



CA-604 Continuum of Care (CoC) Local Competition RANKING POLICY

Adopted by the Governing Board:

I. Introduction

The purpose of the CA-604 Continuum of Care (CoC) Local Competition Ranking Policy (Ranking Policy) is to establish a local framework used to evaluate, score, and prioritize funding applications for homeless services under U.S. Department of Housing and Urban Development (HUD) guidelines. It ensures transparent, objective project rankings for annual federal competition submittals.

HUD conducts an annual, national competition for Continuum of Care (CoC) Program Funding. Through this competitive process, communities secure federal resources to support housing, supportive services, and other interventions that help individuals and families experiencing homelessness obtain and maintain stable housing. These funds are critical to Kern County's coordinated efforts to prevent and end homelessness.

The Bakersfield Kern Regional Homeless Collaborative (BKRHC) is the Collaborative Applicant for CA-604 and the lead agency responsible for completing and submitting the Consolidated Application for funding on behalf of the Bakersfield-Kern CoC. The Consolidated Application consists of a CoC Application, Priority Listing, and Project Applications.

II. "Two Tier" Funding Selection Process

HUD will continue to use its "Two-Tier" funding selection process as part of the CoC Program Competition. Following the local review and ranking process, each project will receive a score based on the CoC's approved evaluation criteria. These scores will determine each project's placement on the CoC's Priority Listing, with higher-scoring projects ranked higher and lower-scoring projects ranked lower. The Priority Listing is then used to assign projects to Tier 1 and Tier 2. Higher-ranked projects are placed in Tier 1, while lower-ranked projects are placed in Tier 2, consistent with HUD's funding limitations and tier calculations. The purpose of this two-tiered approach is for CoCs to notify HUD of which projects are prioritized for funding based on local needs and gaps. HUD uses the Priority Listing, together with its own national review criteria, to make final funding decisions.

Tier 1 project applications are the CoC "highest priority" projects that will be conditionally selected by HUD for funding from the highest scoring CoC to the lowest scoring CoC provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold. Tier 2 projects are evaluated through a national, competitive scoring process. HUD awards Tier 2 funding using a 100-point scale that considers the CoC's Collaborative Application score, the project's position on the CoC's Priority Listing, project type, and alignment with HUD's policy priorities.

Tier 1 is a percentage of the CoC's Annual Renewal Demand as set by HUD. Tier 2 represents the

portion of the CoC's total funding request that exceeds the Tier 1 funding amount established by HUD. It includes the remaining Annual Renewal Demand (ARD) not covered by Tier 1, as well as any requests for CoC Bonus, CoC Reallocation, Domestic Violence (DV) Bonus, DV Reallocation, and DV Renewal funding. Unlike Tier 1, Tier 2 funding is nationally competitive and is awarded based on HUD's scoring methodology, making a project's placement on the CoC's Priority Listing particularly important.

III. Process for Developing the Letter of Intent (LOI) and Ranking Packets

Following the release of the Notice of funding Opportunity (NOFO) from HUD, or the CoC Program Registration Notice, the Planning and Performance Subcommittee will be tasked with creating the Letter of Intent Notice and Ranking Packets.

The Ranking Packets will reflect HUD priorities established in the NOFO or CoC Program Registration Notice and any additional guidance leading up to the NOFO, or released after the NOFO, as well as other CoC-wide priorities established in the strategic planning process. Other factors to be considered in the development of the Ranking Packets should include:

- Performance results based on HUD's national objectives and the CoC-wide strategic plan (as measured by HUD Annual Performance Measures).
- Cost effectiveness of the project.
- High need populations served by the project.
- Participation in the Coordinated Entry System (CES).
- Participation in the Homeless Management Information System (HMIS).
- CoC membership participation.
- CoC and HUD monitoring findings.
- Other criteria as the CoC determines or is required by the HUD NOFO.

IV. Letter of Intent (LOI) Submission

All applicants will be required to complete and submit a CoC approved LOI by the deadline established by the Planning and Performance Subcommittee and approved by the Governing Board. LOIs submitted after the established deadline **WILL NOT be accepted** for any reason.

