MONTEREY/SAN BENITO CONTINUUM OF CARE

ANNUAL CONTINUUM OF CARE NOFO

2023 COC REVIEW AND RANK POLICIES

Approved July 21, 2023

As of 7/21/2023, HUD has not published detailed instructions for project applicants, nor the amount of CoC Bonus Funding and DV Bonus Funding available to the CoC. This document may be revised when additional guidance and information from HUD is published to align with HUD's expectations and requirements.

I. OVERVIEW

The federal Department of Housing and Urban Development (HUD) provides over $3 billion per year in funding for homeless housing and services. This funding is distributed through Continuums of Care (CoCs), which are regional organizations that meet regularly to improve project performance and build community support for responding to homelessness.

On July 5, 2023, HUD released the 2023 Notice of Funding Opportunity for Fiscal Year 2023 Continuum of Care Competition. This NOFO provides funding for both renewal projects (those who received CoC funding in the FY 2022 competition) and new projects.

New projects can only be funded through reallocation, CoC Bonus Funds, or DV Bonus Funds. HUD has not released information regarding how much CoC or DV bonus funding is available for each Continuum of Care at this time. Once this information is published, the CoC's NOFO website will be updated with this information.

Through this year's NOFO competition, Youth Homelessness Demonstration Program (YHDP) renewal and YHDP replacement projects are being non-competitively awarded. Given the timing of the CoC's YHDP award, YHDP renewal projects that began operating in calendar year 2022 and whose grant agreements expire in 2024 will renew their grant awards through the CoC competition process. This will be a non-competitive process. In other words, YHDP project applications *will not* be scored and ranked through this year's competition.

Eligible project types include permanent supportive housing (PSH), rapid re-housing (RRH, joint transitional housing (TH-RRH), supportive services only – coordinated entry (SSO-CE), HMIS, and CoC Planning.

For more information about eligible project types and project costs, project applicants can refer to the Annual NOFO and to eCFR :: 24 CFR 578.37 -- Program components and uses of assistance.

As part of the Annual NOFO HUD requires each CoC to **review** the performance of projects that are applying for renewal of their CoC funding, and to use their performance, among

other factors, to **rank** those projects and new projects in order of their funding priority. Projects that are eligible for funding and that rank near the top of the list or in the middle of the list (known as "Tier 1") will receive federal funding unless extraordinary circumstances affect the amount of federal funding expected to be available for Tier 1 projects. . Projects that are near the bottom of the list (known as "Tier 2") may or may not receive funding, depending on how the CoC as a whole performs relative to other CoCs in the national competition. Projects that are excluded (known as "rejected") from the list altogether will not receive federal funding.

II. 2023 NOFO COMPETITION PROCESS

A.   APPLICATION COMPONENTS

There are three application components for the Review and Rank process:

A. **Annual Performance Reports** (APR) are generated automatically from the data that each project enters into the Homeless Management Information System (HMIS) database during the course of the year. For example, an APR would include statistical data on the percent of clients in each project who have increased their income, who have obtained permanent housing, and who have obtained health insurance. Projects that primarily serve survivors of domestic violence will generate their APRs using data from a comparable, non-HMIS database.

Only renewal projects will have APR data to submit. New projects will not submit any performance data.

B. The **e-snaps Application** is a federal application form that HUD requires all projects to complete in order to apply for HUD CoC funding. When the e-snaps application is complete, projects should not hit "submit." Instead, project applicants will download a PDF copy of the e-snaps application and upload the PDF to CHSP's application platform, Submittable, for review by the Rating Panel.

- Information on using e-snaps can be found at e-snaps : CoC Program Applications and Grants Management System - HUD Exchange
- Technical assistance regarding using e-snaps is available through Focus Strategies. Applicant agencies requesting assistance should email Vanessa Fenley (vanessa@focusstrategies.net) and Hana Gossett (hana@focusstrategies.net).

C. **Oral Interviews** will be conducted by the Rating Panel with all project applicants. The oral interviews provide an opportunity for applicants to clarify or expand on any answers in their written e-snaps application as well as to answer specific questions that are priorities for the CoC but are not included in the e-snaps project application.

B.   HOW APR DATA ARE USED

In order to streamline the data collection process and ensure a fair competition, all APR data will be treated as final and <u>authoritative</u>. Projects may use their Supplemental Questions and Oral Interviews to explain the context for their data, but not to suggest that some other data would be more appropriate. For example, suppose a project's APR shows that it only filled 60 out of its 100 beds. The project would be allowed to explain why it was difficult to fill those beds, but the project would not be allowed to argue that the true number of beds filled was really closer to 75 out of 100 beds. The data in the final APR that is sent to the Panel is binding on both the projects and the Panel.

Because the APR is treated as authoritative, the HMIS Lead and the CoC's technical assistance provider will work with all applicants to help them clean and verify their APR data in advance of the competition. Projects can also generate an unlimited number of APRs for themselves, at any time, using the Reports screen of the Homeless Management Information System (HMIS). The HMIS Lead will help demonstrate how to do this upon request. Ultimately, it is each project's responsibility to read their APRs, confirm that the data is correct, and fix any incorrect data by making the appropriate changes in HMIS.

Note that APRs are only used for renewal housing project applications that have a full 12 months of data during the competition period (see the next section, below). New projects and projects with less than 12 months of data do not use APRs as part of the competition.

The one exception to the policy that APR data is considered authoritative is when there is clear and convincing evidence that a project's APR data exaggerates the project's accomplishments. For example, if a project's APR data is internally inconsistent, inconsistent with information in the project's e-snaps application, inconsistent with other HMIS data, or otherwise implausible, then the Rating Panel has discretion to disbelieve the project's APR in order to **lower** the project's score. If the Panel is able to accurately and confidently identify the project's true performance, then the Panel may lower the project's score based on that performance. If the Panel is unable to confidently identify the project's true performance because of poor-quality data, then the Panel may assign a score of zero for the relevant scoring factor(s). The Panel has **no** discretion to raise a project's score based on errors in the project's APR.

