

San Mateo County Continuum of Care

2021 CoC Competition PROJECT REVIEW AND RANKING PROCESS *Approved September 10, 2021*

I. Background on the 2021 NOFO and Ranking Requirements

On August 18, 2021, the U.S. Department of Housing and Urban Development (HUD) published the *Notice of Funding Opportunity (NOFO) for the FY 2021 Continuum of Care Competition*.

- Funding is available for eligible renewal projects. Renewals must be rated and ranked into two tiers (see below).
- San Mateo County is eligible to request up to \$684,255 for bonus permanent housing projects, which may include: (1) permanent supportive housing (PSH) serving people experiencing chronic homelessness; (2) rapid re-housing (RRH) projects serving homeless single adults or families with children and (3) joint transitional housing/rapid re-housing (TH/RRH) projects serving homeless single adults or families with children.
- San Mateo County may request funding to create one or more new DV bonus projects serving households who are survivors of domestic violence, dating violence, sexual assault or stalking. The maximum available to San Mateo County is \$491,550. The following project types are eligible: (1) rapid re-housing (RRH), (2) joint transitional housing/rapid re-housing (TH/RRH). SSO Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of survivors of domestic violence, dating violence, sexual assault, or stalking may also be submitted; there is a cap of one submission per CoC for SSO-CE project applications.
- San Mateo County may also create new projects through the re-allocation of funds from lower performing existing grants. The availability of re-allocated funds will depend on the performance of currently funded projects and whether there are underperforming projects identified by the CoC Review Panel for reallocation. Re-allocated funds may be used for the same types of projects as the permanent housing bonus (described above) and may also be used by the CoC Lead Agency, San Mateo County Human Services Agency (HSA), for dedicated HMIS projects or Coordinated Entry projects.
- Organizations with multiple CoC projects of the same project type may apply to consolidate two or more (but no more than 10) grants into a single grant through the renewal process.

- Organizations with existing CoC projects may also apply to transition from one project component to another component using the re-allocation process.

The NOFO requires that each CoC conduct a transparent and objective process to review and rank all applications for renewal of existing projects and creation of new projects, including consideration of how projects promote racial equity. Ranking of renewal projects must demonstrate the use of established objective criteria, including performance data, to review project applications. Additionally, the CoC must place projects into Tier 1 and Tier 2, with projects in Tier 2 having to compete nationally for funding.

This document describes the San Mateo County CoC policies and process governing the review and ranking of projects in the 2020 competition, as well as the adopted policy for determining which projects are placed into Tier 2.

II. Rating and Ranking Process and Criteria

a. Adoption of Performance Standards

On July 12, 2013, the CoC Steering Committee adopted objective Project Performance Standards for all program types within the continuum (emergency shelter, short- and long-term transitional housing, permanent housing, rapid re-housing, services only with housing focus, and services only with employment focus). In June 2016 these standards were updated to align with HUD's System Performance Measures (published in 2014) and to reflect recent data on current performance of San Mateo County programs and performance targets recommended by Focus Strategies as part of their technical assistance work on HSA's Strategic Plan to End Homelessness.

In July 2018, the CoC Steering Committee voted to adjust the performance standard for HMIS data quality.

The Performance Standards as amended on July 13, 2018, are attached as **Attachment A**.

b. Solicitation of CoC Applications

On September 3, 2021, the CoC Lead Agency (HSA) released an announcement of available funding for both new and renewal CoC projects. An informational meeting for potential applicants (both new and renewal) is set to be convened on September 15, 2021. Funding announcements were distributed broadly via email to the provider community and were also posted to the HSA website. The announcements explain the process for submitting application, as well as the review criteria and process.

c. Application Process

- On or about September 17, 2021, renewal applicants will receive a Project Performance Report from HSA summarizing their progress in meeting the established performance standards using data from the Clarity HMIS system. This report provides each renewal project applicant the opportunity to provide any narrative explanation or clarification regarding why they did or did not meet any of the standards. This document also includes supplemental narrative questions. Again, this year, match letters will also undergo a technical review for adherence to HUD requirements.
- By October 6, 2021, at 5:00 pm, all applicants (new and renewal) must complete their Project Application(s) (Exhibit 2) in e-snaps. Renewal applicants must also submit their completed Project Performance Reports including any clarifications and responses to the supplemental narrative, as well as supporting documentation. New applicants must also submit their completed supplemental narrative. Applicants that are consolidating two or more renewal grants must submit Project Performance Reports and Project Applications for the individual grants by the date listed above.

