1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this form, please reference the FY 2023 CoC Priority Listing Detailed Instructions and FY 2023 CoC Priority Listing Navigational Guide on HUD's website. https://www.hud.gov/program_offices/comm_planning/coc/competition.

Collaborative Applicant Name: Guilford County DHHS

2. Reallocation

Instructions:

For guidance on completing this form, please reference the FY 2023 CoC Priority Listing Detailed Instructions and FY 2023 CoC Priority Listing Navigational Guide on HUD's website. https://www.hud.gov/program_offices/comm_planning/coc/competition.

2-1 Is the CoC reallocating funds from one or more eligible renewal grant(s) that will expire in Calendar Year 2024 into one or more new projects?   No

Continuum of Care (CoC) New Project Listing

Instructions:

Prior to starting the New Project Listing, review the CoC Priority Listing Detailed Instructions and CoC Priority Listing Navigational Guide available on HUD's website.

To upload all new project applications submitted to this Project Listing, click the "Update List" button. This process may take a few minutes based upon the number of new projects submitted by project applicant(s) to your CoC in the e-snaps system. You may update each of the Project Listings simultaneously. To review a project on the New Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If you identify errors in the project application(s), you can send the application back to the project applicant to make the necessary changes by clicking the amend icon. It is your sole responsibility for ensuring all amended projects are resubmitted, approved and ranked or rejected on this project listing BEFORE submitting the CoC Priority Listing in e-snaps. https://www.hud.gov/program_offices/comm_planning/coc/competition.

WARNING: If you amend project applications back to project applicants to make changes or corrections in e-snaps, you must approve the resubmitted project applications. If you do not approve the resubmitted project applicatins, they will not be included on your CoC's Priority Listings, which could result in your CoC losing funding. HUD lacks the authority to fund projects unless they are included on the Priority Listings, which tell us which projects your CoC is prioritizing.

EX1_Project_List_Status_field

Project Name	Date Submitted	Comp Type	Applicant Name	Budget Amount	Grant Term	Rank	PH/Realloc	PSH/RRH	Expansion
Providing Keys to...	2023-08-15 19:37:...	PH	Tiny House Commun...	$175,300	1 Year	X	Reallocation	PSH	
Family Service of...	2023-09-07 09:32:...	Joint TH & PH-RRH	Family Service of...	$301,715	1 Year	D12	DV Bonus		
SAGSO HOME 2	2023-09-18 11:39:...	PH	The Salvation Army	$211,200	1 Year	13	PH Bonus	PSH	

Continuum of Care (CoC) Renewal Project Listing

Instructions:

Prior to starting the Renewal Project Listing, review the CoC Priority Listing Detailed Instructions and CoC Priority Listing Navigational Guide available on HUD's website.

   To upload all renewal project applications submitted to this Project Listing, click the "Update List" button. This process may take a few minutes based upon the number of renewal projects submitted by project applicant(s) to your CoC in the e-snaps system. You may update each of the Project Listings simultaneously. To review a project on the Renewal Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If you identify errors in the project application(s), you can send the application back to the project applicant to make necessary changes by clicking the amend icon. It is your sole responsibility for ensuring all amended projects are resubmitted, approved and ranked or rejected on this project listing BEFORE submitting the CoC Priority Listing in e-snaps.
 https://www.hud.gov/program_offices/comm_planning/coc/competition.

The Collaborative Applicant certifies that there is a demonstrated need for all renewal permanent supportive housing and rapid re-housing projects listed on the Renewal Project Listing.	X
The Collaborative Applicant certifies all renewal permanent supportive housing and rapid rehousing projects listed on the Renewal Project Listing comply with program requirements and appropriate standards of quality and habitability.	X
The Collaborative Applicant does not have any renewal permanent supportive housing or rapid re-housing renewal projects.	

