

## **BROWARD COC SCORING & RANKING PROCEDURES AND REALLOCATION PROCESS**

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### **Overview of Reviewing, Scoring, and Ranking of HUD-funded Continuum of Care Projects**

The U.S. Department of Housing and Urban Development (“HUD”) releases annually a Notice of Funding Opportunities (“NOFO”) for HUD’s Continuum of Care Programs. Broward’s Homeless Continuum of Care (“HCoC”) apply for these funding opportunities to provide housing and support services to individuals and families who are experiencing homelessness in our community.

As the collaborative applicant HUD requires Homeless Initiative Partnership (“HI”) to develop a performance-based Rating and Ranking Tool that uses objective scoring criteria and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act System Performance Measures.

This tool aligns with HUD’s annual priorities in the FY 2021 NOFO ([HUD No. 21-124](#)). Projects are scored according to three (3) subcategories: 1) Standard Renewals: renewing projects that have operated for at least six full months; 2) First Time Renewals: projects that have not yet begun operations or have begun operating but have not yet completed six full months of operations; and 3) New Projects: projects that have not been awarded HCoC Program funds.

The HCoC Ranking Committee will be comprised of no less than three (3) quality assurance experts from the Community Partnership Division, two (2) Collaborative Applicant staff, and one (1) fiscal expert from the Community Partnership Division, will convene to complete the rating and ranking. There will be three (3) subject matter experts from the Homeless Initiative Partnership to provide technical assistance to the committee.

On September 15, 2021, during the regularly scheduled meeting, the Performance Outcome Needs and Gap Committee (“PONG”) will review and approve the Project Scoring and Ranking Policy and tool. The policy and tool will then be reviewed at the September 2021 meeting for the Homeless Continuum of Care Advisory Board. The HCoC reviews project scores and ranking of projects according to the HCoC-approved Scoring Instructions and Ranking Policies.

The Submission process will proceed as follows:

- Renewal letters of interest and expansions are due to the Homeless Initiative Partnership by September 10, 2021, by 5:00 p.m. The letter must be submitted as outlined in the Public Announcement.
- Projects with successful submission of Renewal Letter of Interest will be forwarded an invitation to the NOFO workshop scheduled on September 14, 2021, at 1:00 p.m.
- The 2021 DV workshop will be held on September 14, 2021, at 3:00 p.m.
- Applicants will prepare and submit project application materials according to deadlines as outlined on the Timeline located at <https://www.broward.org/Homeless/Pages/2021NOFOTimeline.aspx>. Applications received after the deadline will not be considered to move forward.
- PONG committee and HCoC will review the tool and vote on the tool as presented or with modifications.
- Projects will be rated and ranked with the approved tool. A ranked list(s) will be prepared based on raw scores, then translated to a tiered list (Tier 1 and 2) [as described in Sections II.B.11.a and b of the 2021 HUD CoC NOFO](#)
- The Collaborative Applicant will publish the Ranking results and Scores on the Homeless Initiative Partnership website at <https://www.broward.org/homeless/Pages/Default.aspx>

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### **Performance Scoring Policy:**

All sub-recipient applications will be evaluated and scored utilizing the approved 2021 HCoC Scoring and Ranking Tool. Sub-recipient applications may receive a maximum score of 110 points (100 points plus 10 potential bonus points). The HCoC Ranking Committee utilizes scoring to inform the selection of sub-recipients. The HCoC Ranking Committee has the discretion to select one or more applications for the amount available for new projects. The committee may also give the Collaborative Applicant staff direction to negotiate with conditional applicants.

Per the Violence Against Women Act (VAWA), Family Violence Prevention Services Act (FVPSA), HUD Funded Victim Service Providers, HUD Emergency Solutions Grant, and CoC sub-recipients who are victim service providers are prohibited from entering identifiable information in Homeless Management Information System (“HMIS”). Project applications submitted by victim service providers will be scored on data generated from a comparable database that complies with all HUD required technical specifications and data fields listed in HMIS. Victim service projects will be evaluated based on how the project increases victim safety, the efficient use of resources, housing stability that meets unique victim needs, and financial flexibility.

**The 2021 HCoC Scoring and Ranking Tool consists of the following components:**

**A. Threshold Review – Pass/Fail \*\* Failure on any part of this is a fatal flaw**

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 HCoC Program Notice of Funding Opportunity (NOFO), and the local HCoC Request for Applications Proposals (RFP). **All projects MUST pass all threshold requirements in the application review process to receive funding ranking. The Threshold review is considered a pass/fail status and a fatal flaw.**

**B. Project Financial - 30 points:**

Applicants for New and Renewal Projects will be scored on criteria specified in the Project Scoring and Ranking Tool to examine the service providers’ project budget and utilization. Fiscal utilization is expected to be at 95% of contract budget. Those below this threshold will not obtain full points. Project budget must demonstrate cost effectiveness and efficiency to serve the maximum number of individuals and families.

**C. Project Performance (System Performance Measures “SPM”)- 20 points:**

Applications for New and Renewal Projects will be scored on criteria specified in the Project Scoring and Ranking Tool, and performance data obtained from the Homeless Information Management System (HMIS) per HUD System Performance Measures, which will measure how projects within the HCoC are meeting the needs of persons experiencing homelessness in Broward County. This is a critical section as individual project performance on SPM’s submitted to HUD impact the goal of becoming a high performing CoC.

