Draft FY2024 CoC Competition Renewal Project Evaluation and Scoring Criteria

March 27, 2024

In preparation for the FY2024 Continuum of Care (CoC) competition, input is sought from providers, committees, and workgroups, on the proposed point values and scoring scales renewal projects will be evaluated on in this year's competition. Comments are due by **11:59 PM on April 17, 2024** and may be submitted here: https://www.surveymonkey.com/r/FY2024RenewalProjectEvalCriteria. Scoring criteria that are new or changed from 2023 are highlighted in green. The CoC Board will be voting on final FY2024 CoC Competition Renewal Project Evaluation and Scoring Criteria at the May 6, 2024 board meeting.

Throughout this document, references are made to an analysis completed by Housing Innovations. This report provides an analysis of the CoC's process for evaluating and scoring CoC projects, with recommendations to consider for future competitions. A full copy of this report may be found here.

COMPONENT #1: Mainstream Resources & Employment				
Reporting Period: 1/1/2023– 12/31/2023; Data Source: CYAPR				
Applies To: PSH, RRH, TH, and TH-RRH	**Recommended Scoring Range and Points Values**	**2023 Project Averages** *(period: 1/1/2022 – 12/31/2022)*		**Recommended Change from 2023**	**Rationale for Inclusion or Change**
(A) Leavers with Any Cash Income (5 to 7 pts) Projects will be scored on the percentage of adult leavers who leave the project with one or more sources of cash income. "Cash income" includes both earned and non-earned income.	PSH • 65% - 100%: 5 pts • 40% - 64%: 3 pts • Below 40%: 0 pts RRH & TH & TH-RRH • 70% - 100%: 7 points • 60% - 69%: 5 points • 50% - 59%: 3 points • Below 50%: 0 points	<table><tr><td></td><td>Average Performance Rate</td><td>Average Pts Earned</td></tr><tr><td>PSH</td><td>67%</td><td>3.8/5</td></tr><tr><td>RRH</td><td>56%</td><td>3.4/7</td></tr><tr><td>TH & TH-RRH</td><td>50%</td><td>1.5/7</td></tr></table>		• No changes recommended. • Review of preliminary CY2023 data shows that overall performance for all project types is lower than CY2022. However, given the importance of people having income upon program exit, no changes are recommended to scoring scale.	• Meets HUD's expectation that CoC include objective evaluation criteria related to improving system performance. This criterion aligns with System Performance Measure #4. • Aligns with HUD's expectation of assisting clients with increasing income & employment. • For time-limited projects (RRH & TH & TH-RRH) assisting clients with increasing income important for client sustainability after they exit the project, and therefore is weighted more heavily. • For all clients, assisting with increasing client income and
(B) Leavers with Any Non-Cash Benefits (5 pts) Projects will be scored on the percentage of adult leavers who leave the project with one or more sources of non-cash benefits. Non-cash benefits includes food stamps, other TANF benefits, or health insurance (including Medicaid/Medicare).	• 85% - 100%: 5 pts • 60% - 84%: 3 pts • Below 60%: 0 pts	<table><tr><td></td><td>Average Performance Rate</td><td>Average Pts Earned</td></tr><tr><td>PSH</td><td>81%</td><td>3.8/5</td></tr><tr><td>RRH</td><td>86%</td><td>4.6/5</td></tr><tr><td>TH & TH-RRH</td><td>90%</td><td>5/5</td></tr></table>		• No changes recommended. • Review of preliminary CY2023 data shows that average project performance was comparable to performance in CY2022.	
(C) Leavers with Earned Income (Employment) (3 to 5 pts)	PSH • 10% - 100%: 3 pts			• No change recommended.	

Applies To: PSH, RRH, TH, and TH-RRH	Recommended Scoring Range and Points Values	2023 Project Averages (period: 1/1/2022 – 12/31/2022)		Recommended Change from 2023	Rationale for Inclusion or Change
Projects will be scored on the percentage of adult leavers who leave the project with earned income (ie, employment).	• 5% - 9%: 1 pts • Below 5%: 0 pts RRH, TH, and TH-RRH • 20% - 100: 5 pts • 15% - 19%: 3 pts • 10% - 14%: 1 pts • Below 10%: 0 pts	<table><tr><td></td><td>Average Performance Rate</td><td>Average Pts Earned</td></tr><tr><td>PSH</td><td>15%</td><td>2/3</td></tr><tr><td>RRH</td><td>19%</td><td>4/5</td></tr><tr><td>TH & TH-RRH</td><td>6%</td><td>0/5</td></tr></table>		• Preliminary data for CY2023 show some overall improvement in performance for RRH projects as compared to CY2022, with no improvement for PSH projects. For RRH, TH, and TH-RRH projects, it is recommended the minimum performance needed for full points (20%) remain the same to continue an emphasis on this component, as these are time-limited projects, and having a source of income at project exit is important for housing stability.	non-cash benefits assists clients with improving quality of life.
(D) Increases in Total Cash Income for leavers & stayers (2 to 3 pts) Projects will be scored on the percentage of persons (leavers and stayers) who have an increase in any income (earned or other). Measure will be based on both those who exited the project and those who were still in the project as of 12/31/2023.	PSH • 40% - 100%: 2 pts • 10% - 39%: 1pts • Below 10%: 0 pts RRH, TH, and TH-RRH • 25% - 100%: 3 pts • 15% - 24%: 2 pts • 10% - 14%: 1 pt • Below 10%: 0 pts	<table><tr><td></td><td>Average Performance Rate</td><td>Average Pts Earned</td></tr><tr><td>PSH</td><td>45%</td><td>2/2</td></tr><tr><td>RRH</td><td>19%</td><td>2/3</td></tr><tr><td>TH & TH-RRH</td><td>29%</td><td>3/3</td></tr></table>		• No changes recommended. • Review of preliminary CY2023 data shows that average project performance was comparable to performance in CY2022.	
(E) Stayers with Health Insurance (PSH only) Projects will be scored on the percentage of project stayers as of 12/31/23 who have health insurance. Measure will exclude persons that were not yet due for an annual update.	PSH • 80% - 100%: 2 pts • 49% - 79%: 1 pt • Below 50%: 0 pts	<table><tr><td></td><td>Average Performance Rate</td><td>Average Pts Earned</td></tr><tr><td>PSH</td><td>94%</td><td>1.9/2</td></tr></table>		• No changes recommended. • Review of preliminary CY2023 data shows that average project performance was comparable to performance in CY2022.	• PSH providers should assist persons residing in PSH with obtaining health insurance to promote client stability and well-being.

