



## **Wisconsin Balance of State Continuum of Care Reallocation Policy – CoC Competition Process**

The Wisconsin Balance of State CoC allows for two types of reallocation: voluntary and involuntary. Additionally, the Wisconsin Balance of State Board of Directors established a scoring threshold in conjunction with the CoC Project Scoring Tool process for review and ranking of project applications. Annually, the threshold limit is reviewed by the Board.

### **Voluntary Reallocation:**

The Balance of State CoC encourages any agency with a renewal grant to annually evaluate the need for the project and type in the community, project performance, and effectiveness toward the goal of ending homelessness. Any renewal grant may be voluntarily reallocated to a different permanent housing project through a policy of “right of first refusal” approved by the Balance of State Board of Directors. Agencies may also voluntarily reduce their project funds when the community need no longer justifies the funding level. Agencies must complete the RFP Voluntary Reallocation of Funds application, which includes the new project proposal and supporting documentation, and submit it to the CoC Director. The applications are reviewed to ensure compliance with HUD policy priorities, Balance of State CoC goals, and a demonstrated need. Following approval, the agency must complete a new project application in *e-snaps*.

All new projects created through a voluntary reallocation process are ranked and placed on the Tier in accordance to policies set forth in the CoC Project Scoring Tool guide.

### **Involuntary Reallocation:**

The Balance of State CoC monitors projects and provides training and technical assistance to agencies that are underperforming. In such cases, where projects have received substantial training and technical assistance and remain unable to meet minimum HUD and Balance of State CoC performance and compliance requirements, the Balance of State Board of Directors may take action to involuntarily reallocate funding. Involuntarily reallocated funds will be combined with relinquished and reduced funding to create new projects.

All new projects created through the use of involuntary reallocated funds are ranked and placed on the Tier in accordance to policies set forth in the CoC Project Scoring Tool guide.

### **Scoring Threshold:**

As an additional component of the CoC-Project Scoring Tool process, the Balance of State CoC uses a two-step process for all renewal project application reviews. On the CoC Project Scoring Tool, any renewal project scoring 70.0% or higher and is in good standing with HUD and the Balance of State CoC is automatically eligible to apply in the CoC Competition. Any renewal project scoring 69.9% or less and/or are not in good standing with HUD and/or are not in good standing with the Balance of State CoC are not automatically eligible to apply. Those agencies must complete an action plan which identifies whether the project has decided to voluntarily relinquish their funds, voluntarily reallocate their funds,



or complete a request for reconsideration application. The request for reconsideration application provides the agency an opportunity to explain why they scored low, what has changed in their project or agency since the last APR submission, and why the Balance of State Board of Directors should approve their request to apply in the CoC Competition. Annually, a go-to-webinar based training is conducted for all CoC grantees. The CoC Director presents the final CoC-Project Scoring Tool, points, changes, and the scoring threshold policy and process. The recorded webinar and power point slides are posted on the Balance of State website.

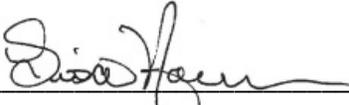
Following the submission deadline for request for reconsideration applications, the Balance of State Board of Directors (without a conflict of interest) and the CoC Director will meet to discuss and approve a plan of action for each project under threshold. Factors in the review and determination include but are not limited to, the impact on the Balance of State, the impact on the local community, documented project changes since submission of the last APR, past performance, monitoring or technical assistance issues, capacity for change, and project risk.

Each project receives a written response via electronic mail.

If a renewal project application scores 69.6% or lower and fell under the established threshold in the previous CoC Competition, the project must submit an Exemption request. The exemption must be done in writing and outlines the steps taken to resolve the issues identified in the previous CoC Competition and request for reconsideration process. If the project is in good standing with HUD, the Balance of State CoC, and making improvements in coordination with the Board and/or staff recommendations, the project will be allowed to submit a project application. If the project is not in good standing with HUD, or the Balance of State CoC, or has not made the improvements recommended by the Board and/or staff, the project will be required to complete the above-referenced process and complete an action plan identifying whether the project has decided to voluntarily relinquish their funds, voluntarily reallocate their funds, or complete a request for reconsideration application.

There are three appendices included in this policy to reflect the current CoC Competition process. As the results will change from year-to-year, a change in the appendices does not necessitate a full review or approval of this policy.

This policy has been approved by majority vote of the WI Balance of State CoC Board of Directors and shall be reviewed as needed.

  
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Signature

September 6, 2022  
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Date

Lisa Haen  
Board Chair, WI Balance of State CoC