Additional details and instructions about the application process are contained in the following documents: Highlights of the 2021 Continuum of Care NOFO, Availability of Funding for New Projects, and Information for Renewal Applicants, which are posted online at HSA's 2021 NOFO website at <https://hsa.smcgov.org/continuum-care-nofanofa>

d. Review, Ranking and Tiering Process

- HSA will convene an unbiased and non-conflicted Review Panel composed of representatives from neutral (non-applicant) organizations. The Panel may include staff from the County of San Mateo, cities and towns within the County, funders and non-profit housing and social services organizations.
- The Review Panel will meet on or about October 19, 2021, to determine final ranking of the projects.
- Prior to the meeting, the HSA staff will calculate the preliminary score for all renewal applicants using the objective Scoring Factors in **Attachment B**. The preliminary scores will be distributed to the Review Panel prior to or at the meeting.
- Prior to the meeting, the Review Panel will receive copies of all new project applications for review and scoring. New project applications will be scored using the scoring factors in **Attachment C**. The Review Panel may request amendments to a new project application including a reduction or expansion of funding requested. This can include asking an applicant to add re-allocated funds from another project to their new project request. The panel may also request that a new project adjust their service model or otherwise change their proposal in order to make it more competitive for bonus funding or to secure points for the overall CoC application.

- In the absence of new applications, or if new applications are deemed materially deficient or non-competitive, the Review Panel reserves the right to invite a new application from an existing grantee, which could be either an entirely new project or an expansion of an existing high-performing project. This applies regardless of the source of the funds (re-allocation, permanent housing bonus, DV bonus, etc.) and is intended to capitalize on the available NOFO funding by advancing highly competitive applications in order to try to maximize the total CoC funds awarded to projects in San Mateo County.
- The Review Panel is committed to ensuring the CoC puts forward the most competitive submissions possible both as the collaborative applicant and through individual project applications. It is with this goal in mind that the Review Panel may recommend changes to renewal projects, including partial reallocation of funding (see Attachment D).
- At the meeting, the Review Panel will determine the final order of ranking of projects in accordance with the Ranking and Tiering Policy in **Attachment D**. Projects expanded at the behest of the Review Panel will be ranked based on existing project performance and tiered in accordance with the ranking policy for new projects.
- All applicants will be notified on or about October 22, 2021, whether their project is being included in the application as well as their rank on the Project Priority listing.
- Applicants may appeal decisions of the Steering Committee in accordance with the policy outlined in **Attachment E**. Appeal request must be submitted in writing to HSA by October 27, 2021.
- The final project rankings, including results of any appeals (see below), will be brought to the Continuum of Care Steering Committee for approval on or about November 8, 2021.
- After submission of the CoC Application to HUD, any applicant may submit a written request to HSA for technical feedback as it relates to the strength of the proposal. Feedback requests may be submitted through December 31, 2021.

