

County of Riverside Continuum of Care



HUD CoC Program Review and Evaluation Process Policy

May 25, 2022

1. BACKGROUND

At the request of the Board of Governance (BoG), the Riverside County Continuum of Care (CoC) Standards and Evaluation Committee at its April 18, 2019, meeting created a Working Group to develop a review and evaluation process policy for distributing grant funds.

The purpose of the review and evaluation policy is to ensure that the Riverside County CoC maximizes the use of grant funds from the federal and state governments to address the needs of the CoC.

In developing this policy, the committee strived for transparency, accountability, and timely response.

Implementation of this policy is to:

- establish threshold evaluation;
- create and implement a Continuum of Care Review and Rank Committee;
- establish a project review and scoring criteria; and
- establish a project and selection appeals process.

After the County departmental restructuring with the move of the CoC Division from the Department of Public Social Services (DPSS) to the Department of Housing, Homelessness Prevention and Workforce Solutions (HHPWS) in March 2020, the Ad hoc Committee for 2021 CoC Program Competition was formed in April 2021 and charged to review and recommend revisions of this policy. The New Project Scorecard and revision of the Renewal Project Scorecard were approved on 6/23/2021. Further refinement was made and approved during the CoC Meeting in May 2022.

2. CREATION OF THE REVIEW COMMITTEE

- A. Interested volunteers will complete an application to HHPWS CoC Division that will redact names and any identifying information will be removed, to ensure anonymity of the reviewer.
- B. Applications will be presented to the Ad hoc Committee for the upcoming CoC Program Competition for review to ensure the applicant meets the criteria. Selected applicants will be notified by HHPWS CoC staff.
- C. The Review and Rank Committee members must attend a mandatory orientation and training on how to review and rank the applications, including funding priorities and requirements.

- D. During each funding cycle, the Ad hoc Committee for the upcoming CoC Program Competition will select reviewers from the Review and Rank Committee through a lottery process.

3. PROJECT REVIEW AND SCORING CRITERIA

Review Committee Volunteers will review proposals using the following criteria:

- A. Board of Governance Funding Principles
- B. Performance Measures
- C. Program and Fiscal Compliance
- D. HUD CoC and all HUD Priorities and Requirements
- E. HEARTH Act Compliance

4. PROJECT SELECTION AND APPEALS PROCESS

An appeals group will be created from the same pool of volunteers used to create the Review and Rank Committee and not directly involved in the original rating of project(s) under appeal. Appeals must be submitted in the form of a written letter addressed to HHPWS CoC Division.

A formal protest must contain the following to be considered. See Appeal Process for full details.

- A specific identification of the statutory or regulatory provision(s) that the alleged action is in violation.
- A specific description of each act alleged to have violated the statutory or regulatory provision(s).
- A precise statement of the relevant facts, and identification of the issue or issues to be resolved.
- Complaints about events or decisions made before the solicitation deadline.
- Complaints that the solicitation unduly constrains competition through improper minimum qualifications or specifications.

A detailed copy of the Review and Evaluation Process Policy is attached.

Riverside County CoC HUD CoC Program Review & Evaluation Process Policy

Part I: Threshold Evaluation

Any applicant must meet these HUD mandated criteria in order to receive grant funds. New project applicants must meet these conditions to be included in application scoring. Renewal projects met this burden at the time of their first application.

