

Title: Rank & Review Policies, Procedures, and Priorities

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Approved By: Governing Council

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Background:

Each year, the U.S. Department of Housing and Urban Development (HUD) makes resources available to communities through a national competition for its Continuum of Care (CoC) Homeless Assistance Programs. Community Alliance for the Homeless, Inc. (CAFTH) is the lead agency for Memphis/Shelby County CoC. CAFTH is responsible for preparing a consolidated application to submit to HUD for all Memphis/Shelby County eligible projects. The community application for funding is done under the guiding framework of the federal HEARTH Act and related regulations and directives from HUD. There are 3 primary components to the application:

- 1) community-wide performance;
- 2) renewal grants; and
- 3) new projects (pending the availability of funding & community performance)

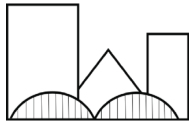
For CoC Planning funds and HMIS funds, the CoC Collaborative Applicant is the only entity allowed to submit applications for those funds. Agencies are able to apply for renewal grants and new project funds through the following applications found in the FY2019 CoC Competition NOFA:

- 1) DV Bonus New Project Funds (Section V.3.a.4)
- 2) Transition Grants (Section III.C.2.u)
- 3) New Projects Created Through Reallocation or CoC Bonus Projects (Section V.3.a.3)
- 4) Expansion Project (Section V.3.a.5)
- 5) Consolidated Project (Section V.3.a.6)
- 6) Renewal Projects (Section V.2.b.)

Please Note: Although transitional housing (TH) programs are included in the CoC NOFA funding pool, our community has voted to not fund TH programs due to the fact that there is stronger evidence for the effectiveness of Permanent Housing programs.

Purpose:

The 2019 Memphis/Shelby County Homeless Consortium Rank and Review Policies and Procedures for the Continuum of Care (CoC) Competition establish a transparent and unbiased framework for the decision-making process guiding the annual CoC collaborative grant application. This document will be used to assist in the review and ranking of projects and is



based on HUD's Homeless Policy and Program Priorities as outlined in the 2019 Notice of Funding Availability (NOFA) for the Fiscal Year (FY) 2019 Continuum of Care Program Competition. The priorities and process is also driven by the federal administration's goals articulated in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness and the Mayor's Action Plan to End Homelessness in Memphis and Shelby County* (released January 2011). The goal is to ensure that there are written procedures in place that provide regulations for a comprehensive review of each applicant and subsequent ranking of all projects selected by the Rank and Review Committee.

Principles of Rank and Review:

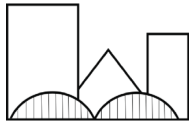
Project applications submitted to the CoC for inclusion on the FY 2019 CoC Priority Listing as part of the CoC Consolidated Application must be reviewed and either accepted and ranked or rejected by the CoC. All project applications approved by the CoC must be listed on the CoC Priority Listing in rank order, except project applications for CoC planning and UFA Costs projects which are not ranked. Higher ranked projects will be assigned to Tier 1 and lower ranked projects will be assigned to Tier 2.

The process and criteria for reviewing and ranking projects for the Memphis/Shelby County Homeless Consortium FY2019 Continuum of Care application are intended to take maximum advantage of the current HUD funding while keeping our options open for the long-term.

Criteria and Evaluation for Rank and Review:

There are 3 factors used to review and rank projects for the 2019 Continuum of Care Application:

- 1) Performance Evaluation as outlined below
 - a. Addressing Local/HUD Priorities and Policies
- 2) Strategic Resource Allocation
 - a. Ending Chronic Homelessness
 - b. Ending Family Homelessness Ending Youth Homelessness, and
 - c. Using a Housing First Approach
- 3) Community Impact: After reviewing the program evaluation, project application and other written information, each project will be assessed for its impact on the community's ability to end homelessness in all priority populations. Projects with the greatest impact on the Continuum of Care and the community if they do not continue to receive HUD funding. This includes:
 - i. Projects that effectively serve a greater number of persons,
 - ii. Projects that provide housing and services unavailable elsewhere for the population served, and
 - iii. Projects that are critical to the operations of the CoC as outlined in the HEARTH Act



Procedures:

Program applications are reviewed, scored, and ranked all based on a variety of scoring guidelines. There are 3 main criteria: PERFORMANCE EVALUATION, STRATEGIC RESOURCE ALLOCATION, and COMMUNITY IMPACT. Using site visits and scorecards, specific project components, organizational capacity, Local/HUD priority alignment and project quality, performance metrics, demonstrated need, supportive services, community leverage/budget, reallocation, data management, and fiscal management, a rank and review committee has access to all moving parts of each project.

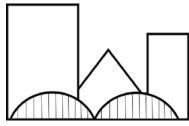
Projects are grouped into Tiers. Tier 1 is 94% of the CoC's FY 2019 Annual Renewal Demand (ARD), as described in Section III.A.3.a. of the NOFA. Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for the permanent housing bonus as described in Section III.A.3.j. of the NOFA.

