



## **FY2022 TX-503 Special NOFO: Review, Scoring, and Ranking Policy and Procedure**

### **i. Review, Score, and Ranking Policy:**

The Austin/Travis County Continuum of Care (CoC) will competitively rank projects based on projects' improvement of system performance. The Austin/Travis County CoC seeks to facilitate a coordinated, equitable, and outcome-oriented community process for the solicitation, review, ranking, and selection of project applications, and a process by which renewal projects are reviewed for performance and compliance with 24 CFR 578 and FR-6500-N-25S.

### **ii. Background:**

On June 22, 2022, the U.S. Department of Housing and Urban Development (HUD) released a national competition for Continuum of Care (CoC) Programs through the CoC Special NOFO to Address Unsheltered and Rural Homelessness (Special NOFO). This competition procures funds into the Austin/Travis County area to provide housing and services to individuals and families experiencing unsheltered homelessness with severe service needs. The Ending Community Homelessness Coalition (ECHO), the Collaborative Applicant for the Austin/Travis County Continuum of Care, has been appointed on behalf of the Continuum to complete and submit the Consolidated Application and facilitate the local competition for Continuum of Care funding, under the supervision of the CoC Board, the Leadership Council, or its representative. The Consolidated Application consists of the CoC Application, Comprehensive CoC Plan, Priority Listing, and Project Applications.

The CoC Board, or its designated representatives, approves this Review, Scoring, and Ranking Policy and Procedure. The CoC Board appoints an Independent Review Team (IRT) to review and objectively score all renewal and new project applications.

### **iii. Review**

All projects submitted to the Continuum of Care will be thoroughly reviewed at the local level. Deficient project applications prolong the review process for HUD, which results in delayed funding announcements, lost funding for CoCs due to rejected projects, and delays in funds to house and assist individuals and families experiencing unsheltered homelessness. CoCs are expected to closely review information provided in each project application to ensure:

1. All proposed program participants will be eligible for the program component type selected;
2. The information provided in the project application and proposed activities are eligible and consistent with program requirements in 24 CFR part 578 and FR-6500-N-25S;
3. Each project narrative is fully responsive to the question being asked and that it meets all the criteria for that question as required by this Special NOFO;
4. The data provided in various parts of the project application are consistent;
5. Each projects application describes operations that are consistent with the CoC Plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs; and,
6. All required attachments correspond to the list of attachments in e-snaps and contain accurate and complete information.

To ensure that all projects submitted to HUD for funding consideration are of a high quality, ECHO staff



will complete a Threshold and Project Quality review of all project applications.

**a. Threshold Review**

ECHO staff will review submitted applications to ensure all applications meet the requirements of 24 CFR 578.15 and any additional threshold requirements outlined in the Special NOFO.

**b. Project Quality Review**

ECHO staff will review submitted applications to confirm all projects ensure:

1. All proposed program participants will be eligible for the program component type selected;
2. The information provided in the project application and proposed activities are eligible and consistent with the Special NOFO and CoC Plan;
3. Each project narrative is fully responsive to the question being asked and that it meets all the criteria outlined in Section V.C.3.c. of the FY22 Special NOFO;
4. The data provided in various parts of the project application are consistent;
5. All required attachments correspond to the list of attachments in e-snaps and contain accurate and complete information; and,
6. The project is fully compliant with the [Austin/Travis County Continuum of Care’s Written Standards for Program Delivery](#).

**c. Deficiencies**

Deficiency is used to refer to missing or omitted information within a submitted application. Deficiencies typically involve missing documents, information on a form, or some other type of unsatisfied information requirement (e.g., an unsigned form, unchecked box, etc.). Depending on specific criteria, deficiencies may be either curable or non-curable.

Curable Deficiency – Applicants may correct a curable deficiency with timely action. To be curable, the deficiency must:

- a. Not be a threshold requirement, except for documentation of applicant eligibility;
- b. Not influence how an applicant is ranked or scored versus other applicants; and,
- c. Be remedied within the time frame specified in the notice of deficiency.