Application Threshold Review	Applicant has met all terms and conditions specified in the RFP. Applications must include all documents including attachments and information required by the application deadline. NO EXCEPTIONS will be granted.
Applicant Eligibility Review	Applicant has met all agency eligibility criteria identified by HUD. Verification documents have been provided on: <ul style="list-style-type: none"> • Registration in System of Award Management (SAMs), • Valid DUNS number or Unique Entity Identifier (UEI), • No outstanding or delinquent federal debt, • Not barred or suspended from doing business with Federal Agencies, • Meeting accounting system and financial management system standards, and • Disclosure of violations of Federal criminal law.
Program Eligibility	Project addresses an immediate homelessness challenge. Project will serve individuals or families that meet the definition of homeless in 24 CFR 578.3.
Alignment with HUD Housing First Policies	The applicant uses a project entry process that prioritizes rapid placement and stabilization in permanent housing that meets HUD’s Housing First criteria: <ul style="list-style-type: none"> • The eligibility criteria for the supportive housing meet the minimum that the funder(s) or landlord require (without additional criteria imposed). • Sobriety is not an entrance requirement. • Medication compliance is not an entrance requirement. • Agreement to participate in services is not an entrance requirement. • There is no minimum income requirement.
Homeless Management Information System (HMIS)	The applicant commits to use of HMIS, including timeliness and data quality standards, demonstrates adequate capacity for data collection and reporting.
Coordinated Entry System (CES)	The applicant commits to participate in CES and complies with CES Policies and Procedures.
Financial Feasibility and Capacity	The applicant must show they have the financial capacity to carry out the project and project cost must be reasonable and feasible.
Match Requirement (if applicable)	Must provide documentation for proof of match. (Nonpayment of match could jeopardize future funding or funding renewal).

Part II: Continuum of Care Review and Rank Committee

Review and Rank Committee (Member Composition, Qualifications, Application and Selection)

There will be an open recruitment for review committee volunteers where HHPWS CoC Division will accept applications. All qualified volunteer names will be entered into a pool for selection by the Ad hoc Committee for the upcoming HUD CoC Program Competition. The review committee will consist of at least 25, but not limited to, 20 volunteers who represent both CoC members and non-CoC affiliated individuals.

- Review committee volunteers should meet the following qualifications:
 - non-conflicted (per the HEARTH ACT)
 - knowledgeable of the local homeless situation
 - complete evaluators training
 - commitment of time
 - complete training on HUD and HEARTH Act policies, procedures, regulations, requirements, etc.
 - complete a qualification form to ensure all the above requirements are met prior to entering the pool.
 - has expert knowledge in serving subpopulations such as Domestic Violence, Veterans, Youth, etc.
 - has multi-geographic and multi-sector representation

Part III-A: Renewal Project Review and Scoring Criteria (80% threshold)

Board of Governance Funding Principles

- Invest in programs that will immediately impact reduction of homeless youth, individuals and families, or prevent them from becoming homeless.
- Invest in programs that demonstrate ongoing, long-term, or sustainable results.
- Invest in programs addressing significant service gaps by targeting high-need communities (identified through the annual Homeless Point-In-Time Count), under-served or hard-to-serve geographic or special subpopulations.
- Invest in programs that emphasize a comprehensive service delivery approach or wraparound services to ensure successful housing and self-sufficiency outcomes.
- Invest in solutions to address the unique needs of homeless individuals living in encampments.
- Invest in programs that support Riverside County's Action Plan emphasizing the expansion of: system coordination housing resources outreach, navigation, and supportive services.

System Performance Measures

1. Length of Time Person Remains Homeless	<ul style="list-style-type: none"> • Measures the average number of days from project entry to residential move-in.
2. Housing Stability (Obtain & maintain permanent housing)	<ul style="list-style-type: none"> • Measures the average percentage of participants that remain in or move to permanent housing (goal is at least 90%). (RRH % moved to PH and PSH % retained and/or moved to PH)
3. Return to Homelessness	<ul style="list-style-type: none"> • Measures the average percentage of participants that return to homelessness at exit (goal is no more than 15%).
4. Income Growth	<ul style="list-style-type: none"> • Measures the average percentage of adult participants who increased their total income (from all sources). (For Stayers: use Q19 A1; and for Leavers: use Q19 A2)

