

	<ul style="list-style-type: none"> (a) Timeliness of drawdown of funds from HUD as reported in LOCCS (b) Attainment of HUD benchmarks (c) Contribution to CoC System Performance Measures (d) Attainment of project goals as stated in CoC or ESG Application (e) Timely submittal of Audits and Monitoring reports and resolution of findings, if any. <ol style="list-style-type: none"> 6. Additional review criteria shall be included if required by HUD with no additional action being required by the Board or Assessment Committee. In such event reasonable notice of such additional requirements including reference to the HUD regulation or release shall be provided to the Agencies as soon as reasonably possible. 7. The purpose of the periodic performance reviews is to identify projects that may benefit from technical assistance. 8. Any assessment, which identifies a project as performing satisfactorily in all four areas of review, may be presented directly to the Board without further review or consent from the performing Agency. 9. Any assessment which identifies a project as needing technical assistance or non-performing in any of the four areas of review shall be reviewed directly with the affected agency and the agency offered opportunity to provide a written response, objection and/or plan of action. Such response shall be reviewed by the committee and considered before the Committee makes any report to the Board regarding the project. Such response from the Agency shall also be included in the report to the Board unless the Agency requests otherwise. 10. Any recommendation for non-renewal due to lack of performance and all information upon which the recommendation is based shall be thoroughly reviewed with the Agency at least 5 working days before such recommendation is presented to the Board for action. 11. The Secretary of the Board shall send the executive director of each Agency a copy of any written report of the Assessment Committee as presented to the Board, which contains any information or comment about the Agency or its projects.
<p>D. Application for CoC Program Grant Funds</p>	<p>Upon HUD issuance of the CoC Program Grant Notice of Funding Availability, the Collaborative Applicant will prepare a master timeline of the CoC Program Grant process and will conduct the following steps to assure a well communicated process for organizations to make application for CoC Program Funds to include, but not limited to:</p> <ol style="list-style-type: none"> 1. Establish all application, review and announcement deadlines sufficient to achieve 2. reasonable public participation in the grant process and allow for timely submission to HUD 3. Issue the local request for proposals for CoC Program Funds 4. Publicize the request for proposal announcement through the Collaborative Applicant 5. website, listserv, and email broadcasts 6. Conduct a briefing on the CoC Program Grant Application process in advance of deadlines 7. Prepare applications for prioritization and ranking 8. Assist project applicants in the submission of application in HUD’s online applications submission portal.
<p>E. Prioritization and</p>	<p>It is the policy of the HOME Coalition to select and rank new and renewal projects using</p>

<p>Ranking of CoC Projects</p>	<p>a collaborative process for developing applications and approving submission of applications in response to a NOFA published by HUD in concert with the funding priorities and plan adopted by the CoC. Projects selected for submission will be selected by a process that is transparent, inclusive, and in accordance with the CoC's conflict of interest policy.</p> <p><u>Procedures</u></p> <ol style="list-style-type: none"> 1. Renewal applications submitted for funding will be given a preliminary score using a quantified score sheet assigning point values to project and system performance measures and indicators of capacity. New project applications will reviewed by an unbiased reader panel of persons familiar with homeless and/or community needs and social services programming. This reader panel will score applications using publically announced objective criteria approved by the CoC. All criteria used will be grounded in CoC and HUD performance standards and best practices. Application scores may also be weighted by established CoC and national priorities for priority types of housing and subpopulations to be served. These scoring criteria and priorities will be summarized in a written quantitative scoring instrument provided by the CoC. 2. Ranking of applications will be based on applications' average scores on the CoC-provided scoring instrument, with the resulting ranking array evaluated against how well it addresses local and national priorities and gaps. The evaluation of the array will be conducted in a public Board meeting by the CoC Collaborative Applicants Board members who have no conflict of interest. The CoC Collaborative Applicant's Board includes representatives of the various homeless subpopulations as well as from throughout the CoC region; of government, nonprofits, and faith-based groups; of homeless and formerly homeless persons; and of businesses, schools, and other stakeholder groups reflecting a diverse range of opinion about homelessness. The process used will be the focused conversation group facilitation method using a trained moderator. 3. Applicants will be notified in writing of the CoC's selections for funding and all projects their ranking and the Minutes of the public Board meeting where the ranking process was conducted. 4. The CoC will post on its website all parts of the CoC Consolidated Application, including the Priority Listings and Minutes of the ranking/evaluation process, before the submission deadline and notify community members and key stakeholders that the application is available.
<p>F. Reallocation Policy and Priorities</p>	<p>Background</p> <p>As the Continuum of Care lead agency, The Northeast LA Housing and Supportive Services Corporation (dba HOME Coalition) annually submits the Continuum of Care (CoC) Program application to the US Department of Housing and Urban Development (HUD). As a part of the process, HUD requires that CoCs carefully evaluate and review all renewal projects and develop a reallocation process for projects funded with CoC funds. Reallocating funds is an important tool used by CoCs to make strategic improvements to their homelessness system. Through reallocation, the CoC can create new projects that are aligned with HUD's and CoC goals of ending homelessness by better matching resources to the CoC region's current homeless population and needs.</p> <p>It is therefore the intent of the HOME Coalition to develop and follow a Reallocation policy and Procedure that accomplishes the following: (1) align with HUD and HEARTH Act policy guidance; (2) be performance based as specified with the annual</p>

HUD NOFA, (3) be based upon performance metrics of importance, and (4) better match available resources with current needs. Just as HUD's guidelines determine the program focus to be targeted in each CoC competition, HOME reallocation decisions will similarly be driven by this focus with additional emphasis on local needs, data and use of common assessment tool.

