

**Southern Nevada Homelessness Continuum of Care
Interim Scoring and Ranking Policies and Procedures
Revised March 2017**

Objective of this Guide

This guide serves as a tool for nonprofit agencies that wish to apply for HUD funding under the federal Continuum of Care (CoC) and outlines policies and procedures for the application, scoring, and ranking. This guide provides a consistent and transparent process for application reviews.

This guide provides information on how the Homeless Emergency Assistance and Rapid Transition Housing Act (HEARTH) impacts local projects that address homelessness in Clark County. Understanding the importance of creating data-driven projects that align with HUD priorities and a consolidated community plan is an important first step in creating a successful application for funding. The Southern Nevada Homelessness Continuum of Care (SNH CoC) Board's Evaluation Working Group (EWG) follows the process outlined in this guide to evaluate projects submitted through the local application process.

After evaluating applications, the EWG makes recommendations to the full CoC Board for which projects to include in the consolidated application to HUD.

Part I: Background and Overview

The Continuum of Care

In 2009, the HEARTH Act codified into law the Continuum of Care (CoC) planning process, which requires a board consisting of geographically based organizations that represent the interests of and provide services for the homeless. The overall CoC goal is to achieve greater coordination in responding to the needs of the homeless population and adhering to a unified approach in measuring progress. The CoC engages in data collection to measure performance of homeless services. Data collection is critical in developing priorities, which in turn drives HUD's investments in the local community.

The SNH CoC Board carries out CoC required duties as detailed in the HEARTH Act. Those duties include community-wide planning for the geographic area, ensuring the strategic use of resources, reviewing and evaluating CoC applications, and scoring and ranking.

Clark County's Department of Social Service serves as the collaborative applicant for the CoC and applies for funding on behalf of the local Continuum of Care.

The Role of the Evaluation Working Group

The Evaluation Working Group (EWG) is a subcommittee of the SNH CoC Board. The EWG's role is to facilitate the scoring and ranking of applications/projects for the local CoC Consolidated Application.

Using HUD regulations and requirements from the current Notice of Funding Availability (NOFA), the subcommittee makes recommendations to the SNH CoC Board for inclusion in the consolidated application.

The EWG members will be individuals who are:

- Knowledgeable about homelessness and housing in the community and who are broadly representative of the relevant sectors, subpopulations, and geographic areas;

- Committed to neutrality— meaning members shall report actual or perceived conflicts of interest and that no member shall vote upon or discuss any matter which shall have a direct financial bearing on the organization(s) the member represents;
- Familiar with housing and homeless needs within the Southern Nevada Homelessness Continuum of Care;
- Willing to review applications with the best interest of homeless persons in mind.

The SNH CoC Board is responsible for determining the eligibility of members who wish to serve on the EWG. Prior to the scoring and ranking, the collaborative applicant will provide a training overview to EWG members regarding their role, scoring tools, and resources for the ranking process. EWG members will sign a Conflict of Interest Agreement and a Confidentiality Agreement.

Conflicts of Interest

The SNH CoC Board recognizes that members represent interests of organizations who ultimately receive benefits from the CoC program. To ensure that individuals and organizations that best serve the needs of the community will not be denied funds because of their active participation on SNH CoC Board, and to confirm that members serve the needs of the community and not the interests of any organization or entity, conflicts of interest will be clearly stated.

The following policies and procedures apply for conflicts of interest:

1. To serve on the EWG, members must sign a Conflict of Interest Agreement.
2. No member shall vote upon or participate in the discussion of any matter, which shall have direct financial bearing on the organizations the member represents. Conflict of interest and even the appearance of a conflict of interest must be avoided. Members shall report a conflict of interest and recuse themselves from voting on issues where a conflict of interest is apparent or identified.
3. As it relates to business and action items, a SNH CoC Board member has an actual or perceived conflict of interest when the member's actions result, or appear to result, in personal, organizational, or professional gain. An actual or perceived conflict of interest occurs when:
 - a. The member is a salaried employee of any organization that receives, or is eligible to receive, CoC funds;
 - b. The member serves on the Board of Directors or as a Trustee of any organization that receives, or is eligible to receive, CoC funds; and/or
 - c. The member has a relative or close personal relationship with a person who is employed, or serves on the Board at any organization that receives, or is eligible to receive, CoC funds.
4. SNH CoC Board members who receive goods and services as a client of an organization that receives, or is eligible to receive, CoC funds is not deemed to have a direct conflict of interest unless the member may receive differential treatment as a result of their position on SNH CoC Board.

