

Texas Balance of State Continuum of Care

The TX BoS CoC is Seeking Public Comment on

Review and Scoring Policies and Procedures for Continuum of Care Program Funds in the Texas Balance State Continuum of Care

The TX BoS CoC is seeking public comment on proposed changes to the *Review and Scoring Policies and Procedures for Continuum of Care Program Funds in the Texas Balance State Continuum of Care*. A public comment period allows for stakeholders to review proposed policy, procedure, and statutory compliance implementation and provide feedback based on experience and expertise.

The document(s) with proposed changes can be found here:

<https://www.thn.org/texas-balance-state-continuum-care/get-involved/texas-balance-of-state-public-comment-portal/>

An electronic public comment form can be found here:

<https://forms.gle/fnr8ndE7LQpNKp5G7>

Written comments may be submitted, in hard copy/fax or electronic formats to:

Texas Homeless Network
Attn: Jim Ward
1713 Fortview Rd
Austin TX, 78704
Fax: 512-478-9077
Email: jim@thn.org

This Public Comment Period opens June 29, 2020 12:01 A.M. and closes on *Thursday July 9, 2020* at 5:00 P.M. CST

There will be multiple rounds of public comment. The next rounds of Public Comment are as follows;

July 14, 2020 12:01 A.M. - July 24, 2020 5:00 P.M. CST
August 1, 2020 12:01 A.M. - August 10, 2020 5:00 P.M. CST

Comment received outside these windows will not be considered.

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Introduction:

THN, as Lead Agency for the Texas Balance of State Continuum of Care is recommending changes to the *Review and Scoring Policies and Procedures for Continuum of Care Program Funds in the Texas Balance State Continuum of Care*. The recommended changes ensure the Texas Balance of State Continuum of Care (TX BoS CoC) hosts a transparent Continuum of Care Program Competition. Changes are intended to make this a standing policy rather than one that is required to be updated annually. Additionally, staff reviewed for accessibility and reduced redundancy where possible.

1. Review and Scoring Policies and Procedures for Continuum of Care Program Funds in the Texas Balance State Continuum of Care:

Substantive proposed changes include

Document Length,

The proposed changes reduce the length of the policy from six (6) pages to four (4) pages. The proposed policy focuses solely on the policy and relevant processes.

Policy Content, page 1

The current Review and Scoring Policy leaves out important details. This policy clarifies certain aspects of existing policy,

- i. Clarified how projects qualify for bonus points
- ii. Clarified that the scoring materials will be released prior to close of the local competition

Policy Content, page 1

The current list of metrics considered when evaluating performance is incomplete. This policy updates the list of metrics that Project Applications *may* be scored on to include,

- i. Supplemental Project Narrative responses

For questions about this public comment process, or for assistance with giving public comment, please contact *Jim Ward, Assistant Director of Planning* at jim@thn.org or (512) 861-2165

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Review and Scoring Policies and Procedures for Continuum of Care Program Funds in the Texas Balance State Continuum of Care

Purpose of this Policy

Texas Homeless Network (THN) is the Collaborative Applicant and Continuum of Care (CoC) Lead Agency for the Texas Balance of State Continuum of Care (TX BoS CoC). THN facilitates the local application process/competition in the TX BoS CoC for the US Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program funds consistent with the requirements in 24 CFR 578.9. To host a clear and transparent process, the TX BoS CoC has adopted the following policies related to the Review and Scoring of all project applications solicited for consideration during the CoC Program Competition

Project Application Reviews

The review of Project Applications is an important function of the TX BoS CoC Competition to ensure high quality applications are submitted. Project Applications are reviewed twice by TX BoS CoC Staff prior to being sent to the Independent Review Team (IRT) for scoring. The first review is a Threshold Review, and the second is a Quality Review.

