



## **ALAMEDA COUNTY CONTINUUM OF CARE 2019 CoC NOFA LOCAL COMPETITION REVIEW AND RANKING PROCESS**

### **OVERVIEW**

The federal Department of Housing and Urban Development (HUD) provides over \$2 billion a year in funding for homeless housing and services. This funding is distributed through Continuums of Care (CoCs) which are regional organizations that meet regularly to improve project performance and build community support for responding to homelessness.

Each year, HUD requires each CoC to review the performance of homelessness projects within that CoC's region, and to use their performance to rank those projects in order of their funding priority. Projects that are eligible for funding and that rank highest (known as Tier 1) will receive federal funding, while those at bottom of the list (Tier 2) may or may not receive funding, depending on 1) the size of the Congressional budget and 2) how the CoC as a whole performs relative to other CoCs in the national competition. Projects that are excluded from the list altogether will not receive federal funding.

### **A. ROLES OF THE HUD CoC AND NOFA COMMITTEES, THE APPEALS PANEL, AND EVERYONE HOME AS CONTINUUM OF CARE LEAD**

#### **1. HUD CoC Committee**

In the Oakland/Berkeley/Alameda County CoC, the HUD CoC Committee functions as the Continuum of Care (CoC) Board required by the Interim Rule to act on behalf of the membership to ensure CoC responsibilities are fulfilled, including preparing the application for Continuum of Care funds.

Under its Roles and Responsibilities, the HUD CoC Committee:

- Recommends guiding principles and strategic direction to the NOFA Committee based on HUD NOFA guidelines
- Designs, operates and follows a collaborative process for submitting the CoC NOFA application to HUD
- Delegates responsibilities to Committees and Workgroups as specified in Section XII.D and XII.E of the Alameda County Continuum of Care/EveryOne Home Governance Charter, including delegating to the NOFA Committee the role of evaluating projects' performance as an independent rating and ranking panel.

## **2. NOFA Committee**

The NOFA Committee conducts the annual HUD Competition's local rating and ranking process for projects seeking Continuum of Care funds, reviews applications submitted, and prepares ranked recommendations for funding. Specifically, the NOFA Committee:

- Integrates funding priorities and strategic direction from the HUD CoC Committee
- Develops local applications for existing and new projects
- Develops scoring criteria in compliance with the requirements of the annual NOFA
- Reviews and scores proposals
- Participates in the Rating and Ranking process and makes final recommendations of the Priority List of Projects (Rating and Ranking List)
- Beginning in 2019, the NOFA Committee's final Priority List of Projects recommendations must be approved by non-conflicted members of the HUD CoC Committee to be included in the CoC Consolidated application package.

## **3. Appeals Panel**

If an applicant contests its rating or ranking, it may appeal. The Appeals Panel, comprised of non-conflicted members seated for each NOFA round, reviews appeals made by CoC Project applicants to the local competition's Rating and Ranking list, as governed by the Alameda County HUD CoC Appeals Process established in 2017. Appeal Panel decisions are final.

## **4. Continuum of Care Lead**

In 2012, the Oakland/Berkeley/Alameda County CoC designated EveryOne Home to serve as Continuum of Care Lead (CoC Lead) and as the non-conflicted, third-party facilitator of the Local HUD Continuum of Care Program Competition. With a portion of the federal CoC planning grant, EveryOne Home conducts activities related to the annual Local HUD Continuum of Care Program Competition (NOFA), including providing analysis, scoring feedback, and other guidance on HUD priorities; supporting the development of the HUD CoC Committee strategic direction to the NOFA Committee; and scoring objective elements of the application and convening and providing support to the NOFA Committee and Appeals panel, among other duties.

All decisions regarding the Local HUD Continuum of Care Program Competition are subject to review and approval by the HUD CoC and NOFA Committees. In addition, EveryOne Home as a collective impact initiative, values community input and discussion and will create opportunities for grantees to provide feedback on changes to process and tools. There will also be an effort

to ensure any changes, including new requirements or policies in the Notice of Funding Availability (NOFA), are communicated to ensure a transparent process.

## **B. 2019 NOFA REVIEW AND RANKING PROCESS**

EveryOne Home staff will recruit NOFA Committee members and propose a NOFA Committee Roster for HUD CoC Committee's approval. NOFA Committee members will be unbiased and non-conflicted and composed from neutral organizations.<sup>1</sup> "Non-conflicted" and neutral organizations are those that are not currently applying for and/or receiving CoC funding distributed by the Alameda County CoC. They will sign a "no conflict of interest" and confidentiality forms.

EveryOne Home, as CoC Lead, will develop a proposed Review and Ranking process, and the HUD CoC and NOFA Committees will provide input to it and approve it.

