

COC REVIEW, SCORE, & RANKING PROCEDURES AND REALLOCATION PROCESS

Performance Scoring Policy

This policy is reviewed annually by the Homeless Trust, prior to the NOFO, as part of the CoC Subcommittee. Public comment is obtained from community stakeholders, funded providers, agencies interested in applying for the collaborative application to HUD, and people with lived expertise. The Homeless Trust sets specific evaluation standards for the competition that remain consistent with HUD guidance and align with system goals and performance improvement initiatives.

Applications for New and Renewal Projects will undergo a threshold review to ensure compliance with the HEARTH Act, the Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO) 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. Renewal projects have previously passed Housing and Urban Development (HUD) threshold review and only in very exceptional cases of changed HUD policies or program changes will be at risk of not passing the threshold review.

The Homeless Trust makes available and accepts comments on the CoC scoring standards for renewal projects. Tools are posted on our website in January, ahead of the CoC Subcommittee which accepts public comment on the instrument annually. Tools are later reposted for the local NOFO solicitation. This year we developed a local scoring tool to reduce technical issues. Our tool uses the rating criteria found in the HUD CoC Project Rating and Ranking Tool version 7.1. Our tool is largely based on prior year performance on HUD-approved System Performance Measures, project costs, project alignment with Housing First and the applicant's ability to spend the previous year's award.

The Miami-Dade County Mayor appoints a selection committee of subject matter experts to review, rate and rank New Project applications, including Reallocation, Expansion and Bonus Project applications. After meeting the local RFA and program requirements, all New Projects are subject to the scoring outlined in the local RFA and new project scoring criteria, Attachment 20. The Selection Committee utilizes scoring to inform the selection of conditional sub-recipients. The committee has the discretion to select one or more applications for the amount available for New Projects. The committee also may give staff direction to negotiate with conditional applicants.

New and Renewal Projects will receive additional points based on the HUD Housing First Assessment Tool. Renewal Projects receive additional points based on the percentage of funds drawn in the previous year.

Full Points:

Description of Rating Factor	Applies to
Performance Measure	
Average length of time to housing <= 30 days (10 pts)	RRH & PSH
Average program participation is 180 days or less (10 pts)	TH:RRH (TH component)
Retention in or exits to Permanent Housing >= 90% (12 pts)	RRH, PSH, TH:RRH
Returns to Homelessness within 12 months <= 10% (8 pts)	RRH, PSH, TH:RRH
New or increased earned income for stayers >= 8% (1 pt)	RRH, PSH, TH:RRH
New or increased non-employment income for stayers >= 10% (1 pt)	RRH, PSH, TH:RRH
New or increased earned income for leavers >= 8% (1 pt)	RRH, PSH, TH:RRH
New or increased non-employment income for leavers >= 10% (1 pt)	RRH, PSH, TH:RRH
Serve High Need Populations	

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High Needs Pop: Percentage of program entrants who were unsheltered at entry >= 15% (10 pts)	RRH, PSH, TH:RRH
Housing First/Low Barrier Implementation [completed HUD tool & reviewed internal processes (10 pts)]	RRH, PSH, TH:RRH
Project Effectiveness	
Project support service costs >\$10k per household (10 pts)	RRH, PSH, TH:RRH
All referrals received through Coordinate Entry (5 pts)	RRH, PSH, TH:RRH
Equity Factors	
Provider has Black, Indigenous, and people of color (BIPOC) & LGBTQ+ represented in managerial/leadership positions (3 pts)	RRH, PSH, TH:RRH
Provider has lived expertise on the Board (3 pts)	RRH, PSH, TH:RRH
Provider has a process for receiving and incorporating feedback from BIPOC & LGBTQ+ clients (3 pts)	RRH, PSH, TH:RRH
Provider has reviewed internal policies and procedures with an equity lens and has a plan for, or has implemented equitable policies that do not impose an undue burden on BIPOC and LGBTQ+ individuals (3 pts)	RRH, PSH, TH:RRH
Provider has reviewed program participant outcome to disaggregate data by age, race, ethnicity, gender, sexual orientation, and other underserved populations to identify any barriers to participation [e.g., lack of outreach faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population (3 pts)]	RRH, PSH, TH:RRH
Provider has taken or identified steps to eliminate the identified barriers (3 pts)	RRH, PSH, TH:RRH
Provider is using HMIS to disaggregate data by race, ethnicity, gender, and sexual orientation (3 pts)	RRH, PSH, TH:RRH
Other and Local Criteria	
CoC Monitoring Score (15 pts)	RRH, PSH, TH:RRH
Restrictive Covenant (5 bonus pts)	PSH

