



Rank and Review Reallocation Policy and Procedure

BACKGROUND

HUD now encourages Continuums of Care to reallocate funds from renewal projects to provide funding for new projects and to create additional permanent housing stock. It is, therefore, the intent of the Mississippi Balance of State Continuum of Care (MSBOS) to develop a Reallocation Policy and Procedure that is: aligned with HUD and HEARTH Act policy guidance; performance-based as specified with the annual HUD NOFO; and finally, based on local needs, data and use of common assessment tool.

Performance Measures

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

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 and impact the CoC score. As HEARTH performance measures are identified through the forthcoming Continuum of Care regulations, the measures used for the renewal / threshold evaluations will be revised. Program outcomes will be collected via the Performance Score Card during the CoC project scoring cycle.

HMIS Data Quality. Programs will be evaluated on their HMIS 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 Card during the CoC project scoring cycle.

Expenditure of CoC Grant Funds. HUD and MSBOS expect that homeless assistance resources be fully utilized. MSBOS rank and review process will include criteria to determine whether any HUD funds 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.

MSBOS Funding Priorities. Performance measures will also be used to assess projects' alignment with the MSBOS Funding Priorities and CoC Goals.

- Addressing Individual Unsheltered Homelessness
- Addressing homelessness in geographical regions of MS Balance of State CoC with the highest populations of homelessness
- Addressing Chronic Homelessness

REALLOCATION PROCESS AND PROCEDURE

MSBOS understands and acknowledges that through the reallocation process very valuable projects may be defunded. MSBOS is striving to develop a reallocation process that will ensure that projects submitted in the CoC Consolidated Application best align with the HUD CoC funding mechanism's priorities and contribute to a competitive application that collaboratively secures these dollars to improve our community. As described in the Performance Measures section of this policy, MSBOS seeks to make data-driven and need-based decisions based on information gathered from the common assessment tool and other HUD-recommended data tools. This does not mean that MSBOS does not value reallocated projects or the diversity of programs in our community. Rather, MSBOS anticipates that most reallocated projects will seek funders with priorities better suited to cultivate the unique contributions these projects make to our community that HUD's CoC funding mechanism is not designed to recognize.

Voluntary Reallocation

Renewal project applicants interested in voluntarily reallocating should notify the MSBOS CoC in writing of their intent. For the 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.

1. The applicant may choose to reallocate all or a portion of their renewal funds.
2. The applicant may choose to compete for all, a portion or none of the reallocated funds.

Involuntary Reallocation

All renewal project applications will be included in the rank and review process. If it is determined that a renewal project fails to meet the required points or address the priorities of the competition, then it will be reallocated.

The MSBOS CoC will consider involuntary reallocation as appropriate and as necessary based upon these criteria:

1. Consider unspent funds and the ability to cut grants without cutting service/housing levels;
2. Consider the history of reallocation (e.g., if a grant was reduced one year, this will not be apparent in spending the following year);
3. Consider the project's performance
4. Consider the project's ability to meet financial management standards;

5. Consider specific new permanent supportive housing or rapid rehousing project(s) and specific renewal project(s) at risk of not being funded;
6. Consider alternative funding sources available to support either new or renewal project(s) at risk of not being funding;
7. Consider renewal HUD “covenant” concerns related to grant funds for acquisition, rehabilitation, or new construction;
8. Consider impact on system performance and the CoC’s Consolidated Application score; and
9. Consider impact on the community in light of community needs.

SUMMARY

Reallocation will occur in a transparent, universal, and performance and need-based manner.