



## EL PASO COALITION FOR THE HOMELESS

6044 GATEWAY EAST, SUITE 211

EL PASO, TEXAS 79905

(915) 843-2170

(915) 843-2184 (FAX)

### Reallocation Plan

#### Background

HUD now encourages Continuums of Care to reallocate funds from renewal projects to provide funding for new projects and to create additional permanent housing stock. It is therefore the intent of the El Paso Continuum of Care to develop a Reallocation Policy and Procedure that is

- Aligned with HUD and HEARTH Act policy guidance;
- Performance-based as specified with the annual HUD NOFA; and
- Based upon performance metrics.

Just as HUD's guidelines determine the program focus targeted in each Continuum of Care (CoC) competition, El Paso CoC reallocation decisions will similarly be driven by this focus.

#### Performance Measures

To provide both project-specific outcome information and CoC-wide contributions, each CoC-funded program will be evaluated based on data entered into the Homeless Management Information System (HMIS), the HUD Annual Performance Report (APR) outcomes, the Project Application submitted for the CoC proposal, and other HUD recommended data tools such as the System Performance Measures. The APR scoring criteria assesses outcomes which directly relate to goals set by HEARTH including reducing the length of homelessness, reducing returns to homelessness and increasing income.

#### Expenditure of CoC Grant Funds

HUD expects that homeless assistance resources be fully utilized. A detailed report from HUD will include criteria to determine whether any HUD funds recaptured at the completion of the most recent grant, how much money was recaptured, and whether actions have been taken to assure that grant funds will not be recaptured in the current program year.

#### Reallocation Process and Procedure

El Paso CoC understands and acknowledges that through the reallocation process, very valuable projects may be defunded. El Paso CoC is striving to develop a reallocation process that will ensure that projects submitted in the CoC Consolidated Application best align with the HUD CoC funding mechanism's priorities and contribute to a competitive application that collaboratively secures these dollars to improve our community. As described in the *Performance Measures* section of this policy, the El Paso CoC seeks to make data-driven decisions based on information gathered from the common assessment tool and other HUD-recommended data tools. This does not mean that El Paso CoC does not value reallocated projects or the diversity of programs in our community. Rather, the El Paso CoC anticipates that most reallocated projects will seek funders with priorities better suited to cultivate the unique contributions these projects make to our community that HUD's CoC funding mechanism is not designed to recognize.

#### Voluntary Reallocation

**Currently-funded NOFA project applicants interested in voluntarily reallocating should notify the El Paso CoC in writing of their intent by the due date of HUD's Grant Inventory Worksheet (GIW).**

The GIW will serve as a tool to identify Project Applicants' intent to reapply for CoC funding. For purpose of reallocated project funding (to create a new permanent housing project), strong preference will be given to those projects that voluntarily apply to reallocate, and especially for those within a compliance period.

This Reallocation Policy and Procedure incorporates the following general objectives:

- To ensure the CoC's responsibility in submitting to HUD an application that is consistent with HUD guidelines and the HEARTH ACT;
- To ensure the amount to be reallocated is sufficient to fund effective PH program(s); and,
- To best position the bulk of the existing transitional housing (TH) programs for continued HUD funding in an environment of changing strategies.

#### Summary

Reallocation will occur in a transparent, universal, and performance-based manner.