C.   THE COMPETITION PERIOD

The period of time that will be measured and evaluated during the NOFO competition is called the official "competition period". The official competition period is April 1, 2022 through March 31, 2023. All APRs will be generated using 4/1/22 as their start date and 3/31/23 as their end date.

However, an exception must be made for evaluating grant spenddown, because each project has its own unique contract end date. It would not be fair to take away points from a project for not spending down 100% of funds if the project's contract period was not yet 100% complete. To ensure that project spenddown is always evaluated based on a completed contract, the Rating Panel will look at spending data from the most recently available quarterly e-LOCCs report issued by the HUD field office. Most likely, the Panel

will have access to a report that runs through 3/31/2023. Because projects are expected to draw down funds within one month of the time the funds were spent, this means that project spenddown would be evaluated based on the most recent contract that had ended as of 2/28/2023.

If a project has not completed any contracts that could be fully evaluated using this method, then the project's spend down will be measured on an ad hoc basis that attempts to provide the fairest possible measurement period.

If a project had not yet started operations as of April 1, 2022, then it will not have 12 full months of data for the competition period, and so it will not be scored in this year's competition. Instead, the project will be automatically ranked at the bottom of Tier 1. A project has "started operations" if it has signed a contract with HUD, drawn down funding from eLOCCs, or housed at least one client. The fact that a project may still be "ramping up" does not mean that the project has not yet started operations.

D. COMPETITION TIMELINE

Additional details and materials for project applicants will be uploaded to the 2023 Annual NOFO website at [CoC Funding - The Coalition of Homeless Service Providers (chsp.org)](chsp.org). All project applicants and stakeholders are encouraged to check the CoC's Annual NOFO website regularly. A broad competition timeline is included below:

On or around July 24, 2023: Application Information Posted: CHSP staff will post application materials to the Annual NOFO website

July 26, 2023: Bidders Conference: CHSP will host a Bidders Conference for prospective applicants. Information regarding the Bidders Conference will be posted on the Annual NOFO website. All applicants are encouraged but not required to attend the Bidders Conference.

The Bidders Conference will be recorded and posted to the Annual NOFO website. Prospective applicants who are unable to attend the Bidders Conference are responsible for accessing information provided during the Workshop and fully complying with all competition requirements.

July 28, 2023: Letters of Intent Due in Submittable: All prospective CoC applicants (for both renewal and new projects) must submit letters of intent by July 28, 2023, at 5:00 p.m. Prospective applicants should submit their Letter of Intent in Submittable. YHDP projects are not required to submit Letters of Intent for the FY 2023 CoC Competition.

August 21, 2023: Project Applications Due in Submittable: Projects must submit the PDF copy of their e-snaps application via Submittable by August 21, 2023, at 5:00 p.m. Late applications will be subject to a reduction in project scores or disqualification.

August 25, 2023: YHDP Project Applications Due in eSnaps: YHDP projects are held harmless in the FY 2023 CoC Competition and therefore do not submit applications in Submittable. YHDP applications should be submitted in eSnaps by August 25, 2023, at 5:00 p.m. for a technical review by CHSP.

September 5, 2023: Projects Notified of Rank and Review Outcomes: All project applicants will be notified (outside of e-snaps) of the outcome of the local competition, including whether the project was included in Tier 1, Tier 2, or was rejected from the project priority list. Projects will also be notified if their funding request was reduced.

September 7, 2023: Appeals Due by email: Any project applicant choosing to appeal the decision of the Rating Panel must submit an intent to appeal by September 7, 2023, by emailing CoC staff at grants@chsp.org. Additional information about the appeals process is included in Section VII.

By September 22, 2023: Approved Consolidated Application Posted: The final consolidated application will be posted to the Annual NOFO website by September 22, 2023.

By September 28, 2023: Consolidated Application Submitted to HUD: The CoC will submit the consolidated application to HUD by September 28, 2023.

III. DESIGN OF RATING FACTORS

The Rating Panel will be guided in their scoring by a series of Rating Factors that summarize the priorities and targets chosen by HUD and by the local community. These Rating Factors are included as Attachment A (renewal projects) and Attachment B (new projects).

Upon publication of the CoC Program NOFO, the Collaborative Applicant, CHSP, will review the currently adopted scoring factors/tools for all project types and ensure they comply with the NOFO. In the event the scoring factors/tools do not comport with the NOFO, changes will be made. Updated scoring factors/tools will be approved by the Leadership Council (CoC Board), in accordance with the CoC Governance Charter and provided to applicants, the Rating Panel, and CoC stakeholders.

IV. SELECTING THE RATING PANEL

Because many of the people who are closely involved with the Lead Me Home CoC (LMH CoC) also receive funding that is distributed through the CoC, the CoC's leadership does not directly review projects' performance. Instead, project performance is evaluated by an independent Rating Panel. Using a variety of objective and subjective data, the Panel prepares a Project Priority List showing the recommended score and rank of all of the projects in San Benito/Monterey Counties. Rating panel members with lived-experience are compensated by the CoC for their time and service to the NOFO competition.

A. RATING PANEL MEMBER QUALIFICATIONS

Rating Panel members shall be:
- Knowledgeable about homelessness and housing in the community and are broadly representative of the relevant sectors, subpopulations, and geographic areas;
- "Neutral," meaning that they are not employees, staff, or otherwise have a business/financial or specific personal conflict of interest with the applicant organizations;
- Familiar with housing and homeless needs within the CoC; and
- Willing to review projects with the best interest of homeless persons in mind.

