



# Northlake Homeless Coalition CoC Community Evaluation Policy

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**Effective Date:** 8/2/2017; Revised 5/30/2018

**Purpose:** To coordinate implementation of a housing and service system that meets the needs of homeless individuals and families. And further, to design, operate and follow a collaborative process for the development of applications and approve the submission of applications in response to the annual HUD NOFA published under 24 CFR 578.19.

**Scope:** This policy applies to all current and future recipients and subrecipients of CoC Program funds for region LA-506 and the CoC Collaborative Applicant, the Northlake Homeless Coalition.

**Background:** After a series of four public meetings held October 2016 – May 2017, the NHC General Membership voted to adopt the Community Benchmarks Scorecard and a collaborative Community Evaluation Process so that CoC funding decisions: (1) are conducted in a transparent, inclusive and community-driven process; (2) are data-driven, aligned with HUD system performance measures and reflect the needs of the community; and (3) are made to increase cost effectiveness and service delivery and prioritize those who are most vulnerable in the community in accordance with HUD CPD Notice 16-11: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing.

**Responsible Party:** The NHC Executive Director, in conjunction with the Governance Committee Chair, is responsible for administering and enforcing this policy. This policy will be reviewed and updated annually as a process of the Governance Committee. The Governance Committee is a committee of the NHC Board, but its membership is not exclusive to NHC Board members. The Governance Committee will submit any revisions to this policy to the NHC Board. The NHC Providers and Stakeholders Association will have the opportunity to review and submit feedback regarding any proposed changes prior to a NHC board vote.

## I. Policy Statement

This policy is established to ensure that Northlake Homeless Coalition CoC funding decisions (1) are conducted in a transparent, inclusive and community-driven process; (2) are data-driven, aligned with HUD system performance measures and reflect the needs of the community; (3) are made to increase cost effectiveness and service delivery and prioritize those who are most vulnerable in the community in accordance with HUD CPD Notice 16-11: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing; (4) align with the state minimum requirements for CoC funding determinations; and (5) are submitted in accordance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Code of Federal Regulation (CFR) for the CoC Program 24 CFR Part 578.19.

**II. Transparent, Inclusive and Community-Driven Process**

- A. All new and renewal project applications (except for the CoC Planning Project, the dedicated Coordinated Entry project and the dedicated HMIS project) will be ranked and evaluated utilizing the Community Benchmarks Scorecard and the NHC Community Evaluation Process.
- B. The Community Benchmarks Scorecard evaluates individual project performance in relation to the system performance measures as well as the following:
  - 1. Capacity/bed utilization;
  - 2. Housing First program model;
  - 3. HMIS data quality;
  - 4. CoC participation;
  - 5. Coordinated entry participation;
  - 6. Cost effectiveness;
  - 7. And prioritized/vulnerable populations
- C. The Community Benchmarks Scorecard includes targets for each of the measures and total points possible for each measure. The Scorecard and the accompanying targets are approved by the NHC Board annually, after the public has had the chance to review and submit feedback during a public comment period consisting of 21 days along with a public NHC Providers and Stakeholders meeting that is advertised on the NHC website, on the NHC mailing list and in the legal/public notices section of the newspaper. 80% of the project's total score will be generated from the scorecard.
- D. The remaining 20% of the project application score will be generated by the NHC Community Evaluation Process. The Community Evaluation occurs during a NHC Providers and Stakeholders Association Meeting that is open to the public and advertised on the NHC website, on the NHC mailing list, and in the legal/public notices section of the newspaper.
  - 1. The NHC will conduct a 1.5-hour Continuum of Care training for attendees and thereafter, each project sponsor will do a brief 5-minute presentation on their organization and program.
  - 2. CoC Evaluation Process attendees will receive a scorecard, a project overview compiled with information submitted in the project application in e-SNAPS, a conflict of interest disclosure form and a voter ballot.
  - 3. Each CoC funded agency may submit one vote per project in the CoC Evaluation process. A person will be considered an affiliate of a CoC-funded agency if they are an employee or board member of the organization OR if they are an immediate relative of an employee or board member of the organization. Immediate relatives are defined as a spouse, child, parent or grandparent for the purposes of this policy.
  - 4. The votes submitted for each project will be averaged to generate the Community Evaluation Process score, which accounts for 20% of the project application score.
- E. The resulting scores will be used to generate the CoC priority listing and ranking of the project applications. Projects that receive the same score will be prioritized by

percentage of vulnerable populations served as determined by Measures 16-21 on the Community Benchmarks Scorecard.

- F. For the Community Evaluation Process to be valid, there must be a minimum of 51% non-funded CoC agencies or independent community stakeholders participating in the process. If participation in the Community Evaluation is less than 51%, the community evaluation portion of the score will be discarded and the project scores will be determined solely by the Community Benchmarks Scorecard.