Projects that meet system level priorities are identified as HMIS/Data related projects or Coordinated Entry. Projects are categorized by populations (Chronically Homeless, Families with Children, Youth, Veterans). The rank and review committee reviews and scores each project application using all of the pieces and components listed above. The rank and review committee reviews and scores each project application using all of the pieces and components listed above. Based on the committee's findings, projects are prioritized using their performance evaluation, strategic resource allocation, and community impact.

In reviewing applications submitted by victim service providers, the rank and review committee will be considering the unique circumstances faced by the service provider and the population that they serve. Because domestic violence service providers are prohibited from entering information into our HMIS system by law, need for these projects will be demonstrated by data that is generated from a comparable database.

The Memphis/Shelby County CoC Governing Council has designated representation from a member of the domestic violence community. Individuals who fill this position are expected to have expertise and knowledge of the needs of persons whose lives have been affected by episodes of domestic violence. The committee may request information from the Governing Council representative or an expert in the field regarding best practice models for providing assistance to the targeted population should expertise be required in this area. The expert assisting in this capacity must not receive CoC program funds, and he/she must be approved by the Governing Council.

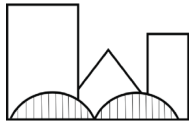
Results are published for the agency as well as the CoC. If projects are recommended for non-renewal, agencies have opportunity to appeal. (additional information outlined below) Using the process outlined below, the Rank and Review Committee will perform the Performance Evaluation.



Factor 1. Performance Evaluation

Renewal Project Applications – Components being reviewed, ranked and scored

- 1) Site Visits: The site visit is conducted by the Lead Agency (CAFTH) and includes a review of: agency documents, program documents, random case file reviews, HMIS printouts, recent LOCCS draw, audit findings, and physical observation of program operations. If there are areas of significant concern identified during the review, the lead agency may request additional information or documents. The intent of these site visits is not to find fault with agency performance, but to avoid federal audit findings, ensure that performance data is reflected accurately in HMIS, and to identify and make technical assistance available for needs that arise. A letter summarizing the results will be provided within 14 days of the visit and the agency will have seven days to respond in writing.
- 2) Performance Scorecards: The performance scorecard dictates the specific metrics on which renewal program performance will be evaluated. Past performance is taken into consideration when scoring projects to assess how well they were able to meet goals and specific criteria laid out in the grant agreement. The performance scorecard uses data from the most recent APR accompanied by the closeout letter. First time renewals that have not had a full year of operating and therefore do not have an APR and accompanying closeout letter from HUD will not be penalized. Those projects will receive full points on any items where there is insufficient APR data to judge the project. These items are outlined below in item C.
- 3) Renewal Application Components for Points Scored
The following items are taken into consideration:
 - a. Performance Benchmarks
 - i. Length of time homeless (RRH leavers and stayers/ PSH leavers with stays less than 181 days)
 - ii. Returns to homelessness (Individuals exiting to homelessness or other; PSH clients returning to homelessness within 2 years)
 - iii. Hard to serve (Entries with no income, units dedicated to chronically homeless individuals)
 - iv. Income growth and mainstream resources (Total income growth, total earned growth, total noncash mainstream benefits)
 - v. Housing stability (RRH exits to PH; maintained PSH or exit to PH), and
 - vi. Occupancy (Occupancy, % of funds spent, annual cost per bed/unit, customer satisfaction survey total)
 - b. Fiscal Management
 - i. Rate of spend-down
 - ii. Efficient use of funds
 - iii. Cost per exit to permanent housing
 - iv. Audit findings, and

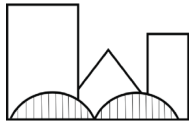


- v. Corrective measures taken in response
- c. Data Management
 - i. Participation in HMIS (timely entry of data, submission of data for the point in time count, and annual housing inventory)
 - ii. Data quality (as measure by null value percentages and case file audits), and
 - iii. Submission of timely APR's
- d. Fidelity to Housing First – low barrier approach
- e. Full Participation in the Coordinated Entry System
- f. Prioritization - Chronically homeless individuals, youth and families with the longest history of homelessness, and severity of need.

Renewal/Expansion Project Components for Points Scored

Before a renewal project is scored and reviewed by the Rank and Review Committee, it must meet the HUD Eligibility Threshold Requirements laid out in Section V.3.C.3.d. of the FY2019 CoC Competition NOFA. Once a project has met the thresholds, it is scored based on the scoring criteria below:

- 1) Performance Measures
 - a. Length of Stay – 25 points
 - i. Participants are placed in housing less than 30 days after referral to RRH, and remain in housing for at least 180 days after referral to PSH
 - b. Exists to Permanent Housing – 20 points
 - i. 90% remain in or move to PH from RRH, TH, and PSH
 - c. Returns to Homelessness – 20 points
 - i. Within 12 Months of Exit to Permanent Housing
 - d. New or Increased Income and Earned Income – 20 points
 - ii. Earned income for project stayers: 8%+ = 5 points
 - iii. Non-employment income for project stayers: 10%+ = 5 points
 - iv. Earned income for project leavers: 8%+ = 5 points
 - v. Non-employment income for project leavers: 10%+ = 5 points
- 2) Project Effectiveness
 - a. Project has reasonable costs – 10 points
 - i. Costs are within local average cost per positive housing exit for project type (total project cost/number served \leq 9,113)
 - b. Coordinated Entry Participation – 0 points (for 2019)
 - ii. 100% of entries to project from CE referrals
- 3) Other and Local Criteria
 - a. CoC Monitoring Score – 10 points
 - i. Project is operating in conformance to CoC Standards
 - b. Occupancy Rate – 10 points