COMPONENT #2: Housing Performance and Quality
Reporting Period: 1/1/2023 – 12/31/2023; Data Source: CY APR or other HMIS data

Applies to: PSH, RRH, TH, and TH-RRH as applicable	Recommended Scoring Range and Points Values	2023 Project Averages (period: 1/1/2022 – 12/31/2022)	Recommended Change from 2023	Rationale for Inclusion or Change
(A) Retention in Permanent Housing *(PSH)* Projects will be scored on the percentage of participants who either remain in the PSH project as of 12/31/2023, or who have exited that project to another permanent housing destination. The following will be excluded from the calculations: • Clients with exit destinations of death, foster care, hospital/residential non-psychiatric facility, residential project or halfway house with no homeless criteria, and nursing home. • Clients entered into and exited from the project in 2023 but never had a housing move-in date.	• 95% – 100%: 25 pts • 90% - 94%: 20 pts • 80% - 90%: 10 pts • Below 80%: 0 pts	<table><tr><td></td><td>Average Performance Rate</td><td>Average Pts Earned</td></tr><tr><td>PSH</td><td>98%</td><td>24.5/25</td></tr></table>	• No changes recommended. • Review of preliminary data for all project types for CY2023 shows that average project performance was comparable to performance in CY2022.	• Meets HUD's expectation that CoC include objective evaluation criteria related to improving system performance. This criterion aligns with System Performance Measure #7. • Measure of project quality.
(A) Exits to Permanent Housing *(RRH, TH, and TH-RRH)* Projects will be scored on the percentage of participants who exit the project to a permanent housing destination. Same exclusions will be given as for PSH noted above.	• 90% – 100%: 25 pts • 80% – 89%: 20 pts • 75% – 79%: 15 pts • 70% – 74%: 10 pts • Below 70%: 0 pts	<table><tr><td></td><td>Average Performance Rate</td><td>Average Pts Earned</td></tr><tr><td>RRH</td><td>100%</td><td>25/25</td></tr><tr><td>TH & TH-RRH</td><td>96%</td><td>25/25</td></tr></table>		
(B) **MODIFIED** Utilization Rates *(PSH, RRH, TH, & TH-RRH)* Projects will be scored on the overall average project utilization rates for following dates: 1/25/23, 4/26/23, 7/26/23, 10/25/23, 12/27/23. Projects that began ramping up expansion units at any point in 2023 will be evaluated on utilization expectations as given in that project's ramp up plan.	• 90% – 100%: 10 pts • 80% – 89%: 5 pts • Below 80%: 0 pts	<table><tr><td></td><td>Average Performance Rate</td><td>Average Pts Earned</td></tr><tr><td>PSH</td><td>95%</td><td>8.4/10</td></tr><tr><td>RRH</td><td>85%</td><td>6/10</td></tr><tr><td>TH & TH-RRH</td><td>86%</td><td>5/10</td></tr></table>	• Recommend a change to the scoring scale so that any performance rate less than 80% earns 0 points (changed from prior scale where any rate less than 75% earned 0 points). • A review of preliminary data for PSH in CY2023 shows that most projects retained overall high	• Utilization rate measure helps to ensure resources are being utilized, which in turn increases our ability to house people. • Utilization rate measure holds agencies accountable for reporting vacancies and receiving referrals from CAM.

Applies to: PSH, RRH, TH, and TH-RRH as applicable	Recommended Scoring Range and Points Values	2023 Project Averages *(period: 1/1/2022 – 12/31/2022)*	Recommended Change from 2023	Rationale for Inclusion or Change
			utilization rates throughout 2023. • While some projects were underutilized over CY2022, continuing to hold an expected 90% utilization rate to earn full points will help to ensure full utilization of resources. • Providers should note that future competitions may continue to change the scale to require greater utilization in order to earn points. 2023 scoring scale for reference: • 90% – 100%: 10 pts • 75% – 89%: 5 pts • Below 75%: 0 pts	• Changing scoring scale as recommended aligns with recommendation made by Housing Innovations and helps promote overall greater utilization of CoC resources.
(C) **MODIFIED** Length of Time from Referral to Housing Move-In (10 pts) *(PSH, RRH only)* Projects will be scored based on the average length of time it took to move clients into housing in 2023. Measure will look at length of time from referral date to housing move-in date. Different standards will apply for different project types: PSH Project Based (non-SROs), PSH SROs, PSH scattered-site, and RRH. The length of time data excludes clients transferred from one program to another. The data also excludes clients who received a security deposit only (this applies primarily to RRH projects). Application materials will include an appendix indicating how each project will be categorized.	PSH Project-Based, non-SRO *(average = 63 days)* • 62 days or less: 10 pts • 63 to 66 days: 5 pts • 67 to 78 days: 3 pts • 79+ days: 0 pts PSH SRO *(average = 8 days)* • 7 days or less: 10 pts • 8 to 11 days: 5 pts • 12 to 23 days: 3 pts • 24+ days: 0 pts PSH Scattered-Site *(average = 88 days)* • 87 days or less: 10 pts	<table><tr><td></td><td>Average Pts Earned</td></tr><tr><td>PSH: PB</td><td>7.7/10</td></tr><tr><td>PSH: SRO</td><td>8.3/10</td></tr><tr><td>PSH: SS</td><td>7/10</td></tr><tr><td>RRH</td><td>6/10</td></tr></table>	The project type averages updated to reflect 2023 data. Recommended change to scoring: Projects that would otherwise earn 0 points two years in a row on this component, but that demonstrated some improvement in performance, can still earn 2 points.	• Measure ties to System Performance Measure #1. • Recommended change in awarding a point for project improvement to incentivize projects towards continued improvement.