### **III. Data Driven, Community-Informed Decision Making**

- A. The Community Evaluation Process and accompanying Community Benchmarks Scorecard (Section II.A – E) ensures that projects are reviewed per quantitative metrics aligned with system performance measures and community priorities with ample opportunities for feedback from a variety of stakeholders, including homeless and formerly homeless persons.
- B. Beginning in 2018, The Community Evaluation Process and Scorecard will implement a minimum threshold score that renewal projects must achieve to apply for renewal funding.
- C. Funding Reallocation Determinations: The NHC will reallocate CoC project funding in the following situations:
  - 1. The CoC funded agency determines to cease operations of the project and/or the organization. The agency will still be responsible for all obligations set forth in the executed grant agreement with HUD and should notify both HUD and the Northlake Homeless Coalition as soon as the decision is made to cease operations or 60 days prior to closure, whichever is greater;
  - 2. The CoC funded agency does not meet the minimum threshold score required to apply for renewal funding (2018 and beyond);
  - 3. The NHC will conduct a community assessment on at least a biennial basis to identify gaps in services, underutilization of services and capacity, progress on system wide performance measures, alignment with goals set forth in the strategic plan and barriers to entry into the homeless service system. The assessment will include focus groups with homeless and formerly homeless clients. This assessment will be a community process overseen jointly by the Coordinated Access and Assessment System (CAAS) Oversight Committee and the Strategic Planning Committee. The joint committee will present its findings and any recommendations for reallocation at a Providers and Stakeholders Association meeting. Community members will have an opportunity to respond to the joint committee recommendations prior to a vote by the NHC Board to accept any recommendations to reallocate funds. Once the NHC Board has decided to reallocate funds, the Monitoring and Evaluation Committee will oversee the process for evaluating project performance and determining which grants should be reduced and/or eliminated. The community assessments will occur in even numbered years and any reallocations based on this process will occur in odd numbered years, notwithstanding any HUD requirements that may necessitate for this process to occur on a more frequent basis. This will allow project sponsors ample time to ramp down any project affected by the reallocation.

4. In addition to the community assessment process, which addresses system wide performance and allocation of resources, the Monitoring and Evaluation committee will be responsible for reviewing project performance via oversight of the onsite monitoring and CoC application submission processes. The Monitoring and Evaluation Committee will review onsite monitoring reports, HMIS APR data, annual applications for funding and performance on system wide performance benchmarks adopted by the NHC. Once a deficiency in performance has been identified, a corrective action plan will be developed and implemented in accordance with the NHC Program Administration and Monitoring Policy. While a CoC funded agency is under a corrective action plan, the agency will not be allowed to apply for any new CoC funds made available during that time. Project sponsors will have one year to improve performance via the corrective action plan and corresponding technical assistance, as available. Technical assistance may include housing and homeless program models and best practices, HUD grant administration, performance measurement and improvement, and HMIS training. Project Sponsors may also request technical assistance via the HUD Office of Community Planning and Development. At the end of the year, the project will be reevaluated and if deficiencies persist, the project will be subject to reallocation. The Monitoring and Evaluation Committee will make a recommendation to either extend the corrective action plan period or reallocate funds. The NHC Board will vote on any recommendations to reallocate funds.
- D. Requests for Proposals: Reallocation and Permanent Housing Bonus Funds
1. When funding is available via reallocation or the permanent housing bonus, the joint NHC CAAS Oversight Committee and Strategic Planning Committee will submit an unmet needs report based on requests for assistance through the coordinated entry system to the NHC Board. The NHC Board will review the unmet needs report along with the funding opportunities available through reallocation or the Permanent Housing Bonus. The NHC Board will vote on the type of project to submit for reallocation and/or the Permanent Housing Bonus after soliciting feedback via the Stakeholders and Providers Association. The NHC Providers and Stakeholders Association meeting to solicit feedback of funding usage is open to the public and will be advertised on the NHC website, on the NHC mailing list and in the legal/public notice section of the newspaper.
  2. The NHC Executive Director will be responsible for crafting the Request for Proposals based on the outcome of the NHC Board vote.

#### **IV. Align with State minimum requirements for CoC Funding Determinations**

- A. The State Homeless Working Group comprised of all the regional Continua of Care as well as the Balance of State CoC have agreed to the following common standards regarding CoC funding determinations:
1. HMIS and Coordinated Entry projects are integral to CoC system performance and should be ranked within Tier 1 of the CoC application. HMIS and Coordinated Entry should be subject to a threshold review to ensure that these projects are with the correct project sponsor and performing optimally.

2. All CoCs should implement a process that includes threshold criteria for submitting a funding application which includes a review of the HUD threshold requirements for project submission, a request for funding, annual performance reports (APRs) and compliance and monitoring.
3. All CoCs will at minimum review project performance for progress related to system performance measures; capacity/bed utilization, Housing First fidelity and Coordinated Entry participation.

**V. Compliance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act**

- A. Each project sponsor is required to ensure that their project application and other required documents for submission meet the HUD Threshold Requirements as listed in the HUD Project and Ranking Tool.
- B. The NHC will be responsible for conducting a threshold review of the application submission and will notify the project sponsor for corrections or revisions, if necessary.
- C. All threshold review corrections must be made prior to submission of the consolidated application or the funding will be reallocated through a convening of a special meeting of the NHC Providers and Stakeholders Association to solicit feedback and a subsequent vote by the NHC Board.