Recusal Procedures

Pursuant to policies around conflicts of interest, an EWG member may recuse himself/herself from speaking or voting. Recusal will occur prior to the beginning of the agenda item, and the CoC member will put on the record all reasons that make it inappropriate for him/her to participate on the item. The member should only recuse himself/herself when there is a conflict of interest and/or he or she cannot participate in an impartial manner.

Part II: CoC Local Applications for the Collaborative Grant

Application Requirements and Process

1. The community is mandated to follow HUD regulations as they pertain to the CoC NOFA; therefore, applicants must be aware of and adhere to all current NOFA requirements.

Timelines, revisions, and changes may occur suddenly, and the local CoC will communicate with community stakeholders through e-mail in order to provide clear and concise information regarding issues pertaining to the grant. ***The CoC is not responsible for late NOFA announcements, short timelines, or additional requests for information from HUD.***

2. Each year, the SNH CoC Board develops a local HUD CoC Project application, which is typically released prior to the release of the NOFA. The local Continuum of Care Project Application is mandatory for anyone who wishes to participate in the current year's Southern Nevada Consolidated Application.
3. Applicants must be a 501(c)(3) nonprofit agency working to address homelessness in southern Nevada.
4. Project applicants are required to have an active Data Universal Numbering System (DUNS) number.
5. Project applicants must have an active registration in the Central Contractor Registration (CCR)/System for Award Management (SAM) to apply for funding.
6. Potential applicants are required to attend at least one local application technical assistance training. The CoC will publicize dates for the technical assistance training and posts information at www.helpohome.org.
7. All applications are submitted online, currently through ZoomGrants. The application requires information related to; project type, scope and description; budget data; connection to consolidated CoC planning; and other pertinent information.
8. Submission of a local application does not guarantee inclusion in the HUD consolidated application competition.
9. Opportunities and access to local applications for funding through the CoC can be found at <http://helpohome.org/funding-opportunities/>. Visit the site for more information including funding timelines and application dates.

Application Evaluation Process

The SNH CoC Board must approve changes to the review and evaluation process or criteria prior to the start of the application cycle.

Applications submitted are reviewed and evaluated according to the following steps and criteria.

Threshold Criteria

All applications must meet the following requirements:

1. The project is consistent with the Nevada Regional Plan to End Homelessness, which integrates the “Opening Doors: Federal Strategic Plan to End Homelessness” and the HEARTH Act of 2009. More information on this plan can be found at <http://helphopehome.org/the-plan/>.
2. The applicant has no outstanding County or HUD monitoring and/or OIG audit findings, and relevant response is not overdue or unsatisfactory.
3. The project complies with the requirements of the CoC Interim Rule, including, but not limited to:
 - a. The project accepts (or will accept) referrals from the coordinated entry system.
 - b. The project participates (or will participate) in the Clark County HMIS.
4. Application and requested materials were received by the deadline.

Applications that do not meet threshold criteria will not be considered for review.

Presentations

The EWG will determine if oral presentations are to be heard for the current application process. During years with oral presentations, each agency will receive written notification of the day, time, and location of the presentations. The EWG has requested that no clients or handouts be presented at the meeting. The meeting is conducted in accordance with Open Meeting requirements and all agencies are encouraged to attend.

If applicable, EWG members will provide each applicant with a list of questions or comments prior to presentations. Audience members are not to interject comments into the Ranking and Scoring Process. If the EWG has a question to pose to an agency, they will seek permission from the group before doing so.

Overview of the Scoring and Ranking Process

Each year, the collaborative applicant will ensure that the criteria for scoring and ranking appears in the grant application instructions.

The SNH CoC has the responsibility for planning, determining local priorities, measuring collective impact, and making recommendations for funding. This includes reviewing local applications for funding and evaluating them based on local priorities and processes. Under the HEARTH Act, performance measures are used to evaluate the effectiveness of projects and determine their ranking priority.

The EWG is charged with assisting the Collaborative Applicant to submit a Consolidated Application, which includes recommended projects that are aligned with HUD priorities and local community needs. HUD requires that the CoC’s governing body rank projects in two tiers, Tier 1 and Tier 2. HUD funds Tier 1 projects as a percentage of the Annual Renewal Demand (ARD), an amount that is determined by HUD. Tier 2 projects are awarded based on availability of funds.

The Evaluation Working Group uses the following HUD criteria to direct conversation around the community’s collaborative application and local priorities.