Applies to: PSH, RRH, TH, and TH-RRH as applicable	Recommended Scoring Range and Points Values	2023 Project Averages *(period: 1/1/2022 – 12/31/2022)*	Recommended Change from 2023	Rationale for Inclusion or Change
	• 88 to 91 days: 5 pts • 92 to 103 days: 3 pts • 104+ days: 0 pts RRH (TBD) *average = 75 days)* • 74 days or less: 10 pts • 75 to 78 days: 5 pts • 79 to 90 days: 3 pts • 91+ days: 0 pts AND If a project earned 0 points on this component in the 2023 competition, *and the* project's performance would earn it 0 points in this year's competition according to the above scale, *and the* project showed at least a 10% improvement over the past two years, the project will earn 2 points.			
(D) **MODIFIED** Returns to homelessness within 6 months of exit from project to permanent housing (5 pts) *(PSH, RRH, TH, TH-RRH)* Projects will be scored based on the percentage of clients who exited the project to permanent housing at some point between 10/1/2022 – 12/31/2023 and who returned to homelessness within 6 months of that exit.	• 3% or fewer: 5 pts • 4% - 5%: 3 pts • 6% - 15%: 1 pt • >15%: 0 pts AND If a project earned 0 points on this component in the 2023 competition, *and the* project's performance would	<table><tr><td></td><td>Average Performance Rate</td><td>Average Pts Earned</td></tr><tr><td>PSH</td><td>5%</td><td>3.4/5</td></tr><tr><td>RRH</td><td>3%</td><td>3.4/5</td></tr><tr><td>TH & TH-RRH</td><td>2%</td><td>5/5</td></tr></table>	Recommended change to scoring: Projects that would otherwise earn 0 points two years in a row on this component, but that demonstrated some improvement in performance, can still earn 1 point.	• Recommended change in awarding a point for project improvement to incentivize projects towards continued improvement. • Meets HUD's expectation that CoC include objective evaluation criteria related to improving system performance. This criterion

Applies to: PSH, RRH, TH, and TH-RRH as applicable	Recommended Scoring Range and Points Values	2023 Project Averages *(period: 1/1/2022 – 12/31/2022)*	Recommended Change from 2023	Rationale for Inclusion or Change
	earn it 0 points in this year's competition according to the above scale, *and* the project showed at least a 3% improvement over the past two years, the project will earn 1 point.	The overall average for all CoC projects combined is 4%. The proposed scoring scale allows for full points only for projects that are performing better than average.		aligns with System Performance Measure #2. • Measure of project quality.
(E) Service Staff and Program Availability *(PSH only)* Projects will be scored based on the extent to which supportive service staff, including on-call crisis staff, are available outside of typical business hours. This will be a self-reported question in the application.	• 3 points: Services are available 24 hrs a day, 7 days a week • 2 points: Services are available 8AM – 5PM Monday -Friday, with some weekend availability • 1 point: Services are available 9AM – 5PM Monday -Friday	<table><tr><td></td><td>% of projects responding</td></tr><tr><td>24 days/7 days a week</td><td>61%</td></tr><tr><td>8AM – 5PM, Mon – Fri, some weekends</td><td>32%</td></tr><tr><td>9AM - 5PM, Mon – Fri</td><td>7%</td></tr></table>	• No changes recommended from 2023 • Measure to be self-reported in application	• Recommend continued inclusion as a measure of project quality
(F) Facilitation and Tracking of Referrals *(PSH only)* Projects will be scored based on agency response to this question in the application: "The primary supportive housing service provider facilitates and tracks referrals, and in some cases transportation, to community service providers for tenants including, at a minimum, behavioral healthcare, primary healthcare, substance abuse treatment and support, employment services, and benefits assistance".	• 2 points: Yes • 0 points: No/unknown; or this information is not currently tracked	<table><tr><td></td><td>% of projects responding</td></tr><tr><td>Yes</td><td>100%</td></tr><tr><td>No</td><td>None</td></tr></table>	• No changes recommended from 2023 • Measure to be self-reported in application	• Recommend continued inclusion as a measure of project quality

COMPONENT #3: Financial Performance
Reporting Period: Most recently completed project term; Data Source: Sage; Submitted audit/monitoring reports

Applies to: All Projects	Recommended Scoring Range and Points Values	2023 Project Averages	Recommended Change from 2023	Rationale for Inclusion or Change
(A) **MODIFIED** Spending Rates Projects will be scored based on the extent to which each project has expended its annual budgeted HUD grant during its most recently completed project year. Scoring will be based on a scale, and the scales may vary depending on the budget lines the project has. HAND staff will pull this information directly from Sage.	Projects without a rental assistance budget line that expended: • 95% - 100%: 8 points • 94% - 90%: 4 points • 89% - 85%: 2 points • Less than 85%: 0 points Projects with a rental assistance budget line that expended: • 90% - 100%: 8 points • 89% - 80%: 4 points • 79% - 75%: 2 points • Less than 75%: 0 points	**Non-Rental Ass't projects** Average Performance Rate / Average Pts Earned 94% / 6.5/8 **Rental Ass't projects** Average Performance Rate / Average Pts Earned 92% / 6.7/8	The percentage of funds to be expended in order to earn full points has been increased. 2023 scoring scales for reference: Projects without a rental assistance budget line: • 90% - 100%: 8 pts • 85% - 89%: 4 pts • Less than 85%: 0 pts Projects with a rental assistance budget line: • 85% - 100%: 8 pts • 75% - 84%: 4 pts • Less than 75%: 0 pts	• The scoring scale for expenditures was relaxed in the competition years following the pandemic, recognizing the pandemic may have impact project ability to expend funds. • As a result of the public comment period for renewal criteria in the 2023 competition, a decision was made to increase the scoring scales for the 2024 competition. • The application materials over the past three years have stated that this scoring scale may increase in future years. • The 2023 application materials specifically stated the scoring scale would be as is given for the 2024 competition. • This year's competition will review mostly FY21 grants, with terms of 2022 -2023. • Scoring projects on expenditures holds agencies accountable to expectation for expending CoC funds.

Applies to: All Projects	Recommended Scoring Range and Points Values	2023 Project Averages	Recommended Change from 2023	Rationale for Inclusion or Change
				• Performance may help to identify agency capacity concerns.
(B) Outstanding/Unresolved Findings Points may be deducted from project score based on outstanding or unresolved findings in an agency audit or funder monitoring reports.	Up to 2 points may be deducted from a project's score *for each of the following that apply*: • *Agency Financial Audit* (other than A-133 Audit): Repeat and/or unresolved audit findings from prior audit year. • *A-133 Audit:* Repeat and/or unresolved audit findings from prior audit year associated with CoC grants. • *A-133 Audit:* Repeat and/or unresolved audit findings from prior audit year associated with federal grants other than CoC grants. • *HUD CoC Program Monitoring report:* No Corrective Action Plan submitted by HUD's deadlines, or Correction Action Plan submitted did not meet HUD's approval. • *City Homeless Program Monitoring Report:* No Corrective Action Plan submitted by City's deadlines, or Correction Action Plan submitted did not meet City's approval.	4 agencies had points deducted from their scores for outstanding findings. The number of points deducted ranged from 2 to 4 points.	No changes recommended.	• Helps ensure CoC funds are allocated to financially viable and compliant organizations.