Non-Curable Deficiency – An applicant cannot correct a non-curable deficiency after the submission deadline. Non-curable deficiencies are deficiencies that, if corrected, would change an applicant’s score or rank versus other applicants. Non-curable deficiencies may result in an application being marked ineligible, or otherwise adversely affect an application’s score and final determination.

All applicants whose projects have identified both curable and non-curable deficiencies must be given at least two (2) business days to address and adequately resolve any deficiencies. If deficiencies cannot be sufficiently addressed, the applicant cannot move forward in the process. Applicants can appeal the determination based on the appeal policy outlined below.

**ii. Scoring**

Scoring is the process of using subjective, objective, and performance-based criteria to evaluate the effectiveness of Projects. Scoring is conducted by the Independent Review Team (IRT) after the Project Applications have been reviewed twice by ECHO staff, once for threshold and once for project quality.



Independent review and scoring of Project Applications must be performed with members independent of the CoC Lead Agency and of CoC Funded programs, projects, or agencies. IRT Members must disclose any conflicts of interest prior to joining the IRT. The IRT ensures the highest level of objectivity when it comes to the scoring of project applications for CoC Program funding. Projects which are non-competitively ranked for funding, either through the FY22 Special NOFO or through Leadership Council Determination, will not be scored.

**a. Austin/Travis County Community Prioritization**

The Leadership Council, as the CoC Board of the Austin/Travis County CoC, has identified the following priorities for applications submitted for consideration during the FY22 CoC Program Special NOFO. The Leadership Council has directed the Collaborative Applicant to review, score, and rank all applications based on these priorities. These priorities will be evaluated in addition to project performance metrics that contribute to the community's System Performance Measures:

- 1. Furthering Racial Equity** - HUD charges CoCs with reviewing local policies, procedures, and processes to determine where and how to address racial disparities affecting individuals and families experiencing homelessness. In addition to other community activities to increase racial equity within the Austin/Travis County CoC, the Leadership Council has prioritized CoC recipients whose staff, leadership, and board are representative of the racial composition of people experiencing homelessness within the community. Priority will also be given to CoC recipients who create measurable improvements in program delivery and service provision to ensure racially equitable outcomes. Priority will also be given to CoC recipients who create measurable improvements in program delivery and service provision to ensure racially equitable outcomes, and to those who conduct equity trainings for all staff including leadership and front-line staff.
- 2. Authentic Engagement of People with Lived Experience** - HUD recognizes that programs in the HRS will be most effective when they authentically engage program participants and hire people with lived expertise into leadership positions. Therefore, in addition to other community activities to integrate lived expertise into governance activities and program delivery, the Leadership Council has prioritized CoC recipients who implement measurable programmatic changes in response to feedback solicited from people with lived experience. Priority will also be given to CoC recipients whose staff and leadership have lived expertise of homelessness.
- 3. Using Emerging Data to Inform Program Design and Growth** - HUD supports CoCs to use outcome measures related to CoC system performance measures in the local review, selection, and rating process. Leadership Council has prioritized CoC recipients who engage performance data, at least annually, to inform program design, staff development, and areas for service improvement through continuous quality improvement.
- 4. Investing in a Competitive Workforce** - HUD expects CoCs to review all projects



eligible for renewal in FY2021 to determine their performance in serving people experiencing homelessness. Cost effectiveness must be measured in correlation with project performance and an agency's retention of a competitive workforce. Leadership Council has prioritized CoC recipients who have demonstrated an ability to recruit skilled candidates, retain a diverse staff, improve project outcomes, and display fiscal responsibility.

### **iii. Ranking Policy**

The Austin/Travis County CoC will rank all projects which have passed threshold and project quality review and scoring by the IRT on the Priority Listing. The CoC Board, Leadership Council, has determined that HMIS and CoC Planning will be non-competitively ranked due to their critical role in supporting the operation of the CoC and implementing CoC Program requirements.

The CoC Board may approve selective restructuring of a project's final location within the Priority Listing to best maximize the CoC Consolidated Application's overall score and potential for funding.