While reallocation can be complicated and does not come without risk, it is a necessary part of ensuring that our CoC's homeless assistance system meets the needs of people experiencing homelessness.

What is Reallocation?

Reallocation refers to the process by which a CoC shifts funds in whole or in part from existing CoC-funded projects that are eligible for renewal to create one or more new projects. Reallocation is accomplished by eliminating projects that are underperforming, are more appropriately funded from other sources, can be replaced by more cost effective options, and/or are no longer needed based on current gaps and needs. Reallocation is particularly important when new resources are limited or not available. Funds made available by reallocation can be made available for new or expansion applications based on CoC priorities. CoCs can pursue reallocations through the annual CoC Program Competition. CoCs can reallocate funding from one or more projects eligible for renewal in a competition year. The annual CoC Program Competition Notice of Funding Availability (NOFA) dictates what types of projects may be created through reallocation in a given competition.

CoC Strategic Reallocation Committee

As the governing body of the CoC, the Board of Directors of the CoC / HOME Coalition appoints a CoC Strategic Reallocation Committee which will be made up of the CoC Executive Committee and Assessment Committee and may include additional informed community members. The Strategic Reallocation Committee may include no voting members with current or prior affiliation with any agency with project(s) currently funded under the HUD CoC Program. The Strategic Reallocation Committee makes recommendations for reallocations to the HOME Board for their approval of the CoC Consolidated Application process.

Reallocation Policy

Decisions regarding reallocation are best made when guided by an overall strategic plan in which the CoC assesses existing projects for their performance and effectiveness in ending homelessness and for their alignment with the CoC system of care's current strategic needs. The Strategic Reallocation Committee seeks to make data-driven decisions based on information gathered from common assessment tools and other HUD-recommended data tools. In general, the CoC will direct funding toward projects that:

1. Best align with HUD and CoC funding priorities aimed at ending chronic homelessness, Veteran homelessness, and youth and family homelessness;
2. Contribute to a competitive application that collaboratively secures CoC funding to improve the communities served by the HOME Coalition;
3. Serve the highest need individuals and families;
4. Help project participants obtain permanent housing as rapidly and directly from homelessness as possible;
5. Ensure long term housing stability; and
6. Ensure the best and most cost-effective fit given community needs.

Performance Measures and Strategic Needs Data

To provide both Project-Specific outcome information and CoC-wide contributions, each CoC-funded program will be evaluated by the Strategic Reallocation Committee to determine if a project should be considered for reallocation based on how the project performed and/or if it is in alignment with the CoC’s current strategic needs. The evaluation will include but not be limited to data entered into the HMIS, the most recently submitted HUD Annual Performance Review (APR), the most recently submitted Project Application submitted for the CoC Proposal, and other authoritative sources, as listed below:

1. Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
2. Financial audit finding(s) for which a response is overdue or unsatisfactory;
3. HUD or CoC monitoring finding(s) for which a response is overdue or unsatisfactory;
4. History of inadequate financial management accounting practices;
5. Evidence of less than quarterly drawdowns and/or untimely expenditures on prior award;
6. Unspent funds in the most recently completed funding cycle may be considered for reallocation depending upon the percentage of funds that were unspent reasons for any recapture, and history of unspent funds.
7. History of other major capacity issues that have significantly impacted the operation of the project and its performance;
8. Timeliness in reimbursing sub recipients for eligible costs. HUD will consider a project applicant as meeting this standard if it has drawn down grant funds at least once per quarter;
9. History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes;
10. Extent of participation in the HMIS, including, but not limited to bed coverage and data quality with no greater than 10% of missing values for any of the universal data elements. Data Quality outcomes will be collected via the Performance Score Card or successor HMIS data quality report during the ranking process;
11. Documented failure to participate in CoC coordinated assessment/entry process as specified in CoC policies;
12. CoC funding priorities as detailed in the most recent CoC Notice of Funding Availability (NOFA) and/or other HUD published priority listings, such as CoC Competition Focus
13. Programs did not consistently meet HUD’s CoC performance measures such as (1) length of time persons remain homeless; (2) extent to which persons who exit homelessness to permanent housing destinations return to homelessness; (3) number of homeless persons; (4) jobs and income growth for homeless persons ; (5) number of persons who become homeless for the first time; etc.
14. Projects that have the lowest score in the evaluation process.
15. Projects that fail to provide documentation that the project and applicant are eligible for funds in the CoC Program Competition.