Applies to: All Projects Unless Indicated	Scoring Range and Points Possible	2023 Project Averages *(period: 1/1/2022 – 12/31/2022)*	Recommended Change from 2023	Rationale for Inclusion or Change
(A) <u>HMIS Agency Admin Meeting Attendance</u> Agency will be scored based on attendance at HMIS Agency Administrator in 2023. The score received by the agency will be applied to all the agency's renewing projects. (3 points) The "e-blasts" sent on 4/18/23, 8/22/23 and 11/15/23 in lieu of an on-line meeting will automatically count as three meetings each agency attended. Example, if an agency attended 2 of the on-line Agency Admin meetings, they would be counted as having attended 5 meetings (3 eblasts + 2 on-line meetings). On-line Agency Admin meeting dates were: 3/7/23; 5/30/23; 7/11/23; 10/3/23 *Data source: HMIS Agency Admin meeting records*	• 6 or more mtgs (ie, 3 or more meetings + 3 eblasts) = 3 pts • 5 or fewer mtgs (ie, 2 or fewer meetings + 3 eblasts) = 0 pts	• Average # of meetings attended: 6.7 • Average score: 2.5/3.	Updated number of "e-blasts" and on-line meetings to align with what took place in 2023.	• Holds agencies accountable for data quality and data completeness, which improve the CoC's ability to report accurate data to HUD for required data reporting such as Point in Time (PIT), Housing Inventory Count (HIC), Longitudinal Systems Analysis (LSA), and System Performance Measures (SPM). • Measures compliance with HMIS policies and procedures.
(B) **MODIFIED** Data Quality and Completeness Agency will be scored based on the % of error rate for the following: (10 points total) • Name (6a) • Date of Birth (6a) • Race & Ethnicity (6a) • Gender (6a) • Relationship to Head of Household (6b) • Enrollment CoC (6b) • Disabling Condition (6b) • Veterans Status (6b) • Income and Sources at Start (6c) • Income and Sources Source at Exit (6c)	Projects may earn 1 point for each of the 10 data elements given where the error rate is 5% or less. Up to 10 points total may be earned (1 point for each data element)	• Average number of data elements with 5% error rate or less: 9 • Average score: 9/10	This year, Race & Ethnicity are combined into one data quality element (were two separate last year). In order to keep this component worth 10 points (ie, having 10 data quality elements), HMIS team recommends adding Veteran Status to review	

Applies to: All Projects Unless Indicated	Scoring Range and Points Possible	2023 Project Averages *(period: 1/1/2022 – 12/31/2022)*	Recommended Change from 2023	Rationale for Inclusion or Change
Score will be based on all projects an agency reports in HMIS (excluding Warming Centers and Street Outreach). The score received by the agency will be applied to all the agency's renewing projects. *Data source: CYAPR, questions 6a, 6b, 6c*				
(C) Accurate Recording of Annual Assessment (1 pt) Agency will be scored based on the percentage of people served for which the annual assessment has been accurately recorded. The number of people without the required annual assessment (APR question 18) will be compared to the number of people served by the project. Score will be based on all projects an agency reports in HMIS (excluding Warming Centers and Street Outreach). The score received by the agency will be applied to all the agency's renewing projects. *Data source: CYAPR, question 18, Number of adult stayers without required annual assessment"*	Percentage of persons served without required annual assessment: • 5% of less: 1 pt • 6% or more: 0 pts	• Overall average error rate: 2% • Average score: 1/1	No changes recommended	
(D) Known Destination Rates (3 pts) Agency will be scored based on the extent to which they have at least 75% of clients exited exit to known destinations for *all* projects an organization has in HMIS (excluding Warming Centers and Street Outreach). The score received by the agency will be applied to all the agency's renewing projects. *Data source: CYAPR, question 23c*	• 75% - 100%: 3 pts • <75%: 0 pts	• Average performance: 98% • Average score: 3/3	No changes recommended	
(E) Timely HIC Submission Agency will be scored based the extent to which the agency submitted *all* its required 2024 Housing Inventory Chart (HIC) by February 16, 2024. The score received by the agency will be applied to all the agency's renewing projects. *Data source: Record of HIC submission*	• 5 points for submitting by due date • 0 points if not submitted by due date	• In 2023, all but 2 agencies submitted their HIC on time.	None	

Applies to: All Projects Unless Indicated	Scoring Range and Points Possible	2023 Project Averages *(period: 1/1/2022 – 12/31/2022)*	Recommended Change from 2023	Rationale for Inclusion or Change
(F) **MODIFIED** Accurate Reporting for Quarterly Point-in-Time Count/Housing Move-In-Date Audit for CoC funded project (3 pts) *(PSH and RRH only)* Agency will be scored on the extent to which the agency refrains from making changes to its PIT count data following the quarterly Housing Move-In Date audits. HMIS System Administrator staff will select one of the four PIT dates from 2023 (will be listed in final application materials). Agencies will not be informed which date was chosen until after the review is completed. The same date will be used for all agencies. The HMIS System Administrator will re-run the project APR for this date and compare the data in that APR to the data in the APR that was confirmed back when the audit was completed. Client Transfers Client transfers occurred in 2023, sometimes due to projects ramping down or projects being over-extended in the number of people they served. Client transfers may have resulted in changes to a project's PIT data, and will be handled as follows: • Agencies sending client transfers: Will be held accountable for changes to PIT data made because of client transfers, because these changes in PIT data point to elements of poor program planning and management. This may result in these agencies earning 0 points for this component. • Agencies receiving client transfers: Will not be penalized for changes to PIT data made because of having to receive client transfers, as these agencies did not have control over another agency's need to transfer clients to them as a result of ramp-downs.	Scores will be awarded as follows: Percentage of client records changed after PIT count audit submission: • 0% - 5%: 3 points • 6% - 19%: 1 point • 20%+ : 0 points	• Average score: 1.8/3	• Change in scoring scale so that it is not "all or nothing". 2023 Scoring scale for reference: No changes made to PIT count audit data after submission: 3 points Evidence that changes were made to PIT count audit data after submission: 0 points	• This was a new scored element in 2023 competition. Based on feedback from providers, the scaled scoring is recommended to acknowledge there may be limited, legitimate instances in which data would need to be changed after the audit. • Accurate PIT data does not only demonstrate an agency is following data entry protocol, but also points to quality of overall program management.

