

FY2022 NY-508 HUD CoC Funding Guide

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 e-snaps 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 create 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 achieve the goal of ending homelessness and provide excellent services.
- The Project Selection Committee will attempt to maximize funding available to end homelessness in the CoC, including reallocating lower performing projects.
- All projects that are approved in the local process will be ranked based on criteria that are set in this document.
- Use equity lense in the review process, including people with lived experience, especially those who are Black, Indigenous, and people of color (BIPOC) in the Project Selection Committee.

Reallocation Process

Reallocation means partially reducing or eliminating a project and utilizing the funds for one or more new projects. Funds are reallocated to new projects whenever reallocation would improve outcomes, resulting 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 on the web. The scoring standards for renewal projects use objective, performance-based scoring criteria and selection priorities that the CoC Board approves. The scoring standards determine how each project is improving CoC System Performance and successfully helping homeless people to quickly obtain and retain housing without unnecessary barriers.

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.
 - is not drawing funds from eloccs at least quarterly
 - 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.

*COVID-19 reasons for underperforming will be taken into consideration

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 in the Appeals section in 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 during the renewal application period. Providers will then 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 the date the renewal application is due. It is the provider's responsibility to ensure their performance data is accurate. The Project Selection Committee will not accept low performance due to data inaccuracy.

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

- Use Coordinated Entry.
- Use a Housing First approach and low barriers to admission and retention in the program.

Renewal Scoring Sheet (Total Score 120 points)

Project Type	Rating Factor	Data Source	Measure	Total Points
Annual Performance (75 Points)				
1. Occupancy				
RRH or Joint RRH-TH	Percent of beds/units filled by households each night during the reporting period	Local HMIS data/Comparable database (entry/exit dates, application capacity info)	>= 95% = 15 90-94% = 10 85-89% = 5	15
PSH	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 or Joint RRH-TH	Percent of clients who move to permanent housing	APR Q23c - divide the number of exits to permanent destinations by the total number of exits	>= 90% = 15 85-89% = 10 80-84% = 5	15
PSH	Percent of clients who remain in or move to permanent housing	Calculation: 1) Refer to Q5a for the number of stayers 2) Refer to Q23c for the 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 Q23c	>= 95% = 15 90-94% = 10 85-89% = 5	
3. Quickly Housing Clients				
RRH or Joint RRH-TH	Average time to housing based on time between program entry date and move-in date	APR 22c - Average length of time to housing	<= 30 days = 15 31-45 days = 10	15
PSH	Average time to housing based on time between program entry date and move-in date (includes all clients who entered after 10/1/17)	APR 22c - Average length of time to housing	<= 45 days = 15 46-60 days = 10 61-90 days = 5	
4. Returns to Homelessness				
RRH or Joint RRH-TH (non DV providers)	Percent of clients who return to homelessness within 6 months after exiting to permanent housing	Local HMIS Data Only considers clients who return to homelessness during the reporting period if the new entry is within six months of the original exit date	0-5% = 15 5-10% = 8	15
PSH (non DV providers)	Percent of clients who return to homelessness within 6 months after	Local HMIS Data Only considers clients who return to homelessness during the reporting period if the new entry is within	0-10% = 15 10-20% = 10	

	exiting to permanent housing	six months of the original exit date	20-35% = 5	
5. Domestic Violence Providers only				
DV TH-RRH providers	Reduce the length of stay in transitional housing by 5%	Compare DV data length of stay from previous year to current year	5%=10	15
DV provider	Percentage of clients who have a safety plan	Report provided by DV provider	100% = 5	
6. Adults who maintained/increased earned income				
RRH or Joint RRH-TH and PSH	Percent of Adults who Maintained/Increased Earned Income	APR Q19a1 + Q19a2 – 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...” for both Q19a1 + Q19a2 and divide by “Total Adults (including those with No Income) for both Q19a1 + Q19a2 + # 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.	PSH 10-19%=3 >=20%=5 RRH 15%-29%=3 >=30%=5	5
7. Adults who Maintained/Increased Any Income				
RRH or Joint RRH-TH and PSH	Percent of Adults who Maintained/Increased Any Income	APR Q19a1 + Q19a2 – 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...” for both Q19a1 + Q19a2 and divide by “Total Adults (including those with No Income) for both Q19a1 + Q19a2 + # 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.	PSH 60%-79%=5 >=80%=10 RRH 30-49%=5 >=50%=10	10
SOAR (5 Points)				
All Projects	Have a SOAR trained staff			5
HMIS data quality (15 Points)				
All Projects	Personally Identifiable Information	CoC APR Q 6a	< 5% =2 5-10% = 1	2
All Projects	Universal Data Elements	CoC APR Q 6b	<5%=2 5-10%=1	2
All Projects	Destination	CoC APR Q 6c	<5% =2	2
All Projects	Income	CoC APR Q 6c	<5% =2	2
All Projects	Timeliness	CoC APR Q.6e. Largest % of data falls the following day range.	%>0-3 days=5 %>4-6 days =3 %>7+ day=0	5
All Projects	HMIS user turnover	HAWNY Staff User Reports	>66%	2
Narrative responses (10 points)				
All projects	Engaging with People with Lived expertise & Racial Equity	Written Response		5
All Projects	COVID Response	Written Response		5
TOTAL				105
Bonus (15 points)				
PSH				