- i. Beds/units in a program are utilized at the rate projected in the original application
- c. Client Satisfaction Survey Score – 5 points
 - i. Client satisfaction survey average scores
- d. Client Satisfaction Survey Return Rate – 5 points
 - i. Return rate for client satisfaction surveys
- e. Application Accuracy – 5 points
 - i. Project application is complete and free of errors
- f. CoC Participation – 5 points
 - i. Agencies are attending CoC Planning/Consortium Meetings

Total Score: 135

Weighted Rating Score: 100

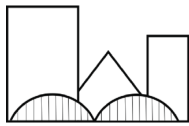
New Project Application Components for Points Scored

Before a new project is scored and reviewed by the Rank and Review Committee, it must meet the HUD Eligibility Threshold Requirements laid out in Section V.3.C.3.c. of the FY2019 CoC Competition NOFA. Once a project has met the thresholds, it is scored based on the scoring criteria below:

- 1) Project Overview
 - a. Housing First – 20 points
 - i. Align with Housing First/Low Demand Threshold
- 2) Agency Experience
 - a. Amount of Time Agency Has Served Those Experiencing Homelessness – 15 points
 - ii. Length of time agency has served those experiencing homelessness
 - b. Federal Grant Experience – 10 points
 - i. Experience agency has with managing a federal grant
 - c. Experience Leveraging Other Funding – 10 points
 - iii. Experience agency has with leveraging federal, state, local, or private sector funding
- 3) Additional Information and Local Criteria
 - a. Application Accuracy – 5 points
 - i. New project applications are complete and free of errors
 - b. Project Budget – 10 points
 - ii. Project financials, outlined below, reflect reasonable and allowable costs
 - c. Membership with Consortium – 5 points
 - iii. Agency is a MSCHC Consortium Member

Total: 75 points

Weighted Rating Score: 100 points



Factor 2. Strategic Resource Allocation

This factor is used to determine if the CoC is making the best use of limited resources. After factor 1. Performance Evaluation has been conducted, the Rank and Review Committee will consider the strategic allocation of resources. Some factors to determine if resources are being allocated to the highest level include but are not limited to:

- Determining if all populations are served based on the needs of the community
- Cost of the project
- Using a Housing First Approach to lower barriers to entry

Factor 3. Community Impact

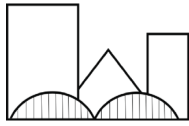
After reviewing the program evaluation and strategic reallocation of resources, each project will be assessed for its impact on the community's ability to end homelessness in all priority populations. Projects with the greatest impact on the Continuum of Care and the community if they do not continue to receive HUD funding. This factor is used to answer the question: What would the impact be on the community if this project does not receive funds? This includes:

- Projects that effectively serve a greater number of persons,
- Projects that provide housing and services unavailable elsewhere for the population served, and
- Projects that are critical to the operations of the CoC as outlined in the HEARTH Act:
 - HMIS
 - Coordinated Entry

Rank and Review Committee Guidelines

The Rank and Review Committee meets as needed to review and score new and renewal applications for Continuum of Care (CoC) funding and for additional funding opportunities within the community as needed including the City of Memphis Emergency Solutions Grant (ESG) and the Action Plan Implementation Grant (AIG).

The Rank and Review Committee will be composed of members of the Governing Council and three additional community members from agencies not currently represented on the Governing Council. The Governing Council is composed of members appointed by their supervisors at their respective agencies from the following areas: Department of Children's Services, Shelby County Schools, Memphis Housing Authority, Veteran Affairs, City of Memphis, Shelby County Government, and the CoC Lead Agency. Governing Council also has representatives from the following areas that are appointed and voted on by the Governing Council members: consumer input, domestic violence, for-profit, legal, LGBTQ, and philanthropy. Community members from outside agencies interested in serving on the Rank and Review Committee will complete an application, and from there the Governing Council



members will select five nominees. From there, the full Consortium will meet to vote and approve three members.

Governing Council members who belong to an agency submitting an application for any funding opportunity will recuse themselves from the Rank and Review Committee to prevent any conflict of interest situations. CAFTH staff present for rank and review will also not hold voting power but will be available to provide technical assistance on HUD NOFA requirements, context on community needs, and answers to any questions from the committee.

Responsibilities of the Rank and Review Committee include completion of training and orientation, execution of a Conflict of Interest statement, and commitment to a maximum of two days of project review per grant cycle. At a minimum, 5 members of the Rank and Review Committee, outside of CAFTH staff, must be present during each day for scoring and ranking to be conducted. If less than 6 members are present, that day's rank and review will be rescheduled unless additional members are able to attend.

