# Sonoma County 2024 Continuum of Care Competition Renewal Project Evaluation Notification

Release Date: April 2, 2024

Renewal Project Supplemental Materials Due Date: May 1, 2024

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## Overview

The federal Department of Housing and Urban Development (HUD) has given the name [Continuum of Care (CoC) Program](https://www.hudexchange.info/programs/coc/) to its competitive funding targeted for services and housing serving homeless people. This funding originated in the McKinney Act of 1987 and was reauthorized as the Homeless Emergency and Rapid Transition to Housing (HEARTH) Act in 2009. All projects require a minimum 25% [match](https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-match/coc-match-overview/) (either in-kind or cash match, leasing is excluded from this calculation); and all projects are required to state what local non-McKinney-Act resources will be leveraged by the HUD award.

Continuum of Care funding is available through a national competitive block grant process in which local communities can access a formula amount (known as **pro rata need**) by demonstrating an effective local, year-round planning process. Therefore, all applications are made with one umbrella Consolidated CoC Application (completed by the Continuum of Care Coordinator), and individual project performance is important.

HUD requires that local CoC’s prioritize all renewal and new projects submitted in our consolidated application. As in past years, project priorities will be generated by a scoring system, site visits, and interviews by an impartial review body. This year, the CoC Funding and Evaluation (F&E) Committee has assigned this review to the 2024 [CoC Competition Evaluation Workgroup](https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/sonoma-county-homeless-coalition/committees/coc-competition-evaluation-workgroup).

HUD has yet to release information on the opening of its application period but has indicated it would like to open the competition earlier than it did in 2023 (early- mid-summer) for the previous CoC Competition. We will continue the process for rating and ranking slightly adjusted in 2024 based on feedback from the working group and any new HUD priorities listed upon release of the Continuum of Care Notice of Funding Opportunity (NOFO).

Staff and CoC Competition Evaluation (CCE) Workgroup members will begin monitoring renewal projects in May of 2024. Preliminary analysis is conducted during this process by the CCE Workgroup comprised of impartial community partners, and those with lived experience of homelessness. The evaluations this year will be reviewed, approved, and recommended by three separate review bodies in the following order:

1. CoC Competition Evaluation Workgroup
2. Funding and Evaluation Committee
3. Homeless Coalition Board (Final)

Please note that there may be times when the CCE Workgroup must report directly to the Homeless Coalition Board for approval to meet local and HUD-required deadlines.

## Changes to the FY 2024 CoC Competition

HUD announced recently that the CoC Program Competition for funding will now take place every other year. With this shift, CoC staff will be able to offer more one-on-one support to agencies, provide additional trainings, and help providers with their policy and procedural manuals. In addition, staff will now be completing file reviews every other year and will be focused on CoC Program Operational Policy and Procedure manuals for the 2024 competition.

## Renewal Evaluation Scoring Process

Renewal project supplemental materials are extensively reviewed, and site visits are conducted by CoC Staff and CCE Workgroup prior to the release of the NOFO to ensure the Homeless Coalition has enough time to thoroughly review all existing projects and develop Corrective Action Plans (if needed). Final ranking of renewal projects will not be completed until the Continuum of Care Notice of Funding Opportunity (NOFO) period opens.

* Agencies that are considering transferring a grant or voluntarily reallocating funding—due to not meeting HUD performance expectations, lack of capacity, etc.—may consult with the CoC Coordinator anytime.
* New projects that do not yet have performance data for a full year of operation will be held harmless and automatically placed into Tier 1 once the competition opens.
* All renewal projects will be rated and ranked based on the Renewal Project Scoring Tool.
* Renewal projects will be scored on their performance for the Annual Performance Report (APR) of 2022-2023, including the project’s position on the Final Priority List submitted in the CoC Competition.
* Renewal projects that do not meet 80% of the top scoring renewal project during preliminary analysis will be offered a Corrective Action Plan.
* Renewal HMIS and Coordinated Entry Projects will be ranked at the bottom of Tier 1 as these are mandated system components.