ATTACHMENT A
Performance Standards Revised July 2018

Measures		Emergency Shelter	Transitional Housing	Permanent Supportive Housing	Rapid Re-Housing
1	a) Exit to Permanent Housing Percent of all leavers who exited to a permanent destination	30% (S)/ 50% (F)	85%	NA	85%
	b) Exit to Permanent Housing or Retained Permanent Housing Percent of participants who retained housing and all leavers who exited to a permanent destination	NA	NA	85%	NA
2	Length of Stay Average length of stay for program participants	Less than: 30 days	Less than: 120 days	NA	NA
3	Returns to Homelessness Percent of all participants who return to homelessness within one year after exiting to permanent housing	Less than: 20% (S)/ 2% (F)	Less than: 11% (S)/ 1% (F)	NA	Less than 15%
4	Increased Employment Income Percent of adult leavers who exited and stayers (who stayed for 12 months or more) with increased employment income	10%	15%	NA	15%
5	Increased Non-Employment Income Percent of adult leavers who exited and stayers (who stayed for 12 months or more) with increased non-employment income	10%	15%	10%	15%
6	Utilization Rate Average daily bed/unit/ or program slot utilization	95%	90%	90%	NA
7	CoC Grant Spending Percentage of CoC award spent in most recently completed year	95%	95%	90%	90%
8	HMIS Data Quality Percentage of null/missing and don't know/refused values *does not include SSN	Less than 5%	Less than 5%	Less than 5%	Less than 5%

Legend: (S) = singles, (F) = families

ATTACHMENT B
SCORING FACTORS FOR RENEWAL PROJECTS

The scoring system for renewal projects is based on objective criteria, including a consideration of past performance as demonstrated by the project APR, HMIS data, budget data, CoC Project Applications and supplemental project narratives. The scoring system also takes into consideration the severity of needs and vulnerabilities experienced by program participants, and the extent to which projects are aligned with Housing First principals (low barriers to participation, no service participation requirements or preconditions).

Projects applying for consolidation will each be scored and ranked separately, as per HUD requirements.

Scoring Factor		Maximum and Minimum Scores		
		TH	RRH	PSH
1	1a. Exits to Permanent Housing (up to 15 pts)	Exceeds standard by more than 10% = 15 points Meets standard or exceeds by up to 10% = 9 points Within 10% of standard = 6 points More than 10% below standard = 0 points		Not Applicable
	1b. Exits to Permanent Housing/Retain Housing (up to 17 pts)	Not Applicable		Exceeds standard by more than 10% = 17 points Meets standard or exceeds by up to 10% = 12 points Within 10% of standard = 8 points More than 10% below standard = 0 points
2	Length of Stay (up to 6 pts)	Exceeds standard by more than 10% = 6 points Meets standard or exceeds by 10% = 4 points Within 10% of standard = 2 points	Not Applicable	
3	Returns to Homelessness (up to 4 pts)	Achieves standard = 4 points		Not Applicable
4	Increased Employment Income (up to 5 pts)	Exceeds standard by more than 5% = 5 points Meets standard or exceeds by up to 5% = 4 points Within 5% of standard = 2 points More than 5% below standard = 0 points		Not Applicable

Scoring Factor		Maximum and Minimum Scores		
		TH	RRH	PSH
5	Increased Non-Employment Income (up to 7 pts)	Exceeds standard by more than 5% = 7 points Meets standard or exceeds by up to 5% = 4 points Within 5% of standard = 2 points More than 5% below standard = 0 points		
6	Utilization Rate (up to 6 pts)	Meets standard or exceeds = 6 points Within 5% of standard = 2 points More than 5% below standard = 0 points	Not Applicable	Meets standard or exceeds = 6 points Within 5% of standard = 2 points More than 5% below standard = 0 points
7	CoC Grant Spending (up to 6 pts)	Meets standard or exceeds = 6 points Within 5% of standard = 3 points More than 5% below standard = 0 points		
8	HMIS Data Quality (up to 12 pts)	All Data Elements Less Than 5% Missing/Don't Know = 12 points 1-2 Data Elements More Than 5% Missing/Don't Know = 6 points More Than 2 Data Elements More Than 5% Missing/Don't Know = 0 points		
9	Housing First (up to 16 points)	<p>Does the project ensure participants are not screened out based on the following criteria?</p> <p>A) Having too little or no income B) Active or history of substance abuse C) Having a criminal record with exceptions for state-mandated restrictions D) History of domestic violence</p> <p>If yes, then 0.5 points for each (possible total of 2 points).</p> <p>Does the project ensure that participants are not terminated from the program for the following reasons?</p> <p>A) Failure to participate in supportive services B) Failure to make progress on a service plan C) Loss of income or failure to improve income D) Being a victim of domestic violence</p> <p>If yes, then 0.5 points for each (possible total of 2 points).</p> <p>Does the project have these Housing First approaches documented in project manual or other project documentation?</p> <p>If yes, then 1.5 points for each approach documented in submitted documents (up to 12 points).</p>		

