

Santa Clara County CoC
HUD Continuum of Care Program Grants
LOCAL COMMUNITY REVIEW PROCESS

Approved: February 17, 2023

This section is intended to explain the Review and Rank Process that is used to review and evaluate all project applications submitted in the local competition.

Prior to NOFO release:

- The NOFO Committee meets, reviews the scoring process, and makes recommendations to modify the competition process and scoring materials, based on feedback from applicants and panelists in the previous competition.
- The Executive Committee of the CoC Board reviews the NOFO Committee's recommended changes to the process and scoring materials and approves the scoring tools and process, subject to necessary changes due to the NOFO.
- At least 4-5 non-conflicted Review and Rank panelists are recruited by Homebase and the Collaborative Applicant. The recruited panelists will include at least one CoC Board member, a non-conflicted provider (ideally a provider with experience administering Federal, non-CoC grants), and at least one person with lived experience being unhoused.
 - For purposes of Review and Rank panel participation, conflict will not extend to a substantially independent program or arm of a CoC recipient, subrecipient, or applicant organization, so long as the program is controlled by an independent board and does not receive or directly benefit from CoC funding or the potential award of a CoC grant in the current competition.
- Homebase assembles supplemental information about Renewal Applicants for the Review and Rank Committee, including HMIS performance data.
- Renewal Applicants submit narrative responses and other materials to be used for scoring.
- Homebase pre-scores certain scoring factors for Renewal Applicants, as indicated on the Renewal Project Scoring Tool.
- Renewal Applicants review pre-scores and submit additional narrative with explanation of or response to pre-scores.
- The Review and Rank Panel reviews all materials from Renewal Applicants, conducts interviews with Renewal Applicants, and meets to finalize scores for Renewal Applicants.
 - Review and Rank Panel members will be oriented to the process and will receive applications, project performance data and scoring materials.
 - Review and Rank Panel members will review and tentatively score the applications prior to their first group scoring meeting.
 - Review and Rank Panel will conduct short in-person interview sessions with applicants to have questions answered and give feedback on how to improve the application.

- Review and Rank Panel will meet over the course of 2-3 days to jointly discuss each application and finalize their individual scores.

After NOFO release:

- Homebase and the Collaborative Applicant host a TA Workshop to release information about the CoC Program NOFO and the Local Competition. The TA Workshop is open to all prospective applicants, both new and renewal.
- New Project Applicants prepare and submit local application materials.
- The Review and Rank Panel reviews all materials from New Project Applicants, conducts interviews with New Project Applicants, and meets to finalize scores for New Project Applicants.
 - Review and Rank Panel members will be oriented to the process and will receive applications and scoring materials.
 - Review and Rank Panel members will review and tentatively score the applications prior to their first group scoring meeting.
 - Review and Rank Panel will conduct short in-person interview sessions with applicants to have questions answered and give feedback on how to improve the application.
 - Review and Rank Panel will meet over the course of 2-3 days to jointly discuss each application and finalize their individual scores.
- Scoring results are released to applicants with a reminder of the appeals process.
- Appellate hearings are held, if requested. Results from appeal(s) are distributed.
- CoC Board or its designee considers and modifies/approves the Priority List of projects, which is then included in the CoC Program Consolidated Application.
- The CoC Program Consolidated Application is made available for public review and reference.
- Process Debriefs are held with Review and Rank Panel Committee members, project applicants, and the collaborative applicant. This information will support the NOFO Committee in making recommendations for improvement for future competitions.

Scoring and Ranking:

- *Late Applications.* Applications received after the deadline will receive zero points in the scoring process. Since this may result in the project not being funded, this can be considered an appealable ranking decision.
- *Administrative Errors.* Panelists shall have discretion to deduct up to 10 points from a project's total score for administrative errors, taking into consideration factors such as the extent of the error, due diligence in resolving the error, impact on the competition, and other factors subject to panelist discretion.
- *Scoring Tools*
 - New housing projects, first-time renewals, transfer housing projects, and first-time renewals after transfer will be scored using the New/Transfer Scoring Tool.

- Housing projects without a full year of data for the evaluation year will be scored using the New/Transfer Scoring Tool.
- New Expansion projects will be scored using the New/Transfer scoring tool. However, a New Expansion project will not be ranked above the renewal project that it proposes to expand. If a New Expansion project receives a higher score than the associated renewal project, it will be ranked directly below the renewal project.
- All other renewal housing projects will be scored using the Renewal Scoring Tool.
- *Project Ranking:* Ranked list(s) will be prepared based on raw scores, then translated to a tiered list.
 - Renewal HMIS and Coordinated Entry projects will be automatically ranked in Tier One, immediately above the project that straddles Tier One and Two, if any. Another mechanism will be used to evaluate HMIS and Coordinated Entry outside the CoC NOFA Review and Rank process.
 - New HMIS and Coordinated Entry projects will be automatically ranked at the top of Tier Two, immediately below the project that straddles Tier One and Two.
- *Reallocation:*
 - Low performing renewal projects will be encouraged to reallocate voluntarily, and potential applicants are encouraged to apply for new projects through reallocation.
 - The Panel will consider reallocating renewal projects. (See additional detail below). In the event that the Review and Rank Panel 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 detail below).

Threshold

In addition to the scoring criteria, all new and renewal projects must meet a number of threshold criteria. Homebase/CoC Staff will conduct a threshold review prior to the review and rank process to ensure baseline requirements are met. These threshold criteria may be found in the Renewal and New Project Scoring Tools.