As outlined within the schedule of events, all **Renewal Project supplemental application materials and attachments are due May 1st by 5:00pm.**

For more information, please contact the CoC Coordinator, Karissa White at (707) 565-4080 or [Karissa.White@sonoma-county.org](mailto:Karissa.White@sonoma-county.org) and the Homeless Projects Specialist, Araceli Rivera at (707) 565-4088 or [Araceli.Rivera@sonoma-county.org](mailto:Araceli.Rivera@sonoma-county.org) Email communication is strongly preferred. Please ensure you include a reference to “CoC Program” in the subject line of the email.

## Sonoma County CoC Renewal Project Funding

Below is a list of the 11 Renewal Project Applications currently submitted by 7 agencies set for review:

*Buckelew Programs – 1 scattered site permanent supportive housing site serving individuals who are homeless/chronically homeless with severe mental illness.*

*Catholic Charities – 1 permanent supportive housing project including scattered sites in Santa Rosa, Guerneville, and select units at the Palms Inn serving 100% chronically homeless individuals.*

*Committee on the Shelterless (COTS) – 1 permanent supportive housing scattered site project serving 100% chronically homeless individuals in Rohnert Park and Petaluma.*

*Community Support Network – 1 site based permanent supportive housing project serving 100% chronically homeless individuals with mental illness in Santa Rosa.*

*Community Support Network grant transferring from Social Advocates for Youth (SAY) - 1 Sponsor Based Rental Assistance project serving transitional age youth ages 18-24.*

*West County Community Services – 1 site based permanent supportive housing project in Guerneville and 1 site based permanent supportive housing project in Sebastopol, both serving 100% chronically homeless adults.*

*Sonoma County Community Development Commission Housing Authority – 1 permanent supportive housing project providing rental assistance, serving special populations experiencing homelessness (persons with HIV/Aids).*

*County of Sonoma, Department of Health Services – Coordinated Entry and Homeless Management Information System (projects are evaluated outside this process).*

*St. Vincent de Paul Sonoma County- 1 site based permanent supportive housing project, St. Vincent de Paul Commons PSH serving the chronically homeless, located in Santa Rosa.*

HUD does not require us to stay with the same 11 projects if they aren't all performing well or no longer address our needs.

The Homeless Coalition is allowed to **reallocate** funding to another new project, if the project:

1. No longer serves local needs;
2. The project is unable to comply with the new regulations;
3. The project is no longer a good match for this funding stream (due to new regulations); or
4. The operator desires to decrease a request from HUD for another reason (e.g., cannot spend down all funds).

**Reallocated funds can be used for any eligible kind of project**, and any eligible expense. We regularly use this feature to reallocate funding from under-performing projects and savings from other projects. Our Homeless Coalition, as the CoC, is also scored by HUD on our process and decisions to reallocate underperforming projects. Determining whether to reallocate funds is a primary purpose of the 2024 CCE Workgroup.

Another possibility is to **reassign** a contract if a provider prefers not to contract with HUD or if their performance does not win the support of the 2024 CCE Workgroup.

One feature of the scoring system is a threshold for unconditional renewal; those projects scoring below the threshold have the option of either improving their performance or giving up their project's funding for reallocation. As evaluation committees have done in the past, the 2024 CCE Workgroup will provide the same level of review for renewal and new projects once the FY 2024 Continuum of Care Competition opens.

HUD scores our Consolidated CoC Application in several areas of aggregate project performance; therefore, ***individual* project performance is important**. Also due to limited funding, HUD requires local communities to prioritize the projects we submit to them; therefore, they must be locally scored.

## Renewal Project Detailed Instructions

In the 2024 Continuum of Care Competition, 11 projects with contract end dates in 2025 will be up for renewal. Project scoring will take place in three phases:

1. **Collection and Preliminary Scoring** of performance data, background documents, and the supplemental application questionnaire.
2. **Site Visits and Interviews** will be scheduled for all CoC-funded agencies in 2024. In 2024, site visits will take place in person. Please note, this year staff will not be conducting file reviews during the competition. After the NOFO submission for 2024, staff will be reviewing CoC Program agency policy and procedural manuals to provide feedback. As in years past, focus will be based on:
   1. Concerns following review of documentation and scoring;
   2. Concerns or corrective action plans in 2020-2024; or
   3. Projects renewing for the first time.
3. **New and Renewal Project Ranking** will be scheduled upon release of the NOFO. Additional information about this process and eligible use of funds will be provided upon release of the local Request for Proposals (RFP).