Scoring Factor		Maximum and Minimum Scores		
		TH	RRH	PSH
10	Promoting Racial Equity (up to 6 points)	<p>Has the project provider identified any barriers to participation faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population, and has or will take steps to eliminate identified barriers?</p> <p>Project has taken steps to identify whether there are barriers = 3 points Project has taken steps to address identified barriers or, if no barriers have been identified, to ensure the project promotes racial equity = 3 points Project has not taken any steps to identify or address barriers = 0 points</p>		
11	Documentation of Referral/ Enrollment Process (up to 6 pts)	<p>Does the project have policies and procedures for accepting and enrolling referrals from CES? Does the project have clear protocols for why referrals may be denied and for what reason? Does the project have these policies and procedures documented in project manual or other project documentation?</p> <p>Project has policies and procedures documented, including protocols for why referrals may be denied = 6 points Project has policies and procedures documented = 3 points Project does not have policies and procedures documented = 0 points</p>		
12	Grants Monitoring/ Compliance (up to 4 pts)	<p>a) Project submitted APR on time= 1 point If not = 0 points</p> <p>b) Project had sufficient LOCCS drawdown frequency for executed contracts (at least quarterly) = 1 point If not = 0 points</p> <p>c) Project did not return funds to HUD = 2 point If returned funds = 0 points</p> <p>d) Project serves CoC-eligible participants (as demonstrated in written policies/procedures on eligibility, screening and admission) = 1 point If not = 0 points</p> <p>e) Serious unresolved compliance finding from HUD would result in up to 8 points subtracted from project's score</p>		
13	Cost Effectiveness for PH exits or PSH units (up to 7 points)	<p>Cost per exit to permanent housing is reasonable for project type = 7 points Cost per exit to permanent housing is not reasonable for project type = 3 points</p>	<p>Cost per unit served is reasonable for project type = 7 points Cost per unit served is not reasonable for project type = 3points</p>	

Scoring Factor		Maximum and Minimum Scores		
		TH	RRH	PSH
14	Policy Priorities (up to 13 points)	Not Applicable	Rapid Re-Housing = 12 points	Permanent Supportive Housing = 13 points
Maximum Score		100	100	100

In addition, in FY 2021, Project Applicants will be asked to provide non-scored narratives on two topics that relate to HUD policy priorities described in the NOFO:

- How the organization and project or program involves people with lived experience of homelessness in providing input on program planning and evaluation, development of policies and procedures, and decision-making structures and processes.
- How the project or program ensures that participants receive needed health and behavioral health services, including connections with providers of healthcare services.

These two items may become scored criteria in future competitions.

Methodology for Renewal Scoring Factors:

Factor 1 through 8 (Project Performance Standards): Data will be extracted from APR/Clarity/Looker/HUD Applications for each project for the period May 1, 2020 to April 30, 2021 to calculate these performance measures.

Factor 9: (Housing First): This will be based on how the applicant responds to the Questions on Section 3B of the Project Application relating to Housing First, entry barriers, and service participation requirements. In addition, these items will be scored based on the project’s documented program manual. The projects with written policies that clearly document low barriers and no service participation requirements will receive higher scores.

Factor 10: (Promoting Racial Equity). This will be scored based on the narrative response provided in the Project Performance Report.

Factor 11: (Documentation of Referral/Enrollment Process): This factor considers whether the project has policies and procedures for accepting and enrolling referrals from CES as well as if there are clear protocols for why referrals may be denied and for what reason. Scores will be based on the projects documented policies and procedures. The projects with comprehensive written policies and procedures will receive higher scores.