Requests to alter an application post-submission:

The CoC expects applicants to submit final project proposals for consideration by the Review and Rank Panel, and applicants should not plan to change their proposed program design during the local review and rank process.

However, an applicant may submit a request to the CoC Board to change a proposed project after the Review and Rank Panel Meeting, if:

- The change is the result of unforeseen circumstances that arose during or after the Review and Rank Panel Meeting; *and*

- The change does not substantially alter the scope of the proposed project, other than to increase the project's capacity.

To request a change to a proposed project, the applicant must submit an application supplement form provided by the Collaborative Applicant. If the CoC Board determines that the requested change meets the criteria above, they may forward the request to the NOFA Committee for consideration at the post-appeals NOFA Committee meeting.

All other changes to project design may be pursued with HUD during or after contracting and may require a HUD grant amendment.

Reallocation

It is possible that funds will be reallocated from projects that will not receive renewal funding, or whose funding will be reduced. This is a decision made by the Review and Rank Panel after extensive deliberation. Only eligible renewal projects that have previously been renewed under the CoC Program will be considered for reallocation. When considering reallocation, the Review and Rank Panel will:

- Consider unspent funds and the ability to cut grants without cutting service/housing levels.
 - Panel members will receive training about the limitations related to spending CoC funds.
 - For projects receiving leasing or rental assistance, information about unspent funds will be presented together with information about agency capacity (serving the number of people the project is designed to serve).
 - Spend-down Threshold:
 - If a recipient spends 85% or less of their most recent grant, they will be required to submit a narrative explanation.
 - If a recipient spends 85% or less of two consecutive grants, the Collaborative Applicant will send them a written warning and instruct them to take steps to resolve the underspending.
 - If a recipient spends 85% or less of three consecutive grants, the Review and Rank Panel will discuss reallocation. The Review and Rank Panel should seek input from the recipient about the feasibility and impact of partial reallocation for their project.
- Consider history of reductions (e.g., if grant reduced one year, will not be apparent in spending the following year)
- Consider specific new permanent supportive housing or rapid re-housing project(s) and specific renewal project(s) at risk of not being funded
- Consider alternative funding sources available to support either new or renewal project(s) at risk of not being funding
- Consider renewal HUD "covenant" concerns
- Consider impact on system performance and consolidated application's score
- Consider impact on the community in light of community needs

The impact of this policy is that high scoring projects may be reallocated if these considerations warrant that decision. In addition, if a project receives less than 75 points, then the Panel should strongly consider reallocation of funding.

Strategic Allocation of CoC Funding

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

Following the Appeals Committee, the NOFO Committee will convene to review the Appeals Committee Ranked List and may make recommendations to the CoC Board regarding changes to the ranking of projects in Tier Two. Recommendations may address ranking only; recommendations regarding reallocation developed by the Review and Rank Panel and sustained by the Appeals Committee may not be considered or modified by the NOFA Committee after appeals are complete.

In recommending changes to the ranking of Tier Two projects, the NOFA Committee may consider the following:

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

Homebase will develop a process for providing information about projects to the NOFA Committee and guidelines for participation by applicants.

Any NOFA Committee recommendations to the CoC Board must be either:

- Consensus recommendations, or
- Recommendations based on a vote of at least 60% of the NOFA Committee members in attendance, in which case the vote must be recorded and given to the CoC Board alongside the recommendation of the voting majority as well as the grounds for opposition.
 - Each organization in attendance may cast one vote; each individual in attendance not representing an organization may cast one vote.

The CoC Board or its designee will approve the final project list for submission. The decision of the CoC Board will be final.

2023 Continuum of Care Program Grants
APPEALS PROCESS

The Review and Rank Panel Committee reviews all applications and ranks them for funding recommendations to HUD. That ranking decision will be communicated to all applicants by email by **12 pm (noon) on September 1**. All applicants are directed to contact HomeBase at sccnofa@homebaseccc.org or 415-788-7961, ext. 305, if no email notice is received.

1. Who May Appeal

An agency may appeal an “appealable ranking decision,” defined in the next paragraph, made by the Review and Rank Panel 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.

2. What May Be Appealed

“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,
- b) places the project in the bottom 15% of Tier 1, or
- c) places the project in Tier 2.

3. Timing:

The ranking decision is communicated to all applicants by **12pm (noon) on September 1**. Applicants have **until 12pm (noon) on September 5** to decide if they are going to appeal and notify HomeBase (sccnofa@homebaseccc.org) for more information, with a formal written appeal (no longer than 2 pages) due by **September 6 at 5:00pm**. 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.

4. Initiating the Formal Appeal

The Formal Appeal must be submitted by **5:00pm on September 6** to Homebase at sccnofa@homebaseccc.org. The appeal document must consist of a short, written (no longer than 2 pages) statement of the agency’s appeal of the Review and Rank Panel Committee’s decision. The statement can be in the form of a letter, a memo, or an email transmittal.

5. Members of the Appeal Panel

A 3-member Appeals Panel will be selected from the CoC Board or its designees. 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 serve simultaneously on the Review and Rank Panel Committee; however, a Review and Rank Panel member and a staff person of the Collaborative Applicant will participate in the Appeals Panel meeting to inform discussion.

6. The Appeal Process, Including Involvement of Other Affected Agencies

The Appeal Panel will conduct a telephone meeting with a representative or representatives of the agency/collaborative who filed the appeal to discuss it on **September 7** if needed. The Panel will then deliberate.

The Appeal Panel will inform appealing agencies of its decision by **September 7 at 3:00pm**.

The CoC Board or its designee will approve the final project list for submission. The decision of the CoC Board will be final.