FRANKLIN ESSEX HOUSING COALITION: 2022 RANK AND REVIEW PROCESS

Background

HUD Continuum of Care (CoC) homeless assistance programs serve as a source of funding for homeless services in the Counties of Franklin and Essex and the planning body coordinating these services is the Franklin Essex Housing Coalition. Working with the CoC (FEHC) and providing support and technical assistance is CARES of NY, Inc., the Collaborative Applicant.

In the 2021 NOFA, the Franklin Essex CoC received $183,588 from HUD to support five projects two for homeless individuals and families, one HMIS project, one CoC planning, and one for UFA. HUD awards homeless assistance grants through an annual application process known as the CoC Program Competition.

HUD requires that the CoC (FEHC) prioritize programs which most effectively serve the community at the local level. To reach this goal, a Rank & Review Process has been implemented for applicants who wish to renew their project/s and for new and/or bonus projects, if bonus funding is available. The process of ranking and reviewing projects is designed to help the CoC (FEHC) learn about each project's performance and effectiveness.

In the Franklin Essex Housing Coalition (FEHC), the Operations Committee is charged with overseeing the Rank and Review process. As stated in the FEHC bylaws, the Operations Committee is responsible for "the design, operation, and implementation of a collaborative process for the development of funding applications, including funding priorities, and the number and type of applications." Each year the Operations Committee reviews the Rank & Review Written Process and Application Tools and makes any changes necessary to reflect changing priorities. The Operations Committee is also responsible for establishing a Review Team for the Rank and Review Application. The Written Process and Application Tools (Renewal and New/Bonus) are posted for public comment.

CoC Transparency

The annual Rank and Review process is conducted in a transparent manner to ensure a fair and consistent way to prioritize projects. Each year, feedback regarding the process and tools is solicited. The process is publicly announced by the CoC, distributed in writing to CoC Membership, and posted publicly on the CARES, Inc. website for all community members to review and comment.

FY 2022 Rank and Review Application

The FEHC emphasizes the importance and impact of using the Rank & Review Application as the primary basis for determining the Project Listing submitted to HUD as part of the CoC Consolidated Application. The Rank and Review Application is thoughtfully revised each year to meet both HUD and CoC standards, incorporate both national and local priorities, and balance objective performance measures with subjective narrative descriptions of project operations.

Review and Approval of the Rank and Review Renewal Application

After the annual CoC Consolidated Application is submitted to HUD by the Collaborative Applicant, the Operations Committee reviews that prior year's Rank & Review process, including reviewer feedback and FEHC member comments. The Operations Committee also develops a list of Review Team members, considering prior reviewers and potential new members.

In phases, the Operations Committee presents the Written Process, Application Tools, and list of proposed Review Team members to the FEHC Board and Membership for one-week public comment periods. The Operations Committee considers submitted comments for inclusion. The Operations Committee updates the Board on any edits, incorporates any additional changes from the Board, and secures a vote for approval. Finally, the Written Process, Application Tools, and list of Review Team members are shared with Membership.

Project Participation

Renewal Projects are required to complete a Rank & Review Renewal Application. The Application process will occur in three (3) parts, with the intent to allow agencies adequate time to complete the full Rank & Review Application. *Completed applications (including required attachments) for each CoC project must be submitted to CARES of NY, Inc. by the stated deadline to be considered complete and sent to the Review Team.*

* Please Note: Coordinated Entry, Planning, and HMIS projects are not required to fill out a renewal application.

*Renewal projects should have one federal fiscal years' worth of data (10/1-9/30) so should be in operation for one full federal fiscal year.

- **Part 1** focuses on project and system outcomes, using project data entered in HMIS and objective questions to "rate" projects. The HMIS data used in Part 1 is from the previous HUD Fiscal Year (Oct 1 - Sep 30). This HMIS data used in Part 1 has been cleaned and reviewed for data quality errors when submitted to HUD for the Longitudinal Systems Analysis (LSA) report. Agencies must confirm Part 1 Data Attachment accuracy within five business days of receipt. During the Part 1/Data Training Session, agencies will be instructed on how to confirm the accuracy of the Data Attachment values.

  If errors are identified on the Data Attachment, the agency must submit the Data Correction Form on the CARES Website. CARES staff will review the Data Correction Form submission to determine if the requested change is a calculation error. If the request is a calculation error, CARES staff will correct the error and resubmit the Data Attachments for the agency's review. After receiving the corrected Data Attachments, agency staff will review the changes and if no additional errors are identified, then agency staff will submit the Data Confirmation Form on the CARES website. If the request for Data Correction Form is determined to not be a calculation error, CARES staff will notify the agency of the decision and request the agency to submit the Data Confirmation Form.

If no errors are identified on the Data Attachment, the agency will submit the Data Confirmation Form on the CARES website. If an agency does not submit a Data Correction Form or Data Confirmation Form after five business days following the Part 1/Data Training Session, then the data will be considered accurate and confirmed

- **Part 2** includes narrative allowing agencies to explain unique circumstances which may affect project performance.
- **Part 3** of the Rank & Review Process includes project interviews with the Review Team. After release of the NOFA, the Operations Committee will draft questions based on specific criteria included in the NOFA Application to be asked during project interviews. Projects will receive these questions prior to the interview. Additionally, reviewers may choose additional points for Parts 1 and 2 up to the maximum amount of points available for each question.

New Projects

A separate application is required for Bonus and Reallocated project proposals. If, after the ranking process, additional money becomes available through reallocation, and if all new projects have been approved, the new project RFP will re-open for submission in efforts to utilize all available funding. RFPs submitted during the second application process will automatically be ranked below projects from the first round. The Review Team reviews and scores all New/Bonus project applications submitted. New project applications are required to interview with the Review Team. Interview questions will include specific criteria included in the NOFA. New project applications will be ranked, approved by the Board, and presented to Membership. The community's goal is to apply for the maximum amount of available funds. The same appeals process that applies to Renewal applications applies to new project applications.

