



POLICY AND PROCEDURE
**HUD NOFO – RENEWALS & REALLOCATION DECISIONS &
ANNUAL PERFORMANCE REVIEWS**

TITLE: RENEWALS – REALLOCATION DECISIONS AND PERFORMANCE REVIEWS

PURPOSE: To establish policy and procedure for Annual Renewal Reviews and Reallocation Decisions related to HUD CoC Funding.

DATE: JUNE 2019 Adopted by Executive Committee
JULY 2019 Ratified by Board of Directors
JUNE 2020 Amended to include COVID-19 revisions
AUGUST 2021 Amended to include updates for 2021 HUD NOFO requirements

POLICY: **1. REALLOCATION DECISIONS**

Reallocation is a process Continuums of Care (CoC) use to shift funds in whole or part from existing eligible HUD Notice of Funding Opportunity (NOFO) CoC renewal projects to create one or more new projects without decreasing the CoC's Annual Renewal Demand (ARD).

Per HUD, CoCs may only reallocate eligible renewal projects that have previously been renewed under the CoC Program.

HUD CoC funded projects must be reviewed at least annually by the CoC to determine whether the project will be renewed or reallocated in whole or in part. Performance and community need for the project services are to be considered.

The BBCoC recognizes that reallocation of an existing CoC funded project is a significant corrective decision to address a grossly underperforming project that has not responded to Technical Assistance (TA) provided or to make a critical shift in resources within the CoC based on evolving community needs.

2. PERFORMANCE REVIEWS

Project performance is evaluated annually using the last Annual Performance Report (APR) generated by HMIS and submitted to HUD through SAGE, the project application for the grant year associated with that APR, the results of HUD or other monitoring if available, the CoC's Threshold and Performance Standards for the Project type, as well as impact on CoC System Performance Measures, and cost effectiveness.

PROCEEDURE: 1. REALLOCATION DECISIONS

The Executive Committee is responsible for making initial Reallocation Decisions based on recommendations from CoC Staff and the CoC Application and Project Performance Review Committee after they have completed Performance Reviews and the community need for the project services. The CoC is responsible for documenting the community need for various services in the CoC’s Homeless Assistance Plan (HAP).

2. PERFORMANCE REVIEWS:

Annual Performance Reviews consist of CoC Staff and CoC Application and Project Review Committee assessments of each project. The CoC Staff assessment will be shared with the renewal project agency before the assessment is shared with the CoC Application and Project Review Committee for review to correct any technical errors and provide additional explanations if necessary.

Project Assessments will rely on the information and data found in:

- a. The last Annual Performance Report submitted by the project to HUD through SAGE.
- b. The project application associated with that APR.
- c. Results of any monitoring including peer monitoring, monitoring of sub-recipients, monitoring by HUD, or monitoring by the CoC if available. Because HUD monitoring is infrequent, reports going back three years may be considered.

Please note that the CoC's ability to conduct on-site monitoring is impacted by natural disasters and pandemic related safety protocols.

- d. CoC staff and HUD documented attempts to provide Technical Assistance to the project
- e. CoC’s Threshold & Performance Standards per Project Type.
- f. The project’s impact on overall CoC System Performance Measures
- g. The project’s cost effectiveness and cost per person and per household.

The scoring tools for renewal projects will be reviewed annually to reflect updates related to HUD priorities and weighted scores in the NOFO, as well as changes in local metrics identified by the CoC through the Needs Assessment and Planning process. Tools are set using a 100-point scale, tools revisions are recommended by CoC staff as well as the CoC Application and Project Review Committee and will be approved by the Executive Committee and ratified by the Board of Directors.

100- point scale:

100-92	Excellent
91-83	Satisfactory
82-74	Needs Improvement - provide TA/Support (1st year)
Below 74	Corrective Action Needed (1st year),
Below 74	Consider Reallocation (2nd year)

3. ANNUAL SCHEDULE

- a. Annual HAP updates, System Performance Measure Targets, and the Renewal Reviews outlined in this policy should be completed each year, however natural disasters and pandemic safety protocols may impact the timing of these activities.

- b. Reallocation Decisions should be completed by the Executive Committee soon thereafter and Board Ratification of those decisions should follow.