WARNING: If you amend project applications back to project applicants to make changes or corrections in e-snaps, you must approve the resubmitted project applications. If you do not approve the resubmitted project applicatins, they will not be included on your CoC's Priority Listings, which could result in your CoC losing funding. HUD lacks the authority to fund projects unless they are included on the Priority Listings, which tell us which projects your CoC is prioritizing.

   EX1_Project_List_Status_field   List Updated Successfully

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Rank	PSH/RRH	Comp Type	Consolidation Type	Expansion Type
Glenwood Housing ...	2023-08-17 09:43:...	1 Year	The Servant Center	$14,748	3	PSH	PH		
Family Service of...	2023-08-18 10:00:...	1 Year	Family Service of...	$92,889	7	RRH	PH		
SAGSO RRH	2023-08-18 15:44:...	1 Year	The Salvation Army	$141,134	5	RRH	PH		
Fast Track Renewa...	2023-08-17 15:54:...	1 Year	The Servant Center	$168,849	2	RRH	PH		
SAGSO HOME	2023-08-20 23:55:...	1 Year	The Salvation Army	$328,012	4	PSH	PH		
HEARTH: Hope, Emp...	2023-08-18 10:39:...	1 Year	Youth Focus, Inc.	$140,920	1		Joint TH & PH-RRH		
Sheltering the Ho...	2023-09-01 16:08:...	1 Year	Greensboro Housin...	$514,262	6	PSH	PH		
Housing Opportuni...	2023-09-01 16:03:...	1 Year	Greensboro Housin...	$568,409	11	PSH	PH		
Permanent Support...	2023-09-25 21:15:...	1 Year	Open Door Ministr...	$257,509	8	PSH	PH		
Coordinated Intak...	2023-09-26 12:36:...	1 Year	Partners Ending H...	$149,664	9		SSO		
HMIS Expansion	2023-09-26 12:37:...	1 Year	Partners Ending H...	$69,721	10		HMIS		

Continuum of Care (CoC) Planning Project Listing

Instructions:

Prior to starting the CoC Planning Project Listing, review the CoC Priority Listing Detailed Instructions and CoC Priority Listing Navigational Guide available on HUD's website.

 To upload the CoC planning project application submitted to this Project Listing, click the "Update List" button. This process may take a few minutes while the project is located in the e-snaps system. You may update each of the Project Listings simultaneously. To review the CoC Planning Project Listing, click on the magnifying glass next to view the project details. To view the actual project application, click on the orange folder. If you identify errors in the project application, you can send the application back to the project applicant to make necessary changes by clicking the amend icon. It is your sole responsibility for ensuring all amended projects are resubmitted, approved and ranked or rejected on this project listing BEFORE submitting the CoC Priority Listing in e-snaps.

 Only one CoC planning project application can be submitted and only by the Collaborative Applicant designated by the CoC which must match the Collaborative Applicant information on the CoC Applicant Profile.
 https://www.hud.gov/program_offices/comm_planning/coc/competition.

WARNING: If you amend project applications back to project applicants to make changes or corrections in e-snaps, you must approve the resubmitted project applications. If you do not approve the resubmitted project applicatins, they will not be included on your CoC's Priority Listings, which could result in your CoC losing funding. HUD lacks the authority to fund projects unless they are included on the Priority Listings, which tell us which projects your CoC is prioritizing.

EX1_Project_List_Status_field   List Updated Successfully

Project Name	Date Submitted	Grant Term	Applicant Name	Budget Amount	Accepted?
NC-504 CoC Planni...	2023-09-26 22:47:...	1 Year	Guilford County D...	$150,857	Yes

Continuum of Care (CoC) YHDP Renewal Project Listing

Instructions:

Prior to starting the YHDP Renewal Project Listing, review the CoC Priority Listing Detailed Instructions and CoC Priority Listing Navigational Guide available on HUD's website.

