

San Francisco Local Homeless Coordinating Board

2021 McKinney-Vento Continuum of Care Homeless Assistance Grants

Local CoC Competition Review, Rank & Appeals Process

Statement of Policy

The San Francisco Continuum of Care (SF CoC) prioritizes transparent and rigorous public input in governance of its local CoC funding competition process, prior to final review and approval by the CoC's Local Homelessness Coordinating Board (LHCB).

The SF CoC Local Competition process is welcoming to persons with disabilities, persons who have experienced homelessness, and persons with limited English proficiency. For reasonable accommodations, please contact Charles Minor at Charles.Minor@sfgov.org or 415-557-6007.

Local Competition Review and Rank Process

- CoC designs a project review and rank process and scoring criteria; LHCB approves process prior to HUD's CoC NOFA announcement.
- Homebase collects Annual Performance Reviews (APRs), additional compliance data, and supplemental local application information from programs.
- Following HUD's CoC NOFA announcement, policy and process documentation is updated according to novel elements of the latest NOFA, as needed. If feasible within time constraints, the LHCB's Funding Committee will meet to discuss any further amendments to its policies and processes. All changes are reviewed by the LHCB at its next available convening.
- Renewal projects receive preliminary scores within *Project Evaluation Reports*, through a designated local application portal. Providers contextualize their preliminary scores with narrative *Project Response Forms*.
- Renewal and new applicant agencies attend the annual Bidders' Conference. They receive blank application material packets (hard copy and electronic access). Providers are connected with technical assistance resources and providers.
- Applicants submit complete application packets, including a PDF of *HUD Project Application(s)*, local application(s), and match documentation. **All documents are to be submitted electronically in separate PDF files, according to the instructions on the *Proposal Submission Checklist*.** HSH/LHCB staff assess project threshold requirements, according to the *Scoring Tools*.
 - LATE/INCOMPLETE APPLICATION POLICY: Late applications received within 48 hours following the due date/time will be reduced by 15 points. Incomplete applications cannot be cured for Priority Panel review beyond the due date. If an incomplete application is nevertheless selected for funding, the application must be corrected prior to final submission to HUD.
- LHCB staff recruits Priority Panel members, preferring members who have previously served on the panel, and/or bearing relevant experience to the given year's NOFA-specific priorities (e.g. panelists with experience serving DV communities for a NOFA containing a DV Bonus). Priority Panel members each sign a *Conflict of Interest and Confidentiality Form*, and preliminarily review and pre-score all applications.
 - **The Priority Panel only reviews scoring factors identified by providers in their *Project Response Form(s)*.** All other factors may remain at their preliminary score, though panelists have discretion to adjust scores not identified by the project to ensure consistency throughout their review process.

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- Priority Panel convenes to review applications, and individually finalize project scores. If a panelist finalizes a score for any performance data-based scoring factor that is *lower* than the pre-scored value, that panelist is asked to rationalize their decision on record.
- Panel members must sign and submit to LHC staff, the *Review and Rank Process Confidentiality and Conflict of Interest Statement*.
- Applications are ranked and ordered in the *Priority Listing* according to score, with the following exceptions:
 - **“Held Harmless” status:** Renewal projects lacking a full year’s worth of performance data are awarded full points on all performance data-based scoring factors.
 - Any renewal projects still lacking a full year’s performance data for the second or later year is asked to explain within the application all reasons for startup delays. Such projects suffer point penalties as dictated in Section 1 of the *Renewal Project Scoring Tool*. The response must include a plan to spend down funds within the HUD-mandated period. In extreme cases where community funding is at risk, panelists may recommend reallocation or ranking in Tier 2.
 - Any first-time renewal housing project proposing to apply for less than 90% of its New Project application’s unit total will not be held harmless, instead receiving a 1/3-point reduction on all performance data-based scoring factors.
 - **Renewal HMIS and SSO-CE:** Automatically ranked at bottom of Tier 1.
 - **New HMIS and SSO-CE:** Automatically ranked atop Tier 2.
 - **Straddler:** Assuming HUD tier rules continue to allow a project to fall partially within both Tier 1 and Tier 2, then the top-scoring non-HMIS nor SSO-CE project in Tier 2 will be moved to straddle the tiers on the *Priority Listing*.
 - **Preservation of existing permanent housing:** The SF CoC prioritizes the preservation of existing permanent housing to maintain critical supportive housing inventory and to prevent the loss of housing for existing program participants. The Priority Panel has discretion to adjust the *Priority Listing* with this goal in mind.
- **Involuntary reallocation:** The Priority Panel may flag projects to be reallocated in-whole or in-part, or else re-ranked in favor of a new project, based on community priorities as determined by the CoC and HSH.

