

Approved by CoC Board of Directors August 8, 2022

These Review Score and Ranking Procedures will apply to both the HUD Unsheltered Supplemental NOFO and the FY2022 CoC NOFO.

Background

The St. Louis City Continuum of Care's Program Performance Committee, a standing committee of the MO-501 Saint Louis City Continuum of Care, exists to advance the CoC's mission and goals to prevent homelessness whenever possible, to reduce the duration and impact of homelessness on our unhoused neighbors and to reduce returns to homelessness by objectively evaluating the effectiveness of existing CoC funded projects.

Program Performance strives to arrive at data driven, strategic funding recommendations that are predicated on each project's positive and lasting impacts on the households they serve while also positively contributing to improved CoC System-Wide Performance.

The Program Performance Committee is charged with:

- Conduct an annual performance evaluation of CoC Renewal Projects
- Develop annual Review, Score and Rank procedures for HUD COC Program Grant local competitions and submit to the CoC Board of Directors for approval
- Develop Scoring Tools for the Review, Score and Rank process and submit to the CoC Board of Directors for approval

Review and Rank Committee

The Program Performance Committee, in collaboration with the CoC Board of Directors and the CoC Lead Agency, will annually recruit and nominate members to the Review and Rank Committee. This Committee will review, score and rank project applications submitted in response to HUD CoC Program Notices of Funding Opportunities. The CoC Board of Directors will approve the membership to the committee.

Members of the Review and Rank Committee will meet the following criteria:

- General knowledge of human services, homelessness, and the non-profit sectors of the City of St. Louis.
- Have no existing or perceived conflict of interest with any applicant. They will have no direct relationship with any applicant or application subrecipient seeking CoC Program funds. Relationships include being an employee, contractor, vendor, or board of director, advisory board or similar relationship currently or in the past year.
- Commitment to follow all review, score and ranking procedures approved by the CoC Board of Directors.
- Include at least one person with lived experience in homelessness.

Upon publication of any local CoC Program competition RFP, potential applicants and subrecipients are required to refrain from any interactions with Review and Rank Committee members to maintain the

integrity and objectivity of the decision making process.

Role of the Collaborative Applicant – Lead Agency

The City of St. Louis Homeless Services Division (HSD) serves as the CoC Collaborative Applicant. Additionally, the City is also an Applicant in CoC Program Grant funding. HSD is charged with facilitating the local competition and understands the inherent perception of conflicts within the CoC decision making process. The City and HSD fully disclose the appearance of conflict and accordingly will operate in complete transparency as well as utilize a third-party contractor to assist with competition operational activities which includes advising, providing data, and preparing materials for the Review and Rank Committee.

Evaluation of Renewal CoC Program Projects

The Program Performance Committee's renewal evaluation process also must identify under-performing programs and/or programs that, in whole or in part, are not addressing our community's most pressing needs, and if appropriate, recommend the reallocation of funding to new projects to the Review and Rank Committee.

Program Performance reviews all renewal projects for performance outcomes to ensure they are high performing projects, with an eye toward reallocating funding away from any projects that: are not well-performing as demonstrated by HMIS and other CoC data; do not expend all their CoC grant funding; or that no longer fill a critical gap in the Continuum and would be better allocated to a new Project seeking to fill such a gap.

Following the Program Performance Committee evaluation, in order to ensure lower performing projects are given ample support and opportunity to implement programmatic changes, the Committee provides various supports to assist with program performance improvements and to prepare CoC Renewal projects for the Review, Score and Rank processes for the upcoming COC NOFO process. Such assistance includes:

- Providing written details to each renewal Project on the Project's scoring outcomes by performance measurement that included an invitation to discuss the same with Project with Program Performance Committee members involved in the Project's evaluation;
- Providing quarterly data reports to each Project offering each Project insights into how their Project would score and rank based on HMIS data collected to date;
- Working with the CoC's Systems Performance Committee to identify our Continuum's most pressing unmet needs in the event that funding is identified for reallocation;
- Working with the City of St. Louis HSD Compliance Monitoring Agents, Planning Grant Consultants and HMIS Lead to better align Program Compliance Monitoring with our CoC's areas of performance focus, including HUD Program Performance Measures, evidence based best-practices and alignment with national and local CoC priorities and policies. These efforts seek to ensure that the Committee has the most comprehensive yet objective Project information to inform the Review and Rank Committee process while also offering Programs the opportunity to identify and correct performance issues and ensure their positive impact on our CoC's system-wide performance.

