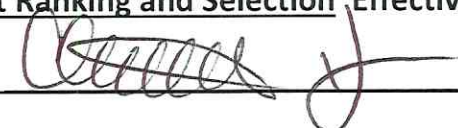# CARROLL COUNTY
CIRCLE OF CARING HOMELESSNESS BOARD
Continuum of Care Policy

Policy on: <u>Continuum of Care Project Ranking and Selection</u> Effective: <u>7/29/19</u>

Approved by Executive (CoC) Board: _____

Date: <u>7/29/19</u>

Purpose: To document the Carroll County, MD- 506 2019 Continuum of Care (Continuum of Care) Project Ranking and Selection Process

2019 HUD NOFA

The U.S. Department of Housing and Urban Development (HUD) released the 2019 Notice of Funding Availability https://www.hudexchange.info/news/the-fy-2019-coc-program-competition-opening-and-updates/ on July 3, 2019.

The amount of available funding may not be enough to fund eligible renewal projects in 2019; therefore, HUD will continue to require Collaborative Applicants to rank all projects, except Continuum of Care planning and UFA Costs, in two Tiers. Tier 1 is equal to 94 percent of the Continuum of Care's 2019 Annual Renewal Demand (ARD). Tier 2 is 6% of the Continuum of Care's ARD. In addition, a bonus is available for new projects or an expansion of existing projects as described in HUD's NOFA and a bonus project serving victims of domestic violence is being offered.

2019 Continuum of Care Funding Carroll County (MD-506)

Category	2019 Grant Funding
Total Renewal Projects = $402,670 (ARD)	
Tier I (94% of Total Renewals)	$378,509
Tier 2 (6% of Total Renewals)	$24,161
Bonus	$20,134
DV Bonus	$50,000
Total 2019 Funding	**$468,650**

Carroll County NOFA

On July 22, 2019, The Carroll County Homelessness Board issued a NOFA for the 2019 Continuum of Care Competition. The following were invited via public notice to submit Letters of Intent by August 5, 2019 and applications by August 19, 2019:

1. **Renewal projects** – all current Continuum of Care projects are eligible for FY 2019 fund renewal. Projects will be required to submit Project applications to the Collaborative Applicant for review, approval and ranking.
2. **Reallocations** – Project applicants with eligible renewals can propose new projects by shifting funds from one or more existing projects to new projects without decreasing or increasing the Continuum of Care's ARD. Through the reallocation process:
   a. Applicants may create new permanent supportive housing projects where all beds will be dedicated for use by the chronically homeless. New Permanent Supportive Housing Projects may also be created that meet all the criteria of DedicatedPLUS as defined in the NOFA.
   b. Applicants may create new rapid re-housing projects for homeless meeting the criteria in the NOFA.
   c. Applicants may create a new Joint TH and PH-RRH component as defined in in the NOFA.
   d. The Continuum of Care Board will review project performance and monitoring results to determine if any projects should be recommended for reallocation per the Board Reallocation Policy.
3. **Bonus Projects** - The Permanent Housing Bonus is available to any existing or new applicant.
   a. Applicants may create new permanent supportive housing projects where all beds will be dedicated for use by the chronically homeless. New Permanent Supportive Housing Projects may also be created that meet all the criteria of DedicatedPLUS as defined in the NOFA.
   b. Applicants may create new rapid re-housing projects for homeless meeting the criteria in the NOFA.
   c. Applicants may create a new Joint TH and PH-RRH component as defined in the NOFA.
   d. Bonus project funding may also be used this year to expand an existing project. Both reallocation and bonus project types are eligible.
   e. An additional allocation of bonus funding is available to create a new project to serve victims of domestic violence as defined in the NOFA.

Overview – Continuum of Care Project Selection Criteria

The Continuum of Care's homeless assistance programs will be evaluated by HUD Policy Priorities in the 2019 NOFA including but not limited to:

1. Contribute to Ending Homelessness for all persons
2. Contribute to the Continuum's Systemic Response to Homelessness
3. Ensure a Strategic Allocation of Resources
4. Use an Evidence Based Approach
5. Increase Client Employment
6. Use a Housing First Model (with flexibility around service participation once stably housed)

Tiers and Ranking:
1. To ensure the Continuum of Care can prioritize their projects locally in the event that HUD is not able to fund all renewals, HUD requires that Continuum of Cares rank projects in 2 tiers. The tiers are financial thresholds. This year Tier 1 is equal to 94% of the Continuum of Care's ARD.

