

**Process for Reallocation for
The County of Riverside Continuum of Care
2015 HUD Consolidated Application
May, 2015**

Through the reallocation process, the County of Riverside Continuum of Care and Board of Governance ensures that projects submitted with the CoC Collaborative Application best align with the HUD CoC funding priorities and contribute to a competitive application that secures HUD CoC dollars to address and end homelessness in Riverside County. The CoC will make decisions based on alignment with HUD guidelines, performance measures, and unspent project funds. Reallocated projects will be encouraged to seek funders that will support the contributions these projects make to the CoC.

All renewal projects are reviewed by an Independent Review Panel, whose members are selected in a voting process by the County of Riverside Continuum of Care, to determine if a project should be considered for reallocation. The Independent Review Panel reviews the renewal projects based on performance criteria and other information each project submits and certifies in a “Letter of Intent to Renew”. The Independent Review Panel makes recommendations for reallocation to the CoC Board of Governance based on the performance of each renewal project.

The recommendation for reallocation is based on any one of the following HUD criteria:

- 1) Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon;
- 2) Audit finding(s) for which a response is overdue or unsatisfactory;
- 3) History of inadequate financial management accounting practices;
- 4) Evidence of untimely expenditures on prior award;
- 5) History of other major capacity issues that have significantly impacted the operation of the project and its performance;
- 6) Timeliness in reimbursing sub recipients for eligible costs. HUD will consider a project applicant as meeting this standard if it has drawn down grant funds at least once per month; or
- 7) History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

HMIS Data Quality. The CoC evaluates all programs on their HMIS quality for the operating year. It is expected that programs will have no greater than 10% of missing values for any of the universal data elements; programs are able to correct incomplete data to improve the

percentages. Data quality outcomes are collected via the monthly Performance Report Cards and APRs generated for each project.