

Trenton / Mercer Continuum of Care Reallocation Policy and Procedure

BACKGROUND:

The US Department of Housing and Urban Development (HUD) encourages Continuums of Care to reallocate funds from renewal projects to provide funding for new projects and to create additional permanent supportive housing stock. It is therefore the intent of the Trenton/Mercer Continuum of Care to develop a Reallocation Policy and Procedure that is aligned with HUD and HEARTH Act policy guidance, based on performance based as specified in the annual HUD NOFA and based upon performance metrics.

PERFORMANCE MEASURES

All CoC projects are reviewed by the Trenton/Mercer CoC Evaluation committee and funding decisions, including decisions to reallocate, are based on project performance. As outlined in the CoC Monitoring policy, the CoC developed specific HMIS Performance and Fiscal Performance measures and instituted a process to monitor projects. This monitoring process is designed for both CoC and Emergency Solutions Grant (ESG) funded projects.

1. HMIS Project Performance Measures

The HUD Annual Performance Report is used to assess outcomes which directly relate to goals set forth in HEARTH including reducing length of homelessness, reducing returns to homelessness and increasing income. Below are specific HMIS Project Performance measures used during the evaluation process:

- a. Housing Stability
- b. Income growth and maintenance
- c. Compliance
- d. Data Quality

2. Fiscal Measures

The Trenton/Mercer CoC expects that homeless assistance resources be fully utilized. Site reviews 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.

- a. Expenditure of CoC Grant Funds
- b. Accurate and timely drawdowns

PROCEDURE:

The Trenton/Mercer CoC strives to develop a reallocation process that will ensure that projects submitted in the CoC Consolidated Application process best align with the HUD's priorities and contribute to a complete application process that collaboratively secures dollars to improve our community.

The CoC will make decisions based on alignment with HUD guidelines, performance measures and unspent project funds. Reallocated projects are encouraged to seek funders that will support the contributions these projects make to the community.

Example Reallocation Strategy : Identify Target projects with \$50K or more unexpended funds for reallocation.

Project	Award Amount	Expense	Balance
Project 1	\$340,792	\$163,963	\$176,829

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Total Unexpended for Target Projects over \$50K	\$176,829
25% = \$127,906	50% = \$255,815