

Texas Balance of State Continuum of Care

The TX BoS CoC is Seeking Public Comment on

Review and Scoring Policy and Procedure 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 Policy and Procedure for Continuum of Care Program Funds in the Texas Balance State Continuum of Care* (Review and Scoring Policy). A public comment period allows 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/jvPT5w5X1bD1VCsA9>

Comments received after 4:59pm CST on *Wednesday, March 29, 2023* will not be accepted.

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

Texas Homeless Network
Attn: Jim Ward
3000 S. IH 35 Ste 100
Austin TX, 78704
Fax: 512-478-9077
Email: jim@thn.org

This Public Comment Period closes on *Wednesday, March 29, 2023* at 4:59 P.M.

Texas Balance of State Continuum of Care

Introduction:

THN, as Lead Agency for the Texas Balance of State Continuum of Care is recommending changes to the Review and Scoring Policy last approved by the CoC Board on December 18, 2020. The recommended changes ensure the policy clearly communicates the process of Reviewing and Scoring projects in the CoC Program Competition and clarifies certain aspects of that process.

Summary of Changes

The substantive changes are listed below. Additionally, the entire document has been edited for language, grammar, and syntax to articulate the policy and procedure

1. Project Submission

This is a new section. It communicates how applications are submitted to the CoC for review. It clarifies that Applicants are solely responsible for the content of their application to HUD and the consequences for inaccurate or incomplete applications, which include additional terms and conditions placed on an award by HUD, or in serious cases for HUD to withdraw an offer of conditional award.

2. Project Application Reviews

Language added, reinforcing that the applicant alone is responsible for the contents of their application, specifically the allowability or feasibility of any proposed activity or cost and must possess a working understanding of the CoC Program. Applicants are responsible for satisfying the terms and conditions of any Conditional Award offer.

3. Scoring Criteria

HUD may, from time to time, specify specific criteria not previously listed in the Review and Scoring Policy, additional language gives the CoC the flexibility to implement those criteria without a revision of the policy.

Several versions of the policy follow.

1. The proposed policy with changes
2. The proposed policy with changes to the document in-line
3. The current policy

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

Texas Balance of State Continuum of Care

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.

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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 to HUD for review. Project Applications are reviewed twice by TX BoS CoC Staff before being sent to the Independent Review Team (IRT) for scoring. The first review is a Threshold Review, and the second is a Quality Review. While staff make every effort to conduct a thorough review of the application and supporting documents, The Applicant is responsible for understanding the requirements of the CoC Program and are responsible for resolving any terms or conditions that may arise from their application.

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

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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.
- The application must conform to the requirements of the Request for Proposals (RFP) and the relevant Notice of Funding Opportunity (NOFO)

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

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 have 72 hours to correct the identified deficiencies.

Scoring

Scoring is 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

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⁴ For more information on reallocation, refer to "Ranking Policies and Procedure for Continuum of Care

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The IRT comprises 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 can 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.

An authorized representative of the Continuum of Care Lead Agency manages this process of recruiting and selecting volunteers for the IRT. 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.

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

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- 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. System Performance Measures
 13. Prior performance in connection with a federal award or requirement

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. The relevant Notice of Funding Opportunity (NOFO) may specify additional metrics that CoCs should score Applicants on that are not reflected in this document. It is the intent of the CoC to incorporate HUDs priorities into this process, and may adopt additional objective criteria as needed, dependant on the NOFO.

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 Opportunity (NOFO). 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.

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:

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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 e-snaps 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

⁵ For more information on ranking, refer to “TX BoS CoC Ranking Policies and Procedures for Continuum of Care Program Funds in the Texas Balance of State Continuum of Care”.

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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 e-snaps 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

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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 11/18/2020 and made publicly available at thn.org on 12/10/2020**

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