Factor 12: (Grants Monitoring/Compliance): Applicants will be scored based on their responses to the questions in Section 2B of the Project Application, to include: whether they submitted APR reports on time, have made sufficient LOCCS drawdowns, or have had any unspent grant funds returned to HUD. Applicants will be asked to submit their eligibility and screening policy/procedures to assess whether projects serve CoC-eligible populations. In addition, projects will lose points for having serious unresolved compliance findings from HUD.

Factor 13: (Cost Effectiveness): For TH and RRH projects, the measure will be calculated by dividing the total program budget by the number of households who exited to permanent housing. For PSH projects, the measure will be calculated by dividing total budget (as submitted by program) by the number of units/households in the project to arrive at an average cost per unit.

Factor 14: (Policy Priorities): This factor provides additional points for permanent housing projects (PSH and RRH).

DedicatedPLUS projects will not receive points for serving chronically homeless individuals because they do not only serve chronically homeless individuals.

DV projects operated by victim services providers will be rated and ranked using the same methodology as all other projects. DV providers will extract performance data from their HMIS compatible database to complete the project performance report.

ATTACHMENT C
SCORING FACTORS FOR NEW PROJECTS:
Re-Allocation, Bonus and DV Bonus Projects

Rating Factor	Score Range
<p>1. HUD System Performance Objectives: The project articulates how it will advance the system performance objectives set forth by HUD:</p> <ul style="list-style-type: none"> • Reduce new entries into homelessness • Reduce the length of time people are homeless • Reduce returns to homelessness • Increase participant income 	0-5
<p>2. Targeting and Outreach</p> <ul style="list-style-type: none"> • Project targets an eligible population • Project targets participants who are coming from the street or other locations not meant for human habitation, emergency shelters, safe havens, or fleeing domestic violence • There is a strong outreach plan specifically designed to identify and engage people in the target population and ensure they can access the program 	0-10
<p>3. Appropriateness of Housing</p> <ul style="list-style-type: none"> • Type, scale, and location of the housing fit the needs of the program participants • Participants are assisted to secure housing as quickly as possible • Programs and activities are offered in a setting that enables homeless people with disabilities to fully interact with others without disabilities possible 	0-5
<p>4. Housing First Model</p> <ul style="list-style-type: none"> • Project will have low barriers to entry and does not screen out applicants based on having no or low income, active or history of substance use, criminal record (except for State mandated requirements), history of domestic violence) or lack of willingness to participate in services • Project prioritizes rapid placement and stabilization in permanent housing • Project will not terminate participation for: failure to participate in services, failure to make progress on service plan, loss of income or failure to improve income; being a victim of domestic violence, or other activities not covered in the lease agreement 	0-15
<p>5. Service Plan</p> <ul style="list-style-type: none"> • For RRH projects, project meets National Alliance to End Homelessness (NAEH) RRH standards • Type, scale, location of the supportive services fit the needs of the program participants and are readily accessible. This includes services funded by the CoC grant and other project funding sources • For PSH projects, there are sufficient services to ensure participants are successfully supported to access and sustain housing. • There is a specific plan to ensure participants are individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible 	0-25