To upload all YHDP Renewal project applications submitted to this Project Listing, click the "Update List" button. This process may take a few minutes based upon the number of YHDP Renewal projects submitted by project applicant(s) to your CoC in the e-snaps system.

You may update each of the Project Listings simultaneously. To review a project on the YHDP Renewal Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If you identify errors in the project application(s), you can send the application back to the project applicant to make necessary changes by clicking the amend icon. It is your sole responsibility for ensuring all amended projects are resubmitted, approved and ranked (if applicable) or rejected on this project listing BEFORE submitting the CoC Priority Listing in e-snaps. .

As stated in the FY 2023 NOFO, CoCs must rank all YHDP Renewal projects that HUD initially funded in the FY 2016 (Round 1) YHDP Competition.
https://www.hud.gov/program_offices/comm_planning/coc/competition.

The Collaborative Applicant certifies that there is a demonstrated need for all renewal permanent supportive housing and rapid rehousing projects listed on the YHDP Renewal Project Listing.	
The Collaborative Applicant certifies all renewal permanent supportive housing and rapid rehousing projects listed on the YHDP Renewal Project Listing comply with program requirements and appropriate standards of quality and habitability.	
The Collaborative Applicant does not have any renewal permanent supportive housing or rapid rehousing YHDP renewal projects.	X

WARNING: If you amend project applications back to project applicants to make changes or corrections in e-snaps, you must approve the resubmitted project applications. If you do not approve the resubmitted project applicatins, they will not be included on your CoC's Priority Listings, which could result in your CoC losing funding. HUD lacks the authority to fund projects unless they are included on the Priority Listings, which tell us which projects your CoC is prioritizing.

Project Name	Date Submitted	Applicant Name	Budget Amount	Comp Type	Grant Term	Accepted ?	Rank	PSH/RRH	Consolidation Type
This list contains no items									

Continuum of Care (CoC) YHDP Replacement Project Listing

Instructions:

Prior to starting the YHDP Replacement Project Listing, review the CoC Priority Listing Detailed Instructions and CoC Priority Listing Navigational Guide available on HUD's website.

To upload all YHDP Replacement project applications submitted to this Project Listing, click the "Update List" button. This process may take a few minutes based upon the number of YHDP renewal projects submitted by project applicant(s) to your CoC in the e-snaps system.

You may update each of the Project Listings simultaneously. To review a project on the YHDP Replacement Project Listing, click on the magnifying glass next to each project to view project details. To view the actual project application, click on the orange folder. If you identify errors in the project application(s), you can send the application back to the project applicant to make necessary changes by clicking the amend icon. It is your sole responsibility for ensuring all amended projects are resubmitted, approved and ranked (if applicable) or rejected on this project listing BEFORE submitting the CoC Priority Listing in e-snaps.

As stated in the FY 2023 NOFO, CoCs must rank all YHDP Replacement applications for projects replacing YHDP Renewal projects that HUD initially funded in the FY 2016 (Round 1) YHDP Competition.
https://www.hud.gov/program_offices/comm_planning/coc/competition.

WARNING: If you amend project applications back to project applicants to make changes or corrections in e-snaps, you must approve the resubmitted project applications. If you do not approve the resubmitted project applicatins, they will not be included on your CoC's Priority Listings, which could result in your CoC losing funding. HUD lacks the authority to fund projects unless they are included on the Priority Listings, which tell us which projects your CoC is prioritizing.

Project Name	Date Submitted	Applicant Name	Budget Amount	Comp Type	Grant Term	Accepted?	Rank
This list contains no items							

Funding Summary

Instructions

This page provides the total budget summaries for each of the project listings after you approved and ranked the New, Renewal, Round 1 YHDP Renewal and Round 1 YHDP Replacement projects, or rejected project applications. You must review this page to ensure the totals for each of the categories is accurate.