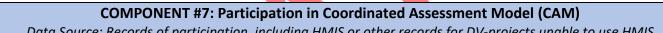| Applies to: All Projects Unless Indicated	Scoring Range and Points Possible	2023 Project Averages *(period: 1/1/2022 – 12/31/2022)*	Recommended Change from 2023	Rationale for Inclusion or Change
Component F will apply only to the CoC funded project being renewed that report into HMIS. Domestic Violence projects that use a comparable database will not be scored on this component.				
(G) **MODIFIED** Accurate Reporting for Quarterly Point-in-Time Count/Housing Move-in-Date Audit for non-CoC funded PSH or RRH projects (2 pts) Same as above for Component F, only this score will apply to any non-CoC funded PSH and/or RRH project(s) an agency had in operation in 2023. These points will not apply to agencies that did not have non-CoC PSH or RRH projects in operation in 2023.	Scores will be awarded as follows: Percentage of client records changed after PIT count audit submission: • 0% - 5%: 2 points • 6% - 19%: 1 point • 20%+ : 0 points	• Average score: 1.2/2	• Change in scoring scale so that it is not "all or nothing". 2023 Scoring scale for reference: No changes made to PIT count audit data after submission: 2 points Evidence that changes were made to PIT count audit data after submission: 0 points	

COMPONENT #5: Inclusion of Persons with Lived Experience of Homelessness				
Data source: Self-report in project application & accompanying attachments as required; other CoC records				
Applies to: All Projects As Indicated	**Scoring Range and Points Possible**	**2023 Project Averages**	**Recommended Change from 2023**	**Rationale for Inclusion or Change**
(A) Consumer Participation in Agency Board or Equivalent (2 pts) Points will be awarded based on the extent to which an agency demonstrates the participation of a homeless or formerly homeless individual on the agency's board of directors or equivalent policymaking entity. This is a score to be earned by the agency; those points will be applied to all of that agency's renewing projects.	• Had consumer participation in CY2023 and provided documentation of same = 2 pts • No consumer participation over the course of CY2023 = 0 pts	• Overall average score: 2/2	No changes recommended	• Holds agencies accountable to regulatory requirement
(B) **MODIFIED** Meaningful Participation of Persons with Lived Experience of Homelessness: Persons Served (5 pts) Points will be awarded based on the agency's response to the following narrative question: Describe how your agency ensures the meaningful participation of persons served within your homelessness programming by addressing the following points: • How persons served by all your homeless/housing projects (not just the project receiving CoC funding) are invited to provide feedback and input into the programming. Include in your description the frequency and manner in which people are invited to provide feedback. Also note the last time this process was completed (month/year). • How your agency responds to this feedback and input.	Scoring Scale: • Final scoring scale to be developed • Maximum number of points to be earned will be 5	• Overall average score: 4/6 (as combined question)	Question will be spilt into two: 5B and 5C. Each question will be worth 5 points, brining the total points available up to 10 (from 6 in 2023) New text to the questions highlighted in green.	• Holds agencies accountable for ensuring meaningful participation of persons with lived experience. • Responses will be reviewed and scored by a review team, including individuals from the Detroit Advisor's Group (DAG). The DAG also provided input on the wording of these questions for the FY2024 competition.

Applies to: All Projects As Indicated	Scoring Range and Points Possible	2023 Project Averages	Recommended Change from 2023	Rationale for Inclusion or Change
• Describe at least one change your agency has made to your homeless programming over the past two years in response to the input received from PWLEH. This change could have been made within the project that receives CoC funding or another homeless project within your agency. This is a score to be earned by the agency; those points will be applied to all of that agency's renewing projects.				
C) **MODIFIED** Meaningful Participation of Persons with Lived Experience of Homelessness: Staff and Board (5 pts) Points will be awarded based on the agency's response to the following narrative question: Describe how your agency ensures the meaningful participation of persons served within your homelessness programming by addressing the following points: • Describe the extent to which your agency intentionally hires PWLEH within your homelessness programming. In your response, note the positions PWLEH are typically hired for. • If the PWLEH staff within your agency are primarily front-line staff, describe how these staff members' perspectives, experiences, and input on agency programming are acknowledged and responded to by agency leadership. • How does your agency ensure equity in pay scales for PWLEH staff who are performing the same/similar job duties as non-PWLEH staff? • Describe how your agency provides opportunities for education, training, and/or career advancement for PWLEH who are hired within your agency.	Scoring Scale: • Final scoring scale to be developed • Maximum number of points to be earned will be 5	See above under 5B	See above under 5B	See above under 5B

Applies to: All Projects As Indicated	Scoring Range and Points Possible	2023 Project Averages	Recommended Change from 2023	Rationale for Inclusion or Change
• Describe how PWLEH are recruited for and incorporated into the decision-making structures within your organization. "Decision-making structures" are defined as being the agency's Board of Directors or other similar policy-making and oversight body within the organization. This is a score to be earned by the agency; those points will be applied to all of that agency's renewing projects.				
(D) Substantiated Grievances (all projects) Points may be deducted from project score based on substantiated grievances filed against that project in 2023. Additionally, if the agency has a substantiated grievance filed against it in 2023 for a non-CoC funded program, and that grievance included the agency retaliating against the client or non-compliance with the grievance committee's requirements, points will be deducted from all that agency's renewal projects. This component will look at grievances that were filed in 2023 and substantiated in either 2023 or the first quarter of 2024.	Points will be assigned to a substantiated grievance by the grievance committee based on a scale from 0 to 5 which reflects the severity of the grievance. Additionally, if the grievance committee determines the agency took retaliatory measures against the client or if the agency is not compliant with grievance committee requirements, an additional 5 – 10 points may be deducted from all of an agency's projects. Details on how grievances will be scored are here.	In 2023, one agency had points deducted due to substantiated grievances.	No changes recommended	• Including as a scored element helps promote quality services to clients and elevation of consumer voice.

COMPONENT #6: Continuum of Care Participation				
Data Source: Records of participation				
Applies to All Projects, Unless where Indicated	**Scoring Range and Points Possible**	**2023 Project Averages**	**Recommended Change from 2023**	**Rationale for Inclusion or Change**
(A) **REINCORPORATED** Participation in January 2024 Unsheltered Point-in-Time Count (2 points) Points will be awarded based on an agency's participation in the January 2024 Unsheltered Point-in-Time Count. "Participation" means the agency either had a team assisting with the street count or conducting next-day interviews.	• Agency participation: 2 points • No agency participation: 0 points	N/A: Not scored in 2023, as there was no unsheltered PIT in January 2023	Re-incorporated	• Promotes agency participation in the CoC and provides capacity for fulfilling unsheltered PIT requirements.