### **Phase One: Collection and Preliminary Review of Renewal Evaluations May 2nd – June 7th**

*Please see the attached checklist of required documents to be submitted by* ***May 1, 2024****.*

The 2024 Renewal Project Scoring Tool is subject to revision by the CCE Workgroup on April 5, 2024; the draft scoring schema is attached here. New project scoring schema will be released upon the local RFP. Final scoring will not be completed until after the Continuum of Care Competition opens and new projects have been reviewed and scored.

Projects are scored on:

* Performance on outcomes we report to HUD
* Alignment with local and HUD priorities (10-Year Plan goals)
* Agency Capacity

Scores will be derived from the project’s most recent Annual Performance Report (APR) term 2022-2023, review of HMIS and other compliance documents (including HUD monitoring or audits), responses to monitoring questionnaires, and submitted documents.

The CCE Workgroup will meet on April 5, 2024, for a review of the CoC Evaluation Process and in May 2024 to review preliminary scoring for new projects and finalize the schedule of site visits.

### **Phase Two: Interviews and Site Visits to Selected Projects May 20th – June 3rd**

As in 2023, all agencies will receive in-person site visits in 2024. You and your staff have already received confirmation of your site visit dates for this year. Site visits will include interviews with the CCE Workgroup members to discuss concerns that may have arisen through the review process; this will also provide an opportunity to discuss where your project is doing well. Site visits will enable providers to discuss submitted evaluation materials and address any questions that have arisen with workgroup members. Staff will not be reviewing client files this year but will work on reviewing and providing individualized feedback after the NOFO submission to CoC Program Policy and Procedure manuals. Please have the following staff present at site visits as well as any follow-up interviews:

* Program manager
* Direct service staff
* Staff in charge of financial and grants management

## Conditional vs. Unconditional Renewal

Policies for conditional vs. unconditional renewal are as follows:

1. Once renewal projects have been scored, a threshold for unconditional renewal will be established at 80% of the top score.
2. Projects scoring below the threshold will be asked to develop a plan to address performance issues before the release of the 2024 NOFO or to voluntarily give up award money to be reallocated to a new project.
3. Determination of any conditions to renewal will be developed for recommendations

during the week of June 3rd

1. Any required Corrective Action Plans must be submitted for approval to the Homeless Coalition Board during the June 26th Board meeting, as approved/recommended by CoC Competition Evaluation Workgroup and the F&E Committee, where the final determination can be made as to whether the project goes forward for Priority Listing submitted to HUD.

## New Project Review and Final Priority List

We anticipate the 2024 application period may open as early mid-summer 2024 and that the evaluation process could potentially overlap into the application period. After the NOFO is released, CoC Staff will release a local Request for Proposals (RFP) for new project applications. If new HUD priorities are outlined within the NOFO that were not included in the Renewal project evaluation materials, the CCE workgroup may ask renewal projects to submit additional materials for scoring.

The CCE Workgroup rates and ranks all renewal and new projects for the competition (including new projects from reallocated funding and/or new projects for bonus project funding), this includes projects place in tier 1 and tier 2 for funding. Projects placed into tier 2 are at risk of losing their funding from HUD. The amount to be placed at-risk in tier 2 will be announced via the 2024 CoC NOFO.

The Homeless Coalition meetings for CoC project evaluations (including the CCE Workgroup, F&E Committee, and the Homeless Coalition Board) are open to the public, and community feedback is welcomed. Renewal Applicants are welcome to join and provide feedback through public comment, but it is not required.