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Appeals Eligibility

An applicant is eligible to appeal if:

- (1) the project is not selected for funding by the Priority Panel, or receives less funding than sought;
- (2) the project is a renewal project ranked in Tier 2 of the Priority Listing; or
- (3) the project is ranked in the bottom portion of Tier 1 equal to the total value of Tier 2.

Appeals Committee Composition

The Appeals Committee comprises three LHCB members, accompanied by one non-voting Priority Panel member to provide context on prior ranking decisions. Appeals Committee members will neither have served as Priority Panel members in the same year, nor be permitted to have real or apparent conflicts of interest with any agencies applying in the current round of funding. Appeals Committee members must sign and submit to LHCB staff, the *Review and Rank Process Confidentiality and Conflict of Interest Statement*. The Appeals Committee's review is limited in scope to the components of the application appealed according to the appellant's submission.

Appeals Process

- The Priority Panel's preliminary *Priority Listing* is publicly posted.
- Applicants are given one business day to request copies of score sheets. Applicants can request score sheets by email at sfnofa@homebaseccc.org. Anonymized notes of Priority Panel's scoring rationale will be provided alongside score sheets, upon request only.
- **Appeals deadline:** Eligible applicants who choose to appeal must electronically submit a written appeal to **both** sfnofa@homebaseccc.org and Charles.Minor@sfgov.org within 3 business days of the *Priority Listing* public posting.
- The written appeal is limited to two pages typed, 12-point font. The appeal states all grounds for appeal, by reference to information contained within the original application materials. No extraneous detail will be taken into consideration, with the exception of ranking context provided verbally by the non-voting Priority Panel member in attendance on Appeals Day.
 - **Involuntary reallocation exception:** A program appealing a Priority Panel decision to reallocate may submit *any* information the agency feels relevant, regardless of inclusion in the original application. The program may also exercise an opportunity to lodge a 10-minute in-person presentation by a maximum of two representatives to the Appeals Committee on Appeals Day. The presentation is followed by a time-restricted question and answer session with Appeals Committee members.
- The written appeal must be signed by an individual authorized to represent the sponsor recipient/subrecipient (e.g. Executive Director) and indicate pertinent sections of the application upon which its arguments are founded.
- The Appeals Committee is given a flexible period of time, subject to NOFA timeline constraints, to review written appeals and all pertinent application materials.
- The Appeals Committee convenes on Appeals Day to review and evaluate all written appeals, hear presentations, if applicable, and render its final determinations.
- Appellants will receive written notice via email of the Appeals Committee's determination regarding the appellant project within 2 business days.
- The Appeals Committee's final *Priority Listing* is submitted to the LHCB for final approval.

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- If funding becomes available after LHCB approval of the final *Priority Listing*, via reallocation or budget correction, LHCB staff will allocate this funding to new project applicants in order of project ranking until it is exhausted.
- Applications will be submitted within the CoC's *Consolidated Application* and applicants will be invited to attend the 2021 NOFA Debrief.

For questions regarding the *San Francisco CoC Local Project Application Review and Rank Process*, please contact Homebase at sfnofa@homebaseccc.org.