Rating Factor	Score Range
<ul style="list-style-type: none"> • There is a specific plan to ensure participants are assisted to secure services from the healthcare system. • There is a specific plan to ensure participants are assisted to obtain and remain in permanent housing in a manner that fits their needs • There is a specific plan to ensure participants are assisted to increase their incomes and live independently • There is a specific plan to ensure there are no barriers to participation faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population • Applicant has demonstrated how they will conduct ongoing assessment to ensure the project is promoting racial equity and how they will take steps to address any identified disparities in how people of different races and ethnicities access the program, experience the program once enrolled, and the outcomes of the program. • Applicant has described how the project will involve people with lived experience of homelessness in providing input on program planning and evaluation, development of policies and procedures, and decision-making structures and processes. • For DV bonus project applicants: services are tailored to meet the needs of survivors of domestic violence, dating violence, sexual assault, or stalking who experienced homelessness 	
<p>6. Timing</p> <ul style="list-style-type: none"> • Applicant has a clear plan to begin operations when the contract is executed. Within six months of contract execution may be awarded up to 10 points and within one year of contract execution may be awarded up to 5 points 	0-10
<p>7. Applicant Capacity</p> <ul style="list-style-type: none"> • Recent relevant experience in providing housing to people experiencing homelessness • Recent data submitted demonstrates strong performance for relevant services and/or housing provided • Relevant experience in operation of housing projects or programs, administering leasing or rental assistance funds, delivering services and entering data and ensuring high-quality data in a system (HMIS or a similar data system) • Organization has track record of involving people with lived experience of homelessness • Organizational and finance capacity to track funds and meet all HUD reporting and fiscal requirements • If application has sub recipients, applicant organizations have experience working together • Any outstanding monitoring or audit issues or issues are explained • For DV bonus project applicants: experience serving survivors of domestic violence, dating violence, sexual assault, or stalking, and ability to house survivors and meet safety outcomes. 	0-10
<p>8. Financial Feasibility and Effectiveness</p> <ul style="list-style-type: none"> • Costs appear reasonable and adequate to support proposed program 	0-10

Rating Factor	Score Range
<ul style="list-style-type: none"> • Match requirement is met • Additional resources leveraged 	
<p>9. Project Type Prioritization</p> <ul style="list-style-type: none"> • TH/RRH - 0 points • Supportive Services Only (SSO) Projects for Coordinated Entry for survivors of Domestic Violence - 0 points • Transition projects that create a new TH/RRH project through re-allocation- 3 points • PSH/DedicatedPLUS - 3 points • RRH – 5 points • PSH Dedicated to Chronically Homeless People – 10 points 	0-10
TOTAL	100
BONUS POINTS	
<p>In the FY 2021 NOFO, HUD will provide additional points in the overall CoC application for communities that include one or more permanent housing projects (PSH or RRH) on the Project Priority List demonstrating coordination with housing providers and health care organizations. To align with this HUD priority, bonus points will be awarded to new PSH or RRH projects with the following features:</p>	
<p>Bonus A: Project utilizes housing subsidies or subsidized housing units not funded through the CoC or ESG program, such as through private organizations, State or local government (including HOME funds from the American Rescue Plan), Public Housing Agencies, faith-based organizations or federal programs other than CoC or ESG.</p>	5
<p>Bonus B: Project utilizes healthcare resources (including behavioral health) to help individuals and families experiencing homelessness. Sources of healthcare resources may include: direct contributions from a public or private health insurance provider to the project; or provision of healthcare services by a private or public organization tailored to the participants of the project. Eligibility for the project may not be restricted by the eligibility requirements of the health care service provider.</p>	5
<p>To receive bonus points, applications must provide written documentation of commitment of resources from the housing or healthcare provider.</p>	
Maximum Total Bonus Points	10
Maximum Project Total	110

ATTACHMENT D RANKING AND TIERING POLICIES

1. Ranking Policy

In determining the rank order of projects, the Review Panel will adhere to the following policies:

- a. Projects will be ordered in accordance with their scores as set forth in Attachment B (for renewal projects) and Attachment C (for new projects).
- b. Projects falling into Tier 1 will be submitted on the Project Priority list in the order in which they are ranked
- c. Projects falling into Tier 2 will be ranked according to the policies set forth below in Section 3 and 4.
- d. The following project types will not receive scores:
 - Renewal projects that do not have any performance data (because they were only recently awarded) will be placed at the bottom of Tier 1 or into Tier 2, at the discretion of the Review Panel.
 - Any dedicated HMIS or Coordinated Entry projects will not receive scores. As critical infrastructure for the CoC, dedicated HMIS and/or Coordinated Entry projects will be placed at the bottom of Tier 1.