Rating Panel members agree to:
- Dedicate time for application review and Rating Panel meetings; and
- Sign a statement declaring that they have no conflict of interest and a confidentiality agreement.

B. RATING PANEL SELECTION

Rating Panel members for the Continuum of Care Competition Review and Rank shall be chosen by LMH CoC staff subject to the membership qualifications above.

The Rating Panel shall consist of three to five members.

C. THE PANEL'S PREPARATION

The Panel will receive a training on the CoC Program and local competition and their responsibilities as Rating Panelists. This training may be conducted via videoconference at the convenience of the Panel.

The Panel will review submitted project applications and applicable data and information prior to the scheduled Review and Rank meeting.

The Panel shall meet in person or by videoconference to discuss the applications submitted as part of the Annual Continuum of Care Competition.

D. EMERGENCY REPLACEMENTS

If one or more Panel members are unable to attend the Review and Rank meeting or otherwise unable to discharge their duties, then LMH CoC staff may appoint one or more suitable emergency replacements, or may continue the Review and Rank process with a smaller Rating Panel, at their discretion.

V. ASSIGNING SCORES TO PROJECTS

A.   IN GENERAL

The Rating Panel will use the information it receives to decide on a score for each project for each of the scoring factors listed in the Scoring Tools. Panelists are encouraged to candidly share their reasoning with each other and to listen carefully to each other's reasoning, but each Panel member is entitled to his or her own opinion: there is no requirement that the Panelists agree about how to score a project. An individual Panelist may tend to score projects more harshly or more leniently as long as that tendency is consistently applied to all projects. After scoring is over, the scores assigned by each Panelist will be averaged to calculate the program's final score.

Except as specifically indicated, all scoring factors have a minimum of 0 points. Panelists may not assign a project a negative number of points. Similarly, Panelists may not assign "extra credit" that goes above the maximum score listed for a scoring factor in the Scoring Tool. Panelists may use decimal scores (e.g., 2.5 points) when necessary.

Scoring criteria for projects are included in Attachment A (for renewal projects) and Attachment B (for new projects).

The total scores from all Panelists will be averaged to create the final score for a project application. The initial scores that panelists establish may be adjusted based on the applicant's responses to the oral interview questions.

B.   APPLICATION ELIGIBILITY THRESHOLD REVIEW

Before Project Applications are submitted to the Rating Panel, they must pass a threshold review. The LMH CoC Coordinator/Collaborative Applicant will complete the threshold review to verify the eligibility of:

- Applicant
- Project
- Activity

This review will take place prior to the application's submission to the Rating Panel for reading and scoring. Proposals that fail to completely meet threshold review criteria will not be forwarded to the Rating Panel for further consideration. These programs will be notified of this decision within 24 hours of the threshold review. Proposals that completely meet eligibility threshold review criteria will be submitted to the Rating Panel and will be scored according to the scoring criteria.

C.   SCALED SCORES

Some scoring factors in the scoring tools include "scales" that instruct panelists on how to translate performance into points. For example, PSH projects that place at least 95% of their clients into permanent housing should receive 24 points, and projects that place between 90% and 95% of their clients into permanent housing should receive 18 points.

D.   MISSING, LATE, OR INCOMPLETE APPLICATIONS

Late Application: Late applications received within 24 hours of the due date/time will receive a 15-point score reduction. Late applications received after 24 hours will not be accepted.

Incomplete Applications: Incomplete applications cannot be cured for Rating Panel scoring but must be corrected prior to HUD submission. If the rating panel approves a project that submitted an incomplete application to be submitted to HUD, the e-snaps application will be amended to be complete prior to submission to HUD.

D.   TIED SCORES

Any ties in final project scores will be broken by the Rating Panel, based on two factors:
1. Alignment with CoC project priorities
2. Alignment with and ability to advance system performance measures

E.   DV BONUS PROJECTS

Projects that are dedicated to serving survivors of domestic violence, dating violence, stalking, and/or sexual trafficking may opt to apply for HUD's domestic violence (DV) bonus funding. The LMH CoC is prioritizing applications for DV bonus funding to housing components only (ex: Rapid Re-Housing and Joint Transitional Housing - Rapid Re-Housing). If no applications are submitted for housing projects using DV bonus funds, CHSP will submit a project application for an SSO – Coordinated Entry project. If submitted, the SSO – Coordinated Entry project will be ranked in Tier 2.

Projects that are applying for DV bonus funding are scored using a slightly modified scoring tool that accounts for the project's ability to promote the safety of its residents and for the project's contribution to the Continuum of Care's analysis of San Benito/Monterey County's DV-specific needs and resources. The highest-scoring DV bonus project in each component type (e.g. DV-specific Rapid Re-Housing) will be nominated by the Continuum of Care to receive bonus funding. If HUD awards the bonus funding to the project, then it will be separately funded using a national pool of DV-specific money. If HUD does not award bonus funding to the project, or if the project is not the highest-scoring DV bonus project of its type within the CoC, then the project will still be eligible to compete as normal for ordinary HUD CoC bonus funding.

F.   PROJECTS WITH NEW SUBRECIPIENTS OR DIRECT RECIPIENTS

A project that receives funding directly from HUD through the CoC is called a "direct recipient." Some direct recipients may delegate some or all of the duties in their contracts to "subrecipients." These subrecipients may change from year to year.

If a project changes its subrecipient(s) in a way that shifts the funding for less than 60% of the project's total CoC award, then the subrecipient will still be scored as a renewal project.