The "Total CoC Request" indicates the total funding request amount your CoC's Collaborative Applicant will submit to HUD for funding consideration. As stated previously, only 1 UFA Cost project application (for UFA designated Collaborative Applicants only) and only 1 CoC Planning project application can be submitted and only the Collaborative Applicant designated by the CoC is eligible to request these funds.

Title	Total Amount
Renewal Amount	$2,446,117
New Amount	$512,915
CoC Planning Amount	$150,857
YHDP Amount - Competitive	$0
YHDP Amount - Non-Competitive	$0
Rejected Amount	$175,300
TOTAL CoC REQUEST	$3,109,889

Attachments

Document Type	Required?	Document Description	Date Attached
Certification of Consistency with the Consolidated Plan (HUD-2991)	Yes	Certification of ...	09/26/2023
Other	No	NC504 CoC Realloc...	09/26/2023
Other	No		
Project Rating and Ranking Tool (optional)	No		

Attachment Details

Document Description: Certification of Consistency with the Consolidated Plan (HUD-2991)

Attachment Details

Document Description: NC504 CoC Reallocation Policy 2023

Attachment Details

Document Description:

Attachment Details

Document Description:

Submission Summary

WARNING: The FY2021 CoC Consolidated Application requires 2 submissions. Both this Project Priority Listing AND the CoC Consolidated Application MUST be submitted.

Page	Last Updated
1A. Identification	08/30/2023
2. Reallocation	09/01/2023
5A. CoC New Project Listing	09/26/2023
5B. CoC Renewal Project Listing	09/26/2023
5D. CoC Planning Project Listing	09/26/2023
5E. YHDP Renewal Project Listing	No Input Required
5F. YHDP Replacement Project Listing	No Input Required
Funding Summary	No Input Required
Attachments	09/26/2023
Submission Summary	No Input Required

**U.S. Department of Housing
and Urban Development**

**Certification of Consistency Plan
with the Consolidated Plan
for the Continuum of Care
Program Competition**

I certify the proposed activities included in the Continuum of Care (CoC) project application(s) is consistent with the jurisdiction's currently approved Consolidated Plan.

Applicant Name: Guilford County DHHS for Guilford County CoC (NC-504)

Project Name: Continuum of Care Program (see attached for individual project names)

Location of the Project: Guilford County, NC (see attached for individual project locations)

Name of
Certifying Jurisdiction: City of Greensboro

Certifying Official
of the Jurisdiction Name: _Nancy Vaughan_

Title: _Mayor_

Signature: _Nancy Vaughan_

Date: _9/21/23_

OMB Approval No. 2506-0112 (Expires 12/31/2024)

Applicant Name	Project Name	Location of Project	Amount Requested
The Servant Center, Inc.	Glenwood Housing II	1312 Lexington Ave., Greensboro, NC 27403	$14,748.00
The Servant Center, Inc.	FastTrack RRH	1312 Lexington Ave., Greensboro, NC 27403	$168,849.00
Youth Focus, Inc.	HEARTH	405 Parkway Ave., Ste A, Greensboro, NC 27401	$140,920.00
Greensboro Housing Authority	Housing Opportunities	450 N. Church St., Greensboro, NC 27420	$568,409.00
Greensboro Housing Authority	Sheltering the Homeless	450 N. Church St., Greensboro, NC 27420	$514,262.00
The Salvation Army of Greensboro	SAGSO Home I	1311 S. Eugene St., Greensboro, NC 27406	$328,012.00
The Salvation Army of Greensboro	SAGSO RRH	1311 S. Eugene St., Greensboro, NC 27406	$141,134.00
The Salvation Army of Greensboro	SAGSO Home II **(New CoC Bonus)**	1311 S. Eugene St., Greensboro, NC 27406	$211,200.00
Open Door Ministries of High Point, Inc.	PSH III	400 N. Centennial St., High Point, NC 27262	$257,509.00
Family Services of the Piedmont	Victim RRH	315 E. Washington St. Greensboro, NC 27401	$92,889.00
Family Services of the Piedmont	Victim Joint TH and PH/RRH **(New DV Bonus)**	315 E. Washington St. Greensboro, NC 27401	$301,715.00
Partners Ending Homelessness	Homeless Management Information System (HMIS) Expansion	815 Phillips Avenue, High Point, NC 27262	$69,721.00
Partners Ending Homelessness	Coordinated Entry Intake (CE) Expansion	815 Phillips Avenue, High Point, NC 27262	$149,664.00
Guilford County DHHS	NC-504 CoC Planning Application FY 2023	1203 Maple St. Greensboro, NC 27405	$150,857.00