Partial Points:

Description of Rating Factor	Applies to
Average length of time to housing 31-60 days (5 pts)	RRH & PSH
Retention in or exits to Permanent Housing 80-89% (6 pts)	RRH, PSH, TH:RRH
Returns to Homelessness within 12 months 11-20% (4 pts)	RRH, PSH, TH:RRH

Ranking Policy

The ranking process is also reviewed annually as part of the CoC Subcommittee. During the process the CoC determines the types of projects that are essential to preserve and initiate discussions for reallocation opportunities.

HUD generally requires Collaborative Applicants to rank all projects in two tiers. Tier 1 is defined by HUD in the NOFO 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 bonus (including the Domestic Violence Bonus) as described in the HUD NOFO. Tier 2 projects must compete nationally for funding.

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Renewal projects will be scored and ranked using a local tool that utilizes the HUD CoC Project Rating and Ranking Tool version 7.1 criteria with feedback provided by the CoC Subcommittee. The tool aligns with Housing First and looks at prior year spending and performance, of all projects with the exception of Street Outreach and Coordinated Entry projects, First Time Renewals including Expansion projects, Change of Project Sponsor or Consolidated projects funded as part of the NOFO competition that have not been in operation for at least one year. These projects will be placed at the bottom of Tier 1 ahead of any Renewal Projects who ranked in Tier 2 and New Projects unless otherwise instructed in the USHUD CoC NOFO.

Projects that are deemed essential to the CoC but which would be at risk of losing funding if placed in Tier 2, will be ranked at the bottom of Tier 1. In all years this would include projects providing Coordinated Entry. On an annual basis, the CoC will determine whether there are other project types to classify as 'essential to the CoC'.

Tier 2: Project components will be organized to best maximize the CoC Consolidated Application Overall Score.

The Planning Project is not ranked.

Re-Allocation Policy

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. Priorities for new projects is proposed by the CoC based on the annual gaps and needs assessment, reviewed at publicly noticed CoC Subcommittee meetings and adopted by the Board.

Voluntary Re-Allocation

As part of the local solicitation for inclusion in the HUD CoC collaborative application, providers are strongly encouraged to reallocate projects that are not spending their full award, underutilizing beds, underperforming and/or not in alignment with Housing First principles and practices. Such reallocated funds are pooled for reallocation to New Projects. The competitive process for New Projects provides bonus points as an incentive to providers offering to reallocate their entire project funds to create a New

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Project addressing CoC priorities. The number of points awarded, and criteria for assignment of bonus points are spelled out in the annual competitive solicitation.

Involuntary Re-Allocation (Unconditional v Conditional Renewal)

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

The Homeless Trust has established a threshold for unconditional renewal. Projects who score below 50 points of the weighted ranking score will be placed on corrective action and may be ranked in Tier 2. All projects submitting full renewal applications meeting threshold and scored above the threshold are approved for renewal without conditions.

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 money to be reallocated to a New Project. If problems continue, projects may be reallocated in the following cycle. Applicants may appeal the decision and the appeal must be considered by the Homeless Trust Board.

Determination of any conditions to renewal will be made at least 45 days ahead of the NOFO due date. Any required Performance Improvement Plans or plan that demonstrates that the grant's expenditure will be improved as part of a reallocation appeal must be submitted for approval at least 30 days ahead of the NOFO due date, so that a final determination can be made as to whether the project goes forward for renewal. A final list of Renewal Projects will be presented to the CoC Board and posted on the Homeless Trust website.

Unspent Funds

Projects that are not fully expending or underspending their grant awards are subject to the reallocation process. Projects that have underspent their award by 10% or more than \$50,000, whichever is less, may be reduced and those funds will go to reallocation for New Project(s). A one-year grace period may be extended by the Homeless Trust to providers who appeal proposed reallocation with a plan that demonstrates that the grant's expenditure will be improved in the current program year. Projects that have under-expended more than 10% of their award in two consecutive program years, without reallocation during the previous year, will have their funding reduced through reallocation in the CoC NOFO competition. The Homeless Trust will recapture 80% of unspent funds after making allowances for vacancies.