However, if a project changes its subrecipient(s) in a way that shifts the funding for at least 60% of the project's total CoC award the project will be scored as a new project in the local competition, and the project will be treated exactly as if it were applying for funding for the first time. Because most of the funding is being absorbed by a new entity that was not responsible for the project's prior performance, it would not make sense to score that entity based on prior results. Note that for regulatory reasons, the project will still fill out a renewal project application form in e-snaps, no matter how much money is re-assigned.

For example, suppose ACME Services, Inc. is the direct recipient for a $100,000 grant called ACME Housing. ACME has two subrecipients: Beneficent Beds ($70,000) and Copious Care ($10,000). If ACME cancels both contracts and begins managing the $80,000 in subrecipient funds more directly, then ACME Housing would be scored as a new project, because at least 60% of the grant has been reassigned. On the other hand, if ACME leaves the Beneficent Beds contract alone and only reassigns the $10,000 Copious Care contract to Dauntless Dens, then ACME Housing would still be scored as a renewal project, because less than 60% of the grant was reassigned. In either case, ACME Housing will fill out a renewal project application in e-snaps.

If a renewal project needs to change direct recipients, the project will be scored as a new project in the local competition, and the project will be treated as if it were applying for funding for the first time, with the added consideration that there are people currently housed or being served by the project. The applicant will fill out a new project application in e-snaps and indicate the application is a reallocation. A change of this nature must be discussed with the CoC Lead Agency, CHSP, prior to submission and more information may be requested of the previous and upcoming direct recipient.

G.   UNSCORED PROJECTS

Certain projects are not assigned scores in the competition. As explained in the next section, these projects will be automatically assigned a spot in the Project Priority List based on community policies.

H. YHDP PROJECTS

YHDP projects that began operations in the calendar year 2022 and have a grant agreement with HUD that expires in 2024, will be renewed through the FY 2023 CoC competition. In accordance with the NOFO, YHDP projects will be held harmless in the FY 2023 competition and therefore not be scored or ranked. YHDP projects will submit renewal project applications in e-snaps and those applications will be reviewed for technical errors and corrections to align with HUD's requirements.

VI. ASSIGNING RANKS TO PROJECTS

After all projects have been scored and the final scores (an average of all Panelist's scores) for all project applicants are calculated based on responses to the e-snaps application and the oral interviews, the Rating Panel will assemble the preliminary Project Priority List. The Project Priority List will be approved by the Leadership Council and submitted as part of the CoC's consolidated application.

A.   TIER 1

Most projects will be ranked in "Tier 1." In 2023, Tier 1 includes 93% of the CoC's Annual Renewal Demand (ARD). 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. CoC staff work closely with all applicants to help review their applications and ensure that their projects will not be disqualified by HUD.

Although HUD requires each project to be assigned a unique place in the Project Priority List, it typically makes no practical difference to an agency whether they are ranked, e.g., first or sixth in the list – all projects in Tier 1 can reasonably expect to receive funding.

B.   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 funding (excluding the DV Bonus amount). This means that the community would like those projects to receive funding, but it is unclear whether HUD will allocate enough money to the community to fund those projects. If the community performs well in the national competition, or if Congressional appropriations stretch further than expected, then most of Tier 2 will be funded. If the community performs poorly in the national competition, it is possible that a significant portion of the projects in Tier 2 will not be awarded federal funding through this opportunity. 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.

C.   STRADDLING PROJECT

Because of the way HUD structures the NOFO competition, there is almost always one project that "straddles" the line between Tier 1 and Tier 2. Theoretically, this project could receive its Tier 1 funding while being denied the share of its funding that falls within Tier 2. In the unlikely event that this occurs, the project and/or HUD could decide that the share of funding remaining is insufficient to successfully continue the project, and the project could be entirely de-funded. Alternatively, the project and HUD could decide that the remaining funding is enough to continue operating the project at a reduced level of coverage (e.g., by serving fewer clients) or to continue operating the project at the same level of coverage (e.g. by increasing local funding).

D.   UNSCORED PROJECTS

- Renewal projects with less than one year of operating data will not be scored using the normal scoring tools. Instead, they are automatically placed at the bottom of Tier 1, just above the 'straddling' project.

- If a program includes data from two different projects (e.g., as the result of consolidation, or as the result of expansion), and a single APR is available that contains data from both projects, then that APR will be used to score the project as normal. In accordance with the scoring tools, the project may have its score on utilization factors adjusted upward if the younger portion of the project has less than one full year of operating data. The fact that part of the project did not have a full year of operating data will **not** cause the entire project to remain unscored.

- If a program includes data from two different projects (e.g., as the result of consolidation, or as the result of expansion), and there is no single APR that adequately reports the data for the pair of projects, then CoC staff will use their best efforts and discretion to find an appropriate basis for objectively evaluating the project(s). This could include merging the APRs, separating the APRs and scoring only the project(s) that have a full year of operating data, separating the APRs and scoring all projects and then averaging their scores, or other reasonable solutions based on the available data.

- The fact that a program was not reviewed or ranked in FY2022 has no effect on how it will be treated in FY2023. Projects are protected based on whether they have 12 months of operating data, not based on whether they have previously participated in a renewal competition.

E.   VOLUNTARY AND INVOLUNTARY REALLOCATION

Some agencies may decide to **voluntarily** reallocate part or all of one of their projects, i.e., to release that funding back into the common pool for the entire CoC. Agencies might choose to reallocate their funding because they are no longer able or willing to continue their program, because they have more funding than they need to operate the program, or

because they believe that the funding could be better spent on alternative uses. A project that is entirely reallocated will not receive a spot in the Project Priority List. A project that is partially reallocated can still receive a spot in the Project Priority List; that project's spot will simply reflect that the project is now applying for a reduced amount of money.