**U.S. Department of Housing
and Urban Development**

**Certification of Consistency Plan
with the Consolidated Plan
for the Continuum of Care
Program Competition**

I certify the proposed activities included in the Continuum of Care (CoC) project application(s) is consistent with the jurisdiction's currently approved Consolidated Plan.

Applicant Name: Guilford County DHHS for Guilford County CoC (NC-504)

Project Name: Continuum of Care Program (see attached for individual project names)

Location of the Project: Greensboro, Guilford County, NC (see attached for individual project locations)

Name of
Certifying Jurisdiction: City of High Point

Certifying Official
of the Jurisdiction Name: Tasha Logan Ford

Title: City Manager

Signature: _Tasha Logan Ford_

Date: 9/21/2023

OMB Approval No. 2506-0112 (Expires 12/31/2024)

Applicant Name	Project Name	Location of Project	Amount Requested
The Servant Center, Inc.	Glenwood Housing II	1312 Lexington Ave., Greensboro, NC 27403	$14,748.00
The Servant Center, Inc.	FastTrack RRH	1312 Lexington Ave., Greensboro, NC 27403	$168,849.00
Youth Focus, Inc.	HEARTH	405 Parkway Ave., Ste A, Greensboro, NC 27401	$140,920.00
Greensboro Housing Authority	Housing Opportunities	450 N. Church St., Greensboro, NC 27420	$568,409.00
Greensboro Housing Authority	Sheltering the Homeless	450 N. Church St., Greensboro, NC 27420	$514,262.00
The Salvation Army of Greensboro	SAGSO Home I	1311 S. Eugene St., Greensboro, NC 27406	$328,012.00
The Salvation Army of Greensboro	SAGSO RRH	1311 S. Eugene St., Greensboro, NC 27406	$141,134.00
The Salvation Army of Greensboro	SAGSO Home II (New CoC Bonus)	1311 S. Eugene St., Greensboro, NC 27406	$211,200.00
Open Door Ministries of High Point, Inc.	PSH III	400 N. Centennial St., High Point, NC 27262	$257,509.00
Family Services of the Piedmont	Victim RRH	315 E. Washington St. Greensboro, NC 27401	$92,889.00
Family Services of the Piedmont	Victim Joint TH and PH/RRH (New DV Bonus)	315 E. Washington St. Greensboro, NC 27401	$301,715.00
Partners Ending Homelessness	Homeless Management Information System (HMIS) Expansion	815 Phillips Avenue, High Point, NC 27262	$69,721.00
Partners Ending Homelessness	Coordinated Entry Intake (CE) Expansion	815 Phillips Avenue, High Point, NC 27262	$149,664.00
Guilford County DHHS	NC-504 CoC Planning Application FY 2023	1203 Maple St. Greensboro, NC 27405	$150,857.00

**NC-504 GUILFORD COUNTY
REALLOCATION POLICY**

Purpose and Background

The Guilford County Continuum of Care (CoC) manages the performance of all CoC projects in the community and strategically allocates resources based on cost, performance, and outcome data to improve how resources are utilized to end homelessness. In the event it is determined that the allocated resources/funds were not utilized optimally, the CoC reserves the right to re-allocate these funds to other projects or organizations. The term "reallocation of funds" refers to the process of redirecting financial resources from one area or program to another. It involves shifting money or budgetary allocations from existing programs, projects, or initiatives to support different priorities or address changing needs.