Tier 2 is the amount between the Continuum of Care's Tier 1 and the Continuum of Care's Final Annual Renewal Demand (ARD).

2. The Continuum of Care must assign a unique rank to each project that it intends to submit to HUD for 2019 funding. Projects scoring highest and contributing to the HUD Policy Priorities including reducing homelessness in the CoC will be ranked and placed into Tier 1 until all Tier 1 funds are allocated. The remaining projects selected for funding will be ranked and placed into Tier 2 until all Tier 2 funds are allocated. HUD strongly advises Continuum of Cares to rank higher those project applications that the Continuum of Care determines are high priority, high performing, and meet the needs and gaps as identified in the Continuum of Care.

3. Projects ranked in Tier 1 are considered relatively safe, while projects in Tier 2 are at risk.

Ranking and Selection

1. All renewal and new applications will be reviewed and ranked using the most recent HUD CoC Rating and Ranking Tool https://www.hudexchange.info/resource/5292/project-rating-and-ranking-tool/

2. Projects must meet Threshold Requirements including:
   a. Coordinated Entry Participation
   b. Housing First/Low Barrier Implementation
   c. Documented Match
   d. Reasonable cost per Permanent Housing exit
   e. Financial feasibility
   f. Active CoC Participation
   g. Complete application and consistent data
   h. Data quality above 90%
   i. Bed utilization rates at or above 90%
   j. Acceptable audit/financial review
   k. Documented organization financial stability

3. Performance Measures – Rating Factors depend on Project type but include:
   a. Length of Stay
   b. Exits to Permanent Housing
   c. Returns to Homelessness
   d. New or increased income or earned income

4. Serve Priority Populations
   a. Coordinated Entry Score
   b. Chronically homeless
   c. 50%+: Disability/Zero Income/Unsheltered

5. Beds dedicated to a Subpopulation
   a. DV beds
   b. 50%+ of beds: Chronic individuals or families; Veteran individuals or families; or parenting youth

6. Coordinated Entry (CE) – Since CE is mandated by HUD and the performance measures do not mirror those of housing projects, CE will be ranked one and fall into Tier 1 as long as the project meets the CoC threshold review.

7. Safe Haven (SH)– The CoC will treat SH as a Permanent Housing project for the purposes of ranking.

8. Other Criteria – Scored per the Customized Rating Criteria Tab
    a. CoC Monitoring Score
        i. Were there monitoring findings in the last program year?
    b. Narrative Score
        i. Did the narrative answer each question completely?
9. New projects created through reallocation will be ranked based on the performance of the renewal application which is being reallocated and in accordance with NOFA guidance.
10. Expansion projects submitted by current applicants will be ranked based on the performance of the existing project to be expanded.
11. Bonus projects submitted by new and existing applicants will be ranked based on the performance of similar projects.
12. All Permanent Supportive Housing Projects will be certified to have demonstrated a need in the Continuum's geographic area.
13. The Committee's final rankings will be submitted to the Circle of Caring Homelessness Board for a formal vote on or before August 30, 2019.
14. All project applicants will be notified in writing by September 4, 2019 of their project acceptance, rejection or reduction and the project's rank in Tier 1 or Tier 2.

Appeals Process:

Agencies that question the ranking and review process or feel that they have been unfairly eliminated from the competition may file an appeal. Project applicants whose project was rejected may appeal the local Continuum of Care competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local Continuum of Care planning process in a reasonable manner by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline of 7:59:59 p.m. eastern time on September 30, 2019. The Continuum of Care's notification of rejection of the project in the local competition must be attached to the Solo Application. If the Continuum of Care fails to provide written notification outside of e- snaps, the Solo Applicant must attach evidence that it attempted to participate in the local Continuum of Care planning process and submitted a project application that met the local deadlines, along with a statement that the Continuum of Care did not provide the Solo Applicant written notification of the Continuum of Care rejecting the project in the local Continuum of Care competition. The appeal must be because a decision made by the Carroll County Circle of Caring Homelessness Board regarding the ranking, rejection, or funding of their project was prejudicial, unsubstantiated by project performance, or in violation of the 2019 Continuum of Care Guidelines. The appeal may be filed with the Circle of Caring Homelessness Board via email: ckay@carrollcountymd.gov by 3:00 pm, September 30, 2019 the appeal deadline.