

CARROLL COUNTY

CIRCLE OF CARING HOMELESSNESS BOARD

Continuum of Care Policy

Policy on: Continuum of Care Project Ranking and Selection

Approved by Carroll County CoC Executive Committee

Date: 9/10/21

Purpose: To document the Carroll County, MD- 506 2021 Continuum of Care (Continuum of Care) Project Ranking and Selection Process

2021 HUD NOFA

The U.S. Department of Housing and Urban Development (HUD) released the 2021 Notice of Funding Availability <https://www.hudexchange.info/programs/e-snaps/fy-2021-coc-program-nofa-coc-program-competition/> on August 18, 2021

The amount of available funding may not be enough to fund eligible renewal projects in 2021; therefore, HUD will continue to require Collaborative Applicants to rank all projects, except Continuum of Care planning and UFA Costs, in two Tiers. Tier 1 is equal to 100 percent of the Continuum of Care's 2021 Annual Renewal Demand (ARD). Tier 2 is the sum of all projects requested less the Continuum of Care's ARD. In addition, a bonus is available for new projects or an expansion of existing projects as described in HUD's NOFA and a bonus project serving victims of domestic violence is being offered.

2021 Continuum of Care Funding Carroll County (MD-506)

Category	2021 Grant Funding
Total Renewal Projects = \$410,313 (ARD)	
Tier 1 (COC ARD)	\$410,313
Tier 2 (All projects requested less ARD)	TBD
Bonus	\$20,515
DV Bonus	\$50,000
Total Potential 2021 Funding	\$480,828

Carroll County NOFA

On September 10, 2021, The Carroll County Homelessness Board issued a NOFA for the 2021 Continuum of Care Competition. The following were invited via public notice to submit Letters of Intent by September 16, 2021 and applications by October 5, 2021:

1. **Renewal projects** – all current Continuum of Care projects are eligible for FY 2021 fund renewal. Projects will be required to submit Project applications to the Collaborative Applicant for review, approval and ranking.
2. **Reallocations** – Project applicants with eligible renewals can propose new projects by shifting funds from one or more existing projects to new projects without decreasing or increasing the Continuum of Care’s ARD. Through the reallocation process:
 - a. Applicants may create new permanent supportive housing projects where all beds will be dedicated for use by the chronically homeless. New Permanent Supportive Housing Projects may also be created that meet all the criteria of DedicatedPLUS as defined in the NOFA.
 - b. Applicants may create new rapid re-housing projects for homeless meeting the criteria in the NOFA.
 - c. Applicants may create a new Joint TH and PH-RRH component as defined in in the NOFA.
 - d. The Continuum of Care Board will review project performance and monitoring results to determine if any projects should be recommended for reallocation per the Board Reallocation Policy.
3. **Bonus Projects** - The Permanent Housing Bonus is available to any existing or new applicant.
 - a. Applicants may create new permanent supportive housing projects where all beds will be dedicated for use by the chronically homeless. New Permanent Supportive Housing Projects may also be created that meet all the criteria of DedicatedPLUS as defined in the NOFA.
 - b. Applicants may create new rapid re-housing projects for homeless meeting the criteria in the NOFA.
 - c. Applicants may create a new Joint TH and PH-RRH component as defined in the NOFA.
 - d. Bonus project funding may also be used to expand an existing project. Both reallocation and bonus project types are eligible.
 - e. An additional allocation of bonus funding is available to create a new project to serve victims of domestic violence as defined in the NOFA.

Overview – Continuum of Care Project Selection Criteria

The Continuum of Care’s homeless assistance programs will be evaluated by HUD Policy Priorities in the 2021 NOFA including but not limited to:

1. Ending Homelessness for all persons
2. Use a Housing First Model
3. Reduce Unsheltered Homelessness
4. Improve System Performance
5. Partner with Housing, Health and Service Agencies
6. Racial Equity
7. Persons with Lived Experience

Tiers and Ranking:

1. To ensure the Continuum of Care can prioritize their projects locally in the event that HUD is not able to fund all renewals, HUD requires that Continuum of Cares rank projects in 2 tiers. The

tiers are financial thresholds. This year Tier 1 is equal to 100% of the Continuum of Care's ARD. Tier 2 is the amount between the Continuum of Care's Tier 1 and the Continuum of Care's Final Annual Renewal Demand (ARD).