### **1. Development and Release of the Local Competition**

- EveryOne Home staff will conduct annually a Projects' Performance Evaluation using APRs, HMIS and other comparable data sources, and relevant documentation to score objective criteria. Staff will notify providers the date that APRs will be pulled so that projects can clean-up data in advance. Data will be collected from the same period for all projects. In 2019, it will be released via email a week prior to the Bidder's Conference.
- The Local HUD Continuum of Care Program Competition (NOFA) will be launched after HUD releases the Notice of Funding Availability and a timeline will be developed by staff to adhere to mandated deadlines.
- Proposed scoring criteria will be shared with the community for feedback. The community will also have an opportunity to provide input on priorities for new funding if available.
- HUD CoC Committee will determine the strategic direction to provide to the NOFA community.
- The NOFA committee will provide final approval of all tools and criteria. The NOFA Committee will follow the HUD CoC's 2019 Public Participation Policy and include public comment on any discussions and approval of scoring criteria. Exceptions to this policy will include any review, rating and/or ranking of projects, discussions of projects' performance, and the Rating and Ranking session. Those will be deemed closed sessions under the Policy.

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<sup>1</sup> The HUD CoC Committee will further refine NOFA panel's qualifications in the process of reviewing and updating the EveryOne Home Governance Charter in September of 2019.

- EveryOne Home staff will then release an announcement of available funding for both new and renewal grantees. Funding announcements will be broadly distributed via email to the provider community and posted on EveryOne Home’s website.
- Applicants, both renewing and prospective, will be invited to attend a Bidder's Conference, receive application materials, and have adequate time to complete and submit their Local Application within HUD’s deadlines.
- EveryOne Home staff will offer a two-week Frequently Asked Questions (FAQ) period, which will be updated in writing each week, in consultation with the NOFA Committee. Agency specific questions will be responded directly. Questions that may impact several applicants will be responded to directly and will be published with FAQs.

## 2. Ranking Policy

- The HMIS and Coordinated Entry (CE) Projects will not receive scores. As critical infrastructure for the CoC, HMIS and CE projects will be placed automatically at the bottom of Tier 1.
- Projects renewing for the first time that do not have one year of data will be automatically placed at the bottom of Tier 1, immediately above the HMIS and Coordinated Entry projects. The relative ranking of these projects will be alphabetical. Given that the amount in Tier 1 is fixed, if the ranking results in a project straddling tiers, the NOFA Committee will make a strategic decision on whether the project will straddle or will be placed completely in Tier 2. They will determine this according to what is best for the overall package.
- Recently awarded projects that are not making enough progress toward becoming operational and/or no longer meet thresholds may be placed in Tier 2 or not be included in the package.

## 3. Reallocation Policy

The Reallocation Policy establishes that any grants that have a history of significant underspending will be candidates to have their grant amount reduced involuntarily by the NOFA Committee. Significant underspending will be defined as a minimum of 3 years of grant underspending of 10% or greater and provide a narrative that fails to adequately describe current efforts and results toward resolving underspending.

Any project subject to potential reallocation of funds under this definition will be informed before the Rating and Ranking session and invited for an interview with the NOFA Panel. In addition, projects facing involuntary reallocation of its renewal amount will be allowed to appeal and meet with the Appeals Panel.

## 4. Review and Scoring of Applications

- EveryOne Home staff will review Local Application packages and determine whether thresholds are met and calculate scores for all applicants for renewing and new projects

using objective scoring factors. The NOFA Committee will review and score all narratives at the time of the Rating and Ranking of projects.

- For new applications, EveryOne Home staff will train the NOFA Committee, as appropriate to review and score all subjective factors in new applications. The NOFA Committee will also review the Performance Evaluation scores from each renewal project along with any corresponding supplemental narratives for specific criteria. If required by the NOFA, the NOFA Committee will score any additional information. NOFA Committee members will finalize individual scores for each project prior to the Rating and Ranking session.
- For new applications, the NOFA Committee will review and approve applications for grantees seeking new funding in the Local Application. All new proposed projects will submit a New Projects Local Application package that will include: 1) a Project Coversheet; 2) a completed New Projects Local Application; and 3) Any materials and documentations required.
- Grantees must also complete an application in *e-snaps* by the date determined by the local process.
- At the Rating and Ranking session, scores will be tabulated, and Project Applications will be ranked and placed in either Tier 1 or Tier 2. To improve the competitiveness of the overall application, the NOFA Committee may reorder individual projects as determined by HUD CoC Committee's Strategic Direction, guiding principles and community needs, and will not be bound to the points awarded to applications. In addition, the NOFA Committee has the authority to decide on all straddling situations. Projects subject to potential reallocation of funds will be informed before this session and invited for an interview with the NOFA panel.
- The NOFA Committee will meet to consider and recommend the final CoC Rating and Ranking List. The NOFA Committee has discretion to recommend projects for involuntary reallocation and will make all decisions on reallocating funding from any project, in accordance with the Strategic Direction issued by the HUD CoC Committee. The NOFA committee may determine if any renewal project should receive a decrease of funding due to substandard performance in outcomes and/or utilization of funds.
- EveryOne Home staff will bring the NOFA Committee's final CoC Rating and Ranking List to the non-conflicted members of the HUD CoC Committee for review and approval.
- The HUD CoC Committee will approve the Consolidated Application prior submittal to HUD, minus the final Rating and Ranking List.

