

VT BoS CoC FY2024 Project Competition Scoring, Ranking and Reallocation Policies

Scoring Policy

Applications for New and Renewal Projects will undergo a threshold review to ensure compliance with CoC regulations at 24 CFR 578, the CoC Program NOFO, and VT BoS CoC Policies and Procedures. Any new or renewal project not meeting the threshold requirement will not be further reviewed and will not be considered for inclusion in the Collaborative Application to HUD. Renewal projects have previously passed HUD threshold review, so only in very exceptional cases, e.g., changes to HUD policies or program models, would renewal projects be at risk of not passing the threshold review.

Scoring of renewal projects is largely based on data obtained from the most recent, completed Annual Performance Report (APR) and HMIS data, and aligns with the HUD approved System Performance Measures and local priorities.

The Scoring and Ranking Committee of the VT BoS CoC, will review, rate, and rank applications and make recommendation(s) to inform the final VT BoS CoC Board of Directors vote. No person who has an interest in an application may participate in the process of reviewing/rating/ranking or CoC Board voting. Having an interest means being employed by or otherwise receiving financial benefits to themselves or immediate family members as a result of an application being funded. Renewal projects will be reviewed based on the renewal evaluation standards and scoring criteria. New Projects will be reviewed based on the new project scoring criteria. The committee has the discretion to select one or more applications for the amount available for new projects. The committee also may give HHAV direction to negotiate with conditionally selected applicants.

The VT BoS Scoring and Ranking Committee will rank applications after scoring all New and Renewal Projects within the CoC, based on the Renewal evaluation standards and scoring criteria, as well as the New Project Scoring Criteria.

Ranking Policy

HUD requires that CoCs rank projects in two Tiers. Tier 1 projects – provided that HUD has sufficient funding – are essentially assured of renewal funding. Tier 2 projects will be funded competitively on a national basis. Factors for awarding the Tier 2 projects have historically included factors such as a) the score that HUD gives to the overall Continuum of Care Application, b) whether the project follows Housing First, and c) a HUD determined ranking score based on the funds requested for a project and how high the project is on the project priority list.

Renewal projects will be ranked solely on their scores and ranked ahead of new project applications. First-time renewal projects will be ranked after older renewal projects, using the Renewal Evaluation Standards and Scoring Criteria. New projects will be scored based on the New Project Scoring Criteria, may be adjusted in ranking based on local considerations, and will be ranked after renewal projects.

Projects that are deemed essential to the CoC, but which would be at risk of losing funding if placed in Tier 2, will be ranked at the bottom of Tier 1. These projects are not comparable to other new and renewal projects, can only be submitted by the entity designated by the CoC, and therefore cannot be competitively evaluated, including HMIS and Coordinated Entry renewal projects. HMIS expansion and SSO-CE expansion projects will be competitively evaluated. Planning projects are not ranked. In the 2024 competition, YHDP projects will be non-competitively renewed and therefore are not ranked.

Project components will be ranked to best maximize the Tier 2 project scores. Projects will be ranked in Tier 2 as follows:

- Renewal project applications ranked according to renewal score
- First-time renewal projects
- Reallocation and Bonus project applications ranked according to new project scores and with consideration of local priorities for funding

Reallocation Policy

Involuntary Reallocation (Unconditional v Conditional Renewal)

Projects with poor performance, not spending their full award, underutilizing beds, not in alignment with Housing First principles and practices, not serving the intended population or with significant, unresolved findings are subject to involuntary reallocation. Projects that are underspending their grant awards are subject to the reallocation process. Projects that have underspent more than 10% of their award may be reduced and those funds could be reallocated for New Project(s). A one-year grace period may be extended to providers who appeal proposed reallocation with a plan that demonstrates that the grant's expenditure will be improved in the current program year. Any funds reallocated as part of recapturing unspent funds will be made available for reallocation to create new projects during the local solicitation process.

Projects scoring 50% or lower may be reallocated involuntarily or may be asked to develop a plan to address performance issues before a final determination is made. Reallocation decisions are subject to the Scoring & Ranking Committee's judgment. If asked to develop a plan to address performance issues, applicant must submit a performance plan within 30 days of the request and will be reviewed at the next regularly scheduled meeting of the Scoring and Ranking Committee. The performance plan must be accepted by the Scoring and Ranking Committee. If the Committee does not approve the Plan, the funds may be subject to future reallocation. If a plan is not submitted, the project may be subject to future reallocation. Any recommendations by the Scoring and Ranking Committee that are formalized through a VT BoS COC Board of Director's vote are subject to appeal through the CoC Grievance process and, if unresolved, to HUD.

Voluntary Reallocation

As part of the local solicitation for inclusion in the HUD CoC collaborative application, providers are asked whether they wish to voluntarily reallocate some or all of their funding. Such reallocated funds are prioritized for the reallocating agency to submit a New Project Application. If the reallocating agency does not submit a New Project Application, then the reallocated funds are pooled with CoC Bonus funds and made available for competition for New Projects, including expansion grants.