Threshold Review

Applications will undergo a Threshold Review of Applicant eligibility. The eligibility requirements are

- Recipients and sub-recipients must be nonprofit organizations, states or local governments, or instrumentalities¹ of state and local governments, including Public Housing Authorities.
- Recipients and sub-recipients must have an active SAM Registration.
- Recipients and sub-recipients must have an active DUNS Number.
- The proposed Project must serve a county or multiple counties in the Texas Balance of State Continuum of Care.²
- The Applicant must have no outstanding delinquent federal debts.
- Applicants must have a financial management system that meets Federal standards as described at 2 CFR 200.302³.
- The Application must contain completed Certification Regarding Lobbying and Disclosure of Lobbying Activities (SF-LLL).
- The Application must contain a Code of Conduct or the Applicant's Code of Conduct must be on file with the Federal Government.

Applications that do not meet eligibility requirements cannot continue in the process. These projects will be rejected in e-snaps, and the person identified the Authorized Representative and the Person to Contact Regarding the Application will be notified in writing outside of the e-snaps platform.

¹ Go to <https://www.irs.gov/pub/irs-tege/eotopice90.pdf#page=5> to determine if your agency is an instrumentality of state or local government.

² Go to <http://bit.ly/3asUNcl> for a list of counties in the Texas Balance of State Continuum of Care.

³ 2 CFR 200.302 https://www.ecfr.gov/cgi-bin/text-idx?SID=d162be61c988ee1d12a9584905baf964&mc=true&node=se2.1.200_1302&rgn=div8

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Quality Review

All projects that pass the Threshold Review will then undergo a Quality Review conducted by TX BoS CoC Lead Agency Staff. Through the quality review process, TX BoS CoC Lead Agency staff are ensuring that the Project Applicant followed the detailed instructions provided by HUD, that there is consistency through the Application, and that the Applicant's response addresses all parts of the questions.

If staff identify deficiencies in the Project Application or the supporting documents during Quality Review, the Application will be amended back to the Applicant in e-snaps. Staff will notify both the Authorized Representative and the Person to Contact Regarding the Application in writing to resubmit the Application for consideration. Applicants will receive 72 hours to correct the identified deficiencies.

Scoring

Scoring is the process of using objective, performance-based criteria to evaluate the effectiveness of projects in reducing homelessness. The Independent Review Team (IRT) scores Applications. The IRT is a subcommittee of the Performance Evaluation Committee. This step, scoring, is crucial to the process because it allows the CoC Lead Agency to rank projects⁴.

The IRT is composed of CoC members independent of the program/project or the TX BoS CoC Lead Agency. The IRT ensures the highest level of objectivity when it comes to the scoring of project applications for CoC Program funding.

Individuals are eligible to serve on the IRT if they live or work in the Texas Balance of State Continuum of Care. IRT Members cannot be representatives or beneficiaries of Continuum of Care Program Funded Agencies; IRT Members must disclose any conflicts of interest through signing a Conflict of Interest Form. IRT Members must come from across the TX BoS CoC to ensure geographic diversity and represent a variety of subpopulations.

This process of recruiting and selecting volunteers for the IRT is managed by an authorized representative of the Continuum of Care Lead Agency. Recruitment efforts include:

- Soliciting volunteers at General Membership Meetings
- Soliciting volunteers through the TX BoS CoC News newsletter
- Consulting with the CoC Board for suggestions
- Asking the Local Homeless Coalition Chairs to share this opportunity with their members

THN staff provides a 2-hour training, held via webinar, which teaches members how to evaluate applications and offer the opportunity to learn more about homeless services and housing programs in the TX Balance of State CoC. Ongoing support to the IRT is available and is encouraged

The TX BoS CoC compensates IRT members for their time and expertise.

⁴ [footnote to be updated] For more information on reallocation, refer to "FY2019 Ranking Policies and Procedure for Continuum of Care Program Funds in the Texas Balance of State Continuum of Care".

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Scoring Criteria

HUD requires CoCs to consider objective, performance-based scoring metrics when scoring Project Applications to determine the extent to which each Project addresses HUD's policy priorities. The TX BoS CoC also evaluates multiple metrics related to successful housing placement and retention and income growth.