Training

Training will be provided, as needed, to all Rank and Review members on:

- the HEARTH Act;
- the Continuum of Care;
- the role of the Rank and Review Committee;
- the Policies and Procedures governing the renewal process; and
- the scoring tools and weighting information.

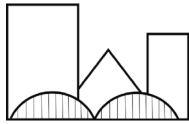
The Rank and Review committee will be provided with a timeline for completion of duties with as much advance notice as possible due to the flexible date of the NOFA being released. Training may be provided in digital form through a webinar or webinar recording.

At least one week before the meeting, the following materials will be provided to the Rank and Review Committee:

- Completed scorecards with supporting documentation
- Monitoring report with supporting documentation
- Description of the project and applicable narratives from the application
- Funding requests and project budgets
- Thorough review of needs assessment and gaps analysis

Facilitation

The Rank and Review Committee will be facilitated by a chair voted on by the committee. Additional technical assistance, when needed, will be provided by the CAFTH Executive Director and CoC Planning Director. A CAFTH CoC Coordinator will record and document minutes. Minutes of the rank and review days, along with copies of the minutes will be available for program directors upon request.



Policies:

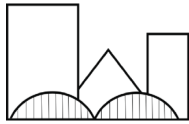
Reallocations: Programs with low performance (significant issues identified in the review process) will be asked by the Lead Agency to submit a performance improvement plan. Agencies that are in performance improvement status have one year to make progress. CAFTH will provide technical assistance to the programs. Failure to make progress will result in a recommendation for reallocation the following year. In the event that an agency has failed to make progress on a performance improvement plan by the next NOFA season, the agency will be notified of the recommendation for non-renewal and reallocation. The recommendations will be brought to the Governing Council for consent. If after resolution of any appeals, reallocations are to occur, and HUD had issued its NOFA, an RFP will be initiated to see applications for new permanent housing programs in the amount of the non-renewing grant(s). The NOFA typically specifies the types of new projects eligible for funding.

Technical Assistance: The CoC lead agency and/or HUD will bring in consultants and technical assistance providers as needs are identified. Agencies are strongly encouraged to request information or technical assistance if they identify issues and are unsure how to address them or if they are interested in program model adjustments and need more information.

Appeals: In the event that an agency wishes to appeal the recommendation for non-renewal, the agency must notify the governing council in writing (on letterhead and scanned/emailed to: Governing Council Chair with a copy to CAFTH's CoC Coordinator within seven days of the notification. The Governing Council may require additional information and will render its decision within 14 days of receipt of the appeal.

Default: In the event an agency fails to substantially perform its obligations under its CoC grant agreement and that failure or omission materially and adversely affects the health and wellbeing of the program participants, the Lead Agency reserves the right to recommend non-renewal upon determination of default, without a one-year performance improvement plan. The agency will be notified of a finding of default in writing and will be given 30 day to cure the problem. This includes bankruptcy or insolvency of an organization, and gross mismanagement or misappropriation of funds.

Third Party Review: In the event of an appeal that is not satisfactorily resolved at the Governing Council, an agency may request a third-party review of the determination for non-renewal. The agency must notify the Governing Council of a request for third party review by the lead agency of another mid-south urban CoC within seven days of the written notice/determination, or within seven days of the adoption of this policy. The third-party reviewer will receive written and oral presentations from the lead agency and the agency submitting the appeal and will render a decision within 14 days.



Lead Agency Access to Information: The lead agency may request information directly from HUD for use in the review and assessment process concerning performance on CoC Grants.

Updates to DedicatedPlus Projects: Projects that were awarded as DedicatedPLUS in a previous CoC Program Competition are required to include households with children to qualify as a DedicatedPLUS project in the FY 2019 CoC Program Competition. For projects who do not plan to continue as DedicatedPlus must return to Beds Dedicated to Chronically Homeless Persons.

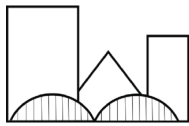
HUD's Homeless Policy and Program Priorities:

The following information is derived directly from the U.S. Department of Housing and Urban Development, Community Planning and Development, Notice of Funding Availability (NOFA) for the Fiscal Year 2019 Continuum of Care Competition, FR-6200-N-25, published July 3rd, 2019, pages 6 - 13. The complete NOFA may be reviewed on the HUD Exchange website:

II. HUD's Homeless Policy and Program Priorities

A. Policy Priorities. This section provides additional context regarding the selection criteria found in Section VII.B of this NOFA and is included here to help applicants better understand how the selection criteria support the goal of ending homelessness:

- 1. Ending homelessness for all persons.* To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness. CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, or those experiencing chronic homelessness). CoCs should have a comprehensive outreach strategy in place to identify and continuously engage all unsheltered individuals and families. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and long experiences of unsheltered homelessness to develop housing and supportive services tailored to their needs. Finally, CoCs should use the reallocation process to create new projects that improve their overall performance and better respond to their needs.
- 2. Creating a systemic response to homelessness.* CoCs should be using system performance measures such as the average length of homeless episodes, rates of return to homelessness, and rates of exit to permanent housing destinations to determine how effectively they are serving people experiencing homelessness. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent.
- 3. Strategically allocating and using resources.* Using cost, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness. CoCs should review project quality, performance, and cost effectiveness. HUD also encourages CoCs



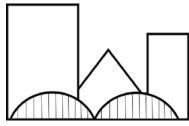
to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness. CoCs should also work to develop partnerships to help CoC Program participants sustainably exit permanent supportive housing, such as through partnerships with Public Housing Authorities (PHAs) and other government, faith-based, and nonprofit resources specializing in areas such as treating mental illness, treating substance abuse, job training, life skills, or similar activities, including those that help CoC Program participants, whenever possible, reach recovery, self-sufficiency, and independence. Finally, CoCs should review all projects eligible for renewal in FY 2019 to determine their effectiveness in serving people experiencing homelessness, including cost effectiveness.

