



CoC Program NOFA Evaluation and Ranking Policy

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About this Policy

The goal of the Continuum of Care's Rank and Review Policy is to ensure that all project applications are evaluated and ranked based on the degree to which they improve the CoC's ability to respond to homelessness within the geographic region covered by the Continuum of Care.

Process

Each year, once the HUD Continuum of Care Program Notice of Funding Availability (NOFA) is released, an informational memo with funding amounts, a schedule of deadlines and meeting dates and application materials will be sent to all CoC members. Members will be advised of opportunities to apply for new projects and renewal projects. Project Application templates will be sent to all potential grant applicants and Project Evaluation templates are sent to those with existing projects.

After the NOFA is released, an Application Workshop will be held where instructions on completing the Project Application in e-snaps are explained. Attendees will also receive information on other requirements of the CoC's Rank and Review process during this meeting.

Deadlines

Project Applications and Project Evaluations will be submitted to the CoC no later than 30 days before HUD's Program Competition application deadline.

Applicants who submitted their Project Applications or Project Evaluations to the CoC by this deadline will be notified in writing whether their new projects or renewals will be accepted and ranked, rejected, or reduced. This notification will be in writing and must be sent within 15 days of the Program Competition application deadline. Where a new project or renewal is being rejected or reduced, the CoC will indicate the reason(s) for the rejection or reduction.

The CoC will post on the Kane County web site, at least two days before the application submission deadline, all parts of the CoC Consolidated Application, including the CoC Application attachments and the Priority Listing, and will notify community members and key stakeholders that the Consolidated Application is available.

Reviewers

The CoC Board of Directors will review and score all new applications and renewals. Board members will be provided with a copy of each Project Application and Project Evaluation, along with evaluation forms from the CoC Lead Agency and HMIS Administrator. Using only the information in these documents, board members will score each new application and renewal. These scores will be compiled by the CoC Lead Agency and will be used to inform the project ranking process.

Data Sources

Rating and Ranking evaluators will use multiple sources of data to inform their deliberations. Important information related to a grantee's project performance, compliance and fiscal history will be collected through the following Evaluation Forms.

Annual Performance Report (APR)

The HMIS Administrator will generate an APR for each project for which an Applicant is seeking a renewal. These APRs will cover the prior federal fiscal year (Oct 1 through Sep 30).

Applicant Questionnaire

Applicants will complete this questionnaire for each new and renewal CoC Program application. The Applicant Questionnaire will allow Applicants to specifically address each Rank and Review Process threshold, design and performance criterion.

Compliance Information Form

The CoC Lead Agency will complete a Compliance Information Form for each new and renewal CoC Program application, based on program audits and site visits conducted during the prior year, CoC meeting attendance records and other information collected by the CoC Lead Agency that can be used to document the Applicant organization's and project's performance, and the project's design.

Evaluation Data Form

The HMIS Administrator will complete an Evaluation Data Form for each CoC Program renewal application, based on the related project's HMIS data for the prior federal fiscal year.

Applicant Review

Each project applicant will receive a copy of the Evaluation Data forms completed by the CoC Lead Agency and HMIS Administrator in order to review the results and add comments. This will provide each Applicant with an opportunity to create a narrative explanation to accompany the performance data, fiscal information and monitoring results being submitted to rankers for review. As more context is added to evaluation data, rankers will be more able to appropriately rate each application and prioritize it for inclusion in the CoC submission.

Appeals

Applicants will be able to appeal results of the Rank and Review process in accordance with provisions detailed in Articles IV and VII of the Bylaws of the Continuum of Care for Kane County.

Continuous Improvement

Each year, following the annual Continuum of Care Program Competition debriefing conducted by HUD, the CoC Lead Agency will review CoC Program NOFA Evaluation and Review Policy and, if appropriate, will propose to the CoC Board changes to the Policy designed to address emerging local needs and to make the CoC more competitive in the upcoming CoC Program Competition.

Scoring

Applications will be scored relative to other projects of the same type. Performance based scoring will be tied to seven key areas; unit utilization, changes in income/employment/non-cash benefits/health insurance, length of time in program, data quality, fiscal performance, cost effectiveness and adherence to housing first principles.

Using the rating information, the CoC will prioritize projects for funding based on objective, performance based scoring criteria and will assess the impact of individual projects on system-wide effectiveness.

The relative weight of each criterion will be determined prior to each year's Application deadline, based on HUD's debriefing of the previous year's Continuum of Care Program Competition, information in the NOFA and related HUD guidance. The CoC Board will approve any changes in scoring criteria and/or weighting.

