

Greater Richmond Continuum of Care (GRCoC)

Coordinated Grant Reallocation Policy and Procedures

Background

Federal and state coordinated grant processes permit a Continuum of Care (CoC) to move or reallocate funds between projects to better achieve federal, state and CoC goals for addressing homelessness. In particular, the US Department of Housing and Urban Development encourages the reallocation of funds from renewal projects to provide funding for new projects. Reallocation also presents an opportunity for CoC's to move funding from projects that are underutilized, not cost effective, underperforming, or obsolete.

Voluntary Fund Reallocation Process

Voluntary reallocation of grant funds may occur in two ways:

1. The Virginia Department of Housing and Community Development may offer additional Virginia Housing Solutions Program funds to GRCoC that have been reallocated from other state CoCs; or
2. GRCoC grantees may self-nominate to voluntarily return public funds coordinated through the CoC at any time during the grant period by providing a written proposal to the collaborative applicant. A grantee seeking to return funds through the voluntary process must do so in accordance with federal and state requirements.

In the event that reallocated funds are available, GRCoC will notify current grantees and solicit written proposals from eligible grantees for use and amount of funds.

The GRCoC Ranking Committee will review the proposal and make a recommendation to the GRCoC Board of Directors for reallocation of the funds. The Ranking Committee may require additional information from grantees regarding the reallocation decision.

The GRCoC Board of Directors will review the reallocation recommendation of the Ranking Committee and vote to approve or disapprove.

The grantee will be notified of the Board's decision in writing within 24 hours.

Community Reallocation Review

As a part of performance monitoring process, the Greater Richmond Continuum of Care (GRCoC) regularly evaluates the performance of programs receiving coordinated community funding. This review is designed to ensure that limited public resources are used efficiently and effectively, and to identify opportunities for reallocation when appropriate.

Each year, during the first half of the calendar year, the Collaborative Applicant completes a performance scorecard for each funded project using data from the project's previous calendar year CoC Annual Performance Report (APR). As part of this review, projects may be assessed for potential reallocation based on a variety of performance and compliance indicators.

The Collaborative Applicant and the Ranking Committee reserve the right to identify and recommend projects for reallocation review both during the annual competitive funding cycle and at other points throughout the year, to better support the CoC's strategic priorities or system performance.

Factors That May Trigger a Reallocation Review

Projects may be flagged for reallocation review based on one or more of the following factors:

- **Underutilization of Resources:** This includes serving significantly fewer people or maintaining longer average lengths of stay compared to comparable projects operating in the community. Relevant performance data may include:
 - o CoC APR Question 7a: Total number of persons served annually
 - o CoC APR Question 22b: Median length of participation for both leavers and stayers
 - o Total project cost relative to its impact and service volume
- **Untimely or Incomplete Expenditures:** Documented delays or failure to fully expend prior year awards may indicate inefficient use of funds.
- **Regulatory Non-Compliance:** Evidence of non-compliance with federal, state, or local regulations may also trigger review.

While there is no appeals process for being identified for reallocation review, organizations may appeal the reallocation recommendation per the Competition Policies and Procedures.

The Ranking Committee will review data from projects recommended for reallocation review and may consider the following factors during a reallocation review:

- Audit finding(s) for which a response is overdue or unsatisfactory
- HMIS compliance, as outlined in the HCIS Policies and Procedures linked [here](#)
- Project alignment with GRCoC funding priorities
- Project operational role within the Coordinated Entry System (does this project serve a specific sub-population prioritized by the CoC, etc.)
- Coordinated application ranking in prior funding competitions
- Other quantitative or qualitative information requested by the Ranking Committee

If reviewed and recommended for reallocation, grantees will be notified in writing of the Ranking Committee's reallocation recommendation and justification. Grantees will be provided with a copy of the Appeals process in the Competition Policies and Procedures.

At the end of the appeal period, the Ranking Committee will provide the reallocation recommendation to the GRCoC Board of Directors as part of the coordinated grant application for review and vote to approve or disapprove.