2. The Continuum of Care must assign a unique rank to each project that it intends to submit to HUD for 2021 funding. Projects scoring highest and contributing to the HUD Policy Priorities including reducing homelessness in the CoC will be ranked and placed into Tier 1 until all Tier 1 funds are allocated. The remaining projects selected for funding will be ranked and placed into Tier 2 until all Tier 2 funds are allocated. HUD strongly advises Continuum of Care to rank higher those project applications that the Continuum of Care determines are high priority, high performing, and meet the needs and gaps as identified in the Continuum of Care.
3. Projects ranked in Tier 1 are considered relatively safe, while projects in Tier 2 are at risk.

Ranking and Selection

1. All renewal and new applications will be reviewed and ranked using the most recent HUD CoC Rating and Ranking Tool <https://www.hudexchange.info/resource/5292/project-rating-and-ranking-tool/>. The CoC's version of the ranking tool is attached to this policy
2. Projects must meet Threshold Requirements including:
 - a. Coordinated Entry Participation
 - b. Housing First/Low Barrier Implementation
 - c. Documented Match
 - d. Reasonable cost per Permanent Housing exit
 - e. Financial feasibility
 - f. Active CoC Participation
 - g. Complete application and consistent data
 - h. Data quality above 90%
 - i. Bed utilization rates at or above 90%
 - j. Acceptable audit/financial review
3. Performance Measures – Rating Factors depend on Project type but include:
 - a. Length of Stay
 - b. Exits to Permanent Housing
 - c. Returns to Homelessness
 - d. New or increased income or earned income
4. Serve Priority Populations
 - a. Coordinated Entry Score
 - b. Chronically homeless
 - c. 50%+: Disability/Zero Income/Unsheltered
5. Equity Factors
 - a. Agency Leadership, Governance, and Policies
 - i. Recipient has under-represented individuals (BIPOC, LGBTQ+, etc) in managerial and leadership positions
 - ii. Recipient's board of directors includes representation from more than one person with lived homeless experience
 - iii. Recipient has relational process for receiving and incorporating feedback from persons with lived homeless experience

- iv. Recipient has reviewed internal policies and procedures with an equity lens and has a plan for developing and implementing equitable policies that do not impose undue barriers
 - b. Program Participant Outcomes
 - i. Recipient has reviewed program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/or age
 - ii. Recipient has identified programmatic changes needed to make program participant outcomes more equitable and developed a plan to make those changes
 - iii. Recipient is working with HMIS lead to develop a schedule for reviewing HMIS data with disaggregation by race, ethnicity, gender identity, and/or age
- 6. Coordinated Entry (CE) – Since CE is mandated by HUD and the performance measures do not mirror those of housing projects, CE will be ranked one and fall into Tier 1 as long as the project meets the CoC threshold review.
- 7. Other Criteria – Scored per the Customized Rating Criteria Tab
 - a. CoC Monitoring Score
 - i. Were there monitoring findings in the last program year?
 - b. Narrative Score
 - i. Did the narrative answer each question completely?
- 8. New projects created through reallocation will be ranked based on the performance of the renewal application which is being reallocated and in accordance with NOFA guidance.
- 9. Expansion projects submitted by current applicants will be ranked based on the performance of the existing project to be expanded.
- 10. Bonus projects submitted by new and existing applicants will be ranked based on the performance of similar projects.
- 11. All Permanent Supportive Housing Projects will be certified to have demonstrated a need in the Continuum’s geographic area.
- 12. The Committee’s final rankings will be submitted to the Circle of Caring Homelessness Board for a formal vote on or before October 21, 2021.
- 13. All project applicants will be notified in writing by October 22, 2021 of their project acceptance, rejection or reduction and the project’s rank in Tier 1 or Tier 2.

