

Prince George's County Continuum of Care Reallocation Policy 2018

The CoC Program (24 CFR part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by the homeless; and to optimize self-sufficiency among those experiencing homelessness. In order to ensure Prince George's County CoC has the right programs to end homelessness, the CoC has developed systemic supports to ensure that homeless assistance is well coordinated, well managed, inclusive, transparent, and achieves positive outcomes. These system-wide supports include Coordinated Entry, Collaborative Case Conferencing, Program Monitoring and Outcome Evaluation, Trainings on EBPs, and a **Policy for Reallocating Resources and Programs** within the CoC.

Under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), the 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. New projects created through reallocation must meet the requirements set forth in Section II.B of the FY 2018 Continuum of Care NOFA and the project eligibility and project quality thresholds established by HUD.

In the FY 2018 CoC Program Competition, CoCs may use reallocation to create:

- Permanent housing-permanent supportive housing (PH-PSH) projects that meet the requirements of Dedicated PLUS as defined in Section III.C.3.f of the NOFA or where 100 percent of the beds are dedicated to individuals and families experiencing chronic homelessness, as defined in 24 CFR 578.3
- Permanent rapid re-housing (PH-RRH) that will serve homeless individuals and families, including unaccompanied youth, coming directly from the streets or emergency shelters or fleeing domestic violence.
- Joint TH and PH-RRH component projects as defined in Section III.C.3.m of this NOFA to better serve homeless individuals and families, including individuals or families fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who meet the following criteria:
 - (i) residing in a place not meant for human habitation;
 - (ii) residing in an emergency shelter;
 - (iii) person meeting the criteria of paragraph (4) of the definition of homeless, including persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking;
 - (iv) residing in a transitional housing project that is being eliminated
- Dedicated HMIS projects.
- A Coordinated assessment/entry system.

Prince George's County CoC will reallocate funds 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 system transformation process.

I. Voluntary Reallocation and/or Transition Process

- CoC grantees are able to self-nominate to voluntarily reallocate or transition CoC-funded renewal funds to create new projects.
- A grantee seeking the ability to reallocate or transition funding through the Voluntary grantee-self-nominating process must do so in accordance with the timeline set by the CoC Lead agency in that year's application process and complete a new project application by the deadline set by the CoC Lead agency in order to be eligible.
- The CoC Project Ranking & Review Committee will review the applications and make determinations regarding the acceptance and ranking of the proposed project.
- If the new project meets HUD's CoC funding priorities, local needs, and is an eligible reallocate or transition project type under the NOFA, the applicant will be given the opportunity to apply to HUD for the new project.
- 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 revert back to the original grant or be released as new funds by the CoC Lead Agency for proposal during the COC competition.

II. Competitive Reallocation

The CoC Lead Agency may initiate a competitive reallocation process due to a renewal grantee ending a CoC program, or in order to increase CoC effectiveness by de-funding a project that does not meet CoC needs either because of program type or continual low performance.

A determination of low performance will be made based on an evaluation of the following criteria:

- Project performance, which takes into consideration exits to permanency, returns to homelessness, and increases in participant income;
- Utilization and effectiveness, which factors bed/unit operating capacity and cost effectiveness relative to project type and population served;
- Extent of participation in HMIS, including, but not limited to, bed coverage and data quality; and
- Grant management, which takes into consideration underspending, timely draws, and recaptured funds.

If a project is deemed to be low performing, the CoC Lead Agency will initiate a process by which the low performing project works with the CoC-Lead agency 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 the project.

In the case of involuntary reallocation, the funds that were allocated to the project will be released as new funds within the CoC, and agencies will have the opportunity to apply for them through a competitive process to create Permanent Supportive Housing for the chronically homeless and/or Rapid Re-housing projects.

III. Project Transfer between Two Existing Grantees or to a New Grantee

The process to transfer projects from one organization to another requires approval by the Executive Committee of the HSP and documentation that the HUD Field Office has approved the transfer request.

Grantees looking to transfer a project can submit the topic under new business at a plenary session of the HSP, address it at an Executive Committee meeting, or contact the Continuum of Care Planner.

IV. Project Transfer to the Collaborative Applicant

In the case where a provider submits an application to the CoC Collaborative Applicant and the project is subsequently approved and included in the CoC application, and selected for funding by HUD, the money allocated for that project will remain in the CoC even if the contract between the project applicant and HUD cannot be ratified. If something should happen to the provider that makes them unwilling or unable to enter into the grant agreement with HUD then the funding reverts to the Collaborative Applicant who will make it available for new projects through the process of reallocation.