Western Virginia Continuum of Care Reallocation Policy

Background

Under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), the HUD reallocation process allows Continuums of Care (CoC) to reallocate funds from renewal projects to provide funding for new projects and to create additional permanent housing. It is therefore the intent of the Western Virginia Continuum of Care to develop a Reallocation Policy that is: aligned with HUD and HEARTH Act policy guidance; performance-based as specified with the annual HUD NOFA; and finally, based upon local needs, data and use of common assessment tool.

Performance Measures

To provide both project-specific outcome information and CoC-wide contributions, each CoC-funded program will be evaluated based on the Project Application submitted for the CoC proposal, the Annual Performance Report (APR) outcomes submitted to HUD, data entered into HMIS, expenditure of CoC grant funds, and other HUD-recommended data tools.

I.   ***Annual Performance Report Outcomes.*** The APR scoring criteria assess outcomes which directly relate to goals set by HEARTH including reducing the length of homelessness, reducing returns to homelessness and increasing income. APR outcomes are also factored into the Performance Scorecard used during the CoC project scoring cycle.

II.   ***Outcomes Impacting CoC Score***. Performance measures will be guided by the outcomes that are reported each year in the HUD Consolidated Application and impact the CoC score. As HEARTH performance measures are identified through the forthcoming Continuum of Care regulations, the measures used for the renewal/threshold evaluations will be revised. Program outcomes will be collected via the Performance Scorecard during the CoC project scoring cycle.

III. ***HMIS Data Quality***. Programs will be evaluated on their HMIS quality for the operating year. It is expected that programs will have no more than 3% missing data/5% SSN numbers, except for Outreach programs that allow 10%, for any of the universal data elements. Programs are able to correct incomplete data to improve the percentages. Data quality outcomes will be collected via the Performance Scorecard during the CoC project scoring cycle.

IV.   ***Expenditure of CoC Grant Funds***. HUD and the Western Virginia CoC expect homeless assistance resources to be fully utilized. CoC site reviews of grantees will include criteria to determine whether any HUD funds recaptured at the completion of the most recent grant, how much money was recaptured, and whether actions have been taken to assure that grant funds

will not be recaptured in the current program year. Data on expenditure of CoC Grant Funds will be collected via the Site Review Scorecard.

V. *Goals to Prevent and End Homelessness*. In alignment with Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness, our community's goals are as follows: 1. Help individuals experiencing homelessness transition to permanent housing and have the skills necessary to achieve self-sufficiency. 2. Work together to be more effective in reducing homelessness in the region.

Reallocation Scenarios and Eligibility

I. HUD CoC funding reallocation can occur following the scenarios below:

1. Sub-recipient no longer interested in continuing the project or part of the project.

2. Sub-recipient no longer needs the CoC funding as other funding is available for the project or part of the project.

3. Sub-recipient underperforms and the CoC and its executive committee decide to reallocate the full or partial funding of the project to a new sub-recipient.

II. A reallocation project is eligible to be funded if the following apply:

1. The reallocation project is for an eligible project type. HUD determines eligible reallocation project types in the CoC NOFA each year.

2. The reallocation project meets all of HUD's threshold requirements.

The Western Virginia CoC has the authority reallocate funds granted through the CoC program as needed to more effectively resolve homelessness, help households achieve stable housing, and improve CoC performance. CoC program funds may be reallocated either by a voluntary process or by a competitive process.

Procedure for Voluntary Reallocation Process

I. CoC grantees are able to self-nominate to voluntarily reallocate CoC renewal funds to create a new project. The CoC Lead Agency may initiate a competitive system transformation process due to a renewal grantee voluntarily ending a CoC project. A grantee seeking to reallocate funding through the voluntary process must do so in accordance with the timeline set by the CoC Lead agency in that year's application process and if applicable, complete a new project application by the deadline set by the CoC Lead agency in order to be eligible and considered.

II. The CoC Scoring Committee will review the application and make a determination regarding the acceptance and ranking of the proposed project, and whether or not it will be in included in the Western Virginia CoC funding application to HUD.

III. If the proposed new project is not accepted by the CoC Scoring Committee, the committee may choose to allow the renewal project to remain in place, or release the funds to the community for competitive bid.

Procedure for Competitive Reallocation Process

I. The CoC Scoring Committee reserves the right to reallocate renewal funding and make it available for new projects through a competitive process. As part of the annual process for renewal projects, applicants are required to supply information so that it can be determined if each renewal project meets local and federal threshold requirements.

II. If it is determined that a renewal project does not meet minimum threshold requirements, an emergency meeting of the CoC Executive Committee will be held to determine whether or not funds should be released through the competitive reallocation process. The following process will be followed:

> 1. Due to the time constraints involved in grant applications, voting may be handled via conference call, e-mail or website communication.

> 2. Any member of the Executive Committee whose agency receives funding through the CoC program shall recuse him or herself from the committee deliberation process.

> 3. The Executive Committee will make the final decision whether or not to reject the renewal application for any agency that does not meet the minimum threshold requirements.

> 4. All committee deliberations will be documented in meeting minutes.

> 5. If any renewal projects' application is rejected, the funds that were allocated to that project will be released as new funds and agencies in the Western Virginia CoC geographic region will have the opportunity to bid for them.

Conclusion

Reallocation will occur in a transparent, universal, and performance-based manner.