SJCoC Local Rank Policy

Specific to the 2021 CoC Program Competition

Updated August 18, 2021; June 11, 2020; June 2019

Background

Each year, the U.S. Department of Housing and Urban Development (HUD) releases the Continuum of Care (CoC) Program Competition (Competition) Notice of Funding Opportunity (NOFO). This Competition brings over $5 million dollars in annually renewable funds into San Joaquin County to provide housing and services to individuals and families who are experiencing homelessness. Specifically, the CoC Interim rule provides that CoC funds may be used for permanent housing (Permanent Supportive Housing or Rapid Rehousing), transitional housing, supportive services, Homeless Management Information System (HMIS), and homelessness prevention.[1]

The NOFO submission consists of three parts:

1. CoC Application –This is the CoC's overall application, and primarily focuses on the CoC's progress on ending homelessness, strategic initiatives, and adoption of HUD's funding and policy priorities.

2. Project Ranking — This is an ordered ranking of all renewal and new projects the CoC is submitting in the application for funding. The project ranking should account for local needs, local performance, and local strategic priorities (24 CFR part 578). Local priorities are expected to align with the overall priorities as determined by HUD and by Congress through the HEARTH Act.

3. Project Applications – Each project approved for inclusion in the local project ranking is included in the CoC's submission to HUD.

In the Fiscal Year 2021 – 2022 CoC Program Competition, the SJCoC may apply for up to an estimated $5,743,492 for renewal and new projects.

Estimated Annual Renewal Demand	$5,743,492
Reallocated Funds for New Projects within the ARD	$0
CoC Bonus Funding (potential)	$287,175
DV Bonus Funding (potential)	$831,135
TOTAL INCLUDING POTENTIAL BONUS:	**$6,861,802**

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[1] Homelessness prevention funds available to recipients and subrecipients located in HUD-designated High Performing Communities only. To date, no CoC has received this designation.

This document details how the San Joaquin Continuum of Care (SJCoC) will score and rank renewal and new projects (i.e. Part 2 of the NOFO submission). The SJCoC System Performance and Evaluation Committee (Committee) is the work group charged with this task.

Rank Priorities

The local scoring and ranking process is designed to reflect HUD priorities, as well as local priorities determined by the SJCoC, including those stated in the San Joaquin Community Response to Homelessness strategic plan. The Strategic Planning process was a joint effort by the SJCoC, City of Stockton, and San Joaquin County to determine community priorities and action steps to address homelessness, and included feedback from over 200 stakeholders countywide representing cities, service providers, governmental agencies, law enforcement, health care systems, and many others.

HUD Priorities (from the 2021 NOFA)

HUD has identified the following policy priorities in the 2021 NOFA (page 9):

- Ending homelessness for all persons
- Use a Housing First Approach
- Reducing Unsheltered Homelessness
- Improving System Performance
- Partnering with Housing, Health, and Service Agencies
- Racial Equity
- Persons with Lived Experience

Local Priorities

SJCoC has identified the following local priorities based on the San Joaquin Community Response to Homelessness strategic plan that are applicable to eligible uses of CoC funds:

- Maximize dollars available to the SJCoC to effectively address homelessness.
- Prioritize projects that enable and assist with the essential functions of the SJCoC, including participation in HMIS data collection, coordinated entry, and SJCoC general membership and committee meetings.
- Prioritize projects that demonstrate strong performance in permanently housing homeless households.
- Reallocate funding from underperforming projects, projects that are underspending, or projects that no longer meet CoC needs to new projects that meet both HUD priorities and local needs by improving the CoC's outcomes and reducing homelessness more effectively than the reallocated project.
- Prioritize projects that provide permanent housing.

Local Rank Process

In accordance with the SJCoC Charter, the SJCoC process for ranking applicants seeking Competition funds is designed to be objective, fair, transparent, and impartial. The local rank process prioritizes projects that efficiently and effectively house homeless households within the eligible uses of Competition funds and provides an opportunity to fund new projects when funds are available.

Renewal and new projects are scored using the Local CoC Scoring Tool and then ranked numerically in order from top local priority to last local priority. The Local Scoring Tool, scoring process, and ranking process is described below.