Appeals Process:

Project applicants whose project was rejected may appeal the local Continuum of Care competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local Continuum of Care planning process in a reasonable manner by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline of 7:59:59 p.m. eastern time on November 16, 2021. The Continuum of Care’s notification of rejection of the project in the local competition must be attached to the Solo Application. If the Continuum of Care fails to provide written notification outside of e- snaps, the Solo Applicant must attach evidence that it attempted to participate in the local Continuum of Care planning process and submitted a project application that met the local deadlines, along with a statement that the Continuum of Care did not provide the Solo Applicant written notification of the Continuum of Care rejecting the project in the local Continuum of Care competition. The appeal must be because a decision made by the Carroll County Circle of Caring Homelessness Board regarding the ranking, rejection, or funding of their project was prejudicial, unsubstantiated by project

performance, or in violation of the 2021 Continuum of Care Guidelines. A copy of the appeal to HUD should also be submitted to the Circle of Caring Homelessness Board via email: csteckel@carrollcountymd.gov by November 16, 2021.

RENEWAL/EXPANSION THRESHOLD REQUIREMENTS

P Project Name: _____ C
 Organization Name: _____
 Project Type: _____
 Project Identifier: _____

Renewal/Expansion Projects
Threshold Review Complete

0%

Saved!

THRESHOLD REQUIREMENTS	YES/NO
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For each threshold, select "Yes" if applicant has fulfilled the threshold requirement and is eligible to submit an application.

Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFAs may provide more detailed guidance. The CoC collaborative applicant and project applicants should carefully review the annual NOFA criteria each year.

Yes to all

HUD THRESHOLD REQUIREMENTS

- x 1. Applicant has Active SAM registration with current information, and maintains an active SAM registration annually.
- x 2. Applicant has Valid DUNS/TIN/EIN number in application.
- x 3. 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).
- x 4. 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.
- x 5. Certifications - Project applicants submit the required certifications specified in the NOFO.
- x 6. Population Served - The population to be served meets program eligibility requirements as described in the Act, the Rule, and the NOFO.
- 7. HMIS Participation - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers use a comparable database that captures the required HMIS data in addition to meeting the needs of the local HMIS.
- x 8. 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 delinquent, or
 - x b) Other arrangements satisfactory to HUD are made before the award of funds by HUD
- 9. 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.
- 10. 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 (FAPIIS), 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

RENEWAL/EXPANSION THRESHOLD REQUIREMENTS

P Project Name: _____
 Organization Name: _____
 Project Type: _____
 Project Identifier: _____

Renewal/Expansion Projects
 Threshold Review Complete

Saved!

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THRESHOLD REQUIREMENTS	YES/NO
11. 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.	<input type="checkbox"/>
12. 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.	<input type="checkbox"/>
13. 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.)	<input type="checkbox"/>
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. Federally-recognized Indian tribes and tribally designated housing entities (TDHEs) established by federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage of the Byrd Amendment, but state-recognized Indian tribes and TDHEs established only under state law shall comply with this requirement. Applicants submit the SFLLL if they have used or intend to use non-federal funds for lobbying activities.	<input type="checkbox"/>
15. 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.	<input type="checkbox"/>
16. 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.	<input type="checkbox"/>

CoC THRESHOLD REQUIREMENTS

For each requirement, select "Yes" if the project has provided reasonable assurances that the project will meet the requirement, has been given an exception by the CoC or will request a waiver from HUD. Otherwise select "No".

X Coordinated Entry Participation	<input type="checkbox"/>
X Housing First and/or Low Barrier Implementation	<input type="checkbox"/>
X Documented, secured minimum match	<input type="checkbox"/>
X Project has reasonable costs per permanent housing exit, as defined locally	<input type="checkbox"/>
X Project is financially feasible	<input type="checkbox"/>
X Applicant is active CoC participant	<input type="checkbox"/>
X Application is complete and data are consistent	<input type="checkbox"/>
X Data quality at or above 90%	<input type="checkbox"/>
X Bed/unit utilization rate at or above 90%	<input type="checkbox"/>

RENEWAL/EXPANSION THRESHOLD REQUIREMENTS

P

Project Name: _____
Organization Name: _____
Project Type: _____
Project Identifier: _____

Completed projects will be moved to the bottom of the list.

