

Prince George's County Continuum of Care Reallocation Policy

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 the Continuum of Care NOFO(s) and the project eligibility and project quality thresholds established by HUD.

In the FY 2022 CoC Program Competition, the Prince George's County CoC, after reviewing County need and service gaps has determined that reallocation of programs and funds can be used to create:

- New permanent supportive housing that will serve chronically homeless individuals, including unaccompanied youth, and coming directly from the streets or emergency shelters.
- New permanent supportive housing designated Dedicated Plus that serves individuals and families meeting dedicated plus criterion.
- Rapid re-housing (RRH) and Transitional Housing-Rapid Re-Housing (TH-RRH) to serve homeless individuals and families, including unaccompanied youth, persons coming directly from the streets or emergency shelters and/or actively fleeing domestic violence

Priority will be given to projects that serve individuals and families with the highest service needs and longest experiences of homelessness; including persons with extremely high rates of physical and mental health illness and substance use disorders, and projects that demonstrate strong partnerships with PHA and healthcare organizations to creatively address this priority.

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

- CoC grantees are able to self-nominate to voluntarily reallocate CoC-funded renewal funds to create new projects.
- A grantee seeking the ability to reallocate 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 reallocation project type under the NOFO, 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, maintenance of permanent housing, increases in participant income, successful implementation of CoC Move on strategies, and linkages to mainstream resources;
- Utilization and effectiveness, which factors bed/unit operating capacity and utilization rates, 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, PSH dedicated plus, Transitional Housing-Rapid Re-Housing, and/or Rapid Re-housing projects.

III. Transition

- CoC grantees are able to self-nominate to voluntarily transition CoC-funded renewal funds to create new projects.
- A grantee seeking the ability to transition an eligible renewal project being eliminated through reallocation from one program component to another eligible new component 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 reallocation project type under the NOFO, 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.