

## Northwest 516 Continuum of Care (NWCoC) Reallocation Policy

Under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), the Department of Housing and Urban Development's (HUD) reallocation process allows Continuums of Care (CoC) to fund new projects by transferring all or part of funds from any existing CoC grant which is eligible for renewal into a new project.

Under HEARTH CoC Regulations and the Special Needs Assistance Project's Notice of Funding Opportunity (NOFO), a reallocation project can be funded if all of the following apply:

A. The reallocation project is for permanent housing (permanent supportive housing 100% dedicating its beds to chronically homeless individuals and families or DedicatedPLUS where 100% of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless youth, that at a minimum, meet one of the criteria in the NOFO or rapid re-housing for families or individuals coming from the streets or shelters), a TH-PH-RRH project, a dedicated HMIS project, or SSO project for coordinated entry.

- B. The reallocation project meets all of HUD's threshold requirements.
- C. The Northwest Continuum of Care (NWCoC) will reallocate funds granted through HEARTH CoC programs as needed to more effectively resolve homelessness, help households achieve stable housing and improve CoC performance.
- D. CoC program funds may be reallocated either by a voluntary process or by a competitive system transformation process during the NOFO competition.
- E. If a project is deemed to be low performing by scoring poorly in the project scoring process

(underspending, e.g.), lack of CoC participation and/or having unsatisfactory project performance outcomes, the CoC Project Ranking and Review Committee will initiate a process by which the low performing project works with the CoC Project Ranking and Review Committee to develop a project improvement plan. If, in the timeframe outlined in the project improvement plan, the project has not made significant changes to improve its performance or meet set targets, the CoC reserves the right to reallocate funding and make it available through a competitive process.

- F. The CoC Project Ranking and Review Committee may initiate a competitive system transformation process due to a renewal grantee ending a CoC program.
- G. As part of the competition process for renewal projects, applicants are required to supply information so that the CoC Project Ranking and Review Committee can determine if each renewal project will meet the minimum threshold requirements.
- H. If the CoC Project Ranking and Review Committee determines that a renewal project does not meet minimum threshold requirements, the CoC Project Ranking and Review Committee will determine whether or not funds should be released for a 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 or electronically.
- 2. Any member of the CoC Project Ranking & Review Committee shall be from an agency who does not receive funding through the CoC program.
- 3. The CoC Project Ranking & Review 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. CoC Project Ranking & Review Committee project ranking list will be shared with the CoC and with Project Applicants.
- 5. If any renewal projects' application is rejected or reduced, the funds that were allocated to that project will be released as new funds during the competition.
- I. CoC Grantees are able to voluntarily reallocate CoC-funded renewal funds to create new projects.

- 1. A Grantee seeking the ability to reallocate funding through voluntary reallocation must do so in accordance with the timeline set by the CoC Project Ranking and Review Committee in that year's application notice and complete a new project application by the deadline set by the CoC Lead agency in order to be eligible.
- 2. The CoC Project Ranking & Review Committee will review the applications and make determinations regarding the acceptance and ranking of the proposed project.
- 3. If the new project meets HUD's CoC funding priorities, local needs, and is an eligible reallocation project type under the NOFO, the applicant have the opportunity to apply for a new project.
- 4. If the new project does not meet HUD's CoC priorities, local needs, is an ineligible project type, or does not request the full grant amount awarded to the existing project, the funds either in total or in part not covered by the request, will be released by the CoC Project Ranking and Review Committee during the CoC competitive process.