Local CoC Scoring Tool

Renewal and new projects are scored according to an objective tool based on their individual project performance, alignment with HUD and SJCoC policy priorities, and compliance. This tool is researched, established, and recommended by the Committee after soliciting feedback from the SJCoC General Membership and the SJCoC Board. The tool is approved by the SJCoC Board.

The Local Scoring Tool is meant to direct HUD CoC funding toward projects that meet the above identified priorities, and that have the proven capacity and experience to effectively, efficiently, and quickly stand up projects in order to most successfully serve households experiencing homelessness within the eligible expenses outlined by the HEARTH Act. It emphasizes project performance and capacity, including HUD-determined and locally approved System-wide Performance Measures.

Threshold Review

All eligible[2] applicants will undergo a threshold review to ensure compliance with the HEARTH Act, the Continuum of Care Program NOFO, and the local SJCoC Letter of Intent. Any new or renewal project not meeting the threshold requirements will not be scored, ranked or considered for funding.

Applications will be rejected and not considered for review for any of the following reasons:
- the applicant has not submitted a Letter of Intent by the posted deadline;
- the applicant of a new project has not attended the required informational session;
- the applicant does not agree to, is not prepared to, or fails to complete the project application in eSnaps as outlined in the Letter of Intent;
- application materials are not received by the deadline;
- the application is not consistent with the Consolidated Plan;
- the agency has outstanding County or HUD monitoring, or Office of Inspector General (OIG) Audit finding(s) that are overdue or unsatisfactory;
- the project does not comply with the requirements of the CoC interim rule (24 CFR part 578), including requirements to participate in the Coordinated Entry (CE) System and the San Joaquin County HMIS;
- the application does not demonstrate required match and/or leverage dollars;
- the project is a permanent housing project but does not require participating households to sign rental or lease agreements that give those households rights to tenancy (specific to projects that use CoC Program dollars to support units of permanent housing through rent assistance, leasing, acquisition, construction, or rehabilitation);
- the application inaccurately portrays or inaccurately describes the proposed project (for example, a proposed permanent supportive housing application is determined by scorers to actually be a transitional housing project).

Renewal Project Scoring

Renewal projects that meet the threshold review criteria will be scored using the Local Scoring Tool for Renewal Projects across three categories: Applicant and Project Capacity, Project Design, and Project

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[2] Renewal projects must meet reallocation performance thresholds to be eligible.

Performance. Performance is heavily weighted by the SJCoC as part of the effort to ensure high-performing projects are prioritized for funding. Data used in the scoring tool comes largely from projects' most recently submitted Annual Performance Report (APR). The Local Scoring Tool for Renewal Projects is provided in Appendix A.

SCORING BREAKDOWN FOR RENEWAL PROJECTS FY2020

Category	Questions	Points	Percentage of Points
Applicant and Project Capacity	6	12	24%
Project Design	5	12	24%
Project Performance	5	26	52%
Totals	**16**	**50**	**100%**

First-time renewals have not yet completed their first operating year, and thus, cannot be scored for their performance due to not having a completed Annual Performance Report (APR) or accumulated a meaningful data sample size. However, the Committee will evaluate each first-time renewal to ensure that each project is achieving satisfactory progress.

New Project Scoring, Including Bonus Funds

Funding for new projects through the Competition is only available if low-performing projects have their funding reallocated, if bonus funding is made available by HUD, or if other new funding is made available by HUD.

New projects that meet the threshold review criteria will be scored using the Local Scoring Tool for New Projects. The SJCoC Local Scoring Tool for New Projects is provided in Appendix B.

SCORING BREAKDOWN FOR NEW PROJECTS FY2020

Category	Questions	Points	Percentage of Points
Applicant and Project Capacity	10	24	40%
Housing First	8	8	13%
Project Design	7	28	47%
Totals	**25**	**60**	**100%**

Reallocation

For the FY2021 Competition, new projects may be created through reallocation. A CoC may reallocate part or all of a renewal project's funding to create one or more new projects that meet both HUD priorities and local needs by improving the CoC's outcomes and reducing homelessness more effectively than the reallocated renewal project.

Reallocation for the SJCoC is fully governed by the SJCoC Reallocation Policy adopted February 6, 2020, by the SJCoC Board. (Please see policy for details).