### **vii. Ranking Procedure**

Once the final scores are received from the IRT, ECHO will average the IRT scores for a given project and convert the raw score to the percentage score using the following formula:

$$\frac{(\text{Application Score awarded by an IRT Member} + \text{Application Score awarded by other IRT Members})}{(\text{total number of IRT members reviewing the same application})} = \text{Average Score}$$
$$\frac{(\text{Average Score} + \text{Performance Score})}{\text{Total Possible}} \times 100 = \text{Percentage Score}$$

ECHO Staff will then populate the Priority Listing using the Ranking Policy above to calculate Project Percent Scores. Using an Excel calculator to determine the mathematical advantage of a given ranking scenario, ECHO Staff will create several scenarios with similar mathematical advantages for consideration to the CoC Board to approve or reject.

### **viii. Project Ranking Appeals**

#### **a. Project Ranking Appeal Policy**

The TX-503 Austin/Travis County CoC is dedicated to facilitating a coordinated, equitable, and outcome-oriented community process for the solicitation, objective review, ranking, and selection of project applications. The Project Ranking Appeals policy contains the following guidelines:

- i. An appeal can only be made by an applicant regarding the scoring of their own application.
- ii. Any discrepancies or errors found by applicants must be reported to the Collaborative Applicant and such corrections will not constitute an appeal, unless the discrepancy or error is deemed an incurable deficiency resulting in exclusion of the project application from consideration.

#### **b. Eligible Appeals**

- i. Appeals can be requested by any agency which has a project submitted for participation in the FY22 CoC Program Special NOFO in the Austin/Travis County CoC geographic area. Example of appeals include:
  1. Projects that are not funded or receive less funding than the amount in the



application.

2. Projects that are deemed to have submitted an incurable deficiency.

c. Appeals Procedure

i. Applicants must follow the following process to submit appeals:

1. Applicants will have three (3) business days to appeal after being notified by email of the final ranking by the Collaborative Applicant.
2. An appeal must be in the form of a letter on the applicant agency's letterhead and must clearly state the reasons for the appeal and specify all issues being contested. The appealing agency must specify facts and evidence sufficient for the CoC Board, or its representative, to determine the validity of the appeal. The CoC Board, or its representative, will review and adjudicate all appeals.
3. Agencies will receive, in writing, the appeal decision before the Special NOFO Collaborative Application submission deadline. ECHO will be responsible for ensuring that projects have received proper notice of all final funding decisions.
4. Applicants may appeal the local CoC competition decision to HUD if the project applicant would like to further appeal the CoC Board's decision.
5. Applicants may ask ECHO for summary scoring information prior to the submission of the appeal letter. Individual IRT member scores will not be released to applicants.

**ix. Independent Review Team (IRT)**

Members of the Independent Review Team (IRT) will provide objective review and scoring of all ranked projects submitted for consideration as part of the FY2022 CoC Program Special NOFO.

The Independent Review Team will be composed of no fewer than 6 and no more than 10 non-conflicted individuals from CoC stakeholders with at least the following representation present:

- Person(s) with Lived Experience of Unsheltered Homelessness
- Leadership Council Representative

Each Project Application will be reviewed and scored by at least three separate IRT members, and the final score for the application will be the average of the scores. IRT members who have lived experience of homelessness will be compensated at a rate of \$75 per application scored.

To be considered as a member of the IRT, a nominee must maintain:

- A commitment to racial equity and reducing racial disparities in the population experiencing homelessness.
- A commitment to the fair and sufficient distribution of HUD CoC funding to local homeless-serving agencies.
- Availability to participate in the review of a maximum of 5 - 6 project applications.
- Ability to participate in a fair and equitable process without agency or programmatic preferences.
- Ability to participate in a respectful, consensus-driven, and problem-solving process.
- Significant knowledge of issues and services related to solutions to homelessness.

**Individuals who are employees, contractors, or board members of service providers that receive HUD CoC funding are not eligible to serve on the IRT.** All IRT members will be required to sign the Conflict of



Interest and Confidentiality policies annually to help ensure the integrity of the IRT review process. Individuals who served on the FY22 CoC NOFO Competition IRT are eligible to serve on the FY22 Special NOFO IRT as well.