2. Tier Two Project Scoring as Established in the HUD NOFO

In this year's NOFO, HUD has set forth a scoring system for Tier 2 Projects:

- a. CoC Score – up to 50 points in direct proportion to the score received on the CoC application
- b. CoC Project Ranking – Up to 40 points based on how each project is ranked within Tier 2, with those closer to the top of the list receiving more points
- c. Commitment to Housing First – projects that demonstrate low barriers to entry and prioritize rapid placement and stabilization in permanent housing, up to 10 points.

All projects in Tier 2 will compete nationally for funding based on this scoring system. Projects lower on the list are less likely to be funded.

3. San Mateo County Tier 2 Policy

Once the rank order of projects has been determined (see Section 1), any projects falling into Tier 2 will be candidates for re-allocation to create new projects. The Review Panel will make

a recommendation as to whether to re-allocate Tier 2 projects or leave them in their rank order.

4. Re-Allocation Policy

In addition to the above, the Review Panel will examine the spending history of ALL renewal projects to determine if any grants should be reduced. Any grants that have significant under spending will be candidates to have their grant amount reduced. Funds captured from grants that are reduced will be used to fund new permanent housing or rapid-re-housing project(s), which can be placed either in Tier 1 or Tier 2, or HMIS or Coordinated Entry projects, which are placed at the bottom of Tier 1.

Renewal applicants may apply to create a Transition Project by voluntarily re-allocating one or more of their grants and creating a new grant of a different project type (PSH, RRH, TH/RRH). The new project will be ranked and scored according to the policies outlined in this document. There is no guarantee that Transition projects will be included in the Project Priority list submitted to HUD, and if they are, there is no guarantee that they would be placed in Tier 1.

Renewal applicants may choose to voluntarily re-allocate a portion of an existing grant to create a new re-allocation project, but these will not be considered Transition Grants by HUD. There is no guarantee the re-allocation project will be included in the Project Priority list submitted to HUD, and if they are, will be placed into Tier 1. The new project will be ranked according to the policies outline in this document.

5. Policy on Adjustments to New Projects

The Review Panel may request amendments to a new project application including a reduction or expansion of funding requested. The Panel may ask a project requesting bonus funds to expand their budget to incorporate re-allocated funds. Projects may also be asked to reduce their budget so that more new projects can be placed onto the Priority List. The panel may also request that a new project adjust their service model or otherwise change their proposal in order to make it more competitive for bonus funding or to secure points for the overall CoC application.

In the absence of new applications, or if new applications are deemed materially deficient or non-competitive, the Review Panel reserves the right to invite a new application from an existing grantee, which could be either an entirely new project or an expansion of an existing high-performing project. This applies regardless of the source of the funds (re-allocation, permanent housing bonus, DV bonus, etc.) and is intended to capitalize on the available NOFO funding by advancing highly competitive applications and positioning the CoC to receive the

maximum amount of HUD funding possible.

6. Final Project Priority List

After following the process described above, the Review Panel may elect to adjust the order of projects if doing so will advance the goals of ensuring a more competitive overall funding application and maximizing our CoC's ability to fund eligible renewals and new projects. These adjustments are limited to the following:

- Adjustments to address any issues that arise from projects straddling the Tier 1 and Tier 2 line, in accordance with the policy outlined in the HUD NOFO.
- Ranking of bonus project(s).
- Ranking of DV bonus project(s).
- Ranking of renewal projects that do not yet have any performance data.

Adjustments to rank order will **not** be made to protect low-performing renewal projects from re-allocation or placement in Tier 2. Tier 2 projects remain at risk; therefore, it will be to the Review Panel's discretion to rank projects within Tier 2 strategically and competitively (i.e., if projects score similarly, the Review Panel may determine to rank a project that with capacity to serve a greater number of households higher than a project with lower capacity).