4. *Using an Evidence-Based Approach.* CoCs should prioritize projects that employ strong use of data and evidence, including the cost-effectiveness and impact of homelessness programs on positive housing outcomes, recovery, self-sufficiency, and reducing homelessness. Examples of measures that CoCs may use to evaluate projects include, but are not limited to: rates of positive housing outcomes, such as reduced length of time homeless and reduced rates of return to homelessness; improvements in employment and income; and improvements in overall well-being, such as improvements in mental health, physical health, connections to family, and safety.

5. *Increasing employment.* Employment provides people experiencing homelessness with income to afford housing. Employment also improves recovery outcomes for individuals with mental illness or addiction. CoCs and CoC-funded projects should work with local employment agencies and employers to prioritize training and employment opportunities for people experiencing homelessness. CoC's should also promote partnerships with public and private organizations that promote employment.

6. *Providing Flexibility for Housing First with Service Participation Requirements.* The traditional Housing First approach has two basic parts: First, individuals are rapidly placed and stabilized in permanent housing without any preconditions regarding income, work effort, sobriety or any other factor. Second, once in housing, individuals never face requirements to participate in services as a condition of retaining their housing. The first part, placement into permanent housing without preconditions, is an important priority to ensure that federal funds are allocated to providers that serve the most vulnerable homeless individuals. This NOFA maintains the commitment to unconditional acceptance of individuals into housing, especially for people with a high degree of vulnerability. At the same time, allowing service participation requirements once a person has been stably housed may promote important outcomes (e.g., employment, increased income, reduced substance use, and strengthened social connection), so this NOFA also provides communities and programs with flexibility, without penalty, to use service participation requirements after people have been stabilized in housing (consistent with 24 CFR 578.75(h)).

B. CoC Program Implementation. The following list highlights important information that applicants should consider as they are preparing the FY 2019 CoC Application and project applications(s). This is not an exhaustive list of considerations or requirements;



therefore, all applicants and CoC stakeholders should carefully review the Rule for comprehensive information.

1. *Performance-Based Decisions*. Consistent with the requirements of the FY 2019 Appropriations Act:

- a. CoCs cannot receive grants for new projects, other than through reallocation, unless the CoC competitively ranks projects based on how they improve system performance as outlined in Section VII.B.1.a of this NOFA;
- b. HUD is increasing the share of the CoC score that is based on performance criteria; and
- c. HUD will prioritize funding for CoCs that have demonstrated the ability to reallocate resources to higher performing projects.

2. *Transition Grants*. See Section III.C.2.u of this NOFA for a definition of the transition grant.

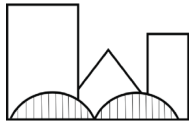
3. *Domestic Violence (DV) Bonus*. The FY 2019 HUD Appropriations Act provides up to \$50 million for “rapid re-housing projects and supportive service projects providing coordinated entry, and for eligible activities that the Secretary determines are critical in order to assist survivors of domestic violence, dating violence, and stalking.” In the FY 2019 CoC Program Competition, CoCs will be able to apply for a DV Bonus for Permanent Housing-Rapid Rehousing (PH-RRH) projects, Joint TH and PH-RRH component projects, and SSO projects for coordinated entry (SSO-CE). Except as provided in Section II.B.1.a of this NOFA, a CoC may apply for up to 10 percent of its Preliminary Pro Rata Need (PPRN), or a minimum of \$50,000, whichever is greater, or a maximum of \$5 million, whichever is less, to create DV Bonus projects.

A CoC may apply for the following types of projects:

- a. Rapid Re-housing (PH-RRH) projects that demonstrate trauma-informed, victim-centered approaches.
- b. Joint TH and PH-RRH component projects as defined in Section III.C.2.n of this NOFA that demonstrate trauma-informed, victim-centered approaches.
- c. SSO Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices that equip the CoC’s coordinated entry to better meet the needs of people experience homelessness who are survivors of domestic violence, dating violence, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC’s coordinated entry and the victim service providers coordinated entry system where they are different).

Regardless of the type of project the CoC applies for, the grant term must be 1-year.

A CoC can only submit one project application for an SSO-CE project. A CoC may apply for any number of PH-RRH and Joint TH and PH-RRH projects provided that



each application is for at least \$25,000. A CoC may also apply to expand an existing renewal project in accordance with Section III.C.2.j of this NOFA, including one that was previously funded with DV Bonus funding. DV Bonus funding may be used to expand an existing renewal project that is not dedicated to serving survivors of domestic violence, dating violence, or stalking who meet the definition of homeless in paragraph (4) of 24 CFR 578.3 so long as the DV Bonus funds for expansion are solely for additional units, beds, or services dedicated to persons eligible to be served with DV Bonus funding.