If you would like to change the project type, please do so in the HIC and re-copy the data to the RAW HIC DATA tab, or do so in the LIST OF PROJECTS TO BE REVIEWED.

Renewal/Expansion Projects
Threshold Review Complete

0%

Saved!

THRESHOLD REQUIREMENTS	YES/NO
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X Acceptable organizational audit/financial review

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0

RENEWAL/EXPANSION PROJECT THRESHOLD REQUIREMENTS

CoC Threshold Requirements

- 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 active CoC participant
- Application is complete and data are consistent
- Data quality at or above 90%
- Bed/unit utilization rate at or above 90%
- Acceptable organizational audit/financial review

Select project type to edit

PSH

Select special population

General

RENEWAL/EXPANSION PROJECT RATING TOOL

D

Performance Measures

Length of Stay

	Factor/Goal	Max Point Value
<input checked="" type="checkbox"/> PSH (General) - On average, participants spend XX days from project entry to residential move-in	15 days	20 points

Exits to Permanent Housing

<input checked="" type="checkbox"/> PSH (General) - Minimum percent remain in or move to permanent housing	90 %	25 points
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Returns to Homelessness (if data is available for project)

<input checked="" type="checkbox"/> PSH (General) - Maximum percent of participants return to homelessness within 12 months of exit to permanent housing	10 %	15 points
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New or Increased Income and Earned Income

<input checked="" type="checkbox"/> PSH (General) - Minimum percent of participants with new or increased earned income for project stayers	8 %	2.5 points
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<input checked="" type="checkbox"/> PSH (General) - Minimum percent of participants with new or increased non-employment income for project stayers	10 %	2.5 points
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<input checked="" type="checkbox"/> PSH (General) - Minimum percent of participants with new or increased earned income for project leavers	15 %	2.5 points
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<input checked="" type="checkbox"/> PSH (General) - Minimum percent of participants with new or increased non-employment income for project leavers	25 %	2.5 points
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Serve High Need Populations *(select from drop-down menu)*

<input checked="" type="checkbox"/> Project focuses on chronically homeless people		
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<input checked="" type="checkbox"/> PSH (General) - XX% of participants are chronically homeless	95 %	20 points
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Project Effectiveness

<input checked="" type="checkbox"/> PSH (General) - Costs are within local average cost per positive housing exit for project type	Yes	20 points
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<input checked="" type="checkbox"/> PSH (General) - Coordinated Entry Participation- Minimum percent of entries to project from CE referral (or alternative system for DV projects)	95 %	10 points
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<input checked="" type="checkbox"/> PSH (General) - Housing First and/or Low Barrier Implementation (General) - CoC assessment of fidelity to Housing First from CoC monitoring or review of project policies and procedures	Yes	10 points
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Equity Factors

Agency Leadership, Governance, and Policies

<input checked="" type="checkbox"/> Recipient has under-represented individuals (BIPOC, LGBTQ+, etc) in managerial and leadership positions	Yes	5 points
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<input checked="" type="checkbox"/> Recipient's board of directors includes representation from more than one person with lived experience	Yes	5 points
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<input checked="" type="checkbox"/> Recipient has relational process for receiving and incorporating feedback from persons with lived experience	Yes	5 points
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<input checked="" type="checkbox"/> Recipient has reviewed internal policies and procedures with an equity lens and has a plan for developing and implementing equitable policies that do not impose undue barriers	Yes	5 points
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Program Participant Outcomes

CUSTOMIZE RATING CRITERIA

<input checked="" type="checkbox"/>	Recipient has reviewed program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/or age	<u>Yes</u>	<u>5</u> points
<input checked="" type="checkbox"/>	Recipient has identified programmatic changes needed to make program participant outcomes more equitable and developed a plan to make those changes	<u>Yes</u>	<u>5</u> points
<input checked="" type="checkbox"/>	Recipient is working with HMIS lead to develop a schedule for reviewing HMIS data with disaggregation by race, ethnicity, gender identity, and or/age	<u>Yes</u>	<u>5</u> points