1. Guidance provided by HUD, the United States Interagency Council on Homelessness, and the National Alliance to End Homelessness;
2. Project's alignment with HUD's policies and procedures as determined by desk audits and onsite monitoring;
3. Project's alignment with HUD's administrative goals as articulated in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*;
4. Alignment with the *Help Hope Home: Southern Nevada Regional Plan to End Homelessness*.

Review and Scoring of Local Applications

The EWG ranks projects based on performance data as dictated by HUD requirements. The EWG adheres to the scoring system outlined in the current year's "Local CoC Application Reviewer's Guide," which can be found at www.helphopehome.org/funding-opportunities under the heading Application Resources.

The Reviewer's Guide provides an overview of application questions, points each question can receive and information that should appear in the answer. The objective of the Reviewer's Guide is to provide a consistent approach to determining the components, quality, and effectiveness of the program within the context of the objectives and priorities of CoC Planning Processes.

Using a scoring sheet provided by the collaborative applicant, Clark County Social Service, the EWG members review each application. The score sheet is then used to help determine an overall score for the proposal, which in turn helps determine which applications move forward. The scorecard also helps identify projects that may be defunded due to substandard performance. A sample scorecard can be viewed at <http://helphopehome.org/scorecard>. **NEED TO UPDATE THIS LINK**.

Ranking Process

After members of EWG have reviewed all relevant information from applications, evaluated the merits of each proposal, heard presentations and scored applications, the applications are ranked for inclusion in the collaborative application. During the ranking process, the EWG will evaluate all projects in accordance with the NOFA. They will also consider information from the application, from monitoring scores, and from presentations.

Projects will be ranked by priority and will be listed in the collaborative application in order of priority. The following methodology is used for the ranking process.

1. Scorecard results which consist of:
 - a. Local application scores;
 - b. Monitoring scores; and
 - c. Performance measures.
2. Renewal projects with outcomes (12 months or more of data available)
 - a. Renewal projects will be ranked based on the average score from their applications and monitoring results.
 - b. Examples of monitoring data includes recidivism rates, rates of spending, and utilization rates.

3. Renewal projects without outcomes (less than 12 months of data available)
 - a. If a provider (applicant) has other CoC funded projects, then the average performance monitoring score for existing projects should be applied to the renewal project without outcomes.
 - b. If a provider (applicant) does not have any existing CoC funded programs, then the project will be ranked based on the application score.
4. New projects
 - a. If a provider (applicant) has other CoC funded projects, then the average performance monitoring score for existing projects should be applied to the new project.
 - b. If a provider does not have any existing CoC funded programs, then the project will be ranked based on the application score.

Monitoring practices include onsite monitoring, desk audits, and HMIS reviews. In determining consistency of monitoring, the EWG and the MWG will determine that the following occurred for every CoC funded organization that is applying for the current year's funding:

1. Regular desk monitoring, or
2. Onsite monitoring, according to the Monitoring Working Group's established schedule for the year, or
3. Ten percent or a minimum of three files were reviewed during each onsite monitoring.

Monitoring information provides the EWG with valuable information it can use while ranking applications/projects. The EWG and MWG will work together to ensure that each applicant has been monitored in the same manner. If the two working groups determine that the monitoring has not been consistent among the applicants, then monitoring information will be excluded from the ranking process. The next steps include taking the EWG funding recommendations and putting them in ranking order in accordance with HUD's two tier system.

1. Application, presentation, and scorecard help to determine final ranking. Ranking occurs in two tiers:
 - a. Tier 1 are funded under the community's Pro-rata need.
 - b. Tier 2 are funded with any remaining funds that HUD may have to allocate.
2. Projects ranked in Tier 1 will include the following:
 - a. HMIS expansion
 - b. Projects that integrate HUD models, such as:
 - i. Safe Haven projects that operate within the scope of HUD's definitions and regulations established for Safe Havens, which is a form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services.

- ii. Projects that implement a Housing First approach as defined by HUD, which is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry.
3. The subcommittee may deviate from the scores and adjust a project's ranking for the following reasons:
 - a. Programs that have poor outcomes due to serving the most vulnerable, hard-to-serve populations (ex.: chronically disabled, mentally ill, etc.), which places the project at risk of being placed into Tier 2.
 - b. Programs that fill a critical service gap and/or community need that might otherwise be placed in Tier 2.
4. If a situation arises where two projects are ranked the same, the following criteria will apply:
 - a. First Tie-Breaker: The project's monitoring score. The mode of monitoring must be the same, as described in the section of this document on monitoring.
 - b. Second Tie-Breaker: The project's local application score.
 - c. Third Tie-Breaker: The project's score on the collaborative applicant's performance monitoring tool.

