

FY2020 NY-508 HUD CoC Funding Guide

This guide was approved by the CoC board on March 16.

The U.S. Department of Housing and Urban Development (HUD)'s Continuum of Care(CoC) program is a nationwide competition for homeless funding. The competition is usually a two-step process. First, a local application has to be submitted in response to the Request For Proposal (RFP) released by the Homeless Alliance of Western New York (HAWNY), the CoC collaborative applicant. Projects that make the selection list will advance to the federal application process. Applicants are responsible for the preparation of both the local application and the eventual HUD electronic submission through Esnap of their project application if the project is approved locally for funding.

Guiding Principles on Project Review and Ranking

- Priority will be given to programs that are most successful in ending homelessness and have a positive impact upon overall CoC system performance.
- The goal is to direct new resources toward existing known service gaps including geographic gaps.
- The goal is to provide an incentive to all funded providers to monitor and improve their performance in order to ensure continued funding with CoC resources.
- The Project Selection Committee will attempt to maximize funding available to end homelessness in the CoC.
- New Projects will compete with renewal projects for ranking in both Tier 1 & 2.
- All renewal projects will be ranked based on Renewal Scoring Standards found on page 3 during the local application process.
- Lower performing projects or projects that don't meet the thresholds will be required to meet with the Project Selection Committee to determine if the project should be reallocated.

Reallocation Process

Reallocation means to partially reduce or entirely eliminate a project and utilize the funds for one or more new projects. Funds are reallocated to new projects whenever reallocation would improve outcomes, result in more efficient use of resources and/or reduce homelessness. The CoC Board establishes the project scoring standards to comprehensively review project quality, performance and cost effectiveness annually. The standards are disseminated widely via email and posted to the web. The scoring standards for renewal projects use objective, performance based scoring criteria and selection priorities that are approved by the CoC Board to determine the extent to which each project is improving CoC System Performance, successfully helping homeless people to quickly obtain and retain housing without unnecessary barriers, and to increase their income.

Reallocation can occur under the following circumstances:

1. A currently funded project declines to renew their project.
2. A currently funded project adjusts their budget to a lower amount.
3. A currently funded project voluntarily reallocates funding to do a new project that aligns better with HUD priorities and project design best practices.
4. The Project Selection Committee can make decisions on a partial or full funding cut on currently funded projects when a project has underperformed. Underperformed is defined as any of the following:
 - continually has a substantial amount of unspent funds;
 - has an unreasonable budget line item;
 - has performed poorly as it relates to local and federal performance outcomes;
 - has a low utilization rate;
 - has not utilized coordinated entry;
 - has not served the proposed target population;
 - has a program design/model that no longer lines up with HUD goals;
 - misuse of federal funds and not following federal regulations with no plans to come into compliance are grounds for immediate defunding;
 - has program design that has a negative impact on system performance and /or overall CoC score.
 - Has a higher cost per client/ cost per successfully housed client compared to a similar program.

The CoC Project Selection Committee will try to make reallocation decisions prior to the release of the NOFA/release of local RFP if possible. The Project Selection Committee will meet to determine which renewal projects may be reallocated in part or full, based on the circumstances above. Projects will then have 5 days after the receiving notification of the recommended reallocation to appeal. The appeal process can be found on page 6 of this guide.

The CoC offers providers education & technical assistance regarding reallocation:

- HUD priorities and best practice models for different populations are discussed at every monthly membership meeting.

- Performance reports are released quarterly to the public
- Low performing providers are scheduled to meet with HAWNY staff to discuss an improvement plan.

Renewal Scoring Standards:

Renewal projects will receive their performance information to be used for scoring at least 30 days prior to the selection committee meeting. Providers will have at least two weeks to review and correct their performance data. HAWNY staff will provide technical assistance if needed. The performance data will be final on a notified date. It is the provider's responsibility to ensure their performance data is accurate. Project Selection Committee will not accept low performing due to data inaccuracy.

Renewing housing application **must** meet the following **thresholds**:

- Use Coordinated Entry.
- Use a Housing First approach and low barriers to admission and retention in the program.
- All PSH programs must be Dedicated or Dedicated Plus.