V. Submission of Ranking Packets

After the Collaborative Applicant reviews and approves all LOIs submitted by applicants, the Collaborative Applicant will distribute the Governing Board approved Ranking Packet to all applicants on the same day. The Ranking Packets must be submitted by Applicants by the deadline established in the Governing Board approved timeline. Ranking Packets submitted after the established deadline **WILL NOT be accepted** for any reason.

VI. Threshold Criteria

The following criteria are required by HUD for both renewal/expansion and new projects. All projects must provide reasonable assurances that the project will meet the threshold requirements or be given an exception by the CoC. For renewal/expansion projects prior performance measures

must demonstrate compliance with these requirements and community standards.

- Coordinated Entry Participation
- Documented and secured minimum match
- Project has reasonable cost per permanent housing exit, as defined by the CoC
- Project is financially feasible
- Applicant is an active CoC participant
- Application is complete and data are consistent
- Data quality at community standards
- Bed/unit utilization rate at or above or above community standards
- Acceptable organizational audit/financial review

Policy on Advancing Recovery and Prohibiting Illicit Drug Enablement. BKRHC prohibits all CoC-funded housing projects from operating drug injection sites or “safe consumption sites,” knowingly distributing drug paraphernalia on or off property under their control, knowingly permitting the use or distribution of illicit drugs on property under their control, or conducting, permitting, encouraging, or allowing such activities under the pretext of “harm reduction.” Projects determined to be in violation of this policy may be subject to corrective action, increased monitoring, consideration during project scoring, ranking, or reallocation, and other appropriate remedies consistent with HUD requirements.

BKRHC encourages CoC-funded projects to connect participants with substance use disorder treatment, recovery services, recovery housing, and other appropriate supportive services. Nothing in this policy requires CoC-funded projects to require sobriety or treatment participation as a condition of assistance or to terminate assistance for a first-time drug-related violation; nor does it prohibit projects from establishing sobriety or treatment participation requirements when allowable under 24 CFR Part 578 and other applicable federal requirements. Project Applicants will be required to certify compliance with this policy with their submitted LOI and Ranking Packet.

CoC funded projects that are found to be performing significantly below community standards will have their CoC funding be considered for reallocation. New applications (including bonus projects) will be ranked alongside renewals, if the new project meets a community priority, as determined by the CoC. The goal of the scoring tools is to establish an objective rating process that allows for a fair assessment of each project. For a project to be ranked it must meet threshold requirements.

VII. Scoring Tools

The scoring tools should compare like program types (e.g. Transitional Housing with Transitional Housing; Supportive Services Only with Supportive Services Only). Once they have been developed by the Planning and Performance Subcommittee the scoring tool(s) will be submitted to the Governing Board for final approval.

Projects funded by HUD that have not yet started will automatically be ranked in Tier 1. Any ties in scoring will be determined by project component type based on HUD or community priorities. Projects will be ranked according to the CoC’s priority list as noted in the Governing Board minutes.

The CoC has established a method for evaluating projects submitted by victim service providers. Projects that meet the requirements of this method will be ranked alongside like project types. This method requires that projects:

- Client data is stored in Violence Against Women's Act (VAWA) compliant database;
- Ensure the safety needs of persons fleeing domestic violence;
- Staff receive ongoing best-practice training on safety protocols and trauma informed care;
- Provide secured, 24-hour monitored facility.

VIII. Ranking Panel Composition

The Ranking Panel will consist of a minimum of five (5) and a maximum of seven (7) members chosen from the community. The panel will always be an odd-numbered panel, and an alternate panelist will be on standby in case there is a last-minute absence from one of the regularly chosen panel members. An independent consultant* will preside as Panel Moderator and serve as a non-voting member. BKRHC staff will be available to provide logistical support on the day of ranking to the Panel and will serve as alternate Panel Moderator if the independent consultant is not available. Panel members will be nominated by the Planning and Performance Subcommittee and approved by the Governing Board. **Provided they not have a conflict as spelled out in the Conflict of Interest Policy.*

IX. Ranking Panel Selection Criteria

Panel members should be knowledgeable about homelessness supportive services and housing in Kern County, should be broadly representative of the relevant sectors, subpopulations, and geographic areas and should be composed of representatives from a cross-section of groups which might include: Faith-based and non-profit providers of homeless services and housing; governmental agencies; legal services and city and county employees. Efforts should be made to recruit representatives from the education and veteran's services fields, as well as a formerly homeless individual.