4. *DV Bonus projects Awarded in FY 2018.* DV Bonus projects awarded funding in the FY 2018 CoC Program Competition are eligible to apply for renewal in the FY 2019 CoC Program Competition provided:

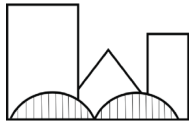
- a. the project has an operating end date in Calendar Year (CY) 2020 (between January 1, 2020 and December 31, 2020); and
- b. continues to serve 100 percent survivors of domestic violence, date violence, or stalking.

5. *Consolidated Project.* Eligible renewal project applicants will continue to have the ability to consolidate two or more eligible renewal projects (but no more than four projects) into one project application during the application process. The projects being combined during a grant consolidation will continue uninterrupted. To be eligible for consolidation, the projects must have the same recipient and be for the same component; and will be funded in this competition only with FY 2019 funds (meaning no funds recaptured from prior years will be awarded to the project). HUD will not permit projects with the following characteristics to consolidate:

- a. outstanding audit or monitoring findings;
- b. outstanding obligation to HUD that is in arrears,
- c. unresolved construction delays,
- d. history of poor financial management or drawdown issues,
- e. history of low occupancy levels, or lack of experience in administering the project type, or
- f. or other capacity issues.

HUD will not permit a transitional housing and a permanent housing project to consolidate to form a Joint TH and PH-RRH component project and will not permit a transition grant to be consolidated with any other project. If a project meeting these characteristics attempts to consolidate as part of the project application process, the submitted consolidated project will be rejected by HUD during the application review process.

To apply for a consolidated grant, applicants must submit separate renewal project applications for each of the grants that are proposed to be consolidated, and an application for the new consolidated grant with the combined budget and information of



all grants proposed for consolidation. Project applications for the grants that are proposed to be consolidated will be ranked, and if all those grants are selected, HUD will award the single consolidated grant. If one of the grants proposed to be consolidated is found to be ineligible for consolidation or is not selected, HUD will award all grants that are eligible for renewal and selected as separate grants. See Section V.B.3.a.(7) of this NOFA for additional requirements.

Collaborative Applicants designated as UFAs have more flexibility in how they manage their CoC Program-funded projects making consolidating projects through the FY 2019 project application process unnecessary. A Collaborative Applicant with UFA designation can consolidate projects during the grant term, so long as the consolidations are not combining different component types and the projects are funded under the same grant (e.g., projects are currently funded under the same renewal grant). If a Collaborative Applicant consolidates projects during the grant term, it can apply to renew them during the FY 2019 CoC Program Competition as consolidated projects.

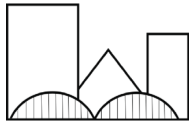
6. *Youth Homeless Demonstration Program (YHDP)*. YHDP projects that were initially awarded in FY 2016 may be eligible for renewal in the FY 2019 CoC Program Competition provided they meet the requirements of the CoC Program and will have an operating end date in Calendar Year (CY) 2020 (between January 1, 2020 and December 31, 2020). The following are applicable to YHDP projects renewing in the FY 2019 CoC Program Competition:

- a. may only request 1 year of renewal funding; and
- b. if the project applicant has more than one YHDP project that is eligible for renewal in FY 2019, the project applicant can consolidate the renewing YHDP projects through the renewal application provided it follows the process outlined in Section II.B.5 of this NOFA.

A YHDP project that requested and received a waiver for activities related to youth must attach a new waiver request to the FY 2019 renewal application that will be reviewed by HUD. YHDP projects cannot use the reallocation process, consolidate with a non-YHDP project, nor use the expansion processes outlined in Section III.C.2.j of this NOFA.

7. *Adjustments for Ineligible Projects*. If an ineligible renewal project is submitted in this Competition or used in the reallocation process, HUD will remove the ineligible project when calculating the final ARD amount for the CoC. To be eligible for renewal in FY 2019, a project must have an executed grant agreement by December 31, 2019 and have an expiration date in Calendar Year (CY) 2020 (between January 1, 2020 and December 31, 2020).

8. *HMIS*. As directed by Congress, HUD must provide an annual estimate of all individuals and families experiencing homelessness nationwide and within the territories. Therefore, all CoCs must have an HMIS that has the capacity to collect unduplicated counts of individuals and families experiencing homelessness and provide information to project subrecipients and applicants for needs analysis and funding



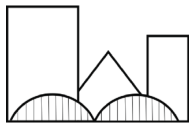
priorities. Additionally, CoC and Emergency Solutions Grants (ESG) Program recipients must participate in the local HMIS; unless a recipient is a victim service provider or legal service provider, in which case it must use a comparable database and provide de-identified information to the

CoC. For many communities, the inclusion of ESG recipients and subrecipients and other HUD federal partners (e.g., the Department of Health and Human Services and Department of Veterans Affairs) that require their programs to use the CoC's HMIS, will mean an increase in users that the HMIS must be able to accommodate. HUD expects communities to be able to use the HMIS information as well as aggregate data from comparable databases to review performance for the entire CoC geographic area, not just at the project level. The HMIS Lead should continue to consider any unique needs that the HMIS might be required to address to accommodate emergency shelter, street outreach, homelessness prevention, and other federal programs.