Scoring is as follows:

Project Type	Rating Factor	Data Source	Measure	Total Points
Annual Performance (70 Points)				
1. Occupancy				
RRH+TH	Percent of beds/units filled by households each night during the reporting period	Local HMIS data (entry/exit dates, average cost, contracted beds)	>= 95% = 15 90-94% = 10 85-89% = 5	15
PSH+SH	Percent of beds/units filled by clients each night during the reporting period	Local HMIS data (entry/exit dates, provider's bed/unit count)	>= 90% = 15 85-89% = 10 80-84% = 5	
2. Exit to Permanent Housing				
RRH+TH	Percent of clients who move to permanent housing	APR Q23a & Q23b divided by the total number of exits	>= 90% = 15 85-89% = 10 80-84% = 5	15
PSH+SH	Percent of clients who remain in or move to permanent housing	Calculation: 1) Refer to Q5a to find the number of stayers 2) Refer to Q23a & Q23b and add together the total number of clients who exit to Permanent Destinations and 3) Add stayers (Step 1) and leavers to permanent housing destinations (Step 2) and divide by number of participants (Q7) minus the number of excluded leavers in Q23a & Q23b	>= 95% = 15 90-94% = 10 85-89% = 5	
3. Quickly Housing Clients				
RRH+TH	Average time to housing based on time between program entry date and move-in date	Local HMIS data (entry date and move-in date)	<= 30 days = 15 31-45 days = 10	15
PSH+SH	Average time to housing based on time between program entry date and move-in date (includes all clients who entered after 10/1/17)	Local HMIS data (entry date and move-in date)	<= 45 days = 15 46-60 days = 10 61-90 days = 5	
4. Returns to Homelessness				
RRH+TH	Percent of clients who return to homelessness within 6 months after exiting to permanent housing	ART Report - 0701 - Exits to Permanent Housing with Return to Homelessness Only considers clients who return to homelessness during the reporting period if the new entry is within	0-5% = 15 5-10% = 8	15

		six months of the original exit date		
PSH+SH	Percent of clients who return to homelessness within 6 months after exiting to permanent housing	ART Report - 0701 - Exits to Permanent Housing with Return to Homelessness Only considers clients who return to homelessness during the reporting period if the new entry is within six months of the original exit date	0-10% = 15 10-20% = 10 20-35% = 5	
5. Adults who Maintained/Increased Earned Income				
RRH+TH and PSH+SH	Percent of Adults who Maintained/Increased Earned Income	APR Q19a3 – Add “Number of Adults with Earned Income” for “Retained Income Category But Had Less \$...”, “Retained Income Category and Same \$...”, “Retained Income Category and Increased \$...”, and “Did Not Have the Income Category at Start and Gained the Income Category...” and divide by “Total Adults (including those with No Income) + # Adults w/o Required Annual Assessment (Q18)” *APR only considers adults who have exited or have had an annual assessment. Data entered in a general interim “update” is not considered.	Ranked Top 20% Among Peers = 5 Ranked Top 50% Among Peers = 3	5
6. Adults who Maintained/Increased Any Income				
RRH+TH and PSH+SH	Percent of Adults who Maintained/Increased Any Income	APR Q19a3 – Add “Number of Adults with Any Income” for “Retained Income Category But Had Less \$...”, “Retained Income Category and Same \$...”, “Retained Income Category and Increased \$...”, and “Did Not Have the Income Category at Start and Gained the Income Category...” and divide by “Total Adults (including those with No Income) + # Adults w/o Required Annual Assessment (Q18)” *APR only considers adults who have exited or have had an annual assessment. Data entered in a general interim “update” is not considered.	Ranked Top 20% Among Peers = 5 Ranked Top 50% Among Peers = 3	5
SOAR (5 Points)				
All Projects	Have a SOAR trained staff			5
Project Compliance-ALL Projects (20 Points)				
All Projects	Combined Data Quality	CoC APR Q.6a-e		13
All Projects	HMIS Staffing	Project had less than 50% HMIS user turnover in past year		2
			TOTAL	90
Bonus			Maximum:15	
PSH				
PSH+SH	Percent of clients who exit to PH (positive turnover rate)	APR Q23a & Q23b	Top 20%	5
PSH+SH	Percent of clients with 2+ disabilities	APR Q13b2 & Q13c2	>= 80%	10
RRH Singles				
RRH+TH	Percent of clients with 1+ disabilities	APR Q13b2 & Q13c2	>= 50%	10
RRH+TH	Average VI-F/VI/TAY score for all clients served	Local HMIS data (VI score, entry/exit date, head of household)	Top 25%	5
RRH Families				
RRH+TH	Percent of clients with 1+ disabilities	APR Q13b2 & Q13c2	>= 50%	4
RRH+TH	Average VI-F/VI/TAY score for all clients served	Local HMIS data (VI score, entry/exit date, head of household)	Top 25%	7
RRH+TH	Percent of households with 5+ members	Local HMIS data (household ID, entry/exit date)	Top 20%	4

Note: “New renewal” is defined as a Rapid Rehousing project operating over 1 year, but less than 2 years, and a Permanent Supportive Housing project operating over 1 year, but less than 3 years.

Programs that have been operating for less than 1 year will not be scored based on the measures above.

There are no VAWA funded DV programs in this year’s renewal applications, therefore no separate evaluating process is set up using comparable data. CoC funded DV RRH’s performance align with other non-DV RRH and so there are no separate outcome measures were used.