Panel members must be willing to sign a formal statement attesting that they do not have a conflict of interest, in accordance with the approved policy. A conflict of interest includes any personal, financial, or organizational interest that could compromise—or appear to compromise—a member's objectivity and impartiality in reviewing applications. Members must not have any current or potential affiliations (examples: will be a subcontractor or benefit from the applicant being awarded) with applicants that would interfere with fair and unbiased decision-making. In addition, panel members must be willing to have their eligibility verified and approved by the CoC, must be able to dedicate the necessary time for application review and panel meetings as outlined in the established timeline, and must attend a training session. Members are also required to be available on the designated ranking date.

X. Ranking Panel Training

At a minimum, Panel training should include the following:

- Current information regarding homelessness activities, needs, services, definitions, and other issues pertinent to the Bakersfield-Kern Regional Homeless Collaborative (BKRHC).
- What constitutes a conflict of interest and the ethical responsibilities of panel members.

- An overview of the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act.
- An explanation of the local Continuum of Care (CoC) Program Competition, including the local funding, review, ranking, and Priority Listing process.
- The roles, responsibilities, and expectations of Ranking Panel members.
- A detailed review of the ranking methodology, scoring tools, evaluation criteria, project applications, and other supporting materials.
- A practice scoring session to promote consistency and uniform application of the scoring criteria.
- Training on the U.S. Department of Housing and Urban Development (HUD) Notice of Funding Opportunity (NOFO), including the funding year's priorities, regulations, policy objectives, and applicable guidance.

Panel training will be provided by one or more designees assigned by the Planning and Performance Subcommittee to ensure panelists are adequately prepared to conduct a fair, objective, and consistent evaluation of all project applications.

XI. Project Ranking

The Panel Moderator will be in attendance on the day of ranking to record decisions of the Panel and any comments/recommendations they have for applicants. The Moderator will also be tasked with assuring that the scoring guidelines established in the scoring tools are followed and accurately scored.

Following review of all ranking packets, Panel members can discuss the merits of each project, application details, and scores. Score sheets are then completed and turned into the Panel Moderator. Overall raw scores are calculated by the Moderator and double checked with assistance from one of the panel members.

Score Percentages. To ensure equitable comparison across project types, the Panel Moderator will present project scores to the Ranking Panel as weighted percentages in addition to raw scores. This adjustment accounts for differences in the total points available among project types and their respective ranking packets (e.g., 215 total possible points compared to 195 total possible points). The weighted percentage will be calculated by dividing the project's total points earned by the total points possible for that project's applicable ranking packet.

The panel will determine the rank of all projects considering all available information and create a Priority List to be submitted to the Governing Board for approval.

During deliberation, the Panel Moderator will provide technical assistance by responding to questions of the panelists, correcting technical inaccuracies if they arise in conversation, and reminding the panelists of the responsibilities within their purview.

Note: Applications which do not meet the minimum threshold requirements in the LOI will not be included in the Priority Listing in the Consolidated Application and therefore will not be forwarded to HUD for consideration. If more applications are submitted than the CoC has money to fund, the lowest-scoring applications will be rejected in the Priority List in the

Consolidated Application.

XII. Final Panel Ranking Approval

Because the ultimate responsibility for submitting the best possible application falls to the Governing Board, the Governing Board must give final approval to the Ranking Panel recommendations. The Governing Board must give full consideration to the recommendations of the Ranking Panel. In order to allow for the best possible Consolidated Application, in limited circumstances, the Governing Board may reconsider the recommendations of the Ranking Panel.