Program Compliance	
5. Annual Performance Reports (APR)	<ul style="list-style-type: none"> Measures whether sub-recipients submit their APR to HHPWS CoC Division for review within 60 days after the project ends.
6. Monitoring Reports	<ul style="list-style-type: none"> Measures whether the project has had any findings during the 12-month period based on the most recent monitoring report by the Collaborative Applicant (HHPWS).
7. Housing Quality Standards (HQS) Compliance	<ul style="list-style-type: none"> Measures whether the project meets applicable housing standards. <ul style="list-style-type: none"> If housing inspections are completed prior client entering a unit If housing inspections are completed annually
8. Access to Mainstream Benefits	<ul style="list-style-type: none"> Measures whether the project provides regular or as needed transportation assistance to mainstream and community resources, including appointments, employment training, educational programs, or jobs.
9. Mainstream Benefits Applications	<ul style="list-style-type: none"> Measures whether the project uses a single application form that allows program participants to sign up for four or more mainstream programs.
10. SSI/SSDI Technical Assistance	<ul style="list-style-type: none"> Measures whether program participants have access to SSI/SSDI technical assistance. The assistance can be provided by the applicant, a sub-recipient, or a partner agency through a formal or informal relationship. Subrecipients may choose to have their own process or utilize arrangement set forth in the MOU between Riverside County CoC and DPSS.
11. Supportive Services Follow Up	<ul style="list-style-type: none"> Measures whether the project regularly follows-up with program participants to ensure that they have applied for, are receiving their mainstream benefits, and renew benefits when required: PSH – at least annually - RRH – at least monthly.
Fiscal Compliance	
12. Monthly Submission of Claims	<ul style="list-style-type: none"> Measures whether the project submits claims monthly as required. Evaluated during most recent 12-month grant period.
13. Recaptured Funds (unspent funds)	<ul style="list-style-type: none"> Measures whether the project returned any funds in the last 3 years (completed). Based on percentage of total project budget. <i>(Note: Any unspent funds are subject to being reallocated regardless of amount or score.)</i>
14. Cost-effective Case Management	<ul style="list-style-type: none"> Measures percentage of budget costs in case management and other supportive services. The CoC does not have written standards on this, so cost effectiveness will be based on an average of the total cost per bed for all projects in that component. The BoG will factor in projects that serve high barrier clients with increased cost for supportive services.

HMIS Compliance	
15. Bed Utilization PH (80%)	<ul style="list-style-type: none"> Measures occupancy rates beds/units supported by the project.
16. HMIS Timeliness	<p>Measures the timeliness of HUD-required data entry.</p> <ul style="list-style-type: none"> Client entry and exit must be recorded within 7 days
17. HMIS Data Quality	<ul style="list-style-type: none"> Measures the accuracy and completeness of HUD-required universal data elements and program specific data elements. Information entered must be valid and accurately represent client information.
HUD-CoC Priorities and Requirements	
18. Housing First	<ul style="list-style-type: none"> Measures the project's entry process that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such income, sobriety, criminal history).
19. Participation in Coordinated Entry System (CES)	<ul style="list-style-type: none"> The subrecipient participates in CES and complies with CES Policies and Procedures.
HEARTH Act Compliance	
20. Participation of homeless in decision-making	<ul style="list-style-type: none"> Measures whether the agency provides for the participation of not less than one homeless individual or formerly homeless on the board of directors or other equivalent policymaking entity.
21. Participation of homeless through employment or volunteerism	<ul style="list-style-type: none"> Measures whether the agency involves homeless individuals and families through employment; volunteer services; or operating the project, and in providing supportive services for the project.
22. Engagement in religious activities	<ul style="list-style-type: none"> Measures whether the agency uses direct program funds to support or engage in any explicitly religious activities. Any federal and state funds distributed by the CoC can only be spent on non-religious social services activities and cannot mandate participation in religious activities to receive services.
23. Involuntary family separation	<ul style="list-style-type: none"> Measures whether the project accepts all families with children under age 18 without regard to the age of any child as appropriate per project target population. The age and gender of a child under the age 18 must not be used as a basis for denying any family's admission to project receives funds under this part (24CFR§578.93)
24. Discrimination Policy	<ul style="list-style-type: none"> Measures whether the project does not discriminate for project entry.
25. CoC Participation	<ul style="list-style-type: none"> Measures whether the agency participates as a CoC member in good standing. As required in the Board of Governance Charter for the Continuum of Care, each agency must have a designated representative who is required to attend fifty percent plus one (50% + 1) CoC meetings per year.