During the NOFO period, the following process will be followed:

* Amounts for new funding through bonus project funding and reallocated funding will be announced via a public Request for Proposals (RFP).
* Applicants will be required to attend a mandatory Bidder’s Conference. **New applicants to CoC Funding are *highly encouraged* to attend and discuss the applying for CoC funding with the CoC Coordinator.**
* Technical Assistance (TA) sessions will be provided for e-snaps assistance as well as answering any questions related to application submissions.
* All renewal and new projects will submit applications to the County of Sonoma’s Department of Health Services (CoC Lead Agency and Collaborative Applicant) through e-snaps. This includes required application materials for e-snaps and match documentation.
  + New projects will be required to submit the supplemental questionnaire and required attachments in addition to the project application.
  + Renewal projects are only required to submit their application in e-snaps since other required materials for scoring were already submitted. Additional information for renewals may be requested from the CCE Workgroup if there are additional requirements outlined in the NOFO to score.
* The CCE Workgroup will meet to review and rank all renewal and new projects as well as make their recommendation on the Priority List to the F&E Committee.
  + New project scoring will closely align with renewal project scoring, weighted equally, and scored on proposed outcomes.
* F&E Committee will make final recommendations to the Homeless Coalition Board, who will make final decisions about reallocation of funding and ranking of all projects on the Priority List.
* CoC Collaborative Applicant will review submitted project applications in e-snaps, and notice providers of any edits needed in their applications.
* CoC Collaborative Applicant will then submit the Final Priority List to HUD through e-snaps, which will include all new and renewal project applications that have been recommended for funding.

More information on the RFP, TA sessions, and Application process will be provided after the NOFO has been released.

## Renewal Project Scoring Tool

Please see the attached CoC Renewal Project Scoring Tool (Subject to revision by the CCE Workgroup on April 5, 2024) for your review. CCE Workgroup will meet on April 5th to review the tool for approval recommendations and discuss how projects are scored. While not required, it is recommended to have staff attend if you are not familiar with the scoring. Meeting information is located on our website here: <https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/sonoma-county-homeless-coalition/committees/coc-competition-evaluation-workgroup>

## Materials

All materials for the 2024 CoC Competition will be posted, as released, on the on the Sonoma County Continuum of Care website: <https://sonomacounty.ca.gov/health-and-human-services/health-services/divisions/homelessness-services/sonoma-county-homeless-coalition/continuum-of-care-competition>

Information will also be sent out through electronic email communication to existing CoC Renewal Project Applicants and through the Sonoma County CoC’s Listserv; if you haven’t already done so, please sign up to receive notifications from our office by subscribing here: <https://public.govdelivery.com/accounts/CASONOMA/subscriber/new?topic_id=CASONOMA_406>

HUD will post all CoC Competition Materials on their website (including the NOFO, application instructions, award information, etc.): <https://www.hud.gov/program_offices/comm_planning/coc/competition>

### **Required Materials Renewal Evaluation Submission**

1. Checklist of Required Documents
2. CoC Renewal Project Threshold Criteria 2024
3. 2024 Renewal Evaluation Application Questionnaire
4. 2024 Renewal Reallocation Questionnaire
5. HUD’s Housing First Assessment Tool- If you have more than one project, please complete one for each. Download here: <https://www.hudexchange.info/resource/5294/housing-first-assessment-tool/>
6. Agency-level Documents for Submission:
   1. Grievance Procedure and any client forms if applicable (e.g., is there a form the participant can fill out to file the grievance in addition to the procedure?)
   2. Five redacted client feedback forms submitted
   3. Termination Policy
   4. Reasonable Accommodations (RA) Policy and any forms if applicable (e.g., is there a form the participant can fill out to request a RA?)- client and staff level
   5. Americans with Disabilities Act Procedure
   6. Agency Outreach Materials used for program participants (including bilingual material)
   7. Anti-Discrimination Policy
   8. CoC Program Standard Operating Policies and Procedures - as required in 24 CFR 578.103(a)
   9. Annual Performance Report- (2022-2023) PDF exported from SAGE Reporting System
   10. Most recent Financial Audit and monitoring reports for the last two years