

BROWARD COC SCORING & RANKING PROCEDURES AND REALLOCATION PROCESS

Process for Reviewing, Scoring and Ranking of HUD funded Continuum of Care Projects

Annually, the U.S. Department of Housing and Urban Development (HUD) holds a national competition for Continuum of Care (CoC) Program funds. This competition brings funds into Broward County to provide housing and services to individuals and families who are experiencing homelessness. The CoC will be evaluated based on the extent to which they further HUD's policy priorities. The policy priorities listed in the 2019 NoFA are:

1. Ending Homelessness for all persons:
 - a. CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
 - b. CoCs should measure their performance based on local data taking into account challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, and those experiencing chronic homelessness).
 - c. CoCs should have a comprehensive outreach strategy to identify and continuously engage all unsheltered individuals and families.
 - d. CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.
 - e. CoCs should use the reallocation process to create new projects that improve their overall performance and better respond to their needs.
2. Creating A systemic response to homelessness:
3. CoCs should be using their Coordinated Entry process to promote participation choice, coordinate homeless assistance and mainstream housing and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance, open, inclusive, and transparent. Strategically allocating and using resources:
 - a. Using cost, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness.
 - b. CoC's should review project quality, performance, and cost effectiveness.
 - c. HUD encourages CoCs to maximize the use of mainstream and other community- based resources when serving person experiencing homelessness.
 - d. CoCs should work to develop partnerships to help CoC Program participants sustainably exit Permanent Supportive Housing, such as through partnerships with Public Housing Authorities (PHA's) and other government, faith-based, and non profit resources specializing in areas such as treating mental illness, substance abuse, job training, and life skills.
 - e. CoCs should review all project eligible for renewal in FY 2019 to determine their effectiveness in serving people experiencing homelessness, including cost effectiveness.
4. ****Revised in 2019**** Using an evidenced -based approach:
 - a. CoCs should prioritize projects that employ strong use of data and evidence, including the cost-effectiveness and impact of homelessness programs on positive housing outcomes, recovery, self-sufficiency, and reducing homelessness.
 - b. Examples of measure that CoCs may use to evaluate projects include, but are not limited to: rates of positive housing outcomes, such as reduced length of time homeless and reduced rates of return to homelessness; improvements in employment and income; and improvements in the overall well-being, such as improvements in mental health, physical health, connections to family, and safety.
5. **** Revised in 2019**** Increasing Employment

BROWARD COC SCORING & RANKING PROCEDURES AND REALLOCATION PROCESS

- a. CoCs and CoC-Program Funded projects should work with local employment agencies and employers to prioritize training and employment opportunities for people experiencing homelessness.
 - b. CoCs should also promote partnerships with public and private organizations that promote employment.
6. **** New in 2019**** Providing flexibility for housing first with service participation requirements:
- a. CoC-Program-Funded Projects should work with individuals and families, with unconditional acceptance and without preconditions, to move quickly into permanent housing.
 - b. This NoFA provides communities and programs with flexibility, without penalty, to use service participations requirements after people have been stable in housing.

Review Process

The CoC Performance, Outcomes, Needs and Gaps Committee (PONG) is designated by the CoC Advisory Board to review and approve the CoC project review process. The Collaborative Applicant (Homeless Initiative Partnership) developed a Project Scoring and Ranking tool to measure project performance and capacity using objective scoring criteria, including the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Performance Measures. Renewal and new projects are scored according to three (3) subcategories: 1) Standard Renewals: renewing projects that have operated for at least 6 full months of operations; 2) First Time Renewals: renewing projects that have not yet begun operating or have begun operating but have not yet completed 6 full months of operations; and 3) New Projects: projects that have never been awarded CoC Program funds. The PONG approved the Project Scoring and Ranking tool and Instructions on April 11, 2019. The PONG is responsible for reviewing project scores and ranking projects according to the CoC-approved Scoring Instructions and Ranking Policies. The PONG scores and ranks projects and makes recommendations to the CoC Advisory Board, which has the authority to approve or reject these recommendations.

The Scoring, Ranking and Review process will proceed as follows in accordance with the 2019 HUD CoC Public Policy:

- A technical assistance workshop to release information about 2019 CoC NOFA and Local Competition will be open to all prospective applicants to be held within 10 business days of the release of the NOFA.
- Applicants will prepare and submit project application materials. Applications received after the deadline will receive zero points in the scoring process.
- PONG members will be oriented to the process and will receive applications, project performance data and scoring materials.
- PONG members will review and tentatively score the applications. PONG members then meet to jointly discuss each application.
- A ranked list(s) will be prepared based on raw scores, then translated to a tiered list (tier 1 and 2)
- Low performing projects will be encouraged to reallocate and potential applicants are encouraged to apply for new projects through reallocation.
- Panel releases scoring results to applicants.
- Appellate hearings are held, if requested. Results from appeal(s) are distributed.
- CoC Advisory Board considers and modifies/approves Priority List of Projects, which is then included in the County's Consolidated NOFA Application.

BROWARD COC SCORING & RANKING PROCEDURES AND REALLOCATION PROCESS

- Projects are given feedback from PONG on quality of application and ways to improve.
- County's Consolidated NOFA Application is made available for public review and reference

In the event that the PONG identifies a renewal project (or projects) whose funding should not be renewed (or funding should be decreased), the Panel will then determine whether any new proposed projects should be awarded and will proceed with reallocation (see Reallocation section below).

Tools for Rating and Ranking

Performance Scoring Policy

Applications for New and Renewal Projects will undergo a threshold review (criteria for the threshold review is specified in the Project Scoring and Ranking tool) to ensure compliance with the HEARTH Act, the CoC Program Notice of Funding Availability (NOFA) and the local CoC Request for Applications. Any new or renewal project not meeting the threshold requirement will not be further reviewed and will not be considered for funding.