9. *Review of CoC Rankings.* CoCs will be required to rank all new reallocated, CoC Bonus, DV Bonus, and renewal project applications submitted by project applicants in *e-snaps*, except CoC planning and UFA Costs (if applicable) projects. Additionally, if a CoC's Renewal Project Listing includes a consolidated project application(s) HUD will follow the ranking process outlined in Section II.B.5 of this NOFA. HUD will not review any project that is rejected by the CoC.

10. *HUD Funding Process.* HUD will continue the Tier 1 and Tier 2 funding process and CoCs and applicants should ensure there is a thorough understanding of the information provided in this NOFA. For CoC Collaborative Applicants designated as an UFA, HUD will use the selection process described in Section II.B.10 of this NOFA. HUD will establish each CoC's Tier 1 and Tier 2 amounts based on the total amount of funds requested by eligible renewal project applications on the Renewal Project Listing combined with the eligible renewal project amount(s) that were reallocated as listed on the reallocation forms in the CoC Priority Listing. HUD will post a report that lists each CoC's PPRN amount, estimated ARD amount, Tier 1 amount, CoC planning amount, amount for CoC Bonus, and maximum amount for DV Bonus, on the HUD Exchange. HUD has also posted the GIWs on the HUD Exchange. Section VIII of this NOFA provides additional information regarding project selection.

a. *Tier 1.* Tier 1 is equal to 100 percent of the combined Annual Renewal Amounts for all projects eligible for renewal for the first time plus 94 percent of the combined Annual Renewal Amounts for all other projects eligible for renewal. Project applications in Tier 1 will be conditionally selected from the highest scoring CoC to the lowest scoring CoC, provided the project applications pass both eligibility and quality threshold review. Any type of new or renewal project application can be placed in Tier 1, except for CoC Planning and UFA Costs (if applicable), which are not ranked. However, in the event insufficient funding is available to award all Tier 1 projects, Tier 1 will be reduced proportionately, which could result in some Tier 1 projects falling into Tier 2. Therefore, CoCs should carefully determine the priority and ranking for all project applications in Tier 1 as well as Tier 2, which is described



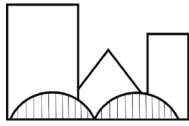
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b. *Tier 2.* Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for CoC Bonus projects (not including amounts available for DV Bonus projects) and before adjustments are made to permanent housing leasing, operating, and rental assistance budget line items based on changes to Fair Market Rent (FMR) as described in Section III.K of this NOFA. This does not include the amounts available for CoC planning and UFA Costs (if applicable) projects. Project applications placed in Tier 2 will be assessed for eligibility and threshold requirements, and funding will be determined using the CoC Application score as well as the factors listed in Section II.B.10 of this NOFA.

HUD will award a point value to each new and renewal project application that is in Tier 2 using a 100-point scale:

- (1) *CoC Score.* Up to 50 points in direct proportion to the score received on the CoC Application; e.g., if a CoC received 100 out of 200 points on the CoC Application, the project application would receive 27.5 out of 55 points for this criterion.
- (2) *CoC Project Ranking.* Up to 40 points for the CoC's ranking of the project application(s). To more evenly distribute funding across CoCs and consider the CoCs ranking of projects, point values will be assigned directly related to the CoCs' ranking of project applications. The calculation of point values will be 40 times the quantity $(1-x)$ where x is the ratio of the cumulative funding requests for all projects or portions of projects ranked higher by the CoC in Tier 2 plus one half of the funding of the project of interest to the total amount of funding available in Tier 2. For example, if a CoC is eligible to apply for projects totaling \$500,000 in Tier 2 and applies for 5 projects ranked in Tier 2 of \$100,000 each: the highest ranked project would receive 36 points and then the subsequently ranked projects would receive 28, 20, 12, and 4 points.
- (3) *Low Barriers to Entry.* Up to 10 points for how the project application demonstrates that it is low barrier and prioritizes rapid placement and stabilization in permanent housing. (See section II.A.6 in this NOFA for more information). Permanent housing (including PSH and RRH), Transitional housing, Joint TH and PH-RRH component, safe haven, and SSO projects that are not for centralized or coordinated assessment can receive up to 10 points for how the project demonstrates that it is low-barrier and does not have preconditions to entry (such as sobriety or minimum income threshold) and prioritizes rapid placement and stabilization in permanent housing. HMIS projects and SSO projects for a centralized or coordinated assessment system will automatically receive 10 points.

c. *Projects Straddling Tiers.* If a project application straddles the Tier 1 and Tier 2 funding line, HUD will conditionally select the project up to the amount of funding that falls within Tier 2. Using the CoC score and other factors described



in Section II.B.10 of this NOFA, HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award the project at the reduced amount, provided the project is still feasible with the reduced funding (e.g., is able to continue serving homeless program participants effectively).

d. *CoC Planning and UFA Costs*. As previously stated, CoC planning and UFA Costs projects are not ranked, therefore, those items will not be included in Tier 1 or Tier

2. CoC planning and UFA Costs projects that pass eligibility and review threshold will be conditionally selected using CoC scores from the highest scoring CoC to the lowest scoring CoC.

