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## **Continuum of Care Written Standard Rating and Ranking Policies and Procedures Erie City and County CoC – PA 605**

The Erie City and County Continuum of Care's (CoC) policies and procedures require projects to be scored and ranked in a fair, unbiased and transparent process. Projects aligned with HUD and local CoC priorities will be prioritized for funding. The Rating and Ranking sub-committee in coordination with the lead applicant and the planning grant provider are responsible reviewing, amending and approving the new and renewal projects scoring tool and renewal project application addendum required for all renewal projects. The Rating and Ranking sub-committee is also responsible for the scoring and ranking of all projects.

The Rating and Ranking sub-committee consists of non-CoC and ESG funded representatives of the community who are invested in ending homelessness in Erie County. If there are any conflicts of interest with a representative, they will be removed from scoring and ranking the project (s) which have a conflict. The sub-committee shall have at least one representative with lived experience. The Rating and Ranking will meet prior to the NOFO release to determine local needs, including amending the renewal application and the renewal and new project scoring tool based on HUD and local CoC priorities. The Rating and Ranking sub-committee may make further amendments to the application and project scoring tools may be made after the NOFO release based on priorities outlined in the NOFO.

The Rating and Ranking sub-committee will review and score all applications based on the criteria found in the sections, Rating Criteria for Renewal/Expansion projects and Rating Criteria for New Projects below. The lead applicant will provide monitoring reports, annual performance reports, fiscal reports and other pertinent information to the Rating and Ranking sub-sub-committee to verify the accuracy, completeness and quality of applications submitted by agencies. The Rating and Ranking sub-committee is also responsible for rejecting, reducing and accepting projects for submission. In some cases, the Ranking and Scoring Committee may rank a project higher than it scored, if the project is a greater need based on HUD and local CoC priorities.

The governing board of the Continuum of Care may vote to reallocate shifting all or part of funds for a project to another new project based on poor performance, non-compliance, not spending down funds, consistently bad monitoring reports (2 years or more), or not meeting HUD or local CoC thresholds. The governing board may also reallocate funds for a project to a new project if the sub-recipient decides they no longer want to manage or renew the project. The reallocation of a project does not have to be done during the NOFO period. If the governing board reallocated a project, they would inform the lead applicant and the ranking and scoring committee. The lead applicant would inform their HUD representative of any reallocation of projects outside the NOFO. All reallocations of project outside of the NOFO must be approved by HUD.



HMIS and Coordinated Entry are required by HUD. Expansion grants for these projects will not be subject to rating and scoring. HMIS and Coordinated Entry expansion grants will automatically be the highest ranked grants in that order.

An applicant may appeal a decision made by the Rating and Ranking sub-committee by emailing the lead applicant. All appeals will be presented to the CoC governing board. The governing board will set up a meeting to hear the appeal and make a decision. The vote on the slate is final. Appeals will only be considered where the applicant believes there was unfairness or bias specific to the review process and scoring of their application. No appeals specific to the ranking or funding recommendation will be considered. Notices of appeals must be submitted by the application due date. Omissions on applications are not allowed to be appealed.

The project applicant can decide to file a formal appeal through HUD. HUD appeal procedures are detailed in the NOFO. The link for the NOFO in the Erie County CoC's NOFO funding announcement.

## **Continuum of Care Review and Ranking Process Erie City and County CoC -PA 605**

### **2024 ERIE COUNTY CoC RATING CRITERIA FOR RENEWAL/EXPANSION PROJECTS**

Under the 2024 HUD Continuum of Care process, the Erie County Continuum of Care is required to rate and rank all renewal projects. The HUD 2024 Rating and Ranking tool that was released from HUD was modified to meet local priorities and performance outcomes and is being utilized for the 2024 rating and ranking process. In order to rate all renewals in a fair and impartial manner, the rating tool consists of an evaluation system based on performance measures, data quality, application accuracy, fund utilization, Housing First/low barrier implementation, and grant utilization. The overall score will equal 200 points maximum when a project receives a perfect score for all performance benchmarks and will be weighted to a score of 100. The criteria for the benchmarks were developed from the System Performance Measures and the projects last submitted Annual Performance Report. The benchmarks for other criteria were obtained from the individual 2024 project applications, HUD invoices, and monitoring reports submitted by the Erie County Department of Human Services (lead applicant) and HUD. A majority of the Scoring is based on objective criteria. An independent Rating and Ranking committee will review and score new and renewal projects. The benchmarks that were established for the evaluation include the following:

- Length of Stay –On average, participants are placed in housing within 30 days after project start for Rapid Rehousing (RRH) and 45 days for Permanent Supportive Housing



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(PSH), re; PSH generally serves participants with higher needs that can be more difficult to house. *Maximum Points: 20*

- 90% or More of Participants in Permanent Supportive Housing will remain in or move to Permanent Housing. *Maximum Points: 25*
- 75% or More of Participants in Rapid-Rehousing will move to Permanent Housing. *Maximum Points: 25*
- 10% or Less of Participants will return to homelessness within 12 months of exit to Permanent Housing. *Maximum Points 15*
- 8% or More of Participants (Stayers) will Increase Their Earned Income. *Maximum Points: 2.5*
- 10% or More of Participants (Stayers) Will Increase Their Non-Employment Income. *Maximum Points:2.5*
- 8% or More of Participants (Leavers) will Increase Their Earned Income. *Maximum Points: 2.5*
- 10% or More of Participants (Leavers) will Increase Their Non-Employment Income. *Maximum Points 2.5*
- 95% or more of entries came from Coordinated Entry referrals. *Maximum Points: 10*
- Project will abide by the Housing First/Low Barrier Model. *Maximum Points: 10*
- PSH - 80% or More of Dedicated Beds for Chronic Homelessness were utilized. *Maximum Points: 10*
- RRH- 20% or More of Beds were utilized for Chronically Homeless. *Maximum Points: 10*
- Program has Policies to Create More Equitable Outcomes. *Maximum Points: 10*
- Project Incorporates Feedback from Persons with Lived Experience. *Maximum Points: 10*
- Fund Utilization – Utilized 90% or More of funds from Previous Year. *Maximum Points: 20*
- Data Quality is 90% or More. *Maximum Points: 10*
- Completeness, Quality and Accuracy of Application. *Maximum Points: 30*
- Quality of Landlord Engagement: *Maximum Points:10*
- Quality of Supportive Services (includes Agency partnerships and Staff Trainings). *Maximum Points: 10*

\* All Renewal/Expansion projects require an additional renewal project addendum provide further information on your project for the Ranking and Scoring committee. The Renewal application addendum will be posted with the NOFO and emailed directly to sub-recipients applying for a renewal/expansion project.

\*\*New Expansion grants will be scored based on Performance Measures and Scoring Criteria of Renewal Grant it is expanding.

\*\*\*Projects will receive full points for criteria met and will receive a graduated reduction in points based on percentages below criteria for maximum points. For example, if scoring criteria was 90% or more and project only met 80%, they would only receive 88% of the maximum points (80 divided by 90



= 88%). Points will be rounded to up to the nearest .5 of total points. (In this example, if maximum points received were 20 points, you would multiply 20 by 88% or .88 which equals 17.6 which rounds to 17.5).

All renewal/expansion projects will receive written notice by emailed letter, no later than 15 days before the CoC Program Competition application submission deadline whether or not there application was rejected, reduced or accepted for submission.