For example, if a project applicant drops out after the Ranking Panel has made its recommendations, and the submission deadline is too close to reconvene the Ranking Panel, the Governing Board can be charged with reallocating those funds to the ranked projects so that the CoC can utilize its full Final Pro Rata Need (FPRN). Additionally, if the Governing Board determines, *based on the best interest of the CoC as a whole, or for some other technical reason*, to make changes to the priority list or individual project rankings, the changes should be made with a separate vote for each project. For example, if two projects are affected by a proposed Governing Board change, there should be two votes to make project changes and one final vote to approve the amended priority list. In the votes impacting specific projects, any Governing Board member who is employed by the applicant agency or has another conflict of interest must abstain from the vote.

Any changes to the Ranking Panel recommendations or changes made by the Appeals Board must be approved by 3/5 of the Governing Board – who do not have a conflict of interest. The Governing Board will *not* serve as the Appeals Board.

XIII. Contacting Ranking Panel Members

To avoid any conflict-of-interest issues and to protect the integrity of the process, Ranking Panel members will not have contact with the project applicants during the LOI/NOFO/Application process, unless it is necessary to conduct or complete actual ongoing business activities.

If contact is necessary to conduct ongoing business activities, such contact must be disclosed to the CoC to ensure there is no relation to the application or ranking process. If contact is made in conflict the panel member will be disqualified, and an alternate will be assigned.

XIV. Dissemination of Results

Each individual CoC project will receive a report of the project's score and a supplemental document showing the formulas for each of the performance measures. Agencies will then have an opportunity following the release of individual project scores to recreate calculations and associated scoring using the formulas provided. After the appeals process is complete the final results of this evaluation will be released in the following manner:

- Each applicant who met threshold will receive their final individual score report; and
- A complete listing of detailed project scores and recommendations will be presented to the governing board.

XV. Ranking Appeals

Eligible Appeals: The application of any applicant agency which a) receives less funding than they applied for or b) is placed in Tier 2 (should HUD require a similar process) may appeal. Applicants that have been found not to meet the threshold requirements are not eligible for an appeal. Grounds for an appeal are to:

- Prove their score is not reflective of the application information provided; or
- Describe bias or unfairness in the process, which warrants the appeal.

All notices of appeals must be based on the information submitted by the application due date following the current NOFO timeline requirements. No new or additional information will be considered. Omissions to the application cannot be appealed. The decision of the Appeals Committee will be final.

XVI. The Appeals Committee

The Appeals Committee will be made up of four (4) members: Three (3) members are Appeals Committee voting members and one (1) is a non-voting member. An alternate Appeals Committee Member will be on standby in case there is a last-minute absence from one of the regularly chosen panel members. The three voting members will be selected from Governing Board membership but must not have a conflict of interest with any of the agencies applying for CoC funding and must be willing to sign a conflict-of-interest statement. The one non-voting member must be a member of the original Ranking Panel. The role of the Appeals Committee is to read and review only those areas of the application that are being appealed.

XVII. The Appeals Process

All appeals must be received in writing within three **business** (3) days of the notification of ranking to projects. All notices of appeal (one original and four copies) must be submitted to the Governing Board Chair to the appropriate Name, Address, City, State, Zip.

The notice of appeal must meet the following requirements:

- A written statement specifying in detail the grounds asserted for the appeal, and must be signed by an individual authorized to represent the sponsor agency (i.e., Executive Director).
- Be limited to one (1) single-spaced page using 12-point font.
- Include a copy of the application and all accompanying materials submitted to the Ranking Panel;
- No additional information can be submitted.

All valid appeals will be read, reviewed and evaluated by the Appeals Committee.

Appeals Committee Review and Deliberation. The Appeals Committee will meet to deliberate and render a decision.

- All applicants will be invited to attend any appeal and may make a five (5) minute statement regarding the appeal.
- The Appeals Committee may ask follow up questions to clarify any points made during the

presentation.

- The Appeals Committee will review the rankings made by the Ranking Panel only on the basis of the submitted project application, the one-page appeal, any statements made during the appeal process, and the material used by the Ranking Panel; no new information can be submitted by the applicant or reviewed by the Appeal Committee.
- The decision of the Appeals Committee must be supported by a simple majority vote.

The appealing agency will receive, in writing, the decision of the Appeals Committee within two (2) business days of the Appeal Committee Meeting; the decision of the Appeals Committee will be final.