

[Reallocation Process for CoC Funding]

HUD expects communities to use the reallocation process to ensure that funding for the CoC program is competitive. The goals include helping communities progress toward HUD-identified priority areas, ensuring high standards for performance outcomes, and ensuring effective use of limited funding. CoCs are scored overall each year through the CoC Consolidated Application, and this score determines the CoC's competitiveness for renewal and new funding. Part of the score is based upon the CoC's use of the reallocation process.

OVERVIEW

As the decision-making body for the Pasadena CoC, the Pasadena Partnership to End Homelessness is responsible for decisions regarding reallocation. The Pasadena Partnership actively encourages new and existing providers to apply for new projects through reallocation. Reallocated funds can be used to create new evidence-informed projects, eliminate under-performing projects, shift projects to other, more appropriate funding streams, ensure the Pasadena Partnership (CoC) inventory matches local need, and provide Coordinated Entry.

Decisions about reallocation are made on an ongoing basis and are based on a thorough analysis of needs and gaps in housing and services in the Pasadena Partnership (CoC). This includes an annual review of HUD priorities, gaps analysis of homeless populations and types of housing and services available in the community, utilization rates, reviews of HMIS data including the PIT and HIC counts and data trends over time, annual monitoring and threshold review data of the current CoC and ESG funded programs, and prioritizing needs of subpopulation.

VOLUNTARY REALLOCATIONS

Voluntary reallocations are initiated by a renewal project applicant by choice. There are different reasons a renewal project applicant might choose reallocation. An applicant might see a greater need in the community for a different type of project from the one they are currently operating. They might also recognize that a different type of project will better meet HUD's priorities for the CoC program, possibly making the CoC overall more competitive for additional funds for new projects. Or, an applicant may be prompted to consider changes to their project if they scored very low during the most recent Pasadena CoC renewal competition. The Pasadena Partnership works with these providers to develop reallocation plans for their programs to create the best program design to meet the needs of their community, focusing on PSH, RRH, or Coordinated Entry.

INVOLUNTARY REALLOCATIONS

Involuntary reallocation includes any renewal projects that are entirely eliminated by the Pasadena Partnership, or that have their renewal application reduced by the CoC. The CoC may pursue involuntary reallocation for renewal projects for multiple reasons, such as unspent funds, or scoring very low during the recent Pasadena Partnership renewal competition.

REALLOCATION PROCESS

Any decision to reallocate is finalized by the Pasadena Continuum of Care Board which represents and is elected by the Pasadena Partnership membership at large. Reallocation occurs during the evaluation of renewal projects within the NOFA process once the allowable new projects for reallocation have been announced by HUD. The Board reviews the renewal project applications, or Letters of Intent (LOI), and will consider entirely or partially reallocating a renewal project's funding if the project has either 1) spent less than 80% on average of its awarded funds over the past three program years or 2) received 60% or fewer of the total available points in the most recent renewal application. If a renewal project falls below thresholds established in either 1 or 2, the CoC Board will either:

A. Direct the Collaborative Applicant (City staff) to establish measurable improvement goals with project operator/sub-recipient. If the renewal project is directly administered by the Collaborative Applicant, the Board will establish measurable improvement goals with the Collaborative Applicant. Project's achievement of established goals over the course of the subsequent year(s) will be brought back to the CoC Board during the next CoC competition, and the Board will make a decision not to reallocate, to partially reallocate, or to entirely reallocate. The Board may also elect to reevaluate the project's progress toward established improvement goals in the subsequent CoC competition.

OR

B. The CoC Board can make a decision not to reallocate, to partially reallocate, or to entirely reallocate project funding during the same CoC Competition without giving the project operator any opportunity to improve.

Finally, if the CoC requires funding to remain in compliance with HUD requirements (i.e. maintaining a CES or HMIS), the CoC Board can elect to partially or fully reallocate any existing program during the CoC Application process in order to make available funding for the required element of the CoC.