## **2024 ERIE COUNTY CoC RATING CRITERIA FOR NEW PROJECTS**

The Continuum of Care (CoC) NOFO has been released by HUD. For this year the Congressional Appropriations Act authorizes HUD to issue a single 2 year NOFO for fiscal years 2024 and 2025. Under the 2024/25 HUD Continuum of Care process, the Erie County Continuum of Care is required to rate and rank all new projects. The HUD CoC Program Rating and Ranking tool that was released from HUD, was modified to meet local priorities and performance outcomes, and is being utilized for the 2024/25 Continuum of Care rating and ranking process. All new project must participate in HMIS and Coordinated Entry as well as meet all the HUD threshold requirements listed on pg. 3 of the Erie County CoC Rating Criteria. Agencies applying for new projects may be asked to provide proof of financial capacity (i.e. audit), experience in utilizing public funds, partnerships with supportive service agencies including healthcare, Social Security, employment agencies and other social service agencies, The overall score will equal 200 points maximum when a project receives a perfect score for all performance benchmarks and will be weighted to a score of 100. The benchmarks for other criteria were obtained from the individual 2024 project applications, monitoring reports from the Erie County Department of Human Services. The benchmarks that were established for the evaluation include the following:

- Experience of applicant in working with the homeless population and providing housing. *Maximum Points: 15*
- Experience with utilizing a Housing First/Low Barrier approach. *Maximum Points: 10*
- Experience in effectively utilizing federal funds including HUD Grants and other public funding. *Maximum Points: 15*
- Extent to which the applicant (1) Demonstrates understanding of the needs of the client (2) Demonstrates type, scale, and location of the housing fits the need of the clients to be served (3) Demonstrates type and scale of supportive services (4) Demonstrates how clients will be assisted with accessing mainstream benefits (5) Establishes performance measures for housing and income that are objective and measurable. *Maximum Points: 15*
- Plan to assist clients to rapidly secure and maintain safe, affordable permanent housing. *Maximum Points: 5*
- Describe how clients will be assisted to increase employment and/or income. *Maximum Points: 5*



Project leverages housing resources with housing units not funded through Continuum of Care or ESG funds. *Maximum Points: 5*

- Describe how project leverages healthcare resources. *Maximum Points: 10*
- Describe plan for rapid implementation of project. *Maximum Points: 10*
- Describe how project is cost-effective. *Maximum Points 5*
- Audit (1) Most recent audit found no exception to standard practices. *Maximum Points: 5* (2) Most recent audit identified as "low risk": *Maximum 5 points* (3) Most recent audit indicates no findings. *Maximum Points: 5*
- Documented Match amount. *Maximum Points: 5*
- Budgeted costs are reasonable, allocable and allowable. *Maximum Points: 5*
- Coordinated Entry Participation - 95 % of entries come from Coordinated Entry. *Maximum Points: 10*
- Project incorporates feedback from persons with lived experience. *Maximum Points: 10*
- Policies and plan for equitable outcomes including supporting underserved communities and providing fair housing. *Maximum Points: 10*
- Completeness, quality and accuracy of application. *Maximum Points: 30*
- Agency partnerships and knowledge of Supportive Services (including SOAR and other staff trainings). *Maximum Points: 10*
- Landlord partnerships and engagement. *Maximum Points: 10*

### **HUD Threshold Requirements**

In order for a project to be accepted, the project must meet all HUD threshold requirements below:

- Applicant has Active SAM registration with current information and maintains an active SAM registration annually.
- Applicant has Valid UEI (Unique Entity Identifier) Number.
- CoC Program Eligibility – Project applicants and potential subrecipients meet the eligibility requirements of the CoC Program as described in the Act and the Rule and provide evidence of eligibility required in the application (e.g., nonprofit documentation).
- Financial and Management Capacity: Project applicants and subrecipients demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds.
- Certifications - Project applicants submit the required certifications specified in the NOFO.
- Population Served - The population to be served meets program eligibility requirements as described in the Act, the Rule, and the NOFO.
- Applicant has no Outstanding Delinquent Federal Debts – It is HUD policy, consistent with the purposes and intent of 31 U.S.C. 3720B and 28 U.S.C. 3201(e), that applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds unless.
  - a. A negotiated repayment schedule is established and the repayment schedule is not