ATTACHMENT E
LOCAL APPEALS PROCESS AND APPEALS FORM

Local Appeals Process

The opportunity to appeal an adverse decision is considered an integral part of a transparent and standardized process. The San Mateo County CoC provides applicants seeking HUD CoC funding an appeal opportunity, through a review conducted by an independent committee, with the intention of ensuring the fairness of Rating and Ranking determinations.

Entities Eligible to Appeal

Appeals are available to any projects in San Mateo County that submitted a new or renewed application to the local CoC NOFO competition.

Grounds for Appeal

Appeals to the Project Priority listing are limited to misapplication of local published rating and ranking policies or HUD policies. Appeals based on disagreements with the correct application of the process will not be considered. Specific grounds for appeal are limited to:

1. Verifiable conflicts of interests seen during the rating and ranking process
2. Misapplication of published rating and ranking rules and policies by HSA staff, CoC Review Panel, or CoC Steering Committee
3. Violation of rating and ranking policies put forth by HUD
4. Technical error in calculation of score

Errors made and submitted by the project applicant will not qualify or be considered in the appeals process. Appeals will only be based on information submitted by the original application due date. New or additional information not included in the original application will not be considered as part of the appeals process. A project may not appeal based on omitted information that was not included as part of the original application. Appeals that are specifically to contest the recommendations on the Project Priority List will not be considered.

Process and Deadline to Appeal

Projects must submit their appeal in writing no later than October 27, 2021. The appeals process entails:

1. Project to complete and sign an appeal form, attached at the end of this document, and return the signed form to HSA_Homeless_Programs@smcgov.org. Appellants may attach supplemental documents to the form.
2. The form shall be reviewed by HSA and Focus Strategies staff to ensure valid grounds for appeals.

3. The Appeals will be heard by a panel of three non-conflicted members of the CoC Steering Committee, a CoC subcommittee, staff from an organization involved with the community's homelessness response system, or a community member. Appeals Committee members must be individuals who did not serve on the Review Panel.
4. Appellants will not be invited to the panel meeting, all information pertaining to an appeal should be communicated via the appeal form in step 1.
5. The Steering Committee or CoC subcommittee will deliberate, and a decision will be made based on a simple majority.
6. All decisions made the Appeals Panel will be final.
7. If the appeal is successful, the finding of the Appeal Panel will go back to the Review Panel to make needed changes or adjustments to the Project Priority List.
8. The appellant will be notified by HSA staff of the result of their appeal (either successful or unsuccessful) and if any changes to the Project Priority List was made.
 - a. If a successful appeal impacts other projects on the Project Priority List, all re-ordered projects under the project in question will be notified of their impacted ranking as well (including the possibility of a project moving from Tier 1 to Tier 2 as the result of a successful appeal).

All agencies/applicants who wish to appeal further to HUD must utilize the process listed within section X of the 2021 CoC NOFO and described at 24 CFR 578.35.

2021 San Mateo County CoC NOFO Local Process: Appeals Form

Instructions:

Please complete all sections of the form. You may attach supplemental materials as relevant to support your appeal. You may use as much space as needed for the narrative portions of the form.

Name of Agency: _____

Name of Project: _____

Program/Project Address: _____

Program/Project Contact Email: _____

Project Classification: New Renewal

1. Grounds for Appeal

- Verifiable conflicts of interests seen during the rating and ranking process
- Misapplication of published rating and ranking rules and policies by HSA staff, CoC Review Panel, or CoC Steering Committee
- Violation of rating and ranking policies put forth by HUD
- Technical error in calculation of score
- Other (specify):

Explanation:

2. Grounds for Appeal

- Verifiable conflicts of interests seen during the rating and ranking process
- Misapplication of published rating and ranking rules and policies by HSA staff, CoC Review Panel, or CoC Steering Committee
- Violation of rating and ranking policies put forth by HUD
- Technical error in calculation of score
- Other (specify):

Explanation:

Name of Person Authorized to Appeal on Behalf of Project: _____

Signature: _____ Date: _____