

## **Re-allocation Process and Procedures**

HUD encourages Continuums of Care (CoCs) to reallocate funds from low-performing renewal projects to provide funding for new projects to create additional permanent supportive housing. It is therefore the intent of the Berks Coalition to End Homelessness, Inc. (BCEH) for the Berks/Reading CoC (PA-506) to develop a Reallocation Policy and Procedure. These policies and procedures will be aligned with HUD and the HEARTH Act to provide guidance and ensure projects are evaluated based on performance and compliance as specified by the annual HUD CoC NOFA.

### **Performance Measures**

Just as HUD's guidelines determine the program focus targeted in each CoC competition, BCEH's reallocation decisions will be similarly driven by this focus with an additional emphasis on local needs, data, and use of common assessment tool.

To provide both project-specific outcomes and CoC-wide contributions, each CoC-funded program will be evaluated based on data entered into HMIS, Annual Performance Report (APR) outcomes submitted to HUD, the Project Application submitted to the CoC, and other HUD-recommended data tools. The APR scoring criteria assesses outcomes which directly relate to goals set by the HEARTH Act including reducing the length of homelessness, reducing returns to homelessness and increasing income, and additional performance measures.

### **Outcomes Impacting CoC Score (reported to HUD in the CoC Consolidated Application).**

Performance measures will be guided by the outcomes that are reported each year in the HUD Consolidated Application which impact CoC scores. As HEARTH performance measures are identified through forthcoming CoC regulations, the measures used for the renewal / threshold evaluations will be revised. Program outcomes will be collected via the Performance Score Cards during the CoC project scoring cycle.

HMIS Data Quality. Programs will be evaluated based on their HMIS data quality for the operating year. It is expected that programs will have no greater than 10% of missing values 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 Score Cards during the CoC project scoring cycle.

Expenditure of CoC Grant Funds. HUD and BCEH expect that homeless assistance resources be fully utilized. BCEH Site Reviews will include criteria to determine whether any HUD funds were 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.

BCEH 5-Year Plan to Prevent and End Homelessness. Performance measures will also be used to assess projects' alignment with *Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness* and our own local strategic plan. Our community's revised and updated 5-Year Plan goals are as follows:

1. Finish the Job of Ending Chronic Homelessness.
2. End Homelessness among Veterans.
3. Prevent and End Homelessness for Families, Youth, and Children.
4. Set a Path to Ending All Types of Homelessness.

Reallocation Process and Procedure. BCEH has reached a consensus that reallocation will not be an annual mandate. BCEH understands and acknowledges that through the reallocation process very valuable projects may be defunded and is striving to develop a reallocation process that will ensure projects submitted in the CoC Consolidated Application best align with HUD's priorities and contribute to a competitive application that collaboratively secures these dollars will improve, and continue to improve, our community. BCEH seeks to make data-driven decisions based on information gathered from the common assessment tool and other HUD-recommended data tools.

### **Voluntary Reallocation**

Currently-funded NOFA project applicants interested in voluntarily reallocating should notify, in writing, their intent by the due date of HUD's Grant Inventory Worksheet (GIW). Project applicants should also notify the local HUD Field Office Representative. The GIW will serve as BCEH's tool to identify Project Applicants' intent to reapply for CoC funding. For purpose of reallocated project funding (to create a new permanent housing project), strong preference will be given to those projects that voluntarily apply to reallocate, and especially for those within a compliance period. Should a project applicant come forth with reallocation requests after the final GIW has been published, they risk the reallocation not being considered for review or approval, however, the CoC will make that decision based on a case by case basis.

This Reallocation Policy and Procedure incorporates the following general objectives:

- To ensure the CoC's responsibility in submitting to HUD an application that is consistent with HUD guidelines and the HEARTH ACT;
- To ensure the amount to be reallocated is sufficient to fund effective PH

program(s); and,

- To best position the bulk of the existing transitional housing (TH) programs for continued HUD funding in an environment of changing strategies.

### **Involuntary Reallocation**

BCEH will consider involuntary reallocation as appropriate and as necessary per results of BCEH's monitoring policies and Scoring Tool. Project Applicants who score at the bottom and who do not meet threshold for the year will be notified that they have a year to improve scores in addition to assistance from BCEH on ways to improve. Those who do not meet the threshold in the following year will be notified that their funds may be reallocated per review of the Board of Directors.

July 2019

Berks Coalition to End Homelessness, Inc.