The CoC’s strategic needs will be identified by current published documents including:

1. CoC 10 Year Plan showing CoC strategic goals, objectives, and action steps;
2. Gaps Analysis showing numbers and types of housing and services needed;
3. Point in Time showing the make-up of the homeless population;

4. Housing Inventory Chart showing available stocks of various types of housing and populations served;
5. Minutes of Board of Directors and community planning meetings showing results of deliberations of the Board of Directors and community planning bodies identifying urgent community needs; and
6. Published guidance from NAEH, USICH , and other nationally recognized authoritative technical assistance providers addressing best practices in addressing and ending homelessness.

Should misuse of federal funds, failure to comply with their grant contract, and/or not following federal legislation with no plans to come in compliance are grounds for immediate defunding. In this case, the HOME Board will take immediate action to accelerate the reallocation process as to not put at risk the households served by the underperforming project.

Reallocation Process/Timeline

Reallocation as a strategic decision can be considered by project recipients and the CoC Board of Directors throughout the year. Action taken to propose reallocation and bring it to a Board vote will be taken at least annually in conjunction with the CoC Program funds competition. The reallocation process timeline associated with the local CoC Program funds competition will be announced each year as part of the timeline for the local competition for CoC Program funds and informed by that year’s HUD CoC Program NOFA.

Voluntary and Involuntary Reallocations

Voluntary reallocation

For projects not subject to involuntary reallocation, an applicant may choose to reallocate funds from an existing renewal project, in order to free additional funds for one or more new projects.

Renewal projects interested in voluntarily reallocating should notify the CoC in writing of their intent as early in the competition period as possible, preferably by the due date of HUD’s Grant Inventory Worksheet (GIW). However, such notice can be provided until two weeks before project applications are due to the CoC

Involuntary Reallocation

Before the first Board meeting following the release of the NOFA, the Strategic Reallocation Committee will evaluate and determine if programs will have a full or partial reallocation of funding. Well-performing programs that have unspent funding will be subject to review of possible partial reallocation of unspent funds.

All funds freed through involuntary reallocations may be made available for one or more new and expansion projects. If no new project applications are submitted, funds will remain available for the original renewal projects.

Project applicants that are subject to partial involuntary reallocation must develop a plan to continue with their renewal project, with the reduced level of funding. This includes HUD contract compliance for numbers of persons served and the types of services provided. It may be possible to seek a contract amendment from HUD for some changes; applicants should contact their HUD representative to discuss any options for

	<p>amendment. If the reduction in funding will result in loss of assistance for persons currently served by the program, the applicant must develop a transition plan for these persons.</p> <p>Board Approval of Proposed Reallocations Any proposed reallocation(s) recommended by the Strategic Reallocation Committee must be approved by the full Board (with any Board members with a conflict of interest abstaining from the vote).</p> <p>Appeals Process In the event of involuntary reallocation, the sponsor(s) of the program(s) under consideration for involuntarily reallocation in whole or in part will be notified in writing at least one week in advance of the consideration by the full Board of that program for reallocation. Representatives from that program including the executive director of the sponsor agency (or his/her designee) must be present at the Board meeting where a vote will be taken on the proposed project reallocation. Sponsor/program representatives will be provided a full explanation of why their project(s) are being considered for reallocation and allowed to address any issues raised and provide additional information they feel appropriate to the Board. The Board may ask additional questions if needed to further their deliberations. After that exchange of information, a vote of the Board will be taken and will be a final determination of that project's selection for reallocation.</p> <p>Sponsoring agency(-ies) which have had grants reallocated in whole or in part will be notified in writing of the vote within three days following the vote. Such notice will include the reasons that were the basis of reallocation. Agencies will have five days to submit a formal letter of appeal. An agency choosing to appeal must: 1. Submit the appeal on a formal letterhead, addressed to the Collaborative Applicant Board President 2. The letter of appeal must present a high level of detail and explanation of why the appeal is requested and what action the agency feels is appropriate. The Board will meet to reconsider the vote for reallocation and provide a ruling of whether the reallocation vote should stand or be reconsidered in light of information provided in the appeals letter. The Collaborative Applicant Board President will provide the Board vote on the appeal within ten days of receipt of the appeals letter. The decision of the Board is final. If the Board again votes to maintain the reallocation in response to the appeal, any agency that wants further redress may follow instructions in the NOFA to submit its renewal application as a solo applicant seek redress as described in the NOFA.</p>
<p>G. Rapid Rehousing Rental Subsidy Policy</p>	<p>Policy It is the policy of the HOME Coalition that CoC-funded and ESG-funded rapid rehousing programs provide assistance in accordance with the Emergency Solutions Grant Program Interim Regulations' minimum requirements as follows:</p> <ol style="list-style-type: none"> 1. Follow a written process for eligibility determination serving individuals and families who meet the criteria under the Emergency Solutions Grant Program Interim Regulations' paragraph (1) of the "homeless" definition in § 576.2 or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other place described in paragraph (1) of the "homeless" definition with priority going to eligible chronically homeless persons or families who otherwise meet program eligibility requirements; 2. Re-evaluate participants' eligibility not less than once annually; those eligible on re-assessment will meet the eligibility definition described in (1) above and have no higher than 30% AMI at subsequent reevaluations;