CoCs may only submit one project application for CoC planning costs and, if designated as an UFA, one project application for UFA Costs. The project applicant for CoC planning and UFA Costs must be the Collaborative Applicant that is listed on the CoC Applicant Profile in *e-snaps*.

e. *DV Bonus*. For projects the CoC indicates it would like considered as part of the DV Bonus, HUD will award a point value to each project application combining both the CoC Application score and responses to the domestic violence bonus specific questions in the CoC Application using the following 100-point scale:

(1) For Rapid Re-housing and Joint TH and PH-RRH component projects:

(a) *CoC Score*. Up to 25 points in direct proportion to the score received on the CoC Application.

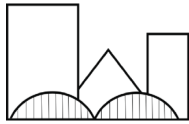
(b) *Need for the Project*. Up to 25 points based on the extent the CoC quantifies the need for the project in its portfolio, the extent of the need, and how the project will fill that gap.

(c) *Quality of the Project Applicant*. Up to 50 points based on the previous performance of the applicant in serving survivors of domestic violence, dating violence, or stalking, and their ability to house survivors and meet safety outcomes. Additionally, to be eligible to receive a PH-RRH or Joint TH and PH-RRH project, the CoC must demonstrate that the project will use trauma-informed, victim-centered approaches.

(2) For SSO Projects for Coordinated Entry:

(a) *CoC Score*. Up to 50 points in direct proportion to the score received on the CoC Application.

(b) *Need for the Project*. Up to 50 points based on the extent to which the CoC demonstrates the need for a coordinated entry system that better meets the needs of survivors of domestic violence, dating violence, or stalking, and how the project will fill this need.



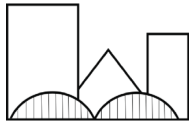
CoCs are required to rank all DV Bonus projects on the New Project Listing of the CoC Priority Listing with a unique rank number. If a project application designated as DV Bonus is conditionally selected by HUD with DV Bonus funds, HUD will remove the ranked DV Bonus project from the New Project Listing and all other project applications ranked below the DV Bonus project will slide up one rank position (e.g., if the conditionally selected DV Bonus project is ranked #5, HUD will remove the DV Bonus project and each project below #5 will move up one ranked position). If the DV Bonus project application is not conditionally selected with DV Bonus funds, the project application will remain in its ranked position and will be considered for funding as a new project provided it meets the requirements in Section II.B.1 of this NOFA and passes the eligibility and threshold criteria in Sections V.C.3.b and c of this NOFA.

- f. *Participant Eligibility.* Projects funded through this NOFA must have the following eligibility criteria for program participants. References to paragraphs of the definition of homelessness refer to the paragraphs listed under the definition of "homeless" in 24 CFR 578.3. All projects must participate in coordinated entry, and selection of program participants must be consistent with the CoC's Coordinated Entry process. As provided by the Consolidated Appropriations Act, 2019, youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving services funded under this NOFA. Additionally, any youth-serving provider funded under this NOFA may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence. HUD interprets "youth-serving provider" as a private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets "living in unsafe situations" as having an unsafe primary nighttime residence and no safe alternative to that residence. These youth-related requirements supersede any conflicting requirements under this NOFA or the CoC Program rule.

Any youth-serving provider funded under this NOFA may serve unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence.

(1) Renewal Projects

- (a) PH-PSH renewal projects must serve one of the following:
- (i) program participants who are eligible for assistance under the project's current grant agreement;
 - (ii) persons who meet the definition of DedicatedPLUS (see Section III.C.2.g of this NOFA) where all units funded by this project must be used to serve program participants who meet the qualifications for DedicatedPLUS;



or

(iii) persons experiencing chronic homelessness at the time they initially enrolled in the project.

(b) PH-RRH, Joint TH and PH-RRH component, TH, and SSO projects may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3. Additionally, these projects may serve persons who qualify as homeless under paragraph (3) of 24 CFR 578.3 if the CoC is approved to serve persons in paragraph (3).

(c) YHDP projects renewing for the first time in the FY 2019 CoC Program Competition must serve youth experiencing homelessness, including unaccompanied and pregnant youth, where no member of the household is older than 24.

(2) New Projects

(a) New PH-PSH projects must serve one of the following:

(i) persons who meet the definition of DedicatedPLUS (see Section III.C.2.g of this NOFA) in which case all units funded by the project must be used to serve program participants who meet the qualifications for DedicatedPLUS; or

(ii) persons experiencing chronic homelessness at the time they initially enroll in the project.

(b) New PH-RRH and new Joint TH and PH-RRH projects may serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3. Additionally, these projects may serve persons who qualify as homeless under paragraph (3) of 24 CFR 578.3 if the CoC is approved to serve persons in paragraph (3).