Chronic underspending or underperformance by a project risks recapture of those funds by the federal Department of Housing and Urban Development (HUD), making those funds unavailable to the community for use in ending homelessness. Therefore, the CoC has developed this policy to provide a clear and transparent process for reallocation for the purpose of keeping these funds in our community.

Definitions

a. *Chronic Underspending*: Occurs when a project that has been funded consecutively for 3 or more years fails to expend a minimum of 90% of its grant funds during each of its three most recently closed out grant years prior to the measurement date OR fails to expend a minimum of 90% of its grant funds during each of its second and third completed grant years.

b. *Chronic Underperformance*: Occurs when a project that has been funded consecutively for 3 or more years fails to serve a minimum of 90% of the projected number of households during each of its three most recently completed grant years prior to the measurement date OR fails to serve a minimum of 85% of the projected number of households during each of its first two completed grant years, per its APR. Chronic underperformance can also occur when a renewal project does not consistently meet

performance benchmarks in the monitoring process.

c. *CoC Funding Priorities*: HUD and local funding priorities identified in the Notice of Funding Opportunity (NOFO) and by local community data and gaps analyses.

d. *Measurement Date*: The measurement date will be the earlier of June 1 of each year or the release date of the NOFO.

e. *Collaborative Applicant (CA):* The organization designated by the CoC to submit the required CoC application for all projects selected for funding, and to apply for CoC planning funds.

f. *Recipient/Grantee*: An organizational member of the CoC that receives CoC funding for a project directly from HUD.

g. *Renewal Project:* Organizations applying to renew funds for existing CoC Program-funded projects*.*

h. *CoC Ranking and Review Committee*: The committee responsible for developing fair and transparent processes and recommending the rating and ranking for projects eligible for funding under the NOFO, Emergency Solutions Grant (ESG) recommendation, and other applicable funding opportunities designated to the committee.

i. *Priority Listing*: A required component of the annual CoC Consolidated Application submission. The Priority Listing details the CoC's final ratings and rankings of all accepted projects (except the Planning grant) from the local competition process.

Projects Subject to Reallocation

HUD wants communities to continually evaluate how to best deploy resources to end homelessness. Therefore, there is no guarantee of ongoing CoC funding for any project.

The annual NOFO is a competitive process, and the CoC Ranking and Review Committee has tools and processes in place to ensure an equitable and transparent review of applications, in accordance with community needs and priorities. The CoC Ranking and Review Committee reviews all applications received to develop the Priority Listing of projects recommended for funding. The Review and Ranking Committee will carefully consider and discuss any projects that will lose or gain funds through reallocation. The CoC Ranking and Review Committee reviews new and renewal projects based on organizational capacity, strategic priority, project

approach and design, cost effectiveness, and population served. Renewal projects will then be additionally reviewed based on performance.

Recommendations to reallocate funds consider both HUD's policy priorities, strategic objectives, and the CoC's needs and priorities. In regards to new and renewal project proposals, the CoC Ranking and Review Committee will review the performance and spending history of renewal projects to determine the reallocation of funds. The Priority Listing indicates to HUD the renewal grants which have been eliminated or reduced in funding, so as to create one or more new projects through the reallocation process.

The CoC issues a local Competition Notice for new and renewal project applications, with a deadline at least 30 days prior to HUD's Continuum of Care competition deadline. The competition notice specifies that new projects may only be funded through reallocation of funds from existing projects or through the bonus funding process. HUD strictly limits the type of projects for which reallocated or bonus funds may be used. Expansion of existing projects may also be funded through reallocation.