Part III-B: New Project Review and Scoring Criteria

Board of Governance Funding Principles

- Invest in programs that will immediately impact reduction of homeless youth, individuals and families, or prevent them from becoming homeless.
- Invest in programs that demonstrate ongoing, long-term, or sustainable results.
- Invest in programs addressing significant service gaps by targeting high-need communities (identified through the annual PIT Count), under-served or hard-to-serve geographic or special subpopulations.
- Invest in programs that emphasize a comprehensive service delivery approach or wraparound services to ensure successful housing and self-sufficiency outcomes.
- Invest in solutions to address the unique needs of homeless individuals living in encampments.
- Invest in programs that support Riverside County's Action Plan <http://dpss.co.riverside.ca.us/files/pdf/homeless/hl-county-plan-v8-recommendations-011618.pdf>, emphasizing the expansion of: system coordination housing resources outreach, navigation, and supportive services.
- Funding priorities with weight to address gaps and needs. Use the annual PIT Count and CES By-Name List to help identify gaps and needs.

Applicant Experience

1. Experience with Target Population	<ul style="list-style-type: none"> • Measures the experience of the applicant and sub-recipients (if any) in working with the proposed population and in providing housing similar to that proposed in the application
2. Financial Management; Utilization of Federal or State Funds	<ul style="list-style-type: none"> • Measures the experience in effectively utilizing federal or state funds including HUD grants and other public funding, including satisfactory drawdowns and performance for existing grants as evidenced by timely reimbursement of subrecipients (if applicable), regular drawdowns, timely resolution of monitoring findings, and timely submission of required reporting on existing grants.

Project Design

3. Needs of population	<ul style="list-style-type: none"> • Assesses description of key characteristics, needs, and extent of population targeted in project based on appropriate data.
4. Housing Design	<ul style="list-style-type: none"> • Assesses appropriateness of type, scale, and location match the needs of population targeted for housing in the project.
5. Services Plan	<ul style="list-style-type: none"> • Measures inclusion of best practices for identified target population. Monthly case management is made available.
6. Measurable Goals	<ul style="list-style-type: none"> • Measures performance plan for housing and income that are objective, measurable, trackable, and meet or exceed local benchmarks.
7. Support Services Follow-up	<ul style="list-style-type: none"> • Measures project plan for follow-up with program participants to ensure that they applied for, receiving their mainstream benefits, and renew benefits when required: PSH – at least annually - RRH – at least monthly.
8. Access to Mainstream Services	<ul style="list-style-type: none"> • Measures whether the project plan has evidence of formal agreements, policies, or procedures to link participants with mainstream services and resources. • Assesses whether the project plan includes transportation assistance to mainstream and community resources, including appointments, employment training, educational programs, or jobs.

9. Mainstream Benefits Applications	<ul style="list-style-type: none"> Measures whether the project uses a single application form that allows program participants to sign up for four or more mainstream programs.
10. SSI/SSDI Technical Assistance	<ul style="list-style-type: none"> Measures whether program participants have access to SSI/SSDI technical assistance. The assistance can be provided by the applicant, a sub-recipient, or a partner agency through a formal or informal relationship.
System Compliance	
11. Program Monitoring	<ul style="list-style-type: none"> Measures whether the applicant has had any negative findings from program monitoring by any funding source during the prior 2 years.
12. Housing Quality Standards (HQS)	<ul style="list-style-type: none"> Measures whether the project meets applicable housing standards. Commitment to housing inspections being completed prior client entering a unit. Plan includes regular housing inspections are completed annually.
13. SSI/SSDI Technical Assistance	<ul style="list-style-type: none"> Measures whether program participants have access to SSI/SSDI technical assistance. The assistance can be provided by the applicant, a sub-recipient, or a partner agency through a formal or informal relationship. Subrecipients may choose to have their own process or utilize arrangement set forth in the MOU between Riverside County CoC and DPSS.
14. Documentation of Supportive Services	<ul style="list-style-type: none"> Measures whether the project will regularly enter data into HMIS (or comparable data tracking mechanism) to report receipt of mainstream benefits or external resources, and renew benefits when required: PSH – at least annually - RRH – at least monthly.
Fiscal Management	
15. Effective Use of Funds - Regular Submittal of Claims	<ul style="list-style-type: none"> Measures whether the project submits claims on a regular basis. Evaluated during most recently completed fiscal year for agency.
16. Use of External Funding	<ul style="list-style-type: none"> Measures effective management of non-public funds
17. Recaptured Funds (unspent funds)	<ul style="list-style-type: none"> Measures whether the agency had unspent funds from grant sources during the past 2 years. Based on percentage of total project budget.
18. Cost-effectiveness	<ul style="list-style-type: none"> Measures percentage of budget costs per successful housing placement. Cost effectiveness will be based on the median of the total cost per successful housing outcome for all projects in that component. The BOG will factor in projects that serve high barrier clients with increased cost for supportive services.

