

INDIANAPOLIS CONTINUUM OF CARE PROGRAM POLICIES

Approved by the Blueprint Council March 20, 2017

Performance Scoring Policy

Applications for New and Renewal Projects will undergo a threshold review to ensure compliance with the HEARTH Act, the Housing and Urban Development (HUD) Continuum of Care (CoC) Program Notice of Funding Availability (NOFA) and the Indianapolis CoC Request for Applications. Any new or renewal project not meeting the threshold requirement will not be further reviewed and will not be considered for funding. Renewal projects that have previously passed HUD and Indianapolis CoC will likely continue to pass threshold review and only in very exceptional cases of changed HUD policies or program changes will they be at risk of not passing the threshold review.

The Program Application and Technical Assistance (PATA) Committee makes available, encourages and accepts comments on the scoring standards for new and renewal projects on the CoC website and annually at CoC meetings. The Ranking and Review Scoring Tool and the New Project/Transfer Application and Scoring Criteria are available on the Indianapolis CoC website. Scoring criteria will be based on HUD priorities, including targeting certain subpopulations such as youth, families, veterans, domestic violence victims and the chronically homeless. These priorities may vary from year to year and will be updated on the CoC website each year.

Scoring of renewal projects is tabulated by the PATA committee and the Coalition for Homelessness Intervention and Prevention (CHIP) staff and is based on data obtained from the most recent, completed calendar year (except for unspent funds which will use the last completed contract year), collaborative applicant data, Homeless Management Information System (HMIS) data, Annual Performance Report (APR), and other sources and comply with the HUD approved System Performance Measures.

The PATA chairperson in conjunction with the Blueprint Council chairperson will select a committee of non-conflicted people to review, rate and rank New Project applications. The New Project Review committee will consist of at least 5 and no more than 9 members. After meeting the Indianapolis Request for Proposal (RFP), priorities and program requirements, all New Projects are subject to the scoring outlined in the Indianapolis RFP and new project scoring criteria available on the Indianapolis CoC website. The New Project Review Committee utilizes scoring to inform their recommendation of new projects. The New Project Review Committee has the discretion to recommend to the PATA committee one or more applications for the amount available for new projects. The committee may also negotiate with conditional new projects.

The PATA committee will rank applications after scoring all new and renewal projects within the CoC based on the Renewal Project Scoring and the New Project Scoring Criteria. This ranking will then be subject to final approval by the Blueprint Council.

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Ranking Policy

The U.S. Department of Housing and Urban Development (HUD) requires CoC's to rank all projects in two tiers. Tier 1 is defined by the HUD CoC Program Competition in the Notice of Funding Availability (NOFA) as a percent of the CoC's Annual Renewal Demand (ARD) approved by HUD on the final HUD-approved Grant Inventory Worksheet (GIW). Tier 1 projects are traditionally protected from HUD funding cuts. Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for the permanent housing bonus as described in the HUD NOFA. Tier 2 projects must compete nationally for funding.

Renewal projects will be scored and ranked according to the Ranking and Review Scoring Tool, available on the Indianapolis CoC website, except for first time renewals or projects funded as part of the NOFA competition that have not been in operation for at least one year. Commonly, projects funded as part of the NOFA competition that have not been in operation for at least one year will be ranked in Tier 1 above the projects deemed essential listed below.

The Indianapolis CoC reserves the right to place any 1st time renewal in Tier 2 based on community needs and/or HUD priorities. New projects will be scored based on the New Project Scoring Criteria and ranked by the New Project Review Committee. The PATA committee reserves the right to place new projects in either Tier 1 or 2 based on community needs and to maximize points available in the CoC Program Competition to give the Indianapolis CoC the greatest opportunity to receive the best mix of funding and housing.

Projects that are deemed essential to the CoC but which would be at risk of loss of funding if placed in Tier 2, will be ranked at the bottom of Tier 1. This may include but not limited to Support Service Only projects providing Coordinated Entry and renewal HMIS projects.

Tier 2: Projects will be organized to best maximize the CoC Consolidated Grant Overall Score.

Planning Project: not ranked per HUD requirements.

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Re-Allocation Policy

Any funds reallocated as part of recapturing unspent funds, voluntary or involuntary reallocation will be made available to create new projects during the local solicitation process.

Unspent Funds

Projects that are not fully expending or underspending their grant awards are subject to the re-allocation process. Projects that have not spent 90% of their award may be reduced and those funds will go to reallocation for New Project(s). A one-year grace period may be extended by the PATA committee to providers who submit a Performance Improvement Plan that demonstrates that the grant's expenditure will be improved in the current program year to comply with the goal of 90% utilization of the HUD grant. Projects that have not spent 90% or more of their award in two consecutive program years may have their funding reduced through reallocation in the next CoC Program competition.

Voluntary Re-Allocation

As part of the local solicitation for inclusion in the HUD CoC Program application, providers are asked whether they wish to voluntarily re-allocate some or all their funding. Such re-allocated funds are pooled for re-allocation to New Projects.

Involuntary Re-Allocation (Unconditional v Conditional Renewal)

Projects with poor performance, not serving the intended population or with significant, unresolved findings are subject to re-allocation.

The PATA committee will establish a threshold for unconditional renewal at 80% of the top score. For example, if the top score is 100, the minimum threshold will be set at 80. All projects submitting full renewal applications meeting threshold and scored above the threshold are approved for renewal without conditions. These projects are subject to the unspent funds protocol above.

Projects scoring below the threshold will be asked to develop a Performance Improvement Plan to address performance issues by next year's competition, or to voluntarily give up their grant award or a portion of their grant award to be reallocated to a new project. If scores remain below threshold, projects may be reallocated in the following cycle and the PATA committee reserves the right to reallocate in the current cycle. Applicants may appeal their scores, and the appeal may be considered under the Appeals Process of the Indianapolis CoC (available on the Indianapolis CoC website).

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Minimum Performance Standards for Renewals

Each year the PATA Committee establishes minimum performance standards and evaluation criteria for renewing projects (projects must receive a minimum score of 60 out of a possible 100 to be considered satisfactory). Grantees will be asked to submit and verify data accuracy.

Projects scoring below the minimum scoring standard must submit a corrective action plan in place of the Performance Improvement Plan noted above. Agencies in the corrective action process will be reviewed by the PATA committee to determine funding eligibility for new projects. Projects in corrective action status may be at risk of losing their funding involuntarily and having those funds reallocated to a new project.

Applicants may appeal the decision, and the appeal must be considered by the Appeals Process of the Indianapolis CoC (available on the Indianapolis CoC website).

Determination of any conditions to renewal will be made at least 30 days ahead of the NOFA due date. Any required Performance Improvement Plans or plan that demonstrates that the grant's expenditure will be improved as part of a reallocation appeal must be submitted for approval at least 20 days ahead of the NOFA due date, so that a final determination can be made as to whether the project goes forward for renewal.

A final list of new and renewal projects will be presented to the Blueprint Council for approval and posted on the Indianapolis CoC website.