Other and Local Criteria *(select from drop-down menu)*

<input checked="" type="checkbox"/>	<input type="text" value="CoC Monitoring Score"/>	Project is operating in conformance with CoC Standards	<u>Yes</u>	<u>10</u> points
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Total Maximum Score PSH-General projects: 175 points

Total Maximum Score

General projects: 175 points

NEW PROJECTS THRESHOLD REQUIREMENTS - DV Providers

v

Project Name: _____
 Organization Name: _____
 Project Type: _____
 Project Identifier: _____

New Projects
 Threshold Review Complete
0%

Saved!

THRESHOLD REQUIREMENTS

YES/NO

For each threshold, select "Yes" if applicant has fulfilled the threshold requirement and is eligible to submit an application.

Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFAs may provide more detailed guidance. The CoC collaborative

Yes to all

HUD THRESHOLD REQUIREMENTS

1. Applicant has Active SAM registration with current information, and maintains an active SAM registration annually.
2. Applicant has Valid DUNS/TIN/EIN number in application.
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4. 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.
5. Certifications - Project applicants submit the required certifications specified in the NOFO.
6. Population Served - The population to be served meets program eligibility requirements as described in the Act, the Rule, and the NOFO.
7. HMIS Participation - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers use a comparable database that captures the required HMIS data in addition to meeting the needs of the local HMIS.
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11. 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.

NEW PROJECTS THRESHOLD REQUIREMENTS - DV Providers

v

Project Name: _____ C
 Organization Name: _____
 Project Type: _____
 Project Identifier: _____

New Projects
 Threshold Review Complete
0%

Saved!

THRESHOLD REQUIREMENTS	YES/NO
12. 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.	<input type="checkbox"/>
13. 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.)	<input type="checkbox"/>
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. Federally-recognized Indian tribes and tribally designated housing entities (TDHEs) established by federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage of the Byrd Amendment, but state-recognized Indian tribes and TDHEs established only under state law shall comply with this requirement. Applicants submit the SFLLL if they have used or intend to use non-federal funds for lobbying activities.	<input type="checkbox"/>
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16. 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.	<input type="checkbox"/>

CoC THRESHOLD REQUIREMENTS

For each requirement, select "Yes" if the project has provided reasonable assurances that the project will meet the requirement, has been given an exception by the CoC or will request a waiver from HUD. Otherwise select "No".

X Coordinated Entry Participation	<input type="checkbox"/>
X Housing First and/or Low Barrier Implementation	<input type="checkbox"/>
X Documented, secured minimum match	<input type="checkbox"/>
X Project has reasonable costs per permanent housing exit, as defined locally	<input type="checkbox"/>
X Project is financially feasible	<input type="checkbox"/>
X Applicant is active CoC participant	<input type="checkbox"/>
X Application is complete and data are consistent	<input type="checkbox"/>
X Data quality at or above 90%	<input type="checkbox"/>
X Bed/unit utilization rate at or above 90%	<input type="checkbox"/>
X Acceptable organizational audit/financial review	<input type="checkbox"/>

NEW PROJECTS THRESHOLD REQUIREMENTS - DV Providers

v

Project Name: _____ *Completed projects will be moved to the bottom of the list*
Organization Name: _____
Project Type: _____ *If you would like to change the project type, please do so in the
HIC and re-copy the data to the RAW HIC DATA tab, or do so in
the LIST OF PROJECTS TO BE REVIEWED.*
Project Identifier: _____

New Projects
Threshold Review Complete

Saved!