PSH	Percent of clients who exit to PH (positive turnover rate)	APR Q23c - exits to permanent destination divided by all clients	>10%	8
PSH	Percent of clients with 2+ disabilities	APR Q13b2 & Q13c2	>= 80%	5
PSH	Percent of persons that enter with zero income	APR Q16 clients with no income at entry divided by total number of persons served	>40%	2
RRH Singles				
RRH or Joint RRH-TH	Percent of clients with 1+ disabilities	APR Q13b2 & Q13c2	>= 50%	5
RRH or Joint RRH-TH (non DV providers)	Average VI-F/VI/TAY score for all clients served	Local HMIS data/by name list data for DV clients (VI score, entry/exit date, head of household)	Avg. 8 or more	5
RRH or Joint RRH-TH	Percent of persons that enter with zero income	APR Q16 clients with no income at entry divided by total number of persons served	>40%	5
DV providers only	Participates in Coordinated Entry Procedure	Coordinated Entry Lead verification		5
RRH Families				
RRH or Joint RRH-TH	Percent of clients with 1+ disabilities	APR Q13b2 & Q13c2	>= 50%	3
RRH or Joint RRH-TH (non-DV providers)	Average VI-F/VI/TAY score for all clients served	Local HMIS data/by name list data for DV clients (VI score, entry/exit date, head of household)	Avg. 8 or more	5
RRH or Joint RRH-TH	Percent of households with 5+ members	Local HMIS data/comparable database data (household ID, entry/exit date)	10%+	2
RRH or Joint RRH-TH	Percent of persons that enter with Zero income	APR Q16 clients with no income at entry divided by total number of persons served	>40%	5
DV providers only	Participates in Coordinated Entry Procedure	Coordinated Entry Lead verification		5

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

All projects that are lower-performing but given chances for improvement due to population or region considerations will be put on probation for a year. Projects 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 only take referrals from CoC Coordinated Entry
Using a Housing First and low barrier approach
Matching funds equal or over 25% of the total request

No more than 10% of the program expense budget can be for the administrative cost	
For RRH, project must meet category 1 or 4 in the homeless definition ¹	
Must use HMIS. For Victim Service Providers, must use a comparable database.	
New project scoring	
Clearly demonstrate the unmet need for the proposed population using local data	5
Demonstrate program design meets the needs of the targeted population	5
Project proposed outcomes align with CoC system and project outcome	5
Provide sufficient supports to ensure clients obtain and remain in housing	10
Assist participants to obtain mainstream benefits(Health, social, employment, childcare)	10
Experience with proposed homeless population and previous performance	15
Experience with grant management	10
Cost are reasonable and feasible	5
No findings in audited financial statement	5
Racial Equity	10
Leveraging Housing Resources	10
Leveraging Healthcare Resources	10
bonus:Community Need/Priority	10
Total Points	100+10 bonus

¹[https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.p
df](https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf)

Ranking Policy:

Tier 1:

- 1: Renewal Permanent Supportive Housing (PSH), Joint Transitional Housing-Rapid rehousing, 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: PH that has operated for less than 1 year
- 3: HMIS
- 4: Coordinated Entry
- 5: New project created through reallocation process
(Projects may be in Tier 1 or straddle between Tier 1 and Tier 2)

Tier 2:

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

YHDP renewal projects and the CoC Planning Project are not being ranked with the rest of the project.

To ensure the YHDP programs are operating as intended, and effectively, a review of the program will be completed in May 2023. At such time determination of continuance of funding will be made.

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 to 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 to respond or schedule a hearing with the applicant within ten business days. The decision made by the Project Selection Committee will be final.