Scoring of renewal projects is tabulated by PONG Committee members using the CoC Project Scoring and Ranking tool which is largely based on data obtained from the Homeless Management Information System (HMIS) that adhere to the HUD approved System Performance Measures, HUD priorities, project costs, project design, applicants experience, project alignment with Housing First, CoC participation, client participation in program design and the applicant's ability to spend the previous year's award.

All project applications are subject to the scoring outlined in the CoC Project Scoring and Ranking tool. The PONG Committee utilizes scoring to inform the selection of conditional recipients. The committee has the discretion to select one or more applications for the amount available for new projects. The committee also may give Collaborative Applicant staff direction to negotiate with conditional applicants.

Ranking Policy

HUD requires Collaborative Applicants to rank all projects in two tiers. Tier 1 is defined by HUD in the NOFA as a percent of the CoC's Annual Renewal Demand (ARD) approved by HUD on the final HUD-approved Grant Inventory Worksheet (GIW). Tier 1 projects are traditionally protected from HUD cuts. Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for any bonus project as described in the HUD NOFA. Tier 2 projects have to compete nationally for funding.

All projects will initially be ranked according to the scores from the CoC Project Scoring and Ranking tool. Projects will then be ranked according to the following criteria:

- All permanent housing projects will be ranked above any transitional housing project or support services only project.
- Renewal projects, projects funded as part of a previous NOFA, will be ranked ahead of any new project applications unless otherwise instructed in the HUD CoC NOFA
- Reallocation projects will be ranked in Tier 1 immediately above Renewal HMIS and Coordinated Entry projects
- Renewal HMIS and Coordinated Entry projects will be automatically ranked in Tier 1, immediately above the project that straddles Tier 1 and 2, if any.
- Projects that are deemed essential to the CoC but which would be at risk of loss of funding if placed in Tier 2, will be ranked at the bottom of Tier 1
- Tier 2 Project components will be organized to best maximize the CoC Consolidated Grant Overall Score.

BROWARD COC SCORING & RANKING PROCEDURES AND REALLOCATION PROCESS

- Planning Projects are not ranked.

Reallocation Policy

HUD encourages CoCs to strategically allocate resources using cost, performance, and outcome data to improve how resources are utilized to end homelessness; this strategic allocation of resources may include the reallocation of resources whenever doing so will better help to end homelessness

Any funds reallocated as part of recapturing unspent funds, voluntary or involuntary reallocation will be made available for reallocation to create new projects during the local solicitation process.

New projects will be ranked based on the score produced by the New Project Scoring Tool and adjusted as appropriate by the Scoring Committee to address Broward COC and HUD priorities and to maximize potential funding for the Broward COC as a whole.

Unspent Funds

Projects that are not fully expending or underspending their grant awards are subject to the reallocation process. Projects that have under-expended more than 10% of their award in two consecutive program years will be subject to having their funding reduced through reallocation in the next CoC NOFA competition.

Voluntary Reallocation

Providers that are underutilizing beds, underperforming, not in alignment with Housing First practices and/or with significant, unresolved findings are strongly encouraged to reallocate projects.

Involuntary Reallocation

Projects with poor performance, not spending their full award, not in alignment with Housing First practices, not serving the intended population, underutilizing beds or with significant, unresolved findings are subject to involuntary re-allocation.

The threshold for involuntary Reallocation will be less than 75% of the top score for the current year's CoC projects. For example, if the top score is 100, the minimum threshold to avoid involuntary reallocation will be 75. Projects scoring below the threshold will be asked to develop a plan to address performance issues by next year's competition (Performance Improvement Plan), or to voluntarily give up award moneys to be reallocated to a new project. If problems continue, projects may be involuntarily reallocated in the following cycle. Applicants may appeal the decision, and the appeal must be considered by the PONG Committee.

Reallocated funds will be pooled for re-allocation to New Projects.

Appeal Process

An agency may appeal an "appealable ranking decision," defined in the next paragraph, made by the PONG Review and Ranking Committee concerning a project application submitted by that agency. If the project was submitted by a collaboration of agencies, only one joint appeal may be made.

"An appealable ranking decision" is a rank assigned by the Review and Rank Panel to a project that meets any of the following criteria: a) likely to result in the project not being funded, in whole or in part or, b) places the project in Tier 2.

Applicants have until 12:00pm (noon) three business days after the announcement of the scoring and ranking for all projects to notify the Chair of the PONG Committee (EMAIL) that they are going to appeal.

BROWARD COC SCORING & RANKING PROCEDURES AND REALLOCATION PROCESS

A formal written appeal (no longer than 2 pages) will be due by five business days after the announcement of the scoring and ranking for all projects. The statement of appeal can be in the form of a letter, a memo, or an email transmittal.

If an appeal will be filed, other agencies whose rank may be affected will be notified as a courtesy. Such agencies will not be able to file an appeal after the appeals process is complete. They may file an appeal within the original appeals timeline.

A 3-member Appeals Panel will be selected from the CoC Advisory Board membership. These individuals have no conflict of interest in serving, as defined by the existing Review and Rank Panel Committee conflict of interest rules. Voting members of the Appeal Panel shall not have serve on the PONG Review and Rank Committee during the current year. A staff person of the Collaborative Applicant will participate in the Appeals Panel meeting to inform discussion. The Appeal Panel may conduct an in person or telephone meeting with a representative or representatives of the agency/collaborative who filed the appeal if needed. The Appeal Panel will inform appealing agencies of its decision by 12:00pm (noon) no later than five business days from receiving the formal appeal.