0%

THRESHOLD REQUIREMENTS

YES/NO

0
0
0

DV NEW PROJECT RATING TOOL

Experience

Factor/Goal

Max Point Val

<input checked="" type="checkbox"/>	DV-A. Describe the experience of the applicant and sub-recipients (if any) in working with the proposed population and in providing housing similar to that proposed in the application.	<u>15</u> points
<input checked="" type="checkbox"/>	DV-B. Describe experience with utilizing a Housing First approach. Include 1) eligibility criteria; 2) process for accepting new clients; 3) process and criteria for exiting clients. Must demonstrate there are no preconditions to entry, allowing entry regardless of current or past substance abuse, income, criminal records (with exceptions of restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, self-disclosed or perceived sexual orientation, gender identity or gender expression. Must demonstrate the project has a process to address situations that may jeopardize housing or project assistance to ensure that project participation is terminated in only the most severe cases.	<u>10</u> points
<input checked="" type="checkbox"/>	DV-C. Describe experience in effectively utilizing federal funds including HUD grants and other public funding, including satisfactory drawdowns and performance for existing grants as evidenced by timely reimbursement of subrecipients (if applicable), regular drawdowns, timely resolution of monitoring findings, and timely submission of required reporting on existing grants.	<u>5</u> points

Design of Housing & Supportive Services

<input checked="" type="checkbox"/>	DV-A. Extent to which the applicant 1) Demonstrates understanding of the needs of the clients to be served. 2) Demonstrates that type, scale, and location of the housing fit the needs of the clients to be served. 3) Demonstrates that type and scale of the all supportive services, regardless of funding source, meets the needs of clients to be served. 4) Demonstrates how clients will be assisted in obtaining mainstream benefits. 5) Establishes performances measures for housing and income that are objective, measurable, trackable and meet or exceed any established HUD or CoC benchmarks.	<u>15</u> points
<input checked="" type="checkbox"/>	DV-B. Describe the plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs.	<u>5</u> points
<input checked="" type="checkbox"/>	DV-C. Describe how clients will be assisted to increase employment and/or income and to maximize their ability to live independently.	<u>5</u> points
<input checked="" type="checkbox"/>	DV-D. Project leverages housing resources with housing subsidies or units not funded through the CoC or ESG programs.	<u>10</u> points
<input checked="" type="checkbox"/>	DV-E. Project leverages health resources, including a partnership commitment with a healthcare organization.	<u>10</u> points

Timeliness

<input checked="" type="checkbox"/>	DV-A. Describe plan for rapid implementation of the program, documenting how the project will be ready to begin housing the first program participant. Provide a detailed schedule of proposed activities for 60 days, 120 days, and 180 days after grant award.	<u>10</u> points
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Financial

<input checked="" type="checkbox"/>	DV-A. Project is cost-effective when projected cost per person served is compared to CoC average within project type.	<u>5</u> points
B. Organization's most recent audit:		
<input checked="" type="checkbox"/>	DV-1. Found no exceptions to standard practicess	<u>5</u> points
<input checked="" type="checkbox"/>	DV-2. Identified agency as 'low risk'	<u>5</u> points
<input checked="" type="checkbox"/>	DV-3. Indicates no findings	<u>5</u> points
<input checked="" type="checkbox"/>	DV-C. Documented match amount meets HUD requirements.	<u>5</u> points
<input checked="" type="checkbox"/>	DV-D. Budgeted costs are reasonable, allocable, and allowable.	<u>20</u> points

Project Effectiveness

<input checked="" type="checkbox"/>	DV-Coordinated Entry Participation- Minimum percent of entries projected to come from CE referrals	<u>95</u> % <u>5</u> points
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Equity Factors

Agency Leadership, Governance, and Policies

<input checked="" type="checkbox"/>	New project has under-representated individuals (BIPOC, LGBTQ+, etc) in managerial and leadership positions	<u>Yes</u> <u>5</u> points
<input checked="" type="checkbox"/>	New project's organizational board of directors includes representation from more than one person with lived experience (per 578.75(g))	<u>Yes</u> <u>5</u> points
<input checked="" type="checkbox"/>	New project has relational process for receiving and incorporating feedback from persons with lived experience or a plan to create one	<u>Yes</u> <u>5</u> points
<input checked="" type="checkbox"/>	New project has reviewed internal policies and procedures with an equity lens and has a plan for developing and implementing equitable policies that do not impose undue barriers that exacerbate disparities and outcomes	<u>Yes</u> <u>5</u> points