HMIS Compliance	
19. Bed Utilization	<ul style="list-style-type: none"> Measures occupancy rates beds/units proposed by the project.
20. HMIS Timeliness	<ul style="list-style-type: none"> Measures the commitment to timeliness of HUD-required data entry plan. Client entry and exit must be recorded within 7 days.
21. HMIS Accuracy and Completeness	<ul style="list-style-type: none"> Measures the accuracy and completeness of HUD-required universal data elements and program specific data elements. Information entered must be valid and accurately represent client information. If not a current HMIS participant, measures data completeness in an alternate data base.
HUD- CoC Priorities and Requirements	
22. Housing First implementation	<ul style="list-style-type: none"> Measures experience with utilizing a Housing First. Measures commitment to Housing First implementation that meets the HUD conditions. Verifies the project's entry process that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such income, sobriety, criminal history).
23. Participation in CES	<ul style="list-style-type: none"> Measures applicant's commitment to participate in CES and complies with CES Policies and Procedures.
Hearth Act Compliance	
24. Participation of Homeless in Decision-Making	<ul style="list-style-type: none"> Measures whether the agency provides for the participation of not less than onehomeless individual or formerly homeless on the board of directors or other equivalent policymaking entity of the sub-recipient.
25. Participation of Homeless	<ul style="list-style-type: none"> Measures whether the agency, to the maximum extent practicable, involves homeless individuals and families through employment; volunteer services; oroperating the project, and in providing supportive services for the project.
26. Engagement in Religious Activities	<ul style="list-style-type: none"> Measures whether the agency uses direct program funds to support or engage inany explicitly religious activities, including activities that involve overt religious content, such as worship, religious instruction, or proselytization, or any manner prohibited by law. Any federal and state funds distributed by the CoC can only be spent on non-religious social services activities and cannot mandate participation in religious activities to receive services.
27. Involuntary Family Separation	<ul style="list-style-type: none"> Measures whether the project accepts all families with children under age 18 without regard to the age of any child as appropriate per project target population The age and gender of a child under the age 18 must not be used as a basis for denying any family's admission to project receives funds under this part (24CFR§578.93)
28. Discrimination Policy	<ul style="list-style-type: none"> Measures whether the project does not discriminate for project entry.
29. CoC Participation	<ul style="list-style-type: none"> Measures whether the agency participates as a CoC member in good standing. As required in the Board of Governance Charter for the Continuum of Care, each agency must have a designated representative who is required to attend fiftypercent plus one (50% + 1) CoC meetings per year.

Part IV: Project Selection and Appeals Process

BoG Review and Selection Process

- Prior to making final decisions, the Board of Governance will receive a full presentation and overview of the Review and Ranking Committee's funding recommendations.

Appeals Process

An appeals group will be created from the Review and Rank Committee through a lottery process. HHPWS CoC Division will provide the same information that was provided to the Review and Rank Committee during their review process. Appeals must be submitted in the form of a written letter to HHPWS CoC Division.

- A formal protest must contain the following to be considered:
 - A specific identification of the statutory or regulatory provision(s) that the alleged action is in violation.
 - A specific description of each act alleged to have violated the statutory or regulatory provision(s).
 - A precise statement of the relevant facts, and identification of the issue or issues to be resolved.
 - Complaints about events or decisions made before the solicitation deadline
 - Complaints that the solicitation unduly constrains competition through improper minimum qualifications or specifications.
 - Complaints that the pre-bid conference was not fair or accessible. (Please note that bidders must attend in person all mandatory pre-bid conferences).
 - Complaints that questions were not fully or properly addressed by the Procurement Contract Specialist/Buyer.
 - Complaints that the Request for Proposal/Quote/Qualification did not provide adequate information or contained an improper criterion.
 - Other matters known or that should have been known, to interested bidders by reading the solicitation document.