**D. HMIS Data Quality- 20 points:**

Applicants for Renewal Projects will be scored on criteria specified in the Project Scoring and Ranking Tool to evaluate the effectiveness and quality of data inputted by homeless service providers. Data quality refers to timeliness, completeness, accuracy, and quality improvement plan from the service providers.

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**E. Agency Commitment to HCoC Priorities – 30 points:**

Applicants for the New and Renewal Project will be scored on criteria specified in the Project Scoring and Ranking Tool to ensure service providers’ primary goal is to end homelessness for all persons experiencing homelessness in Broward County, using an evidence-based approach, working to improve system performance, collaborating with community agencies to leverage and coordinate resources, address racial disparities, and engage with people with lived experience in decision-making.

**Totaling 100 Points**

**F. Bonus Points - 10 points:**

Applicants for the New and Renewal Project will be scored on criteria specified in the Project Scoring and Ranking Tool to ensure Broward HCoC is working towards being a designated high-performing community.

**Ranking Policy**

Project applications presented to the HCoC for inclusion in the FY 2021 HCoC Priority Listing as a component of the HCoC Consolidated Application must be reviewed, ranked and accepted or rejected by Broward’s HCoC. All project applications approved by the HCoC will be listed in the HCoC Priority Listing in ranked order. Higher-ranked projects will be assigned to Tier 1, and lower-ranked projects will be assigned to Tier 2 as described in Sections II.B.11.a and b of the [2021 Notice of Funding Opportunity NOFO](#). The purpose of this two-tiered approach is for CoCs to notify HUD which projects are prioritized for funding based on local needs and gaps.

CoC Number and Name	Preliminary Pro Rata Need (PPRN)	Estimated Annual Renewal Demand (ARD)	Tier 1	Bonus	Domestic Violence Bonus	CoC Planning (3% of ARD)
FL-601 - Ft Lauderdale/Broward County CoC	\$6,906,481	\$11,482,064	\$11,482,064	\$574,103	\$1,035,972	\$344,462

**Broward Project Priority**

Broward HCoC will utilize the HUD Priority Listing and the following criteria :

- Permanent Housing (PH) (including Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH))
- Joint Transitional Housing and Permanent Housing-Rapid Rehousing component (Joint TH and PH-RRH component)
- Supportive Services Only for Coordinated Entry (SSO–CE)
- Dedicated Homelessness Management Information System (HMIS)

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Broward's HCoC aligns with the priorities listed above, however due to the critical shortage of Supportive Services, the Collaborative Applicant recommends the SSO -CE be ranked above the Joint Transitional Housing and Permanent Housing-Rapid Rehousing component (Joint TH and PH-RRH component).

- Renewal HMIS and Coordinated Entry projects will be automatically ranked in Tier 1, above any project that may be ranked between Tier 1 and 2.

### **Reallocation Policy**

Sub-recipient applications that score less than 75% of the top score may still be eligible; however, the sub-recipient will be placed on a corrective action plan by the Community Partnerships Division to address performance challenges by the next application cycle. Broward HCoC will evaluate the performance of low-ranking projects when reallocation is being considered. Broward HCoC will evaluate the low-ranking projects based on the [National Alliance to End Homelessness \(NAEH\)](#) in evaluating low-ranking projects for reallocation. Broward HCoC will reallocate funding from one PSH project to another high-performing PSH project, which can absorb the service operations without displacing clients.

Any funds reallocated as part of recapturing unspent funds, voluntary or involuntary reallocation, will be made available to create new projects during the local solicitation process. The HCoC will utilize the [guidance](#) from the United States Interagency Council on Homelessness.

New projects and expansions 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 to maximize potential funding for the Broward CoC.

### **Unspent Funds**

Projects that are not fully utilizing or underspending their grant awards are subject to the reallocation process. Projects that have under-expended more than 5% (i.e., utilization must be at or above 95%) 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, or with significant unresolved findings are strongly encouraged to reallocate projects.

### **Involuntary Reallocation**

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

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 voluntarily give up award money 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 CoC Board must consider the appeal.

Reallocated funds will be pooled for reallocation to New Projects.

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### Appeal Process

- The FY 2021 CoC Program Competition NOFO lists the application deadline. CoCs are to review, approve or reject all Project Applications no later than 15 days before the CoC Program Competition application deadline. Only those organizations that meet these criteria should participate in the appeal process. This year, if the criteria cited above are met, the Project Applicant will have the opportunity to submit a Notice of Intent to Appeal and apply as a Solo Project Applicant directly to HUD through e-snaps. For a project application to be considered for funding, it must meet these criteria and submit the Solo Applicant appeal project application to HUD before the application deadline that is provided in the FY 2021 CoC Program Competition NOFO.”<https://www.hud.gov/sites/dfiles/CPD/documents/FY-2021-Project-Application-Appeals-Navigational-Guide.pdf>

- County’s Consolidated NOFO Application is made available for public review and reference on the HIP Website

In the event the HCoC Board identifies a renewal project (or projects) whose funding should not be renewed (or funding should be decreased). In that case, the HIP Staff will determine whether any new proposed projects should be awarded and will proceed with reallocation (see Reallocation section above).

Any deviation from the HCoC’s s policy and HUD’s priorities that have been voted upon and approved will impact the total NOFO score and any future awards.