Program Participant Outcomes

<input checked="" type="checkbox"/>	New project describes their plan for reviewing program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/or age. If already implementing a plan, describe findings from outcomes review	<u>5</u> points
<input checked="" type="checkbox"/>	New project describes plan to review whether programmatic changes are needed to make program participant outcomes more equitable and developed a plan to make those changes. If already implementing plan, describe findings from review	<u>5</u> points
<input checked="" type="checkbox"/>	New project describes plan to work with HMIS lead to develop a schedule for reviewing HMIS data with disaggregation by race, ethnicity, gender identity, and or/age. If already implementing plan, describe findings from review	<u>5</u> points

Other and Local Criteria

Total Maximum Score

New DV projects: 170 points

NEW PROJECTS THRESHOLD REQUIREMENTS

v

Project Name: _____
 Organization Name: _____
 Project Type: _____
 Project Identifier: _____

New Projects
 Threshold Review Complete
 0%

Saved!

THRESHOLD REQUIREMENTS

YES/NO

For each threshold, select "Yes" if applicant has fulfilled the threshold requirement and is eligible to submit an application.

Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFAs may provide more detailed guidance. The CoC collaborative

Yes to all

HUD THRESHOLD REQUIREMENTS

1. Applicant has Active SAM registration with current information, and maintains an active SAM registration annually.
2. Applicant has Valid DUNS/TIN/EIN number in application.
3. 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).
4. 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.
5. Certifications - Project applicants submit the required certifications specified in the NOFO.
6. Population Served - The population to be served meets program eligibility requirements as described in the Act, the Rule, and the NOFO.
7. HMIS Participation - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers use a comparable database that captures the required HMIS data in addition to meeting the needs of the local HMIS.
8. 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 delinquent, or
 - b) Other arrangements satisfactory to HUD are made before the award of funds by HUD
9. 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.
10. 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
11. 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.

NEW PROJECTS THRESHOLD REQUIREMENTS

v

Project Name: _____ *Completed projects will be moved to the bottom of the list*
 Organization Name: _____
 Project Type: _____ *If you would like to change the project type, please do so in the HIC and re-copy the data to the RAW HIC DATA tab, or do so in the LIST OF PROJECTS TO BE REVIEWED.*
 Project Identifier: _____

New Projects
Threshold Review Complete

0%

Saved!

THRESHOLD REQUIREMENTS	YES/NO
12. 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.	<input type="checkbox"/>
13. 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.)	<input type="checkbox"/>
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. Federally-recognized Indian tribes and tribally designated housing entities (TDHEs) established by federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage of the Byrd Amendment, but state-recognized Indian tribes and TDHEs established only under state law shall comply with this requirement. Applicants submit the SFLLL if they have used or intend to use non-federal funds for lobbying activities.	<input type="checkbox"/>
15. 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.	<input type="checkbox"/>
16. 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.	<input type="checkbox"/>

CoC THRESHOLD REQUIREMENTS

For each requirement, select "Yes" if the project has provided reasonable assurances that the project will meet the requirement, has been given an exception by the CoC or will request a waiver from HUD. Otherwise select "No".

X Coordinated Entry Participation	<input type="checkbox"/>
X Housing First and/or Low Barrier Implementation	<input type="checkbox"/>
X Documented, secured minimum match	<input type="checkbox"/>
X Project has reasonable costs per permanent housing exit, as defined locally	<input type="checkbox"/>
X Project is financially feasible	<input type="checkbox"/>
X Applicant is active CoC participant	<input type="checkbox"/>
X Application is complete and data are consistent	<input type="checkbox"/>
X Data quality at or above 90%	<input type="checkbox"/>
X Bed/unit utilization rate at or above 90%	<input type="checkbox"/>
X Acceptable organizational audit/financial review	<input type="checkbox"/>

NEW PROJECTS THRESHOLD REQUIREMENTS

v

Project Name: _____
Organization Name: _____
Project Type: _____
Project Identifier: _____

Completed projects will be moved to the bottom of the list

If you would like to change the project type, please do so in the HIC and re-copy the data to the RAW HIC DATA tab, or do so in the LIST OF PROJECTS TO BE REVIEWED.

