Memphis / Shelby County Homeless Consortium

Title: 4.2. Policies & Procedures for Rank and Review	
Prepared By: CAFTH	Reviewed By: Governing Council
Approved By: Governing Council	Date Approved: 9/14/2022

Purpose:

The 2022 Memphis/Shelby County Homeless Consortium Rank & 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 the Department of Housing and Urban Development's (HUD) Homeless Policy and Program Priorities as outlined in the 2022 Notice of Funding Opportunity (NOFO) for the Fiscal Year (FY) 2022 Continuum of Care Program Competition. The priorities and process are also driven by the federal administration's goals articulated in *Home Together: The Federal Strategic Plan to Prevent and End Homelessness,* and the *901 Home, Together: Strategic Plan to End Homelessness in Memphis/Shelby County* (released March 2021). 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 & Review Committee.

Principles of Rank and Review:
Project applications submitted to the CoC for inclusion on the FY 2022 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 Unified Funding Agency (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 FY 2022 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 2022 Continuum of Care Application:
1) <u>Performance Evaluation</u> as outlined in Section 4.3
   a. Addressing Local/HUD Priorities and Policies
2) <u>Strategic Resource Allocation</u>
   a. Ending Chronic Homelessness,
   b. Ending Family Homelessness,
   c. Ending Youth Homelessness, and
   d. Using a Housing First Approach
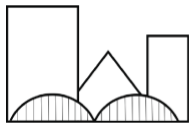
3) <u>Community Impact</u>: After reviewing the program evaluation, project application and other written information, each project will be assessed for its impact on the community's ability to end homelessness in all priority populations. Projects with the greatest impact on the Continuum of Care and the community are prioritized to 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 100% of the CoC's FY 2022 Annual Renewal Demand (ARD), as described in Section III.B.2.a. of the NOFO. Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for the domestic violence or CoC bonus as described in Section III.B.2.h. of the NOFO.

Projects that meet system level priorities are identified as Homeless Management Information System (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 & 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, the 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
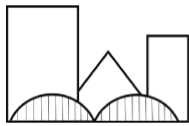
capacity must not receive CoC program funds, and he/she must be approved by the Governing Council.

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).

Policies:

Reallocations: Renewal projects scored in the bottom 25% of all renewal projects and/or ranked in the bottom 25% of all renewal projects will be asked by the Lead Agency to submit a performance improvement plan, as specified in Section 4.6: Performance Improvement Plans Policy. The Lead Agency will provide technical assistance to the programs. Failure to make progress as determined by the Rank & Review Committee may result in a recommendation for reallocation of the project's renewal funding the following year. Additionally, agencies that wish to voluntarily reallocate all or a portion of the annual renewal funding for their project(s) may do so by informing the Lead Agency of their intent to not apply for their full renewal funding amount

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) by sending notice to the Governing Council Chair and to the CAFTH CoC Planning Director within one week of notification. The Governing Council will form an Appeal Review Committee to review any appeals submitted by applicants based on the Local CoC Program Competition scoring and ranking process. The Appeal Review Committee includes one member of the Project Rank & Review Committee and two individuals not associated with any project seeking or receiving CoC funding. Committee members are nominated and affirmed by the Governing Council and must abide by the CoC's Conflict of Interest statement.

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 days to cure the problem. This includes bankruptcy or insolvency of an organization, and gross mismanagement or misappropriation of funds.

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
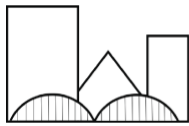
DedicatedPLUS project in the FY 2022 CoC Program Competition. For projects who do not plan to continue as DedicatedPLUS, they must return to Beds Dedicated to Chronically Homeless Persons.

A. Policy Priorities. This section provides additional context regarding the selection criteria found in Section II.A of this NOFO 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, those experiencing chronic homelessness, and people with disabilities, including those living with HIV/AIDS). CoCs should partner with housing, health care, and supportive services providers to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.

2. *Use a Housing First approach.* Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. CoC Program funded projects should help individuals and families move quickly into permanent housing, and CoCs should measure and help projects reduce the length of time people experience homelessness. Additionally, CoCs should engage landlords and property owners to identify housing units available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client-centered service methods. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.

3. *Reducing Unsheltered Homelessness.* In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the country. People living unsheltered have extremely high rates of physical and mental illness and substance use disorders. CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, and supportive services to provide permanent housing options for people who are unsheltered.

4. *Improving System Performance.* CoCs should be using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, 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. CoCs should review all projects eligible for renewal in FY 2022 to determine their effectiveness in serving people experiencing homelessness, including cost-effectiveness. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement
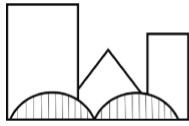
strategies. HUD recognized the effects of COVID-19 on CoC performance and data quality and reduced the points available for rating factors related to system performance in the FY 2021 CoC NOFO. This FY 2022 CoC NOFO significantly increases the points available for system performance rating factors.

5. *Partnering with Housing, Health, and Service Agencies.* Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. This is especially important as the CARES Act and American Rescue Plan have provided significant new resources to help end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:

    a. work closely with public and private healthcare organizations and assist program participants to receive primary care, receive housing-related services, and obtain medical insurance to address healthcare needs. This includes developing close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.

    b. partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new HOME program resources provided through the Homelessness Assistance and Supportive Services Program that was created through the American Rescue Plan;

    c. partner with local workforce development centers to improve employment opportunities; and

    d. work with tribal organizations to ensure that tribal members can access CoC-funded assistance when a CoC's geographic area borders a tribal area.

6. *Racial Equity.* In nearly every community, Black, Indigenous, and other people of color are substantially overrepresented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: developing a coordinated community response created in partnership with a racially diverse set of stakeholders and people experiencing homelessness and partnering with organizations with experience serving underserved populations. CoCs should review local policies, procedures, and processes with attention to identifying barriers that result in racial disparities, and taking steps to eliminate barriers to improve racial equity and to address disparities.
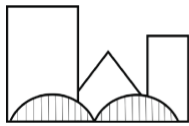
7. *Improving Assistance to LGBTQ+ Individuals.* Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlaps with other forms of prohibited discrimination. CoCs should address the needs of LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in their planning processes. Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure privacy, respect, safety, and access regardless of gender identity or sexual orientation in projects. CoCs should also consider partnering with organizations with expertise in serving LGBTQ+ populations.

8. *Persons with Lived Experience.* HUD is encouraging CoCs to include in the local planning process people who are currently experiencing or have formerly experienced homelessness. People with lived experience should determine how local policies may need to be revised and updated to improve the effectiveness of homelessness assistance programs, including participating in planning and oversight activities and developing local competition processes. CoC leaders and stakeholders should also prioritize hiring people who have experienced homelessness in areas where their expertise is needed (e.g. peer outreach and support).

9. *Increasing Affordable Housing Supply.* The lack of affordable housing is the main driver of homelessness. CoCs play a critical role in educating local leaders and stakeholders about the importance of increasing the supply of affordable housing and the specific consequences of the continued lack of affordable housing. CoCs should be communicating with jurisdiction leaders, including for the development of Consolidated Plans, about the harmful effects of the lack of affordable housing, and they should engage local leaders about steps such as zoning and land use reform that would increase the supply of affordable housing. This FY2022 CoC NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable housing supply.