COMPONENT #7: Participation in Coordinated Assessment Model (CAM)				
Data Source: Records of participation, including HMIS or other records for DV-projects unable to use HMIS				
Applies to All Projects, Unless where Indicated	**Scoring Range and Points Possible**	**2023 Project Averages**	**Recommended Change from 2023**	**Rationale for Inclusion or Change**
(A) Referral Outcome Reporting: CoC Funded Projects (2 pts) Projects will be scored based on the extent to which outcomes to referrals to the CoC funded project received from CAM in 2023 are recorded in HMIS. Exceptions will be made when needed for project transfers. Details on exceptions will be provided in final application materials.	% of 2023 referrals with outcome recorded in HMIS: • 85% - 100%: 2 points • <85%: 0 points	• Average performance rate: 59% • Average score: 1/2	No change	• Evaluation components promote accountability for compliance with Coordinated Entry (CAM) requirements. • Including referral outcome reporting for non-CoC funded projects (7B) holds agencies accountable for this required reporting criteria which impacts system-wide reports. • PSH and RRH project completion of Housing Move-In Dates impacts all of the system-level reports the CoC submits to HUD; therefore it is a vital data element to be completed.
(B) Referral Outcome Reporting: Non-CoC Funded Projects (2 pts) Agencies will be scored based on the extent to which outcomes to referrals to the non-CoC funded projects received from CAM in 2023 are recorded in HMIS. This is a score to be earned by the agency; those points will be applied to all of that agency's renewing projects.	% of 2023 referrals with outcome recorded in HMIS: • 75% - 100%: 2 points • <75%: 0 points	• Average performance rate: 83% • Average score: 1.7/2	No change	

Applies to All Projects, Unless where Indicated	Scoring Range and Points Possible	2023 Project Averages	Recommended Change from 2023	Rationale for Inclusion or Change
Exceptions will be made when needed for project transfers. Details on exceptions will be provided in final application materials. Details on which projects this will apply to will be provided in the application materials.				
(C) New Client Entries (2 pts) Projects will be scored based on the extent to which new project entries in 2023 were from CAM. Exceptions will be made when needed for project transfers. Details on exceptions will be provided in final application materials.	Percentage of client entries via CAM: • 100%: 2 points • <100%: 0 points	• All projects except one had 100% performance (one project had 99% performance).	No change	
(D) Housing Move in Date Completion *(PSH, RRH, and TH-RRH as applicable only)* Projects will be scored based on the extent to which Housing Move in Dates are completed. Exceptions will be made for new clients still in the housing search process and for some clients with an entry/exit but no HMID. Details on exceptions will be provided in final application materials.	Percentage of clients with HMID completed: • 90- 100%: 4 points • 80% - 89%: 2 points • 70% - 79%: 1 points • <70%: 0 points	• Average performance: 99% • Average score earned: 4/4	• No change	

Applies to: HMIS Only Grants	Scoring Range and Points Possible	2023 Project Averages	Recommended Change from 2023	Rationale for Inclusion or Change
(E) Report Generation Projects will be scored based on HMIS Lead Agency staff generating reports from HMIS to support CAM process. May include generating reports to support the implementation of Coordinated Entry Data Standards.	HMIS Lead Agency staff generating reports from HMIS to support CAM process (2 pts)	Points earned: 2	No changes recommended.	• Holds the HMIS Lead Agency accountable for supporting the Coordinated Entry process. • All components will be scored via self-report, which will be reviewed and confirmed or declined by the Values & funding Priorities Committee
(F) Provision of CAM-specific HMIS training Projects will be scored based on HMIS Lead Agency staff providing CAM-specific HMIS training. May include providing training to support the	HMIS Lead Agency staff providing CAM-specific HMIS training (2 pts)	Points earned: 2		

Applies to: HMIS Only Grants	Scoring Range and Points Possible	2023 Project Averages	Recommended Change from 2023	Rationale for Inclusion or Change
implementation of Coordinated Entry Data Standards.				
(G) CAM Customized HMIS Reports Projects will be scored based on HMIS Lead Agency staff providing customized HMIS reports to support CAM. May include customizing reports to support the implementation of Coordinated Entry Data Standards.	HMIS Lead Agency staff providing customized HMIS reports to support CAM (2 pts)	Points earned: 2		

COMPONENT #8: CAM Lead Agency & Implementing Partner Only
Reporting Period: 1/1/2023 – 12/31/2023; Data source: Varies by component
For the FY2024 Competition, this component will only apply to CHS, as HAND did not begin operating as the CAM Lead Agency until late 2023.

	Scoring Range and Points Possible	Recommended Change from 2023	Rationale for Inclusion
(A) PSH Packet Submissions for Completed Navigation Appointments Points will be earned based on the percentage of clients who scored for PSH and who completed their navigation appointment (denominator) and had a PSH packet submitted (numerator). Benchmark is that at least 70% of the clients have a PSH packet submitted. *Data source: CAM Lead internal records. Data will be self-reported in the application, although supporting documentation may also be required.*	Percentage of clients with completed navigation appointment that had PSH packet submitted: • 70% - 100%: 8 pts • 60% - 69%: 6 pts • 50% - 59%: 4 pts • < 50%: 0 pts	None	CHS navigates clients who score for PSH. Submission of PSH packets is a key step in moving the client through the housing process.
(B) Accurate Submission of PSH Packets Points will be earned based on the percentage of PSH packets submitted by CAM navigators that are correct on the first attempt, based on the documentation required at the time of packet submission for a person to be placed on the PSH prioritization list. Benchmark is that at least 91% are correct upon first submission. *Data source: CAM Lead internal records. Data will be self-reported in the application, although some supporting documentation may also be required.*	• 91% - 100%: 8 pts • 80% - 90%: 6 pts • 69% - 79%: 4 pts • <69%: 0 pts	None	CHS navigates clients who score for PSH. Submission of PSH packets is a key step in moving the client through the housing process.