New Projects
Threshold Review Complete

0%

Saved!

THRESHOLD REQUIREMENTS

YES/NO

0
0
0

New Project Ranking Tool - Not DV

- General-A. Describe the experience of the applicant and sub-recipients (if any) in working with the proposed population and in providing housing similar to that proposed in the application. 15 points

- General-B. Describe experience with utilizing a Housing First approach. Include 1) eligibility criteria; 2) process for accepting new clients; 3) process and criteria for exiting clients. Must demonstrate there are no preconditions to entry, allowing entry regardless of current or past substance abuse, income, criminal records (with exceptions of restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, self-disclosed or perceived sexual orientation, gender identity or gender expression. Must demonstrate the project has a process to address situations that may jeopardize housing or project assistance to ensure that project participation is terminated in only the most severe cases. 10 points

- General-C. Describe experience in effectively utilizing federal funds including HUD grants and other public funding, including satisfactory drawdowns and performance for existing grants as evidenced by timely reimbursement of subrecipients (if applicable), regular drawdowns, timely resolution of monitoring findings, and timely submission of required reporting on existing grants. 5 points

Design of Housing & Supportive Services

- General-A. Extent to which the applicant 1) Demonstrates understanding of the needs of the clients to be served. 2) Demonstrates that type, scale, and location of the housing fit the needs of the clients to be served. 3) Demonstrates that type and scale of the all supportive services, regardless of funding source, meets the needs of clients to be served. 4) Demonstrates how clients will be assisted in obtaining mainstream benefits. 5) Establishes performances measures for housing and income that are objective, measurable, trackable and meet or exceed any established HUD or CoC benchmarks. 15 points

- General-B. Describe the plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs. 5 points

- General-C. Describe how clients will be assisted to increase employment and/or income and to maximize their ability to live independently. 5 points

- General-D. Project leverages housing resources with housing subsidies or units not funded through the CoC or ESG programs. 10 points

- General-E. Project leverages health resources, including a partnership commitment with a healthcare organization. 10 points

Timeliness

- General-A. Describe plan for rapid implementation of the program, documenting how the project will be ready to begin housing the first program participant. Provide a detailed schedule of proposed activities for 60 days, 120 days, and 180 days after grant award. 10 points

Financial

- General-A. Project is cost-effective when projected cost per person served is compared to CoC average within project type. 5 points

- B. Organization's most recent audit:
 - General-1. Found no exceptions to standard practices 5 points
 - General-2. Identified agency as 'low risk' 5 points
 - General-3. Indicates no findings 5 points

- General-C. Documented match amount meets HUD requirements. 5 points

- General-D. Budgeted costs are reasonable, allocable, and allowable. 20 points

Project Effectiveness

- General-Coordinated Entry Participation- Minimum percent of entries projected to come from CE referrals 95 % 5 points

Equity Factors

Agency Leadership, Governance, and Policies

- New project has under-representated individuals (BIPOC, LGBTQ+, etc) in managerial and leadership positions Yes 5 points
- New project's organizational board of directors includes representation from more than one person with lived experience (per 578.75(g)) Yes 5 points
- New project has relational process for receiving and incorporating feedback from persons with lived experience or a plan to create one Yes 5 points
- New project has reviewed internal policies and procedures with an equity lens and has a plan for developing and implementing equitable policies that do not impose undue barriers that exacerbate disparities and outcomes Yes 5 points

Program Participant Outcomes

- New project describes their plan for reviewing program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/or age. If already implementing a plan, describe findings from outcomes review 10 points
- New project describes plan to review whether programmatic changes are needed to make program participant outcomes more equitable and developed a plan to make those changes. If already implementing plan, describe findings from review 10 points
- New project describes plan to work with HMIS lead to develop a schedule for reviewing HMIS data with disaggregation by race, ethnicity, gender identity, and or/age. If already implementing plan, describe findings from review 10 points

Other and Local Criteria

Total Maximum Score

New General projects:185 points