



Reallocation Policy

Proposal for Adoption by Steering Committee

10/7/20

Background

Through HUD's annual Continuum of Care (CoC) competition, the Connecticut Balance of State Continuum of Care (CT BOS) typically has an opportunity to eliminate funding in whole or in part from existing projects and reinvest those resources in new projects. This process is known as reallocation, and it is intended as a tool for CoCs to continuously align investments with strategic priorities and ensure that projects are meeting HUD and CoC expectations. HUD strongly encourages CoCs to review and realign their project portfolios annually, and the scoring methodology HUD uses in the competition often provides an incentive to do so. CoCs that fail to take advantage of the reallocation opportunity, typically, do not fare as well in the annual competition, which results in receiving fewer federal resources to end homelessness.

CT BOS has implemented a comprehensive reallocation process that uses performance and need data to determine how to efficiently and effectively expend available CoC program resources to improve system performance and end homelessness within the CoC. CT BOS also considers project compliance with HUD, state and CT BOS requirements when making reallocation decisions.

The process used by CT BOS to make reallocation decisions is described below.

Reallocation Criteria

CT BOS uses the following criteria to identify projects for possible reallocation:

- The CoC may reallocate funds from projects that are underperforming. This helps to improve system performance, for example, to:
 - reduce homelessness
 - reduce length of time clients remain homeless
 - reduce returns to homelessness
 - increase participant access to income and benefits
 - increase housing stability
- The CoC may reallocate funds to ensure efficient use of resources, for example to address:
 - under spending
 - high costs
 - program vacancies
- The CoC may reallocate funds when projects are using outdated program models.
- The CoC may reallocate funds when monitoring findings or other information indicate that a project is significantly out of compliance with HUD, state, or CT BOS requirements and that the responsible agency is unable or unwilling to make the necessary corrections.
- Projects also have the option to voluntarily reallocate to make better use of CoC resources.

Reallocation Procedures:

- The CT BOS Steering Committee, with input from stakeholders, establishes a methodology to evaluate renewal projects annually. The evaluation methodology uses objective, performance-based scoring criteria. The criteria are posted to the CT BOS website. The CT BOS Steering Committee establishes a corrective action threshold and projects scoring below that threshold for 2 or more years may be considered for reallocation.
- CT BOS monitors a sub-set of projects annually to determine the extent to which projects are complying with HUD, state, and CT BOS requirements. This process is primarily intended as a support to provider agencies to help them identify and correct areas in which their operations are not aligned with requirements. When a project meets one or more criteria outlined above, monitoring results may also be used to inform reallocation decisions.
- CT BOS may also periodically look at other available information about the projects it funds (e.g., spending reports from HUD, HUD monitoring findings, state monitoring findings, CAN data, complaints received, etc.)
- Using the criteria outlined above, the CT BOS Chairs identify and refer projects to the Steering Committee for possible reallocation.
- The Steering Committee determines if projects will be reallocated in whole or in part.
- Projects slated for full or partial reallocation may submit an appeal. A Grievance Committee hears and decides appeals.
- The CoC offers providers education & technical assistance. This may include, for example, providing information and assistance on renewal evaluation criteria, monitoring standards, and/or the reallocation process via Steering Committee meetings, emails, trainings, semi-annual public meetings, Coordinated Access Networks, and the CT BOS website. This may also include, for example, provision of individualized technical assistance to providers interested in voluntary reallocation and those selected for reallocation by the Steering Committee.
- The Steering Committee decides annually how to best allocate funds for new projects, including reallocated funds, bonus dollars, and any other source. Using available Coordinated Access Network and other data, the Steering Committee considers which types of projects are most needed and which target populations should be prioritized.
- The CoC welcomes and solicits new project applications from all eligible organizations, including those that have never received CoC Program funds as follows:
 - CoC posts a Request for Proposals (RFP) publicly on the CoC's website.
 - CoC sends information about the RFP opportunity out to its email list, which includes more than 460 individuals.
 - CoC partners widely distribute information about the RFP opportunity to their email lists, which include organizations that do not currently receive and have never received CoC program funds.