	Scoring Range and Points Possible	Recommended Change from 2023	Rationale for Inclusion
(C) <u>Accuracy of Submission of HCV Applications by CAM Navigators</u> Points may be earned based on the accuracy of HCV applications submitted by CAM Navigators. Benchmark is that at least 91% of applications are correct on the first submission. *Data source: CAM Lead internal records. Data will be self-reported in the application, although some supporting documentation may also be required.*	• 91% - 100%: 8 pts • 80% - 90%: 6 pts • 69% - 79%: 4 pts • <69%: 0 pts	None	Completion of HCV applications is a key step in assisting a client with accessing housing.
(D) <u>Client Satisfaction with Navigation</u> Points will be earned based on the overall average satisfaction reported by clients using the Access Points. Benchmark is that clients report an overall satisfaction rating of "4" on the scale of 1 to 5. *Data source: Client satisfaction surveys administered by navigators. Data will be self-reported in the application, although supporting documentation may be required.*	• Overall average rating of 4 or above: 4 pts • Overall average rating of 3: 2 pts • Overall average rating of <3: 0 pts	None	Including scoring on client satisfaction promotes ensuring CE access is responsive to client feedback.

COMPONENT #9: Domestic Violence Projects Only
Increasing Participant Safety
Data source: Narrative Response in the application

Applies to: Domestic Violence Projects Only	Scoring Range and Points Possible	2023 Points Earned in local competition	Recommended Change from 2023	Rationale for Inclusion or Inclusion
(A) Increasing Participant Safety (4 points) Points will be awarded based on the agency's response to the following narrative question: Describe the project's most important strategies for improving safety for people survivors of domestic violence (DV)/human trafficking (HT), and how the project assesses improvements to participant safety. Use specific examples where possible and see the scoring scale for how this question will be scored.	<u>Scoring Scale:</u> **4 - 3 pts:** Response clearly describes multiple strategies for improving safety for DV/HT survivors; clearly describes how the project assesses improvements to participant safety; provides at least one concrete, substantive, and current example of what this work looks like that are relevant to the project; demonstrates that working to improve safety for DV/HT survivors is a key part of the project. **2 pts:** Response describes at least one strategy for improving safety for DV/HT survivors and at least one way that the	1.6/4	No changes recommended	• A scored element for the first time in 2023 (after having been an "informational only" question for prior two years.) • The extent to which DV-specific projects are able to ensure the safety of their program participants is an important aspect of project quality.

	project assesses improvements to participant safety; provides an example of what this work looks like that may not be concrete, substantive, current or clearly relevant to the project. **1 pts:** Response describes at least one strategy for improving safety for DV/HT survivors, but does not provide concrete or substantive examples of what this work looks like or how the project assesses improvements to participant safety. **0 pts:** Response does not identify strategies for improving safety or demonstrate that the project has done work in this area.			

COMPONENT #10: HMIS Lead Agency Only
Project-Specific Performance
Proportional Points from FY2023 CoC Application
Data source: Score received on the FY2023 CoC Application

Applies to: HMIS Only Grants	Scoring Range and Points Possible	2023 Points Earned in local competition	Recommended Change from 2023	Rationale for Inclusion or Inclusion
In the FY2023 CoC Competition, HUD evaluated and scored the CoC's HMIS on the following: • Timely submission of required data reports (including the Point in Time, Housing Inventory Count, System Performance Measures, and LSA) • Bed coverage rates • Working with Domestic Violence providers on ensuring they have a comparable database in place to collect/report data The local HMIS grants will receive a score in Detroit's local competition in proportion to the score received on the above elements in the FY2023 CoC application. This proportion (100%) will be applied to the total points the	Up to 70 points, based on score received in CoC application	70/70 points (100%)	None	• These are elements HUD evaluates the Detroit's HMIS implementation on annually to evaluate the performance of the HMIS implementation.

HMIS grant can receive for this component (70). The HMIS grants will receive 70 out of the 70 points possible (100%) for this component.				

COMPONENT #11: BONUS POINTS
Data source: HMIS Lead Agency records of data submission

Applies to: All projects	Scoring Range and Points Possible	2023 Points Earned in local competition	Recommended Change from 2023	Rationale for Inclusion or Inclusion
NEW: Agency Bonus Points (3 points) Agencies may earn up to 3 bonus points based on their timely submission of the HMIS Quarterly Audits in 2023. Any bonus points earned will be applied to all an agency's renewing projects. The dates of Quarterly Audit for 2023 were as follows: • Q1 &Q2 2023 Quarterly Audit (10/1/2022 – 3/31/2023) due May 1, 2023 • Q3 Quarterly Audit (4/1/2023 – 6/30/2023) due August 1, 2023 • Q4 Quarterly Audit (7/1/2023 – 9/30/2023) due November 1, 2023 <u>How bonus points are factored in</u> • Bonus points are points an agency may earn in addition to the standard points possible for their project. • Bonus points mean a project may earn a score greater than 100%, as bonus points are included only in the numerator, but not the denominator, when determining final score. Example: A renewing PSH project may earn up to 131 points. PSH Project X earned 115 out of these 131 points (115/131 = 88%). This project then earned 3 bonus points for submitting all their Quarterly Audits on time in 2023. Their score is now (115 + 3)/131 = 90%	Agency submitted 3 of the Quarterly Audits by the deadline: 3 bonus points Agency submitted 0- 2 of the 3 of the Quarterly Audits by the deadline: 0 bonus points	N/A	New bonus point opportunity in 2024	• Rewards agencies that complied with HMIS instructions regarding submission of quarterly audits • May become a scored component in a future competition • For the 2024 competition these are "bonus points", meaning they are not included in the denominator of the total points an agency could earn (see example). In future competitions, when this becomes a scored component these points will be included in the denominator, meaning that failure to earn these points may have a negative impact on the projects overall score.

INFORMATIONAL ONLY QUESTIONS: Not Scored in 2024
Data source: Self-report in the application

The following are potential informational only questions will be asked in the FY2024 renewal project applications. These questions are being asked to better understand how projects are being implemented. While these questions will not be scored in the FY2024 competition, providers should note they may become a scored component in a future competition. Not all questions apply to all project types.

#1: Eviction/Project Termination (Applies to: PSH, RRH, TH-RRH, TH) Agencies will be required to report the number of people evicted and/or terminated from their projects in 2022 and the primary reasons for eviction and termination. Agencies will also be required to report on the number of people who received an eviction or termination notice but were ultimately able to avoid an eviction/termination. For these questions, "eviction" and "termination" mean different things for different types of projects:

Scattered-Site projects:

- "Eviction" means the landlord moves to evict the client for client non-compliance with lease agreements. The agency is expected to continue to work with the client to prevent eviction or move the client to a new unit. The client remains enrolled in the program.
- "Termination" means the agency is terminating the client from the program (and subsequently exiting from HMIS), although all attempts should be made to ensure the client does not exit to homelessness.

