

## **Delaware Continuum of Care Reallocation Policy 2017**

### **I. Policy Statement**

- A. Under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), the HUD reallocation process allows Continuums of Care (CoC) to fund new projects by transferring all or part of funds from any existing CoC grant which is eligible for renewal into a new project.
  
- B. A reallocation project is eligible to be funded if the following apply:
  - The reallocation project is for an eligible project type. HUD determines eligible reallocation project types in the CoC NOFA each year.
  - The reallocation project meets all of HUD's threshold requirements.
  
- C. The DE Continuum of Care will reallocate funds granted through HEARTH CoC programs as needed to more effectively resolve homelessness, help households achieve stable housing and improve CoC performance.
  
- D. CoC program funds may be reallocated either by a voluntary process or by a competitive system transformation process.

### **II. Competitive Reallocation**

- E. The CoC Scoring Committee reserves the right to reallocate funding and make it available through a competitive process.
  
- F. The CoC Lead Agency may initiate a competitive system transformation process due to a renewal grantee voluntarily ending a CoC project.
  
- G. As part of the process for renewal projects, applicants are required to supply information so that it can be determined if each renewal project will meet the minimum threshold requirements.
  
- H. If it is determined that a renewal project does not meet minimum threshold requirements, an emergency meeting of the CoC Board will be held to determine whether or not funds should be released for a competitive reallocation process. The following process will be followed:
  - 1. Due to the time constraints involved in grant applications, voting may be handled via conference call, e-mail or web site communication.
  - 2. Any member of the Board whose agency receives funding through the CoC program shall recuse him or herself from the Board deliberation process.
  - 3. The CoC Board will make the final decision whether or not to reject the renewal application for any agency that does not meet the minimum threshold requirements.
  - 4. All Board deliberations will be documented in meeting minutes.
  - 5. If any renewal projects' application is rejected, the funds that were allocated to that project will be

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released as new funds and agencies will have the opportunity to apply for them.

### III. Voluntary Reallocation Process

- I. CoC grantees are able to self-nominate to voluntarily reallocate CoC-funded renewal funds to create new projects.
- J. A grantee seeking the ability to reallocate funding through the Voluntary grantee-self-nominating process must do so in accordance with the timeline set by the CoC Lead agency in that year’s application process and complete a new project application by the deadline set by the CoC Lead agency in order to be eligible.
- K. The CoC Scoring Committee will review the applications and make determinations regarding the acceptance and ranking of the proposed project.
- L. If the new project meets HUD’s CoC funding priorities, local needs, and is an eligible reallocation project type under the NOFA, the applicant will be given the opportunity to apply to HUD for the new project.
- M. If the new project does not meet HUD’s COC priorities, local needs, is an ineligible project type, or does not request the full grant amount awarded to the existing project, the funds either in total or in part not covered by the request, will be released by the CoC Lead Agency for proposal during the COC competitive reallocation process.

### IV. Recusal

- N. The CoC Lead Agency will not participate in any discussion or deliberation about reallocation that may impact their CoC funding.

### V. Revision History

Reason for Revision	Date Revised
Original Reallocation Policy updated	May 2012
Revised to include updated language	February 2015
Revised to reflect FY15 CoC NOFA	October 2015
Revised based on CoC Scoring Cmte. feedback	April 2016
Revised based on CoC Scoring Cmte. feedback	June 2017