Any funds reallocated as part of recapturing unspent funds, voluntary, or involuntary reallocation will be made available for reallocation to create new projects during the local competition process. New projects will be ranked based on the score produced by the New Project Scoring Tool and adjusted as appropriate by the CoC Ranking and Review Committee to address the CoC and HUD's priorities and to maximize potential funding for the CoC as a whole. A one-year grace period may be extended by the CoC to providers who appeal proposed reallocation with a plan that demonstrates that the grant's expenditure will be improved in the current program year. Renewal projects that do not align with HUD and/or local funding priorities are subject to reallocation. The Collaborative Applicant will notify all projects with chronic underspending and/or underperformance and/or no longer meeting HUD and/or local funding priorities of its intent to reallocate, within 14 business days of the request date. During the first year of a three-year period, a new project will not be included in any calculations related to underspending or underperformance.

The CoC may reduce or eliminate funds from eligible renewal projects and reallocate the funds to create new projects and/or expand existing renewals.

Reallocation Amount

   a. *Chronic Underspending*: If there is chronic underspending, the reallocation amount may be the greater of the average underspending for the two most recently completed grant years, or ten percent of the annual project funding. When evaluating consolidated projects for reallocation, the average underspending will include the underspending for

the projects that have been consolidated.

b. *Chronic Underperforming*: If there is chronic underperformance as defined above, but there is no underspending, the Collaborative Applicant, together with the Ranking Committee, may recommend a reallocation amount. History of grant consolidation will be considered when determining a reallocation amount.

c. *Reallocated Amount is $7,500 or Less*: If the calculated reallocation amount is less than $7,500, then no reallocation will be made.

Special Reallocation and Amount Rules

a. A project that had its grant amount reduced by the CoC's reallocation policy ("Reallocated Project") will not be subject to reallocation the subsequent year. The following year, the project would be subject to reallocation if there is chronic underspending in the 2 most recently closed out grants. The reallocation amount may be the greater of the average underspending for the two most recently completed grant years, or ten percent of the annual project funding.

b. A reallocated project is not eligible to apply for expansion funds until the completion of its first operating year in which the funds were reallocated.

Voluntary Reallocation

As part of the local solicitation for inclusion in the NOFO Competition, or other funding opportunities where applicable, CoC's are strongly encouraged to reallocate projects that are not spending their full award, underutilizing beds, underperforming, not in alignment with Housing First principles and practices, and/or with significant, unresolved findings. Such reallocated funds are pooled for reallocation to new projects and the expansion of renewal projects. Renewal projects that cannot effectively expend all project funding may choose to relinquish some, or all, of their funding as long as they commit to identify placement for any household that would be displaced as a result of the reallocation.

Interest in a voluntary reallocation should be communicated by the Renewal Project to the Collaborative Applicant as soon as possible to allow the community to plan for the reallocation process in collaboration with the CoC Ranking and Review Committee. Projects that voluntarily reallocate funding will be evaluated for chronic underspending utilizing the grant amount after voluntary reallocation.

Involuntary Reallocation

Projects with poor performance, not spending their full award, not in alignment with Housing First practices, not serving the intended population, underutilizing beds or with significant, unresolved findings are subject to involuntary reallocation.

The threshold for involuntary Reallocation will be less than 75% of the top score for the current year's CoC projects. For example, if the top score is 100, the threshold to avoid involuntary reallocation will be 75.   Projects scoring below the threshold will be asked to develop a plan to address performance issues by next year's competition (Performance Improvement Plan), or to voluntarily give up award money to be reallocated to a New Project. If concerns continue, projects may be involuntarily reallocated in the following cycle. Applicants may appeal the decision, and the appeal must be considered by the CoC Board.

Conflicts of Interest

No member of the Ranking and Review Committee who is associated with a project impacted by this policy may participate in deliberations or vote on any reallocation decision.

How Funds are Reallocated

If a project has its grant amount reduced because of the Reallocation Policy, the project budget must be adjusted by the grantee prior to the submission of the NOFO application. The reallocated funds are included in the NOFO funding amount available for new or existing projects.