Project-Based PSH or TH projects:

- In general, for project-based projects, "eviction" and "termination" are synonymous.

#2: Client to Case Manager Ratio (Applies to PSH, RRH, TH-RRH, TH)
Agencies will be asked to provide their client- to-staff ratios as an informational only question

#3: Service Provision (Applies to: PSH, RRH, TH-RRH, TH, CE-SSO)
Projects will be required to provide a response to the following questions. These questions are being asked to gain a more robust picture of how services are provided within a project. Because agencies may have multiple projects of varying types, this question will need to be answered on a per-project basis. Note: For the purposes of this question, "in-person" means that the staff person and client are in each other's physical presence during the provision of case management.

Questions that will be asked:
1) Describe the frequency with which case management services are provided to clients in the program. In your response, also describe how the frequency of services is "scaled up" or "scaled down" based on the clients needs/desires.
2) Describe method by which services are provided (ie, in-person in the community, in the client's home, via phone/text/messaging or other electronic means).
3) Describe how best practices such as Trauma Informed Care, Motivational Interviewing, and Progressive Engagement are used when providing services.

#4: Agency Consumer Grievance Process and Documentation (Applies to PSH, RRH, TH-RRH, TH, CE-SSO, HMIS)
Agencies will be asked to describe their internal process for responding to client grievances. Agencies will also be asked to provide a copy of their grievance procedure.

#5: Referral Returns Narrative (Applies to PSH, RRH, TH, and TH-RRH)

Providers will be asked to describe their process for determining when to return a referral to CAM, primary reasons for referral returns, and challenges they encounter resulting in the need for the referral to be returned.

#6: Housing Inspections (Applies to PSH, RRH, TH, and TH-RRH)

Providers will be asked to describe the following:

1) What percentage of units fail the initial Housing Quality Standard (HQS) inspection that is needed before moving a client in?
2) For those units that fail the initial inspection, how does the agency communicate and work with the landlord to ensure repairs are completed so that the unit will pass inspection?
3) How does your agency ensure the timely completion of annual unit inspections?
4) How does your agency respond to client concerns about repair needs in their units (whether this occurs during the annual inspection process or at any time throughout the year)? Describe how the agency works with the client and the landlord to ensure needed repairs are addressed in a timely manner.

Criteria Not Recommended for Evaluation and Scoring in 2024

Following are criteria that have been evaluated and scored in prior competitions. The rationale for not including these as scored criteria in 2024 are given below. Any criteria not scored this year may be included as a scored criteria in a future competition.

- **All projects, all agencies:**
  - Meeting attendance, including CoC meetings, workgroup meetings (PSH, RRH, or TH workgroups): Attendance at these meetings in 2023 was removed as a scored criterion given that these meetings are now occurring virtually which can create challenges with accurate attendance keeping. The exception to this is HMIS Agency Admin meeting attendance.

- **PSH Projects:**
  - PSH projects have been scored in the past on the percentage of clients who reported satisfaction with their housing. This was based on self-report by the agency. Since 2022, this question has been removed and replaced with the more in-depth question on how agency's incorporate persons with lived experience into their programming and decision-making structures.

- **CAM Lead Agency and Implementing Partner:**
  - For CHS (CAM Implementing Partner): For the 2024 competition, CHS will not be evaluated on compliance with Coordinated Entry data standards, as the performance on this component is also dependent upon the CAM Lead Agency entering data in an accurate and timely fashion. Since the beginning of the CAM Transition in late 2022, some elements of the accuracy and timeliness of this data entry has declined, which are factors outside of CHS's control. Therefore, CHS will not be scored on this component in the 2024 competition. This will likely be reincorporated as a scored component in future competitions.
  - Several scored components the CAM Lead Agency has historically been evaluated on were removed for the 2023 competition because the CAM Lead Agency at that time (Southwest Counseling Solutions) was transition their CAM Lead Agency role to a different entity. HAND assumed the role of the CAM Lead Agency as of 9/1/2023. The CAM Lead Agency CE-SSO renewal grant was submitted by HAND for renewal in 2023 as a "first time renewal".
  - The following scored criteria, used in prior years to evaluate the CAM Lead agency, will be removed again for the 2024 competition, in keeping with established protocol that projects being submitted for renewal with less than 12 months of operation are not evaluated on a full complement of criteria. It is anticipated these scored components will return as evaluation criteria for the new CAM Lead Agency in a future competition:

- Client satisfaction with Access Points & Navigation
- Accurate submission of PSH Packets
- Accurate submission of HCV applications to MSHDA portal
- Timeliness of referrals to PSH, RRH, and TH vacancies
- Compliance with PSH Prioritization Policies
- Data reporting to CoC Board
  - Provision of training to participating agencies: Removed in recognition that the need for CAM lead and participating agencies to respond to the pandemic may have impacted ability for these trainings to be provided

- **Review of PSH, RRH, TH Policies**
  - In the 2019 competition, PSH providers were evaluated on 5 different program policies.
  - In the 2021 competition, the policies PSH providers were evaluated on was expanded to 6, and RRH and TH providers were evaluated on 1 policy each.
  - A policy review was not completed in 2022 for the following reasons:
    - Capacity to review: Reviewing policies is an extremely laborious and time-consuming process and capacity was limited for this review.
    - Between 2019 and 2021, the overall average scores earned by the PSH providers on their policies improved significantly, demonstrating that providers made changes to their policies following the 2019 review (and subsequent feedback they received). The table below shows changes in average scores earned on 5 of the PSH policies between 2019 and 2021
  - A policy review is not recommended in 2024 for capacity reasons.

		Policy #1: Annual Service Plan		Policy #2: Rent Collection Process		Policy #3: Rent Calculation Process		Policy #4: Program Termination		Policy #5: Fair Housing/Non Discrimination		TOTAL (out of 15 possible)	
		2019	2021	2019	2021	2019	2021	2019	2021	2019	2021	2019	2021
Average Score from all Agencies (out of 3 possible for each policy)		1.8	2.6	1.8	2.6	1.6	2.2	1.7	2.4	1.8	2.7	8.6	12.9
Overall Percentage of Points Possible Earned By All Agencies		59%	87%	60%	87%	53%	74%	55%	79%	59%	91%	57%	72%