Alternatively, the Rating Panel has the discretion to recommend projects for **involuntary** reallocation. The Rating Panel determines if any renewal project should receive a decrease in funding (or an elimination of funding) due to substandard performance in outcomes and/or utilization of funds. Any funding captured from an existing project will be made available for reallocation to a new project that meets the requirements in the NOFO.

All projects must meet certain threshold requirements (as detailed in Attachments A and B) in order to be included in the ranked list. CoC staff will provide technical assistance to all projects to attempt to help them meet these threshold requirements. Special consideration will be made for reviewing New Project applications for eligibility determinations in order to provide technical assistance prior to the Review and Rank convening in order to encourage successful applications by new projects. Nevertheless, it is ultimately each applicant's responsibility to ensure that their application meets all threshold criteria. If the Rating Panel is concerned that a project may not be able and willing to meet threshold criteria even after receiving short-term technical assistance, then the Rating Panel should reallocate that project's funding.

HUD expects CoCs to reallocate funds from non- and/or under-performing projects to higher priority community needs that align with HUD priorities and goals. Reallocation involves using funds in whole or part from existing eligible renewal projects to create one or more new projects. In the recent competitions, HUD allowed CoCs to use the reallocation process to create:
- New permanent supportive housing projects that serve chronically homeless individuals and families, including unaccompanied youth.
- New rapid rehousing projects for homeless individuals and families, including unaccompanied youth, coming directly from the streets or emergency shelter or fleeing domestic violence.

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.

LMH CoC has identified the need for permanent housing options within San Benito/Monterey County. Lowest performing projects may be reallocated to support new permanent supportive housing or rapid re-housing projects that emphasize serving the Chronically Homeless or Transition Aged Youth.

F.   NOTIFICATION OF RANKINGS

Project applicants will be notified as to whether they were recommended for funding (and, if so, where their project is ranked on the Project Priority List) within 3 Business Days of the Review and Rank Meeting.

VII. TECHNICAL APPEALS

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

A.   MEMBERS OF THE APPEAL PANEL

The Appeal Panel shall consist of three members. These members may be selected from non-profits, foundations, consumers, government, and private agencies with experience in grant administration and homelessness projects.

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

Appeal Panel members must not have a conflict of interest with any of the agencies or parties applying for CoC Program funding as defined by the existing Rating Panel conflict of interest rules.

B.   APPEAL ELIGIBILITY

A project applicant may only appeal if they have reason to believe that the Review and Rank Process was not accurately followed, resulting in a reduced score or rejection of the project application from the priority listing. Projects falling into Tier 1 may not appeal their ranking. Appeals based on policy considerations, funding priorities, or other subjective criteria will not be considered and are not eligible for an appeal.

Only projects meeting the following situations may appeal:
1. The Rating Panel recommends the project for full or partial reallocation;
2. The project is placed in Tier 2;
3. The project is straddling Tier 1 and Tier 2, or;
4. The project is placed immediately above the unscored renewal projects, so that if one other project's appeal is successful, then this project could be moved down into Tier 2.

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

D. APPEALS 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.

1. Project Applicants must provide notice to the CoC of an appeal, by emailing CoC staff at grants@chsp.org by September 7, 2023 at 5 p.m. This notice must include:

    i. A statement as to why the project is eligible to appeal.

    ii. The basis for the appeal.

    iii. A short, clear, written statement no longer than two pages of the basis for the Project Applicant's appeal of the Rating Panel's decision. The CoC 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.

2. All appeals will be forwarded to the Appeal Panel.

3. The Appeal Hearing shall be conducted according to the following procedure:

    i. The Appeal Hearing will be conducted telephonically or via videoconference.

    ii. The Appeal Panel will join the call with the neutral facilitator and a representative of the Rating Panel.

    iii. The neutral facilitator will explain the facts of the appeal and answer any procedural questions.

    iv. The Appeal Panel may ask the Rating Panel member questions about the Review and Rank Process to clarify what occurred during Review and Rank and what information the Panel considered in evaluating the Project Applicant.

    v. The appealing Project Applicant will then join the phone call. The appealing Project Applicant will be allotted a few minutes 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.

    vi. The Appeal Panel conducts a discussion of the appeal and takes a formal vote.

4. 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 and will be transmitted to the CoC Board without further debate.

VIII. SUPPLEMENTAL PROJECT FUNDING

In some circumstances, there may be an opportunity after the application deadline for programs to submit application materials for additional funding. LMH CoC will issue a Supplemental Project Application when:

- After receiving all project applications, it appears there is additional funding available; or,
- After conducting the threshold review of the submitted project applications it appears there is additional funding available; or,
- After conducting the review and rank, the Panel has recommended a program for reallocation and there are not adequate new project applications for those funds.

In the event that Supplemental Applications are required, the Collaborative Applicant 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 Rating Panel will (re)convene either via telephone, video conference, or in person depending on availability and convenience to evaluate the applications.

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

The Rating Panel is not required to use the formal scoring factors to evaluate supplemental applications. Instead, the Rating Panel may recommend one or more supplemental application(s) for funding based on an intuitive evaluation of the supplemental applications, provided that no supplemental application may be ranked higher than a regular application.

IX. APPROVAL OF THE RANKED LIST AND SUBMISSION TO HUD

- All technical appeals shall be concluded within 10 business days of notification of ranking decisions.
- Once the technical appeals are complete, if any, the Recommended Priority List will be submitted to the CoC Board for review and approval.
- The CoC Board has the discretion to alter the Recommended Priority List only if alterations are determined to 1) address urgent community needs, and 2) strengthen the CoC's application.
- Once the CoC Board approves the Recommended Priority List, the Review and Rank Process is complete.