## **5. Communicating the Results of the Local Competition**

- Scoring results will be delivered to applicants via email, along with next steps and the Appeals Process.
- All applicants which are eligible for an appeal will have 2 business days to submit the Appeal. Appeals will be reviewed by non-conflicted members of the Appeals Panel, seated by the HUD CoC Committee. Applicants who submit an appeal may also request an interview with the Appeals Panel as part of the CoC's Appeals process.

- EveryOne Home staff will generate the final Rating and Ranking List as approved by the non-conflicted members of the of the HUD CoC Committee, to be posted on the EveryOne Home website and announced on the EveryOne Home mailing list and social media accounts.
- The Local Applications and Rating and Ranking list (Priority List of Projects) will be submitted to HUD along with the County-wide Consolidated Application by HUD’s NOFA deadline, and all project applicants will be invited to attend the NOFA debrief early the following calendar year.

### C. APPEALS PROCESS (2019 Update)

The NOFA Committee has developed a formal appeals process for the HUD CoC NOFA local competition in 2017 and amended and approved by the HUD CoC Committee on 7/16/2019. The Appeals Panel, which is seated by the HUD CoC Committee, consists of three non-conflicted individuals representing the EOH’s Leadership Board, the HUD CoC Committee, and the NOFA Committee.

#### Appeals are limited to the following:

- An application that was not evaluated according to the published local NOFA process AND/OR
  - i. Evaluated in a way that violates federal regulations AND
  - ii. The adjustment of scores has the possibility of changing in which Tier an Applicant project is ranked OR whether an Applicant project is included in the package at all. Note: this includes any Project that meets Appeals Criteria #1 and/or #2, and its initial Rating and Ranking score appears very close to the end of Tier 1 and can be moved down to Tier 2 as a result of scoring post appeals.
- A project that is facing an involuntary reduction of its renewal grant amount (i.e. renewal grant partially re-allocated to a new project).

#### 2) What is not eligible for appeal:

- a. Errors or omissions by project Applicants
- b. Projects that do not meet threshold criteria
- c. Dissatisfaction with Project’s scores
- d. Need for funds
- e. Appeals submitted after stated deadline

#### 3) Process:

- NOFA Committee will release the first Rating and Ranking List on 9/9, including dollar amounts and point scores.

- In the unlikely event of a mathematical error, Applicants must report the issue to EveryOne Home within 24 hours of release of the Rating and Ranking List for the error to be corrected. The Rating and Ranking List and scores will be reissued with the appropriate corrections at the time of the release of the final Rating and Ranking List.
- Applicant projects have from 9/11 through the close of business day (CBD) on 9/12 (2 business days), to register any appeals via email. Appeals and any supporting documentation should be emailed to [info@everyonehome.org](mailto:info@everyonehome.org). Appealing projects will be limited to the grounds raised in the original appeal, and only on items/attachments that were included in the initial project's Application. Appellants may also request along with the appeal to schedule a 30-minute meeting with the Appeals Panel at the time of the Panel's deliberations.
- All appeal requests will be confirmed via email within one (1) business day of submission. All appeals submitted before the deadline will be posted to the EveryOne Home website within 24 working hours of the deadline. All Applicant projects who wish to submit appeals will be subject to this deadline. There will not be a second round of appeals.
- Agencies will need to provide, in writing and with supporting examples/backup documentation, specific sections of the Application on which the appeal is based, and/or sections or examples where local guidelines or regulations were violated.
- The appeal's request must specify facts and evidence sufficient for the Appeals Panel to determine the validity of the appeal (see above Appeals are limited to the following, Page 4)
- Appealing projects will be limited to the grounds raised in the original appeal, and only on items/attachments that were included in the initial project's Application.
- The Panel will review all submitted appeals and back up documentation and will meet in person on 9/13 to discuss, make final recommendations and provide responses to each appeal. The Panel will allocate time for 30-minute meetings with appellants requesting to meet with the Panel, in person or over the phone.
- The HUD NOFA Committee will complete its recommendations on the final Rating and Ranking List on 9/14, including results of any appeal.
- The final Ranking and Ranking List will be presented for review and approval to the HUD CoC Committee's non-conflicted members on 9/14.
- A final Rating and Ranking List reflective of any changes generated by appealing projects will be issued by EveryOne Home staff and published on the EveryOne Home website on 9/15.
- The HUD CoC Committee will approve the Consolidated Application prior submittal to HUD, minus the final Rating and Ranking List.