

Columbus and Franklin County Continuum of Care (OH-503) Funding Reallocation Process

Policy

HUD Continuum of Care (CoC) funding reallocation can occur following the scenarios below:

1. Sub-recipient is no longer interested in continuing the project or part of the project. The procedure below is implemented as soon as the CoC or Community Shelter Board (CSB, Collaborative Applicant and Unified Funding Agency) is made aware by the current sub-recipient of the intent to close or decrease the size of the project. This policy does not apply in the case that another sub-recipient is identified to take over the project or part of the project in its current form.
2. Sub-recipient no longer needs the CoC funding as other funding is available for the project or part of the project. The procedure below is implemented as soon as the CoC or Community Shelter Board is made aware by the current sub-recipient that HUD funding is no longer needed for the project or part of the project.
3. Sub-recipient underperforms and the CoC decides to reallocate the full or partial funding of the project to a new sub-recipient. The procedure below is implemented as soon as the CoC makes the decision to defund a current sub-recipient, a project, or part of a project due to underperformance. Underperformance is defined as any of the following:
 - a. Continued underperformance as it relates to local and federal performance outcomes
 - b. Continued underperformance as it relates to efficient use of available project capacity or the project is not using its available capacity
 - c. Continued underperformance as it relates to full drawdowns of allocated HUD CoC funds
 - d. Continued underperformance as it relates to compliance with local and federal review and certification standards
 - e. Misuse of federal funds and not following federal legislation with no plans to come in compliance are grounds for immediate defunding. In this case CSB, on behalf of the CoC, will take immediate steps to accelerate the procedure below as to not put at risk the households served by the underperforming project.

Procedure

CSB, on behalf of the CoC, issues an electronic Request for Proposals for new projects interested in receiving HUD CoC funds, as soon as it is determined that funding is available for reallocation. The electronic request for proposals is issued broadly, to all providers serving people experiencing homelessness. All entities interested in applying must submit a Concept Paper, the format for which is available on CSB's website at <http://csb.org/providers/applying-for-funds>. The Concept Paper can be replaced by the CoC Project Application if HUD funding application timing is such that the normal development steps cannot be followed.

The CoC Board will review the Concept Paper at the next scheduled meeting and will recommend implementation of a single project or multiple projects, dependent on the funding availability.

If a site-based permanent supportive housing development is proposed, the project development steps must be followed, as detailed in the Information Packet posted on CSB's website at <http://csb.org/providers/applying-for-funds>.

The CoC has final decision making authority on all new projects created through reallocation. CoC members vote on a resolution confirming the decision.

Columbus and Franklin County Continuum of Care (OH-503) Funding Adjustment Process

Policy

HUD Continuum of Care (CoC) mid-grant funding allocation adjustments can occur following the scenarios below:

1. Through monthly tracking, CSB, as the UFA, projects that the sub-recipient will not draw down its full allocation of HUD CoC funds or requires an adjustment of funds between budget line items
2. A sub-recipient volunteers a reduction of funding or identifies a need to adjust the allocation of funds between budget line items
3. A sub-recipient identifies a need for additional funds beyond its allocation of HUD CoC funds

Procedure

In the case of scenario 1, CSB, on behalf of the CoC, contacts sub-recipients whose projected drawdown of funds indicates a need for reallocation and proposes adjustments. In the cases of scenarios 2 and 3, the sub-recipient contacts CSB to propose allocation adjustments. All funding adjustments are reviewed in collaboration with the affected subrecipients prior to any change taking effect. Once proposed reallocation amounts are agreed upon by CSB and the affected sub-recipients, CSB may issue a call for reallocation requests to all subrecipients if CoC funds are projected to be available. Requests are evaluated based on the following:

- a. Capacity to accurately project drawdown of funds
- b. Cost eligibility
- c. Alignment with CoC strategic goals
- d. Additional CoC funds obtained through reallocation will not supplant existing funds, per the HEARTH Act:
(f) LIMITATION ON USE OF FUNDS.—No assistance received under this subtitle (or any State or local government funds used to supplement such assistance) may be used to replace other State or local funds previously used, or designated for use, to assist homeless persons.

CSB recommends a schedule of reallocated funds via a resolution to the CoC Board for electronic vote. If the resolution to reallocate funds passes, CSB prepares and distributes contract amendments to all subrecipients affected. CSB forwards the signed resolution to the local HUD Field Office.