- The Approved Priority List shall be publicly posted on the CoC website in accordance with the timeline stated in the Continuum of Care Program NOFO and shall be used to fill in the appropriate application forms for the Collaborative Applicant to submit to HUD as part of the national competition.

PROJECT SCORING CRITERIA – RENEWAL PROJECTS

2023 ANNUAL NOFO

This attachment includes information about the rating factors for all project applications submitted for the 2023 Annual NOFO local competition. Project applicants will only need to submit a PDF of their e-snaps application. While the Panel may review all parts of the application to gain an understanding of the program model and approach, select sections and questions on the e-snaps application will be scored. The tables below outline the rating factors, corresponding sections from the e-snaps applications, and maximum points available for each group of rating factors. Please note the threshold criteria apply to all projects.

YHDP Renewal project applications are being held harmless in the FY 2023 competition and therefore will not be reviewed using the following criterion.

Threshold Criteria for All Projects
Project applicants may be disqualified if any of the threshold criteria below are not met:
1. Applicant is not eligible to apply for CoC funds
2. Applicant is applying for an ineligible project type
3. Project does not serve an eligible population
4. Project is not willing to participate in coordinated entry
5. Project is not willing to use HMIS (or, for domestic violence [DV] survivor providers, a comparable data system)

ALL HOUSING PROJECT TYPES (PSH, RRH, TH-RRH)

Rating Factor	Application Component	Maximum Points Possible
I. CoC Priorities (25 points possible)		
A. Project Type • 5 points for PSH • 5 points for RRH • 2.5 points for TH-RRH • 2.5 points for TH	**e-snaps Screen 3A. Project Detail** 6. Project Type	5

B. Serving chronically homeless (CH) households
• 2.5 points awarded for identifying CH as subpopulation focus
• Up to 2.5 points awarded for serving CH households
    o 2.5 pts = at least 90%
    o 2 pts = 75 – 89%
    o 1 pt = 50 – 74%
    o 0 pts = Less than 50%
	e-snaps Screen 3B. Description
	2. Subpopulation focus
	
	e-snaps Screen 5B. Program Participants - Subpopulations
		5

C. CoC priority special populations and severe service needs Special populations: chronically homeless individuals, homeless youth (under 25), domestic violence survivors, homeless families with children, and/or homeless veterans Severe service needs: low or no income, current or past substance abuse, a history of victimization such as domestic violence or sexual assault, criminal histories, mental illness, HIV/AIDS, and/or chronic homelessness • 5 pts for serving multiple special and/or severe service needs populations • 2.5 pts for serving one special and/or severe service needs populations • 0 pts for serving 0 special and/or severe service needs populations	**e-snaps Screen 3B. Description** 1. Project description 2. Subpopulation focus **e-snaps Screen 5B. Program Participants – Subpopulations**	5
D. Racial equity • Up to 3 pts awarded based on the project's description of barriers to participation faced by persons of different races and ethnicities and the steps taken to eliminate barriers • Up to 2 pts awarded based on project's commitment to measuring and improving its response to racial disparities	**Oral Interviews**	5
E. Engaging people with lived experience in decision-making • Up to 5 pts awarded for agencies who engage homeless and formerly homeless clients in program design and policy making	**Oral Interviews**	5

II. Project Performance (System Performance Measures) (25 points possible)		
A. Increase total income (SPM 4) All Programs: Percentage of persons 18 and older with at least one source of non-cash benefits at exit or at a timely annual follow-up interview/assessment for each adult or head of household. Divide the number of adults with at least one source of non-cash benefits by the number of living adults in the project (minus the number of adults stayers not yet due for an annual assessment) and apply the scale to the right. • 5 pts = 80% or higher • 2.5 pts = 70 − 79% • 0 pts = less than 70%	**APR Q 19a3**	5
B. Non-cash benefits (SPM 4) All Programs: Percentage of persons 18 and older with at least one source of non-cash benefits at exit or at a timely annual follow-up interview/assessment for each adult or head of household. Divide the number of adults with at least one source of non-cash benefits by the number of living adults in the project (minus the number of adults stayers not yet due for an annual assessment) and apply the scale to the right. • 5 pts = 80% or higher • 2.5 pts = 70 − 79% • 0 pts = less than 70%	**APR Q 20b**	5
C1. (PSH & RRH) Housing stability and permanent housing placement (SPM 7b) Count each person who either **remained in the project** at the end of the competition period **or exited to permanent housing**. Divide this count by the total number of people who participated in the project during the measurement period, excluding people who passed away or who exited to foster care, nursing homes, or non-psychiatric hospitals or inpatient medical facilities, and then apply the scale. • 15 pts = 80% or higher • 7.5 pts = 74 − 79% • 0 pts = less than 74%	**APR Q 23a & b**	15

C2. (TH & TH-RRH) (SPM 7b) Count each person who **exited to permanent housing** during the measurement period. Divide this count by the total number of people who exited the project during the measurement period, excluding people who passed away or who exited to foster care, nursing homes, or non-psychiatric hospitals or inpatient medical facilities, and then apply the scale. • 15 pts = 80% or higher • 7.5 pts = 74 – 79% • 0 pts = less than 74%	**APR Q 23a & b**	15
III. Administrative Performance (30 points possible)		
A. Bed occupancy/utilization Ratio of the households served to the actual units, expressed as a percentage. • 5 pts = 90% or higher • 2.5 pts = 80 – 89% • 0 pts = less than 80%	**APR Q 7b or 8b** (projects can use occupancy by person or by household, depending on which more accurately conveys actual project utilization)	5
B. HMIS data quality report card grade For 4/1/2022 to 3/31/2023 • 5 pts = A • 2.5 pts = B • 0 pts = C, D, or F	**Data Quality Report**	5
C. Grant utilization • 5 pts = No funds available for recapture • 2.5 pts = Some funds available for recapture; applicant has adequately explained why funds were available for recapture and has plans to fully spend down grant funds • 0 pts = Some funds available for recapture; applicant does not adequately explain why funds were available for recapture	**e-snaps Recipient Performance Screen** 4. Funds recaptured 4a. Explanation of recaptured funds	10
D. Audits/monitoring • 5 pts = Project has no unresolved audit or monitoring findings; OR project has adequately explained why findings remain unresolved • 0 pts = Project has unresolved audit or monitoring findings that are not adequately explained	**e-snaps Recipient Performance Screen** 2. Unresolved HUD monitoring and/or OIG audit findings 2b. Explain why findings are unresolved	5

