Draft FY2024 CoC Competition Renewal Project Evaluation and Scoring Criteria Comments and Responses

April 25, 2024

The draft FY2024 CoC Competition Renewal Project Evaluation and Scoring Criteria was released for public comment on March 27, 2024. Comments were received through April 17, 2024. Following are the comments received as of the deadline, with responses to those comments. These responses have been approved by the Values and Funding Priorities Committee.

Comments may have been edited for clarity.

COMPONENT #1: Mainstream Resources and Employment	
COMMENT	**RESPONSE**
No comments received.	

COMPONENT #2: Housing Performance and Quality	
COMMENT	**RESPONSE**
2A (Exit to, or Retention of, Permanent Housing): Given the population we're serving, combined with record high inflation, and huge increase in the cost of housing in Detroit, reduce the percentages of expectations for exits to permanent housing.	Thank you for your comment. For context, the proposed scoring scale for this component is as follows: **PSH (% of people served who retain PSH placement or exit to other permanent housing)** • 95% - 100%: 25 points • 90% - 94%: 20 points • 80% - 90%: 10 points • Below 80%: 0 points **RRH, TH, TH-RRH (% of people served who exit to permanent housing)** • 90% - 100%: 25 points • 80% - 89%: 20 points • 75% - 79%: 15 points • 70% - 74%: 10 points • Below 70%: 0 points This is the same scoring scale used in last year's competition. Preliminary data shows that the majority of the CoC funded projects continue to perform well on this measure, which is one of the reasons why the performance expectations are set high. Exits to, or retention of, permanent housing is a key measure of success in a project's (and our community's) progress towards ending homelessness. This measure will remain as is written.

COMPONENT #2: Housing Performance and Quality	
COMMENT	**RESPONSE**
2B (Utilization Rates): Utilization rates for PSH: Five points for 75%-89% utilization rates should be maintained for the coming year. Grantees' expectation during the 22/23 year was that utilization rates of 75% and above would be five points; and less than 75% would be zero. In judging utilization, the CoC could take into account steps the agency is making to improve that utilization rate. For example, for the 24/25 funding cycle, the agency's assessing the current year's actual numbers served and adjusting to get a more realistic projected bed capacity. This will reduce the denominator and increase the percentage utilization.	Thank you for your comment. For context, the proposed scoring scale for this component is as follows: • 90% – 100% utilization: 10 points • 80% – 89% utilization: 5 points • Below 80% utilization: 0 points The CoC raised the minimum performance rate needed to earn any points (to 80%, up from 75%) in alignment with a recommendation made by a consultant the CoC worked with several years ago in reviewing our project evaluation criteria. The recommendation to raise the threshold to 80% was made a few years ago, but the CoC waited to implement it in light of pandemic-related challenges. Fully utilizing all available resources is key to ending homelessness in our community. Therefore, providers are expected to be fully utilizing the housing resources they are receiving funding for. Clarification is provided here (as well as in the self-scoring tools provided annually) on how this component is measured: • This measure looks at a project's utilization rate at five points in 2023 (the last Wednesday of Jan, April, July, Oct, and Dec). Five dates are reviewed to have a more fulsome look at a project's overall utilization over the course of the year, rather than looking at just one or two dates. • The measure compares the total number of households with a ***project start date*** on the given date as compared to the total number of units the project is funded to provide. ◦ This measure looks at households with a ***project start date***, and not just a housing move-in-date, given that a project may be actively working with a client to move them into housing (and therefore they have a project start date in HMIS) but, at the time the data is reviewed, that person may not yet have moved into a unit, and do not yet have a housing move in date. The person is still considered to be "utilizing" a

COMPONENT #2: Housing Performance and Quality	
COMMENT	**RESPONSE**
	unit given that the agency is actively working with them to move them into housing. The CoC understands that at times project-based PSH projects may need to take units off line for a period of time, typically to conduct repairs on the unit. If an agency determines that it needs to take such a unit offline for an extended time to conduct the repairs, that agency is welcome to inform HAND of this so that this diminished capacity may be taken into consideration when evaluating project utilization. Future competitions may consider individual agency improvement in this measure. For the 2024 competition, the measure will remain as is written.

COMPONENT #3: Financial Performance	
COMMENT	**RESPONSE**
No comments received.	

COMPONENT #4: HMIS Participation	
COMMENT	**RESPONSE**
No comments received.	

COMPONENT #5: Inclusion of Persons with Lived Experience	
COMMENT	**RESPONSE**
5B (Meaningful Participation of Persons with Lived Experience of Homelessness): Only those with a minimum of five years professional experience (within the last ten years) in the field of human resources are eligible to evaluate this component.	Thank you for your comment. The CoC values input and perspective from a range of experiences in the review of project applications. At this time reviewers evaluating this component will not be required to have at least five years experience in the field of human resources.