All projects that are lower performing, but due to population or region considerations giving chance for improvement will be put on probation period for a year. Projects that are on probation will be required to meet with the Homeless Alliance of WNY/Project Selection Committee quarterly.

New Project Scoring Standards:

New Projects that do not meet threshold criteria or submit after the deadline stated in the local Request for Proposal (RFP) will not be reviewed or scored.

Threshold Criteria	
Commitment to prioritize clients using CoC Coordinated Entry system (Q5)	
Using a Housing First Approach and low barriers (Q3)	
Matching funds equal or over 25% of the total request (Budget sheet)	
No more than 7% of the program expense budget can be for the administrative cost	
For PSH, a project must dedicate 100% of units to chronically homeless clients or Dedicated Plus and use the Order of Prioritization established in CoC Written Standard and Coordinated Entry Policy and Procedure. ¹	
For RRH, project must meet category 1 or 4 in the homeless definition ² .	
Must use HMIS. For DV, must use a comparable database. (Question 6 on DV application)	
New project scoring (Non-DV)	
Clearly demonstrate the unmet need for the proposed population using local data (Q2)	15
Program design is suitable for proposed population (Q1)	10
Project proposed outcomes align with CoC system and project outcome(Q1)	10
Experience with proposed homeless population and previous performance (Q3)	15
Experience with grant management (Q4)	10
Accessing mainstream benefits (Q3)	10
Cost are reasonable and activities are eligible (Budget sheet)	10
Leverage meeting 150% (Budget sheet)	5
No findings in audited financial statement (attached financial statement)	5

¹ <http://wnyhomeless.org/continuum-of-care/coc-documents/>

² [https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.p
df](https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf)

Is housing vs services cost reasonable?	10
Total Points	100
Bonus(will be given to max. 4 projects scored the highest within its proposed population and meeting the community needs)	20

New project scoring (DV)	
Clearly demonstrate the unmet need for the proposed population using local data (Q2)	15
Program design and services proposed are suitable for DV population (Q1)	10
Project proposed outcomes align with DV specific outcomes(Q1)	10
Experience with serving survivors of domestic violence and previous project outcomes (Q3)	15
Experience with grant management (Q4)	10
Accessing mainstream benefits (Q3)	10
Cost are reasonable and activities are eligible (Budget sheet)	10
Leverage meeting 150% (Budget sheet)	5
No findings in audited financial statement (attached financial statement)	5
Is housing vs services cost reasonable?	10
Total Points	100
Bonus(will be given to max. 4 projects scored the highest within its proposed population and meeting the community needs)	20

Ranking Policy:

Tier 1:

- 1: Renewal Permanent Supportive Housing (PSH), Transitional Housing, and RRH based on Project Score. (Depends on the amount of funding available in Tier 1, the lower scoring programs may be ranked in Tier 2 or reallocated)
- 2: PSH that have operated for less than 1 year.
- 3: New project (based on project quality and community need)
- 4: HMIS & Coordinated Entry

Projects may be in Tier 1 or straddle between Tier 1 and Tier 2)

Tier 2:

- 1: Remaining PSH, RRH based on performance score.
- 2: Remaining new projects based on Project Score

Funding Security for Regions

CoC agrees to attempt to maintain the level of funds that are available to newly merged areas: Niagara and GOW(Genesee, Orleans and Wyoming),and seek opportunities to expand its funding if the programs perform well or through new applications. Renewal projects are still held the same standards in terms of performance.

Appeals

An applicant organization that has been denied funding or awarded funds in an amount that is less than applied for or requested under the local application process may submit an appeal to the CoC Project Selection Committee under any of the following conditions:

- a. If they were denied the right to reasonably participate in the local application process;
- b. If the Project Selection Committee overlooked information in the application that would have caused the application to meet thresholds or be successfully scored. No additional application information may be submitted after the deadline stated in local RFP;
- c. A decision made by the CoC Project Selection committee regarding the ranking, rejection or funding of their project was unsubstantiated by the project performance standards.

If the applicant can prove it meets one of these criteria, the applicant organization may file an appeal to be reconsidered for inclusion in either the local competition or federal competition. It is the responsibility of the Applicant to address each area(s) identified as a factor(s) of the funding decision in a manner that could result in a more favorable decision. **An appeal shall not be used as a negotiation tool to extend a poor performing program with the promise to better in the future.**

A written appeal request must be submitted to HAWNY within **five business days** of the notice of the decision with detailed reasons, for appeal, in accordance with the criteria above (a,b, or c). The Project Selection Committee will then respond to the appeal by providing either a written letter respond or schedule a hearing with the applicant within ten business days. The decision made by the Project Selection Committee will be final.