

Greater Richmond Continuum of Care (GRCoC)

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.

Policy Statement

The GRCoC will reallocate funds granted through federal and state coordinated grant processes, as needed, to more effectively resolve homelessness, help households achieve stable housing and improve CoC performance. Reallocation will be based on the adopted GRCoC Funding Priorities, the Road Home Ten Year Plan update, federal and state strategic goals and project performance. GRCoC program funds may be reallocated either by a voluntary process or through the coordinated grant process.

Reallocation Process for the Voluntary Return of Funds

- GRCoC grantees may self-nominate to voluntarily return CoC funds 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.
- The GRCoC Ranking Committee will review the proposal and make a recommendation to the GRCoC Board of Directors for reallocation of the funds. In the review process, the Ranking Committee will consider the **following** factors as well as the capacity and performance of other grantees and their project(s) to receive reallocated funding.
 - Audit finding(s) for which a response is overdue or unsatisfactory
 - History of inadequate financial management
 - Evidence of untimely expenditures on prior award
 - History of other major capacity issues that have significantly impacted the operation of the project and its performance
 - History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes
 - HMIS compliance
 - Alignment with GRCoC funding priorities and federal and state strategic goals
 - Coordinated application ranking

- 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.

Reallocation Process during Coordinated Grant Application Process

- During the coordinated grant application process, the Ranking Committee may recommend that it is necessary to reallocate funds from a project, in part or in whole, to another project based on the factors described above. Additionally, the Ranking Committee will consider the capacity of other project(s) to receive additional funding and their performance.
- Grantees will be notified in writing of the Ranking Committee's reallocation recommendation and justification. Grantees will also be provided a copy of the Appeals process.
- In the event of an appeal, grantees will be notified in writing of the decision within 24 hours.
- 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.
- The approved coordinated grant application including the project ranking and funding will be posted to the GRCoC website, endhomelessnessva.org, and a notice will be emailed to the GRCoC.