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| 1. Department: Human Services | 2. Volume: HS HOSSD –<br>3. Program - XXX   |
| 4. Division: HOSS-D           | 5. Signature:   |
| 6. Section: ALL               | 7. Program: HUD Funded Projects that participate in the Annual Notice of Funding Opportunity (NOFO) |

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| <b>Chapter 1*</b>           | <b>Policy Name: HUD Performance Standard for the Reallocation of Funds</b>   |
| <b>1.1 Authority</b>        | Approval Designation: Broward County Human Services Department<br>Housing Options, Solutions, and Support Division<br>US Department of Housing and Urban Development   |
| <b>1.2 Purpose</b>          | The purpose of this policy is to provide guidance to the HOSS-D for evaluating and reallocate funds both voluntarily and involuntarily for all projects that participate in the annual HUD Notice of Funding Opportunity Renewal Process. Projects must consistently utilize 95% of funds annually.  |
| <b>1.3 Scope</b>            | This applies to all HUD sub-recipients of County Funding of the Housing Options and Supportive Services Division (“HOSS-D”).   |
| <b>1.4 Definitions</b>      | Sub-Recipient – those entities that are provided funding through Broward County’ HUD NOFO.   |
| <b>1.5 Policy Statement</b> | It is the policy of HOSS-D to ensure that funding is utilized as efficiently and effectively as possible and to ensure funds are being utilized to provide services to individuals experiencing homelessness. This policy is driven by the need to evaluate utilization and performance on an annual basis and determine what if any reallocations are needed by the HUD renewal projects. |
| <b>1.6 Procedures</b>       | <b>Performance Reallocation</b><br>Sub-recipient applications that score less than 70% of the total score will be evaluated for voluntary or involuntary reallocation. Sub-Recipients who score at or below 70% on the rating and ranking process may be considered for submission to HUD however, the sub-recipient will be placed on a corrective action plan by the HOSS-D to           |

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address performance challenges by the next application cycle. During the second consecutive year of scores at or below 70%, the Broward HCoC will evaluate the performance of low-ranking projects when reallocation is being considered. Broward HCoC will evaluate the low-ranking projects based on the recommendations from the National Alliance to End Homelessness (NAEH) in evaluating low-ranking projects for reallocation. Should reallocation be necessary, Broward HCoC will reallocate funding from one project to another high-performing project, which can absorb the service operations without displacing clients.

Relocated funds may be used for new projects and expansions. These projects will be ranked based on the score produced by the New (Bonus) Project Scoring Tool and adjusted as appropriate by the Scoring Committee to address Broward CoC and HUD priorities to maximize potential funding for the Broward CoC.

Careful consideration must be given to the rating and ranking of any PSH project. Any plans to reallocation or find a substitute sponsor must not impact client care and result in any displacement of clients.

**Unspent Funds to Reallocated**

Projects that are not fully utilizing financially or underspending their grant awards are subject to the reallocation process. Projects that have under-utilized from a fiscal perspective more than 15% (i.e., utilization must be at or above 95%) of their award in two consecutive program years will be subject to having their funding reduced through reallocation in the next CoC NOFO competition.

Although a project may be performing well with respect to outcomes, monitoring results, system performance measures, data quality and timeliness, they may have more than 15% of funds unutilized at the end of the grant period.

Performance should not be based solely on the HUD competition. The rating and ranking process should consider a variety of elements listed below.

- Fiscal performance
- Outcomes
- Bed/Unit Utilization
- Performance Measures (i.e. days from entry to project to move

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in date or returns to homelessness)

- Annual Monitoring Result
- Active Corrective Action Plans
- Data Quality and timeliness
- Housing First Alignment (demonstrated by number of individuals housed from the street)

**Voluntary Reallocation for Performance**

Providers that are not performing in any of the above areas may be subject to a Corrective Action Plan (CAP). If a sub-recipient has been placed on a CAP of any type (fiscal, administrative, or programmatic) throughout the year under review, for two consecutive years they will be asked to voluntarily reallocate the funds.

**Involuntary Reallocation**

Projects with overall poor performance for two consecutive years, defined as not spending their total award, not in alignment with Housing First practices, not serving the intended population, underutilizing beds, or significant unresolved findings on any rating or ranking or annual monitoring are subject to involuntary reallocation. Project performance should be reviewed monthly with the provider during monthly calls and clearly documented prior to any involuntary reallocation decision.

The threshold for involuntary reallocation will be a score that is less than 70% of the total score. For example, if the total possible score is 100, the minimum threshold to avoid possible involuntary reallocation will be 70. Projects scoring below the threshold will be asked to develop a plan to address performance issues by next year's competition Corrective Action Plan (CAP) or voluntarily give up award money to be reallocated to a new project.

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| <p><b>1.7 Appeal Process</b></p> | <p><b>Appeal Process</b></p> <ul style="list-style-type: none"> <li>The CoC Program Competition NOFO lists the application deadline. CoCs are to review, approve or reject all Project Applications no later than 15 days before the CoC Program Competition application deadline this may not be the same deadline as the HUD application deadline. The Appeals Process must be published in the Public Timeline. In 2024 two additional weeks must be added to the due dates for review as the Office of Budget and Management now reviews all grants submitted. Only those organizations that meet these criteria should participate in the appeal process. This year, if the criteria cited above are met, the Project Applicant will have the opportunity to submit a Notice of Intent to Appeal and apply as a Solo Project Applicant directly to HUD through e-snaps. For a project application to be considered for funding, it must meet these criteria and submit the Solo Applicant appeal project application to HUD before the application deadline that is provided in the CoC Program Competition NOFO.” <a href="#">Latest Updated Appeals Guide 2024.</a></li> <li>County’s Consolidated NOFO Application is made available for public review and reference on the HIP Website one week prior to the deadline.</li> </ul> <p>In the event the HCoC Board identifies a renewal project (or projects) whose funding should not be renewed (or funding should be decreased). In that case, the HOSS-D Staff will determine whether any new proposed projects should be awarded and will proceed with reallocation (see Reallocation section above).</p> <p>Any deviation from the HCoC’s s policy and HUD’s priorities that have been voted upon and approved will impact the total NOFO score and any future awards.</p> |
| <p><b>3. Appendices</b></p>      | <p>N/A</p>  |
| <p><b>1.8 Approval Dates</b></p> | <p>Effective Date: XXXX</p>   |
|                                  | <p>Date of Last Review: N/A<br/>Date Due for Review: 7/15/2025.</p>   |

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**1.9 Policy  
Author**

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