Generally, the reallocation of funds and/or project(s) may occur in the following circumstances:
- The project applicant makes the determination to not apply for a renewal project.
- Due to poor performance or other justifications based on a failure to meet HUD priorities or local needs:
    - The Committee recommends that a renewal project is not submitted to HUD in the annual Competition, and/or
    - The Committee recommends that a renewal project is submitted to HUD in the annual Competition, but at a reduced funding request.

Ad hoc Scoring Group

The Committee will establish an ad hoc group to conduct the renewal and new project scoring process using the Local Scoring Tool, as described above. To maintain impartiality, individuals from agencies that are submitting a renewal or new project application are ineligible to participate in the ad hoc group. The Committee will, with the assistance of the Collaborative Applicant, establish this ad hoc group for each annual Competition.

The ad hoc group will submit the scoring results to the Committee. The Committee is responsible for preparing the final ranked ordering of renewal and new projects, as described above. The Committee will send the final local rankings to the SJCoC Board for review and approval.

Rank Ordering

HUD requires Collaborative Applicants to rank all projects submitted for Competition funding, and place projects in one of 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 the permanent housing bonus, as described in the HUD NOFA. Tier 2 projects must compete nationally for funding.

Renewal and New Projects that met threshold criteria and were scored using the Local Scoring Tool will be ranked in the following order (in accordance with the previously listed priorities):

1. Renewal projects that support the entire system (the SJCoC Homeless Management Information System).
2. First time renewal projects (i.e. projects that have not been scored for their performance due to not having a completed Annual Performance Report (APR) or accumulated a meaningful data sample size).
3. Top 75% of renewal projects ranked in order of highest to lowest percentage score.
4. New PH projects and PH expansion projects that are possible because of reallocated dollars ranked in order of highest to lowest percentage score, up to the amount available through reallocation.
5. Renewal projects with the bottom 25% of renewal scores ranked in order of highest to lowest percentage score.
6. New projects that are possible because of Bonus dollars ranked in order of highest to lowest percentage score.
7. New projects seeking funding when there are no reallocated dollars available or projects seeking reallocated dollars that singly or in total exceed the amount of reallocated dollars available.
8. Any other projects will be ranked last in order of highest to lowest percentage score.

Because of the adoption of the Reallocation Policy, including an annual project performance review and subsequent TA and capacity building, all eligible renewals (excluding projects that have been reallocated) shall be ranked before any new projects, with the exception of new projects made possible by reallocation, which will be ranked according to the priorities outlined above.

The Committee is responsible for developing the ranked list of all scored project applicant proposals. The SJCoC Board must approve the final ranked list. The Board reserves the right to set specific priorities for reallocated funds. Any SJCoC Board members with a conflict of interest must recuse themselves from all related discussions and abstain from the vote approving the final ranking list. The Collaborative Applicant will submit this list to HUD as part of the Consolidated Application.

Appeals Process

Applicants may submit a written appeal if they can describe bias or unfairness in the process that warrants the appeal (i.e. nonconformance with the Competition process). Note: Project Applicants that have been found to not meet the threshold requirements are not eligible for an appeal.

A committee appointed by the CoC Board will review appeal letters. No member of the Appeals Committee may have a conflict of interest with any of the agencies applying for CoC Program funding. If an operator of a project seeking an appeal is a member of the SJCoC Board of Directors, that member shall recuse themselves in a voting capacity as part of the appeal but may represent the operator as part of the SJCoC Board discussion. If deemed necessary, the Appeals Committee may request that one member of the ad hoc scoring group attend the meeting in a non-voting, advisory capacity.

The appeal letter must specify what process was violated and must be mailed or hand-delivered, not faxed or e-mailed, to:

> San Joaquin Continuum of Care
> Attn: Adam Cheshire
> 44 North San Joaquin Street, Suite 640
> Stockton, CA 95202

All appeal letters regarding the RFQ process must be received at the above address at least two weeks before the final submission date of the overall CoC Application, which will be publicly noticed by both the SJCoC and HUD.

After hearing any appeals, the SJCoC Board will make the final determination of local rankings. This determination is considered final and no further appeals will be heard.