Reallocation of Funds

For FY2022, renewal projects shall be considered for a partial or total reallocation of funding if the project:

- Voluntary Reallocation – During the annual CoC Program Competition, CoC-funded organizations may choose to reallocate all or part of renewal project funding. In the event an organization requests reallocation of one or more CoC-funded projects, the organization requesting reallocation is responsible for any and all HUD-required closeout activities, securing housing for any project participants whose housing will be impacted by reallocation, and, if needed, requesting technical assistance from the CoC and/or HUD.

Projects interested in voluntarily reallocating should notify the CoC by emailing the President of the CoC Board of Directors with the organization name, project name, project award amount, reallocation amount, and contact information as soon as possible.

The CoC has established that funding from projects that are voluntarily reallocated is first offered to the current recipient agency or subrecipient to design another project or expand an existing project to meet local goals to end homelessness. New projects created through voluntary reallocation will be scored and ranked in the position of the prior project from which funds are being reallocated. Funding that has been reallocated by agency indication (i.e. not through CoC request) may only be reallocated once per 5 years. Agencies will require a Letter of Support from the CoC Lead Agency (Collaborative Applicant) to indicate appropriate justification of the new project being created through voluntary reallocation.

- Project Renewal Evaluation Scores among the lowest performers in the past two years of local competition (FY2021 and FY2022).
- Projects that left 10% or more of their CoC funding unspent at the conclusion of its last completed program year.
- The Project is in whole or in part identified as no longer filling a critical unmet gap in the Continuum of Care

In the event funding reallocations are identified, the Review and Rank Committee will reallocate all the available funding to new projects (new or expansion) that fill a critical gap in the Continuum for an identified priority population with a particular focus on our most underserved populations as identified by System Performance, gaps analysis, HMIS reporting and System Performance committee recommendations.

Project Scoring of Renewal Projects

Program Performance uses both objective data-driven to annually evaluate and score all renewal project applications. The scoring tools are designed to identify our CoC's highest to lowest performing projects through data and project information to determine the project's efficiencies and effectiveness. Scoring areas focus on key systems performance measures and CoC priorities, including:

- Positive Housing Outcomes / Returns to Homelessness
- Income Performance Measures
- Bed Utilization
- Severity of Needs Served by the Project
- Utilization of Coordinated Entry Policies and Procedures to fill vacancies
- A Demonstrated Commitment to Housing First Practices
- Fiscal Management of CoC funds / Spenddown rate
- Level of involvement and training in the CoC
- Cost effectiveness
- Past contract year compliance monitoring results

In an effort to be objective and data driven in the scoring process, the Committee relies heavily on data collected by projects within the HMIS System or HMIS comparable database for domestic violence providers.

Upon opening of the HUD CoC Competition, additional subjective criteria will be evaluated and scored in the local competition to include subjective narratives addressing specific HUD and CoC program priorities for the current program year including:

- Addressing equity in services / disparities in access
- Inclusion of persons with lived experience in decision-making

These scores will be added to the annual evaluation score.

Project Scoring of New Projects

Program Performance uses both objective data-driven measures and subjective narratives to evaluate and score all new project applications. The scoring tools are designed to identify the projects that best address both HUD and the City of St. Louis CoC's community needs. Scoring areas including:

- Addressing HUD and CoC Program Priorities
- Organizational Capacity and Experience
- Experience with targeted homeless populations
- Commitment to Coordinated Entry Policies and Procedures
- A Demonstrated Commitment to Housing First Practices
- Level of involvement/investment in our CoC
- Project Cost effectiveness
- Addressing equity in services / disparities in access
- Inclusion of persons with lived experience in decision-making

All applicants, new or renewal will have access to the scoring tools before the local competition RFP deadline.

Scoring Procedures by Review and Rank

All new project applications will be independently reviewed and scored by all members of the Review and Rank Committee.

All renewal project applications will be independently reviewed by no less than three members of the Review and Rank Committee to assure there is a well-represented pool of reviewers examining all renewal projects. The

The evaluation and scoring tools used are attached. The score categories demonstrate our CoC's commitment to objective data-driven decisions.

Project Ranking

All renewal projects will be initially ranked in order based on the annual evaluation score awarded by the Project Performance Committee. The Review and Rank Committee scoring will be added to that score for the final competition score.

All new projects will be initial ranked by score and incorporated into the overall project list.

Lower scoring renewal and new projects filling a critical systems gap will be given further consideration when determining their placement in the rank and the assignment of Tier One versus Tier Two status.