Reallocation Process

The reallocation process is the CoC's process to shift funds from existing CoC-funded projects to create new projects. Reallocation may happen for several reasons:

1. Low-performing projects (as determined by the application and monitoring scores) may be defunded and these funds reallocated to new projects.
2. Significant history of under-spending of CoC funds by a provider may result in having funds reallocated to new projects. This is to ensure that funding is kept within the community rather than being returned to the Federal Treasury. The CoC will notify applicants at risk of under-spending in advance of reallocation of their funds.
3. Providers may choose not to apply for renewal funding, and these funds will be reallocated to new projects.

The Scoring and Ranking Process follows Open Meeting rules and all applicants are encouraged to attend these meetings.

During the ranking process, the CoC may reallocate funds to new projects when reallocation would improve community outcomes and reduce homelessness. Funds from renewal projects that are not funded in whole or in part will be reallocated to new projects. Any renewal projects that are defunded may participate in the local appeals process as outlined in the appeals section of this document. Any new projects excluded from the local application process may participate in the appeals process, as well.

Notification of Funding Recommendations

The collaborative applicant will notify applicants of funding recommendations in writing within two business days of the closing of the scoring and ranking process. The overall ranking will be posted on www.helphopehome.org.

Debriefing sessions will be held with an applicant agency at their request, which must be in writing. The debriefing shall be held within two weeks of the request and will be done by members of the Scoring and Ranking group as assigned by the EWG.

Appeals to Ranking Decisions

All eligible applicants have the opportunity to appeal both their score and their preliminary ranking prior to the SNH CoC Board's final approval of the priority funding list. A project applicant may appeal a decision if the application received less funding than applied for, or if the agency can show, with clear evidence, that the process was unfair. Project applicants that did not meet the threshold requirements outlined in the section of this document called Threshold Criteria are not eligible to appeal.

Applicants must notify the CoC of their intent to appeal in writing by sending an email to helphopehome@clarkcountynv.gov. Any and all appeals must be received within three (3) business days of the notification of ranking of projects. Every effort will be made for the appeal to be heard on the next available agenda and if need be, a special public meeting will be scheduled.

All notices of appeal must be based on the information submitted by the application due date as part of the full application. Omissions to the application cannot be appealed. The notice of appeal must include a written statement specifying the grounds asserted for the appeal and must be submitted by an individual authorized to represent the agency, such as the Executive Director.

The SNH CoC Board will appoint an appeals committee of four impartial members. Three of these individuals will be voting members of the committee who have not served on the EWG. The fourth member will be in a non-voting capacity and must have been a member of the EWG that ranked the current round of applications. No member of the appeals committee may have a conflict of interest with any of the agencies applying for the current round of funding. All members of the appeals committee must sign a conflict of interest statement and a confidentiality agreement. The role of the appeals committee is to read and review only those areas of the application that are being appealed.

The appeal hearing will include a set amount of time (no more than one hour) for the organization representative(s) to present a case and participate in a discussion with the appeals committee. The applicant is required to attend the appeal hearing in order for the appeal to be considered. Failure to appear for the hearing will result in loss of the opportunity to present their case.

After the hearing, the appeals committee will render a decision within two (2) business days and notify the provider in writing if they uphold or overturn the recommendations of the original scoring and ranking group. If the applicant does not agree with the appeal decision, the agency can request to have an appeal heard by the full CoC Board. This request must be in writing to helphopehome@clarkcountynv.gov. The board will hear the appeal and return a decision to the applicant at the meeting during which the EWG makes funding recommendations. The decision of the CoC Board is final on appeals.

Recommendations for Approval by the SNH CoC Board

Following the scoring and ranking process, the EWG members present their funding recommendations to the full CoC Board for final decisions. At this meeting, the CoC board will also hear any appeals that have been elevated from applicants and return their decision during the meeting. The decision on appeals is final at this board meeting.

The CoC Board members vote to approve or decline the recommendations. Any CoC board member whose agency is also an applicant for the current round of funding must recuse himself or herself from discussion and voting so as not to pose a conflict of interest. Upon final voting on the recommendations, the CoC board will approve the collaborative applicant to move forward with submitting the consolidated application to HUD.

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