

## DES MOINES/POLK COUNTY CONTINUUM OF CARE

### REALLOCATION OF RENEWAL PROJECT FUNDS

#### **POLICY:**

Reallocation is a process the Des Moines/Polk CoC may use to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's Annual Renewal Demand (ARD). New projects created through reallocation must meet the requirements set forth in HUD's annual CoC Program NOFO as well as the project eligibility and project quality thresholds established by HUD in their annual CoC Program NOFO.

The Des Moines/Polk CoC may only reallocate eligible renewal projects that have previously been renewed under the CoC Program.

~~Youth Homeless Demonstration Program (YHDP) projects cannot be reallocated.~~

#### **PROCEDURE:**

##### YHDP Project Reallocation:

- 1.) Funding reallocated from projects previously funded with YHDP funding must be used for projects serving the same subpopulation.

##### DV Bonus Project Reallocation:

- 2.) Funding reallocated from projects previously funded with DV Bonus funding must be used for projects serving the same subpopulation.

Reallocation of renewal project funds may occur in two ways:

- 1.) Voluntary Reallocation - Agencies operation existing renewal projects may voluntarily reduce a portion of the project's CoC funding or eliminate CoC funding of a project. Through a voluntary reallocation of renewal project funds, the agency may apply for new projects that have been designated as higher priority programs.
- 2.) Involuntary Reallocation – An involuntary reallocation will occur when a renewal project's application is rejected by Homeward's Grant Committee and affirmed by a majority vote of Homeward's Board of Directors. A project may be rejected due to
  - (a) Failure to address deficiencies outlined in a Quality Improvement Plan (QIP) within the time frame specified in the plan;
  - (b) Findings identified through Homeward's annual site-review;
  - (c) Non-compliance with Des Moines/Polk CoC policies;



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- (d) Failure to meet threshold requirements in the annual Des Moines/Polk CoC program application;
- (e) Non-compliance with HUD regulations; and/or
- (f) Fiscal non-compliance.

#### Use of Reallocated Funds:

The balance of funds from either voluntary or involuntary reallocation of funds must be used for new projects per guidelines listed in HUD's annual Continuum of Care Program NOFO:

- 1.) New Projects Created Through Reallocation or CoC Bonus processes:
  - (a) Permanent housing-permanent supportive housing (PH-PSH) projects.
  - (b) Permanent housing-rapid rehousing (PH-RRH) projects.
  - (c) Joint TH and PH-RRH component projects.
  - (d) Dedicated HMIS project for the costs at 24 CFR 578.37(a)(4) that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant and is listed on the HMIS Lead form in the CoC Applicant Profile in e-snaps. Additionally, if the CoC has organizations within its geographic area that are victim service providers, the HMIS Lead, or subrecipient, may request HMIS funds for a comparable database. Victim service providers may also request HMIS funds in their project application budgets to enter data into a comparable database.
  - (e) Supportive services only coordinated entry (SSO-CE) project to develop or operate a centralized or coordinated assessment system.