The objective, performance-based scoring metrics projects used to review Applications may include:

1. Successful housing placement and retention
2. Income growth
3. Severity of needs and vulnerability of participants at project start
 - If this will be the only Project of its kind in a geographic area serving a special homeless population/subpopulation
 - Persons/Families with a history of victimization/abuse, domestic violence, sexual assault, childhood abuse
 - People with a history of criminal justice system involvement
 - People experiencing chronic homelessness
 - Youth experiencing homelessness
 - Unsheltered homelessness
 - Low or no income at project entry
 - Current or past substance abuse
4. Returns to homelessness
5. Bed utilization
6. Cost-effectiveness, i.e., how much each Project spends to serve and house an individual or family as compared to other projects serving similar populations
7. Fiscal management
8. HMIS data quality
9. Adherence to Housing First
10. Prioritization fidelity
11. Whether or not the Applicant thoroughly addresses application questions in e-snaps.
12. Supplemental Project Narrative Responses

It is important to note that there are different performance expectations for different housing interventions, and therefore different scoring thresholds on the above-indicated metrics dependent on the type of intervention applied for. Project Applications are scored differently on the same metric for this reason.

All scoring materials, that is, the renewal project score cards and the final Supplemental Project Narratives will be released to the public prior to the local competition deadline.

Scoring Project Applications Submitted by Victim Service Providers

For the past several years, HUD has asked whether the CoC has a specific method for evaluating projects submitted by victim services providers. HUD asks this in the CoC Program Competition Notice of Funding Available (NOFA). The TX BoS CoC makes several adjustments when evaluating project applications submitted by victim service providers. Metric scoring ranges related to income growth and housing stability and vulnerability are reduced for Renewal Projects targeting survivors of domestic violence.

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Scoring Policy

Bonus points are the primary method by which the TX BoS CoC can encourage and incentivize New Project Applications that propose to meet a specific need in a community. Renewal Projects are not eligible for special considerations.

The IRT awards bonus points to those New Projects that propose to serve only one particularly vulnerable sub-population. For example, if 100% of the Project is dedicated to survivors of domestic violence, dating violence, sexual assault, and stalking, that project application would be eligible for 10 bonus points. Bonus points are given in the form of a base point adjustment to the Project's application score. The IRT will award bonus points as follows:

1. Survivors of domestic violence, dating violence, sexual assault, and stalking: 10 pts
Or
2. Transition-Age Youth (Youth aged 18-24): 10 pts
Or
3. Chronically homeless individuals and families: 5 pts

To qualify for these bonus points, applicants must select the appropriate subpopulation in Project Description of the esnaps Application.

Special considerations will also be given to New Project(s) from counties where a project was subject to full reallocation, whether the TX BoS CoC initiated the reallocation, or an agency voluntarily reallocated 100% of CoC project funding.

1. Reallocation bonus: 10 pts

Agencies that had a project involuntarily relocated during the current competition are not eligible for the reallocation bonus points.

A maximum of 10 points per Project Application in the form of bonus points is possible.

Scoring Procedure

After the Threshold Review and Quality Review, project applications are assigned to an IRT Team comprised of two IRT Members. Staff will ensure there is geographic diversity on each team. Each team will receive up to 5 applications to score using Supplemental Project Narratives submitted by Project Applicants. Each Application is thoroughly reviewed and will receive 2 scores, one from each IRT Member. After completion of the IRT review, the scores are averaged by TX BoS CoC staff. The CoC Lead Agency will then rank applications for the CoC Project Listing according to the Ranking Policies adopted by the TX BoS CoC Board.⁵

*****This policy was approved by the Texas Balance of State Continuum of Care Board of Directors XX/XX/XXXX and made publically available at thn.org on XX/XX/XXXX*****

⁵ [footnote to be updated] For more information on ranking, refer to "FY2019 TX BoS CoC Ranking Policies and Procedures for Continuum of Care Program Funds in the Texas Balance of State Continuum of Care".