Threshold Criteria

The following criteria will help to determine whether the Applicant's project meets the CoC's and HUD's minimum standards for funding. Applications will be evaluated for threshold requirements on a two point scale (Meets Threshold, Does not Meet Threshold). Applications that do not meet all threshold requirements will be rejected.

Outstanding Audit Findings

Successful applicants will not have any outstanding HUD, state and local government monitoring and/or audit findings. *Data Sources: Applicant Questionnaire, Compliance Information Form*

CoC Participation

Successful applicants will be members in good standing of the Continuum of Care. *Data Source: Compliance Information Form*

CoC Interim Rule (24 CFR part 578) Compliance

Successful applicants will be in full compliance with all applicable requirements of the CoC Interim Rule, including participation in (or willingness to participate in) the Coordinated Entry System. *Data Sources: Applicant Questionnaire, Compliance Information Form, Evaluation Data Form*

HMIS Participation

Applicants will participate fully in (or make a commitment to fully participate in) the Kane County HMIS. A completed and fully executed HMIS Memorandum of Understanding will be included with each new and renewal Project Application. Applications from organizations with outstanding HMIS compliance issues will not be considered for funding. *Data Sources: Compliance Information Form, Evaluation Data Form*

Design Criteria

The CoC will give preference to projects that address its design priorities. New Applications and Renewals will be evaluated on a four point scale (Excellent, Good, Fair, Poor) based on how well they address each Design criterion below.

Special Populations Served

Preference will be given to projects that serve people who are:

- Chronically Homeless
- Members of households with Children
- LGBT Individuals
- Veterans
- Victims of Domestic Violence
- Youth

Data Sources: Applicant Questionnaire, Compliance Information Form, Evaluation Data Form

Severity of Needs

Preference will be given to projects that serve people who have:

- Low or No Income
- Current or Past Substance Abuse
- History of Victimization
- Criminal Histories
- Chronic Homelessness

Data Sources: Applicant Questionnaire, Compliance Information Form, Evaluation Data Form

Housing First and Reducing Barriers

Applicants will be penalized if they screen out program participants for any of the following reasons:

- Having too little or no income
- Active or history of substance abuse
- Having a criminal record (with exceptions for state-mandated restrictions)
- Having an eviction record
- Having a history of domestic violence

Data Sources: Applicant Questionnaire, Compliance Information Form

Applicants will be penalized if they terminate program participants for any of the following reasons:

- Failure to participate in supportive services
- Failure to make progress on a service plan
- Loss of income or failure to improve income
- Being a victim of domestic violence
- Any other activity not covered in a lease agreement

Data Sources: Compliance Information Form

Local Priorities

Preference will be given to projects that primarily serve one or more of the following populations:

- Chronically homeless
- Families with children
- Veterans

Data Sources: Applicant Questionnaire, Evaluation Data Form

Performance Criteria

The CoC will give preference to high performing projects. New Applications and Renewals will be evaluated on a four point scale (Excellent, Good, Fair, Poor) based on how well they address each performance criterion below.

Cost

Applicants will demonstrate the cost effectiveness of their projects through the following metrics:

- Unit Cost
- Cost per Successful Exit

Data Sources: Applicant Questionnaire, Evaluation Data Form

Efficacy

Applicants will demonstrate the effectiveness of their projects through the following metrics:

- Administrative (average monthly expenditures, recaptured funds)
- Exits to Permanent Housing
- Unit Utilization Rate
- Jobs and Income Growth
- Returns to Homelessness within 6 months

Data Sources: Applicant Questionnaire, Evaluation Data Form

Data

Applicants will be expected to meet or exceed the following Data Quality Standards as detailed in the CoC's HMIS Policies and Procedures:

- Accuracy
- Completeness
- Timeliness

Data Source: Evaluation Data Form

Ranking and Tiering

The Kane County CoC is committed to sustaining a transparent, coordinated, inclusive, and outcome-oriented community process for the objective review, ranking, and prioritization of CoC Program project applications. All project applications will be evaluated and ranked based on performance history, the degree to which they improve the Continuum's ability to be responsive to individuals experiencing a housing crisis and contribute to the goal of reducing homelessness in Kane County.

The CoC Lead Agency and Board of Directors will follow HUD regulations and guidance regarding project ranking and tier placement.

Reallocation

The CoC will actively encourage new and existing providers to apply for new projects through reallocation, as provided for in the Reallocation Policy approved by the CoC Board of Directors.