5B (Meaningful Participation of Persons with Lived Experience of Homelessness): In my estimation, some Lead Agency/CoC policy somewhere should state that any disgruntled ex-employee or disgruntled ex-client should not be evaluating the funding possibilities of the agency that they hold such disdain for. It certainly doesn't seem fair to me. Any of these individuals already had the opportunity to file Grievances which have their own methods of penalizing a Service Provider which can cause lowering funding to the Provider.	Thank you for your comment. Over the past year the CoC has taken intentional steps to include persons with lived experience of homelessness within our project review process. This means there may be occasions when individuals are assigned to review an application from an agency they have previously received services from. Individuals on the project review committee are required to sign a Conflict of Interest disclosure each year. In that Conflict of Interest statement, individuals are required to disclose if they were employed by, are currently receiving services from, or have received services within the prior 6 months for any of the applicant agencies. If this is the case, that individual is recused from reviewing applications from that agency. Upon signing the Conflict of Interest disclosure, all reviewers affirm this statement in the disclosure: *"My signature affirms that I will, to the best of my ability, evaluate the application in a fair and impartial manner using the evaluation rubric provided. My signature further affirms that if, during the review process I realize I am unable to be unbiased in my review, I will disclose this to HAND staff and be reassigned to different project application(s) to review."* The Conflict of Interest disclosure also states that the reviewer understands *"…if HAND staff become aware of a conflict of interest I have not disclosed, I will be recused from the review process."* This language was added to the Conflict of Interest disclosure last year to help ensure, to the best of our ability, that all applications are reviewed in an unbiased manner. It also noted that any project review that includes a review of narrative responses is always reviewed by at least three different individuals, and that scoring rubrics are provided to guide the review and scoring. Reviewers are expected to align their scoring of responses against the given rubric. Multiple reviewers are used to help ensure a diversity of perspective during the review. Lastly, project applications are assigned to reviewers with prudence to help ensure the project review process is carried out in a way that reduces the potential of bias during the review process.

COMPONENT #6: Participation in Coordinated Assessment Model (CAM)	
COMMENT	**RESPONSE**
No comments received.	

COMPONENT #7: CAM Lead Agency and Implementing Partner Only	
COMMENT	**RESPONSE**
No comments received.	

COMPONENT #8: Domestic Violence Only Projects	
COMMENT	**RESPONSE**
No comments received.	

COMPONENT #9: HMIS Lead Agency Only	
COMMENT	**RESPONSE**
No comments received.	

INFORMATIONAL ONLY	
COMMENT	**RESPONSE**
No comments received.	

Other Comments	
COMMENT	**RESPONSE**
It's clear from this work that the Lead Agency and the Coc Board have been busy analyzing the performance of the Service Providers over time. It's nice to see we are improving in many areas.	Thank you for the comment.
I found the policies proposed to be solid and seem fair as our performance improves as a CoC in incremental stages. The Renewal Project Evaluation Criteria seem straight forward.	Thank you for the comment. Yes, the renewal evaluation criteria looks back on calendar year 2023, with the exception of the points related to participation in the January 2024 unsheltered PIT.

Other Comments	
COMMENT	**RESPONSE**
Although some policies "go backwards" in terms of looking at performance in the recent past (e.g., participation in PIT count of January 2024, and looking at most data since January 2024) in May or later of 2024, I believe that these inclusions were well publicized by the CoC long before 2024 began.	
Regarding the scoring criteria for grievances, Scoring should judge the PSH project rather than the entire agency. Larger agencies operating many non-PSH programs in addition to their PSH program will naturally have higher numbers. Another idea is to assign a percentage of number of grievances divided by the total of number of people served. Using a count, e.g. 5 or more grievances, puts a smaller agency at a great advantage.	Thank you for your comment. To clarify how grievances are scored: • Only *substantiated* grievances are considered in the scoring. Unsubstantiated grievances are not taken into consideration. • In general, only the CoC project under review would lose points for a substantiated grievance filed against the project. The number of points that would be deducted depend upon the severity of the grievance, as determined by the Grievance Committee. • Substantiated grievances filed for a non-CoC funded project are scored only if that grievance included retaliation against the client or the agency was non-compliant with the grievance process. • While some agencies with multiple non-CoC funded projects may have more client grievances filed (and substantiated) against that non-CoC project, if those grievances do not include client retaliation or non-compliance they will not "count against" the score for the agency's CoC project. For further clarification, a grievance is "substantiated" when the Grievance Committee, after reviewing all documentation and evidence submitted in relation to the grievance (whether submitted by the client or the agency) determines there is proof that the claims made in the grievance are either wholly, or in part, true and accurate. Lastly, the following examples are provided to give additional clarification: The agency in these examples has two CoC funded PSH projects and a City funded emergency shelter program.

Other Comments	
COMMENT	**RESPONSE**
	Example 1: Over the course of 2023, the agency had three grievances filed against its shelter program. Two of those shelter grievances were not substantiated. One of those shelter grievances was substantiated, but the Grievance Committee found no evidence that the agency retaliated against the client, and the agency complied with the Grievance Committee requirements. This one substantiated shelter grievance is not taken into further consideration. Additionally, the agency had a grievance filed against one of its CoC funded PSH projects. This grievance was substantiated and given a score of 2 points (according to the grievance scoring scale). There was no evidence that the agency retaliated against this PSH client, and the agency complied with the Grievance Committee requirements. In this scenario, two (2) points will be deducted from this ***project's*** renewal score in the competition. No points were deducted from the agency's other CoC PSH project. **Example 2:** Over the course of 2023, the agency had three grievances filed against its shelter program. Two of those shelter grievances were not substantiated. One of those shelter grievances was substantiated, and the Grievance Committee saw evidence that the agency retaliated against the client and did not comply with Grievance Committee requirements. The agency had no grievances filed against either of its CoC funded PSH projects. Because of the substantiated shelter grievance that included client retaliation and non-compliance, points will be deduced from the scores of both of the agency's CoC PSH projects. The number of points deducted will range from 5- 10, depending on the nature of the grievance. The Grievance Committee will determine this point value.

Other Comments	
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Please add scoring criteria related to the applicant budget being reflective of the increased cost of living; promoting staff retention, resulting in less interruption of services to clients due to staff turnover.	Thank you for your comment. At this time, the only full project budgets submitted with applications are for new project applications. Renewal applications are not currently required to submit full project budgets with staff salaries. It is agreed that agency staff retention is important to ensure continuity of care to clients. Consideration will be given to if this is something the CoC wants to evaluate projects on in a future competition.