Austin/Travis County Continuum of Care 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 CoC Board 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 NOFA; and finally, based upon performance metrics of import. Just as HUD's guidelines determine the program focus targeted in each CoC competition, CoC Board's reallocation decisions will similarly be driven by this focus, with additional emphasis on local needs, data and use of a 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. CoC Board has found that the most transparent way to collect this data is by using a Performance Score Card and Agency Presentations.

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 CoC Board expect that homeless assistance resources be fully utilized. CoC Board reviews 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. Data on expenditure of CoC Grant Funds will be collected via the local HUD Continuum of Care Funding Renewal process.

Austin/Travis County 10-Year Plan to Prevent and End Homelessness. Performance measures will also be used to assess projects' alignment with *Opening Doors: 10 Year Plan to Prevent and End Homelessness,* developed to determine CoC Board's community funding priorities. Data on 10-year plan alignment will be collected via the Site Review Score Card. In alignment with *Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness*, our community's revised and updated 10 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
CoC Board understands and acknowledges that through the reallocation process very valuable projects may be defunded. CoC Board 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, CoC Board seeks to make data-driven decisions based on information gathered from the common assessment tool and other HUD-recommended data tools. This does not mean that CoC Board does not value reallocated projects or the diversity of programs in our community. Rather, CoC Board 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
Currently-funded NOFA project applicants interested in voluntarily reallocating should notify CoC Board in writing of their intent by the due date of HUD's Grant Inventory Worksheet (GIW). The GIW will serve as CoC Board'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 (PSH or RRH), strong preference will be given to those organizations that voluntarily apply to reallocate projects, and especially for those within a compliance period.

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 existing transitional housing (TH) and Supportive Services Only

(SSO) programs for continued HUD funding in an environment of changing strategies.

Involuntary Reallocation

CoC Board will consider involuntary reallocation as appropriate and as necessary per results of CoC Board's Corrective Action Threshold cycle. At the conclusion of each NOFA project scoring cycle, CoC Board will establish a threshold percentage of project scoring (inclusive of Project Applicant Performance Score Card and Data Score Card). Project Applicants who do not meet threshold for the year will be notified that they have a year to improve scores. Those who do not meet threshold the next year will be required to submit a plan of correction action. If Grantees remain in 'plan of correction action' status in the next year's renewal evaluation, they will not be able to submit new applications for assistance. Those not meeting threshold for two consecutive years will be reviewed for possible involuntary reallocation of funds. A sample Corrective Action Threshold cycle timeline is included below:

Date	Activity
Month 1 - 2	APR and HMIS data quality reports collected. Consumer satisfaction survey distributed
Month 3	Data analyzed and scored
Month 4	Providers notified of scores
Month 5-6	Corrective Action Plans prepared

Summary

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