Renewal projects that continue to fill a critical need in the CoC, may be prioritized above new projects to be funded with reallocated funding.

All directives and guidance published by HUD in connection with the FY2022 CoC Funding Competition may be considered in determining final Project Rankings.

Projects leaving more than 10% of Project funding unspent at the conclusion of their last full contract year may be placed at the bottom of Tier One or in Tier Two or be subject to reduced funding and funds reallocated to higher ranking new projects.

First year renewal projects will be placed towards the bottom of Tier One in recognition of the time it takes to ramp up a new Project to capacity and the limited data available to fairly analyze and assess the Project's Performance such as bed utilization and spend-down.

Renewal Projects assigned to new Sub-Recipients as a result of the original operator's decision not to renew will be placed towards the bottom of Tier One in recognition of the time it takes for the data to be accurately reflective of the new Sub- Recipients performance.

Expansion and Consolidation Project

HUD allows two methods of amending existing renewals through expansion or consolidation of existing renewal projects.

For projects proposed by applicants for consolidation, they will be scored individually, and the individual scores will be averaged to determine the rank of the consolidated renewal projects.

Expansion projects will be scored utilizing the new scoring tools. The Review and Rank Committee will consider in their deliberations the score and rank of the renewal grant being expanded in funding and ranking decisions. Expansion grants will be ranked against all new and renewal projects.

HMIS and Coordinated Entry Projects

The annual CoC Program Grant renewal HMIS and Coordinated Entry projects will be placed at the bottom of Tier One, in recognition of their critical role in operating the Continuum of Care. These projects will be independently evaluated annually by the HMIS and Coordinated Entry Committees in collaboration with the Contract Compliance Monitoring performed by the City of St. Louis HSD.

In the event of submission of a new or expansion HMIS or Coordinated Entry SSO project, the projects will be reviewed and scored utilizing the new project tool and ranked alongside all new and renewal projects.

Additional Review and Ranking Considerations

The Review and Rank committee must apply the scoring and ranking process under the context of actual funds available and the HUD tiering process and limitations. They are charged to maximize funds applied for and consider the HUD NOFO collaborative application national scoring competition in making final rank and funding decisions. This will require project review discussions, analysis and decision making in addition to scores. These may include:

- Level of negative impact to the CoC if project were not funded (or funding was reduced); capacity among other CoC Project's to ensure continuity of supports to a specific targeted population served by the project to be cut, in whole or part
- Number of households served, and cost efficiency as weighed against the per household cost of positive housing
- History of performance with other CoC projects
- Expertise and capacity of project applicant and any subrecipient
- Specific HUD NOFO stated federal priorities impacting the overall collaborative application scoring for the CoC
- First time applicants or subrecipients that will provide support to underserved communities

The Review and Rank Committee will produce a final rank in spreadsheet format. This will provide the details on rank, score, funding, tiering and funded or rejected projects.

The Chair of the Review and Rank Committee will submit the spreadsheet and memo detailing the Review and Ranking process to the CoC Board by the CoC local competition deadline.

Board Approval

The CoC Board will accept the Review and Rank Committee report and vote on the final rank and funding. The project list will be posted on the CoC and City of St. Louis websites no less than 15 days before the HUD NOFO deadline.

Notification to Project Applicants

The written notification email of the rejection or funding reduction of new or renewal projects made by the Rank and Review Committee and approved by the CoC Board of Directors, must be sent to the project applicant and subrecipient (if applicable) at least 15-days prior to the HUD application submission deadline.

Appeal Process

Once the CoC Board of Directors approves the Review and Rank Committee report, the ranking and funding decisions are deemed final for the local competition.

Per the HUD FY2022 CoC NOFO, eligible project applicants that believe they were denied the right to participate in the CoC grant process in a reasonable manner, may submit a solo project application to HUD and may be awarded a grant from HUD by following the procedure found in 24 CFR 578.35. Solo applicants must submit their solo project application in eSNAPS to HUD by 8:00 PM EDT, on September 30, 2022. See Section X.C of the NOFO (page 97) for additional information regarding the Solo Applicant appeal process.

Grievances

If at any stage of the local CoC competition a potential, new, or renewal applicant or subrecipient have questions or concerns with the transparency, fairness, or compliance concerns of the process, they should submit this grievance or concern in writing to an officer of the CoC Board of Directors or to XXX at the City of St. Louis. Depending on the nature and topic of the complaint, the CoC and/or the Collaborative Applicant will provide swift due diligence to respond to the grievance and act according to local or federal established procedures.