E. Coordinated Entry Up to 5 pts for projects explaining how it contributes to the Coordinated Entry System, including participating in workgroups, serving as an assessing agency, and/or attending trainings; and explaining how it uses HMIS to facilitate referrals and assessments	Oral Interview	5
IV. Housing First (10 points possible)		
A. Project enrolls people with specified barriers (having little to no income; active or history of substance use; having a criminal record with exceptions for state-mandated restrictions; history of victimization) • 5 pts = Project checks all 4 barriers • 3 pts = Project checks 3 of 4 barriers • 2 pts = Project checks 2 of 4 barriers • 1 pt = Project checks 1 barrier • 0 pts = Project checks "none of the above"	**e-snaps Screen 3B. Description** 3b. Project enrolls participants with specified barriers	5
B. Project prevents program termination based on specified reasons (failure to participate in supportive services; failure to make progress on a service plan; loss of income or failure to improve income; any other activity not covered in a lease agreement) • 5 pts = Project checks all 4 barriers • 3 pts = Project checks 3 of 4 barriers • 2 pts = Project checks 2 of 4 barriers • 1 pt = Project checks 1 barrier • 0 pts = Project checks "none of the above"	**e-snaps Screen 3B. Description** 3c. Project prevents participant termination	5
V. Mainstream Resources (10 points possible)		
A. Supportive services provided Up to 5 points awarded if types and frequency of supportive services provided are well-suited for project target population	**e-snaps Screen 4A. Supportive Services for Program Participants** 1. For supportive services, indicate who will provide and how often they will be provided	5
B. Strategies to access mainstream benefits 1. Transportation assistance to clients to attend mainstream benefit appointments, employment training, or jobs? 2. At least annual follow-up with participants to ensure mainstream benefits are received and renewed? 3. Do project participants have access to SSI/SSDI technical assistance provided by the applicant, a sub-recipient, or partner agency?	**e-snaps Screen 4A. Supportive Services for Program Participants** 2. – 4.	5

4. Has the staff person providing the technical assistance completed SOAR training in the past 24 months? • 5 pts = 4 of 4 answered "yes" • 3 pts = 3 of 4 answered "yes" • 2 pts = 2 of 4 answered "yes" • 1 pt = 1 of 4 answered "yes" • 0 pts = none answered "yes"		
100 Points Possible		

ATTACHMENT B

PROJECT SCORING CRITERIA – NEW PROJECTS

2023 ANNUAL NOFO

This attachment includes information about the rating factors for new project applications submitted for the 2023 Annual NOFO local competition. Project applicants will only need to submit a PDF of their e-snaps application. While the Panel may review all parts of the application to gain an understanding of the program model and approach, select sections and questions on the e-snaps application will be scored. The tables below outline the rating factors, corresponding sections from the e-snaps applications, and maximum points available for each group of rating factors. Please note the threshold criteria apply to all projects.

YHDP Replacement projects are held harmless in the FY 2023 Competition and therefore are not reviewed or scored using the following criteria.

Threshold Criteria for All Projects

Project applicants may be disqualified if any of the threshold criteria below are not met:
1. Applicant is not eligible to apply for CoC funds
2. Applicant is applying for an ineligible project type
3. Project does not serve an eligible population
4. Project is not willing to participate in coordinated entry
5. Project is not willing to use HMIS (or, for domestic violence [DV] survivor providers, a comparable data system)

Rating Factor	Application Component	Maximum Points Possible
I. CoC Priorities (20 points possible)		
A. Project Type • 5 pts for PSH (CoC bonus and/or reallocation) • 4 pts for RRH (CoC bonus, DV bonus, and/or reallocation) • 2.5 pts for TH-RRH (DV bonus) • 0 points for other project types	**e-snaps Screen 3A. Project Detail** 6. Project Type	5
B. CoC priority special populations and severe service needs Special populations: chronically homeless individuals, homeless youth (under 25), domestic violence survivors, homeless families with children, and/or homeless veterans Severe service needs: low or no income, current or past substance abuse, a history of victimization such as domestic violence or sexual assault, criminal histories, mental illness, HIV/AIDS, and/or chronic homelessness • 5 pts for serving multiple special and/or severe service needs populations • 2.5 pts for serving one special and/or severe service needs populations • 0 pts for serving 0 special and/or severe service needs populations	**e-snaps Screen 3B. Description** 1. Project description 2. Subpopulation focus **e-snaps Screen 5B. Program Participants – Subpopulations**	5
C. Racial equity • Up to 3 pts awarded based on the project's description of anticipated barriers to participation faced by persons of different races and ethnicities and the steps taken to eliminate barriers • Up to 2 pts awarded based on project's commitment to measuring and improving its response to racial disparities	**Oral Interviews**	5
E. Engaging people with lived experience in decision-making • Up to 5 pts awarded for agencies who engage homeless and formerly homeless clients in program design and policy making	**Oral Interviews**	5