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delinquent, or

- b. Other arrangements satisfactory to HUD are made before the award of funds by HUD
- Applicant has no Debarments and/or Suspensions – In accordance with 2 CFR 2424, no award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal government.
  - Pre-selection Review of Performance - If your organization has delinquent federal debt or is excluded from doing business with the Federal government, the organization may be ineligible for an award. In addition, before making a Federal award, HUD reviews information available through any OMB-designated repositories of government-wide eligibility qualification or financial integrity information, such as Federal Awardee Performance and Integrity Information System (FAPIS), and the “Do Not Pay” website. HUD reserves the right to
    - a. Deny funding, or with a renewal or continuing award, consider suspension or termination of an award immediately for cause;
    - b. Require the removal of any key individual from association with management or implementation of the award; and
    - c. Make provisions or revisions regarding the method of payment or financial reporting requirements
  - Sufficiency of Financial Management System - HUD will not award or disburse funds to applicants that do not have a financial management system that meets Federal standards as described at 2 CFR 200.302. HUD may arrange for a survey of financial management systems for applicants selected for award who have not previously received Federal financial assistance, where HUD Program officials have reason to question whether a financial management system meets Federal standards, or for applicants considered high risk based on past performance or financial management findings
  - False Statements - A false statement in an application is grounds for denial or termination of an award and may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment. Recipient or applicant confirms all statements are truthful.
  - Mandatory Disclosure Requirement - Recipients or applicants disclose in writing to the awarding program office at HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award within ten days after learning of the violation. Recipients that have received a Federal award including the term and condition outlined in Appendix XII to 2 CFR part 200—Award Term and Condition for Recipient Integrity and Performance Matters are required to report certain civil, criminal, or administrative proceedings to SAM. Failure to make required disclosures can result in any of the remedies described in § 200.338 Remedies for noncompliance, including suspension or debarment. (See also 2 CFR part 180, 31 U.S.C. 3321, and S.C. 2313.)
  - 14. Prohibition Against Lobbying Activities - Applicants are subject to the provisions of Section 319 of Public Law 101-121, 31 U.S.C. 1352, (the Byrd Amendment), and 24 CFR part





87, which prohibit recipients of federal awards from using appropriated funds for lobbying the executive or legislative branches of the Federal government in connection with a Federal award. All applicants submit with their application the signed Certification Regarding Lobbying included in the Application download from Grants.gov. In addition, applicants disclose, using Standard Form LLL (SFLLL), "Disclosure of Lobbying Activities," any funds, other than federally appropriated funds, that will be or have been used to influence federal employees, members of Congress, or congressional staff regarding specific awards..

- Equal Participation of Faith-Based Organizations in HUD Programs and Activities – Projects ensure that all projects meet the requirements under 24 CFR 5.109. On April 4, 2016, HUD amended 24 CFR 5.109 consistent with E.O. 13559, entitled Fundamental Principles and Policymaking Criteria for Partnerships with Faith-Based and Other Neighborhood Organizations (75 Fed. Reg. 71319 (Nov. 22, 2010)). (See 81 FR 19355). These regulations apply to all HUD programs and activities, including all of HUD's Native American Programs, except as may be otherwise provided in the respective program regulations, or unless inconsistent with the respective program authorizing statute.
- Resolution of Civil Rights Matters - Outstanding civil rights matters be resolved before the application submission deadline. Project applicants, who after review are confirmed to have civil rights matters unresolved at the application submission deadline, will be deemed ineligible. Their applications will receive no further review, will not be rated and ranked, and will not receive funding.

### **CoC Threshold Requirements**

In order for a project to be accepted, the project must meet all CoC threshold requirements below:

- Coordinated Entry Participation
- Housing First and/or Low Barrier Implementation
- Documented, secured minimum match
- Project has reasonable costs per permanent housing exit, as defined locally
- Project is financially feasible
- Applicant is an active CoC participant\*
- Application is complete and data are consistent
- Acceptable organizational audit/financial review

\* Exceptions could be granted with Ranking and Scoring Committee approval vote.



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