From the Continuum of Care for Kane County – Bylaws dated 08-16-2017

Article IV: Organizational Structure

Appeals Committee: The role of the Appeals Committee is to resolve any decisions made by the Continuum or any of its committees following a written request for an appeal. The Appeals Committee consists of three Organizational Members elected by General Members annually that are not Members of the COC Board and hold one year terms.

Article VIII: Appeals Procedure

Any Member of the Continuum or prospective Member in the case of denial of an application for Membership, who has a grievance over any decisions, actions, or procedures of the Continuum or any of its committees, shall be entitled to file an appeal before the Appeals Committee in writing. The appellant presenting his/her grievance shall be given a designated time to state the basis of the appeal. Any person of the appellant's choosing may be present at the appeal hearing. After the appellant has been heard, the Appeals Committee shall move into executive session to confer and decide its ruling on the appeal by majority vote. The decision of the Appeals Committee will be submitted to the COC Board for review and reconsideration. A vote will be taken jointly by members of the COC Board and the Appeals Committee at a separate meeting. A final decision will be made based on a majority vote. The appellant shall be given a written statement of the final decision and reasons therefore within sixty (60) days of receipt of the appeal. The decision shall be considered final.

IL 517 Aurora/Elgin/Kane CoC Reallocation Policy
Adopted by Membership 7-20-2016
Approved by CoC Board 8-3-2016
Re-Adopted by CoC Board 7-26-2017

Aurora/Elgin/Kane CoC is striving to develop a reallocation process that will ensure that projects submitted in the CoC Consolidated Application best align with HUD CoC funding mechanisms priorities and contribute to a competitive application that collaboratively secures these dollars to improve our community. The Aurora/Elgin/Kane CoC seeks to make data-driven decisions based on information gathered from project's financial records and other HUD-recommended data tools.

HUD has stated that CoCs should manage the performance of all projects in the community and reallocate resources whenever doing so will better help them end homelessness. Taking this regulation into account the Aurora/Elgin/Kane has developed a Reallocation Policy that allows for both Voluntary and Involuntary reallocation of funds from renewal projects for the creation of new projects that fit the goals set forward by HUD and will assist in serving the homeless population it serves.

The reallocation process will be communicated throughout the entire CoC area via email and website posting and will encourage both new and existing providers to apply for new projects through reallocation. Reallocation shall have the intent to achieve one or more of the following objectives:

1. To meet housing needs for persons as identified in the Coordinated Entry process.
2. To align with HUD's policy priorities.

Voluntary Reallocation

Currently-funded CoC program project applicants interested in voluntarily reallocating should notify Aurora/Elgin/Kane CoC in writing of their intent to reallocate funds. The previous competition Awards list will serve as Aurora/Elgin/Kane's tool to identify Project Applicants' intent to reapply for CoC funding. The deadline for voluntary reallocation is 30 days after both the Tier One and Tier Two awards are announced from the previous competition. This Reallocation Policy and Procedure incorporates the following general objectives:

1. To ensure the CoC's responsibility in submitting to HUD an application that is consistent with HUD guidelines and the HEARTH ACT;
2. To ensure the amount to be reallocated is sufficient to fund new project(s);

Involuntary Reallocation

The CoC Board, after a thorough review of a project's cost, performance, and outcome data will consider involuntary reallocation of a renewal project where HUD contractual goals are not met, both in numbers served and financial expenditures.

The Needs Assessment Committee will review each grant recipient's expenditures on a quarterly basis. Should a review present concerns, the grant recipient will be notified by email, letter or phone call by a

member of the committee. This communication will attempt to assist the recipient in developing a plan for correction. If the recipient cannot correct insufficient expenditures or outcomes by the time of the Project Ranking they will be put on notice that their project will be ranked lower in the application process and may be subject to reallocation.

Re-allocation of underperforming projects will only take place when there are new projects that meet the requirements of the current NOFA, creating permanent supportive housing that will serve chronically homeless individuals and families, including unaccompanied youth and rapid rehousing to serve homeless individuals and families, including unaccompanied youth, coming directly from the streets or emergency shelters or fleeing domestic violence situations or other persons who meet the criteria of paragraph (4) of the definition of homelessness.

Transitional Project Reallocation

Should a Transitional Project choose to change the type and focus of its project to a new permanent supportive housing project or rapid rehousing projects they may request a “re-allocation swap” from the CoC Board. Approval will be based on the Agencies previous performance in project delivery.