II. Project Quality, Readiness & Appropriateness (15 points possible)		
A. Project Quality, Readiness, and Appropriateness • Design of services and/or housing, with consideration for whether services/housing are appropriate for the population it intends to serve. (10 points) • Explanation of how and when project will have site control, if applicable (2 points) • Explanation of timeline for when housing occupancy/services will begin (3 points)	**Screen 3B. Description** 1. Provide a description that addresses the entire scope of the proposed project 2. For each primary project location, or structure, enter the number of days from the execution of the grant agreement that each of the following milestones will occur.	15
III. Applicant Capacity (15 points possible)		
A. Agency/Collaborative Capacity • Effectively utilizing federal funds and performing activities (5 points) • Experience leveraging funds (5 points) • Adequate financial management structure (5 points) Points may be deducted if there are unresolved audit or monitoring findings that may affect applicant capacity	**Screen 2B. Experience of Applicant, Subrecipient(s), and Other Partners** 1. Describe your organization's experience in effectively utilizing federal funds and performing the activities proposed in the application. 2. Describe your organization's experience in leveraging Federal, State, local, and private sector funds. 3. Describe your organization's financial management structure. 4. Are there any unresolved HUD monitoring or OIG audit findings for any HUD grants under your organization?	15
IV. Housing First (10 points possible)		
A. Housing First Approach • Full points will be awarded if the project follows a Housing First approach, as signified by 5d Points will be deducted for answers in 5a – 5c that indicate project is not following a Housing First approach	**Screen 3B. Description** 5a. Will the project quickly move participants into permanent housing? 5b. Will the project enroll program participants who have the following barriers? 5c. Will the project prevent program participant	10

	termination from the project for the following reasons? 5d. Will the project follow a "Housing First" approach?	
Va. Performance and Service Plan (Reallocation and CoC Bonus Applicants) (25 points possible)		

A. Housing and Services
• Project will advance applicable HUD's System Performance Measures, specifically (10 points):
    ○ Employment and income growth
    ○ Successful placement and/or retention in permanent housing
• Program model and service plans clearly articulate (15 points):
    ○ How participants are assisted to access and retain permanent housing
    ○ How participants are assisted to secure mainstream health, social, and employment resources for which they are eligible
    ○ How participants are assisted to increase their incomes
	Screen 4A. Supportive Services for Program Participants
	1. Describe how program participants will be assisted to obtain and remain in permanent housing. (SPM 4, 7b)
	
	2. Describe the specific plan to coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible. (SPM 4, 7b)
	
	3. For all supportive services available to program participants, indicate who will provide them and how often they will be provided.
	
	4. – 6. Identify whether the project includes the following activities. (SPM 4, 7b)
		25

Vb. Performance and Service plan (DV Bonus Applicants) (25 points possible)		

A Housing and Services
• Project will advance applicable HUD's System Performance Measures, specifically (5 points):
    ○ Employment and income growth
    ○ Successful placement and/or retention in permanent housing
• Program model and service plans clearly articulate (5 points):
    ○ How participants are assisted to access and retain permanent housing
    ○ How participants are assisted to secure mainstream health, social, and employment resources for which they are eligible
	Screen 4A. Supportive Services for Program Participants
	1. Describe how program participants will be assisted to obtain and remain in permanent housing. (SPM 4, 7b)
	
	2. Describe the specific plan to coordinate and integrate with other mainstream health, social services, and employment programs for which program participants may be eligible. (SPM 4, 7b)
		10

o How participants are assisted to increase their incomes	3. For all supportive services available to program participants, indicate who will provide them and how often they will be provided. 4. – 6. Identify whether the project includes the following activities. (SPM 4, 7b)	
B. Victim-Centered and Trauma-Informed Approaches • Approaches delivered with an understanding of the vulnerabilities and experiences in trauma survivors, including the prevalence and physical, social, and emotional impact of trauma (5 points) • Places priorities, needs, and interests at the center of the work with the victim; provides nonjudgmental assistance; ensures that restoring victims' feelings of safety are a priority; ensures victims' rights, voices, and perspectives are incorporated into system- and community-based efforts (5 points) • Project has previous experience and can demonstrate previous performance in serving survivors of domestic violence, dating violence, sexual assault, and/or stalking (5 points)	**Screen 3B. Description** 1. Provide a description that addresses the entire scope of the proposed project	15
VI. Budget and Cost Effectiveness (15 points possible)		
A. Budget and Match • Budget demonstrates the project will have enough resources to provide high-quality, reliable services and to the target population (10 points) • Budget demonstrates and documents minimum match (5 points)	**Screen 4B. Housing Type and Location** **Part 5: Program Participants** **Part 6: Budgets** **Screen 7A** Third-Party In-Kind Match	15
100 points possible		
BONUS POINTS		
A. Transition Grant Award 10 points if the agency is **voluntarily re-allocating** at least 1 non-Permanent Supportive Housing project during this competition cycle and is applying to transition from a non-Permanent Supportive Housing project to a **Permanent Supportive Housing project with a Housing First Approach.**	**Designated in e-snaps application**	10

B. Permanent Housing Project that Leverages Mainstream Housing Resources
• Award 10 points if the project has a documented leverage commitment from a mainstream housing provider
    ○ In the case of a PSH project, provide at least 25 percent of the units included in the project
    ○ In the case of a RRH project, serve at least 50 percent of the program participants anticipated to be served by the project
	Screen 7A
	Third-Party In-Kind Match (if applicable)
	
	Oral Interview
		10

C. Permanent Housing Project that Leverages Healthcare Resources • Award 10 points if the project has a documented leverage commitment from a healthcare provider ○ An amount that is equivalent to 25% of the funding being requested for the project will be covered by the healthcare organization	**Screen 7A** Third-Party In-Kind Match (if applicable) **Oral Interview**	10