible, the Project Applicant will submit a formal appeal pursuant to the official CoC Competition timeline.
 - The Formal Appeal must consist of a short, clear, written statement no longer than two pages of the basis for the Project Applicant's appeal of the Review and Rank Panel's decision.
 - The Formal Appeal must be sent as an attachment to Homebase.

- Upon timely receipt of the Formal Appeal, Homebase, as the neutral facilitator of the process, will convene the Appeal Panel and set a time and date for the Appeal Hearing.
 - The Appeal Hearing will be conducted telephonically.
 - The Appeal Panel will join the call with the neutral facilitator and a representative of the Review and Rank Panel.
 - The neutral facilitator will explain the facts of the appeal and answer any procedural questions.
 - The Appeal Panel may ask the Review and Rank Panel member questions about the Review and Rank Process to clarify what occurred during Review and Rank and what the Panel considered.
 - The appealing Project Applicant will then join the phone call. The appealing Project Applicant will be allotted a brief time to explain their appeal. The Appeal Panel may then ask any questions of the appealing Project Applicant. The appealing Project Applicant then leaves the phone call. The Appeal Panel can ask any additional questions that have arisen of the Review and Rank Panel member before excusing them from the call.
 - The Appeal Panel conducts a discussion of the appeal and takes a formal vote.
- The Appeal Panel may consider the effect of its decision on other Project Applicants and may include those project applicants in the appeals discussion.

The decision of the Appeal Panel is final.

2022 Continuum of Care Program Grants
Detailed Application Submission Timeline [Post-NOFO Updates]

This timeline highlights the steps that your agency will take to participate in the local competition for NOFO funding. Please mark these dates in your calendar!

- August 15, 2022** **TA Workshop for all new and renewal project applicants**
During this session, Homebase will review the Technical Assistance Handbook and application materials
To receive materials electronically, please email Marin@Homebaseccc.org.
- August 15, 2022** **Enter E-SNAPS and start your project application (formerly Exhibit 2).**
- E-snaps can be accessed at <http://www.hud.gov/esnaps>.
 - Before you can prepare your Project Application, complete your Applicant Profile. Once your Applicant Profile is complete, move ahead with Project Application(s).
 - **Please read all HUD-published guidance and training modules before calling Homebase for technical assistance.**
- August 19, 2022** **Submit New Project Letters of Intent**
- If considering applying for a new project, please email Marin@Homebaseccc.org and csager@marincounty.org with a brief description and estimated total budget.
- August 26, 2022** **SUBMIT NEW PROJECT LOCAL APPLICATIONS – by NOON**
- Please see the 2022 New Project Local Application for a list of all the materials to submit.
 - Please email Marin@Homebaseccc.org with all of these materials as Microsoft Word attachments.
 - LATE APPLICATIONS WILL RECEIVE 0 POINTS IN THE SCORING. PLEASE PLAN AHEAD!
- August 26, 2022** **SUBMIT RENEWAL & NEW E-SNAPS PROJECT APPLICATIONS – by NOON**
- Please email Marin@Homebaseccc.org and csager@marincounty.org PDFs of your project applications exported from e-snaps.
- Sept. 7 or 8, 2022** **Review and Rank Interviews**
- Applicants will participate in interviews with the Review & Rank Panel during assigned timeslots (to be announced).

- Sept. 8 or 9, 2022** **Applicant Notification**
- Applicants will receive notification of the results of the Review & Rank process via email.
- Sept. 9 or 12, 2022** **Appeals Due – by NOON**
- If you intend to appeal the Project Review Panel’s decision, you must submit your notice of intent to appeal by email to Marin@Homebaseccc.org and csager@marincounty.org no later than NOON on **Friday, Sept. 9, or Monday, Sept. 12** (dependent on date of Applicant Notification)
 - Final appeals are due by email to Marin@Homebaseccc.org and csager@marincounty.org no later than NOON on **Sept. 13**.
 - All appeals will be considered by the Appeals Panel and decisions announced by end of date **Sept. 13**.
- Sept. 23, 2022** **UPLOAD FINAL APPLICATIONS TO E-SNAPS**
- Between Sept. 16 and Sept. 23, 2022, applicants should finalize their applications, incorporating suggestions from the Review & Rank Panel and technical edits from Homebase.
 - Homebase will review every submission for omissions or inconsistencies and work with grant recipients to correct them.
Please be sure that someone at your agency is available to answer last minute application questions!
- Sept. 28, 2022** **SUBMISSION OF CONSOLIDATED APPLICATION TO HUD BY COLLABORATIVE APPLICANT**
- To avoid delays caused by potential system failures in e-snaps and increase the overall score, Marin CoC intends to submit all materials at least one (1) day before the federal deadline of **September 30, 2022**.