

Boise City/Ada County Continuum of Care, ID-500 Reallocation Policy and Procedure

Updated August 2024

Background

Operating from the shared presumption that homelessness is a housing problem and any person in a housing crisis needs, indeed deserves, safe and stable housing, our CoC seeks to evolve toward a system wherein persons experiencing homelessness can be rapidly returned and stabilized in permanent housing. Undoubtedly, certain barriers limit our capacity and ability to respond in such a manner. Therefore, to best mitigate those barriers, the CoC must understand its current performance and how that baseline relates to where the CoC envisions itself when a systemic response to homelessness is fully realized.

Reallocation provides an opportunity for the CoC to strategically move resources should a renewal project underperform or should the CoC decide that CoC Program funds are better spent in another way to match local priorities and need. Reallocation helps ensure funded projects align with the U.S. Department of Housing and Urban Development's (HUD) policy priorities and the priorities of the CoC to fund effective permanent housing projects.

Policy and Procedure

The CoC encourages renewal projects to evaluate cooperatively with the CoC whether reallocation is appropriate or necessary to better:

1. Create and sustain a systemic response to homelessness wherein the experience is prevented whenever possible and is otherwise rare, brief, and one-time;
2. Serve those experiencing homelessness by meeting them where they are; and
3. Rapidly respond to the experience of homelessness with evidence-based interventions aimed to secure and maintain permanent housing.

Evaluation and monitoring of CoC-funded projects occurs on an on-going basis throughout the year, primarily through the CoC's monitoring process but also through active participation by CoC-funded projects in the CoC. By these projects' participation in CoC-sanctioned committees and workgroups, the CoC and its members provide and implement continuous quality improvement opportunities to ensure resources are allocated to their highest and best use.

All renewal project applications are reviewed by the Score and Rank Committee (SRC). The SRC uses the results from the CoC's rating and ranking tool to measure the project's performance. After reviewing, rating and ranking renewal and new project applications, including any bonus projects, the SRC will make a recommendation to the Our Path Home Executive Committee. Inherent to the review, rating and ranking process undertaken by the SRC is a recommendation whether to reallocate some or all of a renewal project's funds.

Involuntary Reallocation

Project funds will be automatically eligible for involuntary reallocation under the following scenarios:

- Failure to meet the threshold criteria for application of CoC Program funds as delineated

in the rating and ranking tool

- Failure to meet the minimum score on the rating and ranking tool
- Any underspent funds will be reallocated (in the amount not expended) to another permanent housing project that has expended its CoC funds in a timely manner

Voluntary Reallocation

Renewal project applicants may request to voluntarily reallocate some or all of its funds to create a new project that better aligns with HUD's policy priorities and better serves the greatest local need as determined by the CoC. A request for voluntary reallocation needs to be sent to the Our Path Home Executive Committee as part of the letter of interest, which occurs in advance of submitting the application to the Our Path Home manager.

The renewal project should submit, as part of their letter of interest, a written proposal to the Executive Committee that:

1. Expresses the project's intent to voluntarily reallocate and apply for new project funds; and
2. Describes the need the new project proposes to meet and how it is aligned with local priorities; and
3. Outlines the scope of work and operational plan for the program (number of units, scattered-site vs single site delivery model, support services costs, projected case load for support services), and long-term strategy for sustainability; and
4. Requests a letter of support from the CoC to do so.

The Executive Committee will evaluate and determine whether to provide a letter of support. Assessment of voluntary reallocation must include how the proposal will:

- Align with local priorities.
- Impact need through number of people served.
- Leverage federal funding to its highest and best use considering the funding landscape.

New projects, including those funded through reallocation, will be required to meet the threshold criteria outlined in the rating and ranking tool, including HUD's project quality thresholds described in the FY24 & 25 NOFO.