

Background

The U.S. Department of Housing and Urban Development (HUD) states that one of the primary responsibilities of the CoC is to develop a new, renewal and reallocation process for selection and ranking criteria of projects for CoC Program funding.

In addition, HUD states that communities should have a mechanism for ranking and selecting projects that demonstrate decisions based on pre-established selection. Criteria may include capacity to implement and manage the proposed project, experience working with the target population, cost effectiveness, etc. Communities should emphasize and rank projects based on the project's ability to articulate achievable outcome measures as emphasized by HUD and local priorities. This is especially important as projects come up for renewal funding and communities must assess project performance.

A. Ranking and Rating Procedures for New and Renewal Project Applications

HUD notes that it is important that new and renewal projects meet minimum project eligibility, capacity, timeliness, and performance standards identified in the annual HUD CoC NoFA or they will be rejected from consideration for funding. When considering new and renewal projects for award, San Bernardino County Staff from the Office of Homeless Services (OHS) will conduct a cursory review of all application(s) to determine if the project meets eligibility and threshold requirements as established by the HUD in the annual Notice of Funding Availability.

OHS will review project applications, information in the Line of Credit Control System (LOCCS); Annual Performance Reports (APRs); and information provided from the local HUD/Community Planning and Development (CPD) Field Office, including monitoring reports and A-133 audit reports as applicable, as well as performance standards on prior grants, and assess a project on the following criteria using a pass/fail basis:

- 1) The project applicant's performance against plans and goals established in the initial application as amended;
- 2) Project applicants must demonstrate all timeliness standards for grants being renewed, including that standards for the expenditure of grant funds have been met;
- 3) The project applicant's performance in assisting program participants to achieve and maintain independent living and record of success, except Homeless Management Information System (HMIS)-dedicated projects are not required to meet this standard; and
- 4) Evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site may result in a rejection of the application from the competition. HUD reserves the right to reduce or reject a funding request from the project applicant for the following reasons:
 - (a) Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
 - (b) Audit finding(s) for which a response is overdue or unsatisfactory;
 - (c) History of inadequate financial management accounting practices;
 - (d) Evidence of untimely expenditures on prior award;
 - (e) History of other major capacity issues that have significantly impacted the operation of the project and its performance;

- (f) Timeliness in reimbursing sub recipients for eligible costs. HUD will consider a project applicant as meeting this standard if it has drawn down grant funds at least once per month; or
- (g) History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

HMIS Data Quality. The CoC evaluates all programs on their HMIS quality for the operating year. It is expected that programs will have no greater than 5% of missing values for any of the universal data elements; programs are able to correct incomplete data to improve the percentages. Data quality outcomes will be collected via the monthly Performance Report Cards and APRs generated for each project.

San Bernardino County CoC 10-Year Strategy to Prevent and End Homelessness. Performance measures are used to assess projects' alignment with the priorities noted in the CoC's 10 Year Strategy to End Homelessness in San Bernardino County. In alignment with *Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness*, our community's revised and updated its strategy entitled, *Recalibrating for Results*:

A Three Year Evaluation of the 2009–2019 San Bernardino County 10-Year Strategy to End Homelessness goals are as follows:

- 1) Housing First Model
- 2) End Homelessness among Veterans.
- 3) Prevent and End Homelessness for Families, Youth, and Children.

The OHS will present all applications that meet the eligibility and threshold requirements to the local Interagency Council on Homeless Grant Review Committee (ICHGRC) comprised of members of the CoC Governing Board. The ICHGRC is the group organized to carry out the responsibilities prescribed in the CoC Program Interim Rule. In accordance with HUD regulations, no member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents. Therefore, any individual participating in or influencing decision making must identify actual or perceived conflicts of interest as they arise and comply with the letter and spirit of this policy. Disclosure should occur at the earliest possible time and if possible, prior to the discussion of any such issue. Individuals with a conflict of interest should recuse themselves from *discussion and* voting on any issue in which they may have a conflict. An individual with a conflict of interest, who is the committee chair, shall yield that position during discussion and abstain from voting on the item.

- 1) The ICHGRC members are knowledgeable about homelessness and housing in the area and are broadly representative of the relevant sectors, subpopulations, and geographic areas. The ICHGRC will be composed of representatives from a cross-section of groups which may include: Faith-based and non-profit providers of homeless services and housing; housing developers; mental health; substance abuse; veteran's services; and consumers.
- 2) The ICHGRC will establish a time frame that allows for review and discussion about the applications, questions and clarification about applications with applicant agencies, scoring of the applications, and presenting project scoring and ranking recommendations.
- 3) The ICHGRC determines the rank and funding levels of all projects considering all available information.
- 4) The OHS staff will provide technical assistance by responding to questions of the ICHGRC panelists, correcting technical inaccuracies if they arise in conversation, and reminding the ICHGRC panelists of their responsibilities if they step outside their authority.
- 5) Scores are calculated by OHS staff.
- 6) The ICHGRC considers adjustments for such issues HUD incentives or priority requirements.

- 7) The ICHGRC considers proposal changes or project budget adjustments that may be required to meet community needs.
- 8) Scoring results are delivered to applicants electronically with a reminder about the appeal process if a project application is rejected.
- 9) Submissions which do not meet the threshold requirements will not be included in the Priority List in the CoC Application, and therefore will not be forwarded to HUD for consideration.
- 10) Project applications will be accepted or rejected in writing, outside of *e-snaps* and will include the reasons for the rejection no later than 15 days before the application deadline which is November 20, 2015.

B. CoC Appeal Process

Appeals must be received in writing within one (1) business day of the notification of ranking to projects. Due date is October 13, 2015. The written appeal can be scanned & e-mailed to the OHS Program Manager: Thomas Hernandez @ Tom.hernandez@dbh.sbcounty.gov and must adhere to the following items:

- 1) The notice of appeal must include a written statement specifying in detail the grounds asserted for the appeal, must be signed by an individual authorized to represent the sponsor.
- 2) The notice of appeal is limited to one page.
- 3) The appeal must include a copy of the application and all accompanying materials submitted to the ICHGRC.
- 4) The Appeal Committee will meet to deliberate based on the following:
 - a) The panel will review the rankings made by the ICHGRC only on the basis of the submitted project application,
 - b) the one page appeal, and
 - c) the material used by the ICHGRC; no new information can be submitted by the applicant or reviewed by the Appeal Committee
- 5) The decision of the appellate panel must be supported by a simple majority vote
- 6) The decision of the Appeal Committee will be final