



2020 CONTINUUM OF CARE PROJECT REALLOCATION POLICY

WASHTENAW COUNTY CONTINUUM OF CARE (CoC)

Purpose:

The policy establishes the circumstances that would lead to the reallocation of a CoC-funded project. Per the U.S. Department of Housing and Urban Development (HUD), reallocation allows a CoC to shift funds from existing eligible renewal projects to create one or more new projects.¹ Funds can be shifted in whole or in part and must be done without decreasing the CoC's renewal funding amount.

Policy:

The Funding Review Team (FRT) uses project and agency performance data contained in the CoC-approved rubric, along with community need data and narrative responses, to make reallocation determinations. At the agency level, applicants are evaluated based on a variety of threshold criteria assessing their fiscal management, active participation in the CoC and its committees, and attendance at the Community Housing Prioritization meetings. In addition, agencies' projects are evaluated based on project outcomes, compliance with federal and local requirements, and data quality standards. If a threshold is unmet, agencies may submit an explanatory waiver request to the FRT. After thorough consideration, the FRT may prescribe a corrective action plan to improve agency/project performance.

Reallocation will be recommended by the FRT if an agency: 1) does not meet the threshold criteria AND a waiver is not granted of the threshold criteria; OR 2) does not meet the requirements of a corrective action plan AND if a waiver has not been granted for unmet requirements; OR 3) if the project is no longer needed, as determined by community need.

Full or partial reallocation is possible. The FRT will make reallocation recommendations as necessary to the CoC Board. The CoC Board will make the final decision on any recommended reallocations.

Approved by the CoC Board on 5/20/2020.

¹ U.S. Department of Housing and Urban Development, Community Planning and Development. *Notice of Funding Availability (NOFA) for the Fiscal Year (FY) 2019 Continuum of Care Program Competition*. Washington, DC: U.S. Department of Housing and Urban Development, n.d., page 20. <https://files.hudexchange.info/resources/documents/FY-2019-CoC-Program-Competition-NOFA.pdf>.