Bonus Projects

Each year, HUD *may* offer bonus funding and the NOFA outlines how the funds may be spent. Bonus project proposals must fill an unmet need as noted within the Action Plan or locally determined priorities. Bonus project applications are required to interview with the Review Team. Interview questions will include specific criteria included in the NOFA. Bonus applications will be ranked, approved by the Board and presented to Membership. The community's goal is to apply for the maximum amount of available funds. The same appeals process that applies to Renewal applications applies to Bonus project applications.

Reallocation

Reallocation is the process by which the CoC shifts funds, in whole or in part, from existing eligible renewal grants to new projects that fill an unmet need within the community. Reallocation is one of the most important tools by which communities can make strategic improvements to their homeless services system.

Projects that can be flagged for reallocation consideration include those that have demonstrated inadequate financial management, a history of expending funds on ineligible activities, a lack of full expenditure of funds, and consistent low scores during the Rank and Review. Reallocation is recommended for any project *not* participating in Coordinated Entry, HMIS or the annual Point-in-Time, or operated by an agency that is not a member in good standing of the FEHC may be considered for reallocation The Board may determine

reallocation of a particular project as in the best interest of the CoC and essential to maintaining full funding. Further, agencies may voluntarily choose to reallocate funds from their own projects. New project proposals developed by agencies through reallocation of their own funds will be prioritized during the ranking process. All other proposed projects using reallocated funds will be ranked according to general ranking procedures.

Project proposals developed with reallocated funds must fill an unmet need and submit a New/Bonus application. Agencies interested in applying for reallocated funds are required to interview with the Review Team. Applications for New/Bonus projects will be ranked separately from Renewal projects, and the final ranking will be approved by the Board presented to CoC Membership.

Reviewers

Reviewers must be individuals from the community who are not CoC-funded or from neighboring communities and knowledgeable about the CoC process, services, and providers. Review Team members are considered by the Operations Committee and invited by the Collaborative Applicant (CARES) to participate. After reviewers agree to participate, one to two days are scheduled to conduct project interviews and for scoring to take place. Interviews will be scheduled for a date after the NOFA is released to allow for any HUD-specific criteria to be incorporated into the interview process.

Reviewers are provided a copy of each project's full application for review and score forms to complete. The Review Team has the authority to 1) allot additional points to questions in Part 1 and Part 2 based on responses given by agencies during the interview; and 2) allot points based on responses given by agencies to Part 3 interview questions. After conducting interviews with each agency, the Review Team discusses and finalizes scores for each project application. In the event project applications initially receive the same score, it is the responsibility of the Review Team to reconsider scoring in order to break the tie. The Review Team also considers any submitted appeals (see **Appeals Process** outlined below) and provides any final comments to be shared with agencies. Final scores result in the project ranking.

Threshold Review

In order to ensure CoC projects are high performing, all project applications must also meet a minimum scoring threshold of 50% of total possible application points. The Threshold Review will be conducted by the Review Team after the Rank and Review process is complete and final project scores determined. If the pre-determined threshold is not met, the Review Team may recommend the FEHC Board consider the possibility of reallocation or amendments to the project application/s with said agency.

Project Ranking

The NOFA requires that the CoC conduct a transparent and objective process to review and rank all Renewal and New/Bonus projects. Using the CoC-approved Rank & Review Tool, all Renewal projects seeking funding are scored and placed in numerical order by scores. New/Bonus projects are scored and placed in numerical order beneath Renewal Projects. Because HMIS and CE projects are required CoC infrastructure, they are ranked at the bottom of Tier 1. All agencies receive their project scores and are offered the opportunity to debrief with the Collaborative Applicant. Debriefing allows agencies the opportunity to request clarification regarding how/why Application question/s received certain scores. Debriefings are required if agencies are considering an appeal. Agencies may choose to appeal project score/s within the allotted time frame (see the

Appeals Process outlined below). After all debriefings with the Collaborative Applicant are completed and appeals considered by the Review Team, the project ranking is presented to the Board for review/approval then shared with Membership.

Appeal Process

1. Who May Appeal?

   An agency may appeal a decision concerning a Renewal or New/Bonus project application submitted by that agency. If a project was submitted by a collaboration of agencies, only a joint appeal may be submitted.

2. What May Be Appealed?

   The appeals process applies to project scoring and ranking ***only***. *There is no appeal for project tiering.* An appeal may ***not*** be based on the following:

   - Failure to answer any question/s on the application.
   - Failure to submit required attachments to the application.
   - Failure to submit the application by the required deadline.

   Any mathematical errors found by an applicant will be corrected by the Collaborative Applicant.

3. Timing of an Appeal

   Formal appeals may be submitted by a project within **three (3) business days** of debriefing. Appeals must be submitted in writing to the Collaborative Applicant (sbarnaby@caresny.org), who will then forward to the Review Team. The written appeal must consist of a brief statement no longer than one page, and can be in the form of a letter, memo or email.

Project Tiering

HUD requires that the CoC ranks projects into two tiers based on the funding allocation released in the NOFA. Tiering prioritizes projects for funding. Using the project ranking, the Collaborative Applicant tiers projects (New/Bonus projects are always placed at bottom of Tier 2) and presents the results to the Board. When the NOFA is released, priorities outlined in the application may be strategically applied by the CoC to project tiering. Final tiering results are presented to the Board for approval and vote, tiering results are then shared with Membership. The Board votes on the full application, including tiering.

Final